

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Appeal No. 1278/2014

Date of Institution ... 15.10.2014

Date of Decision ... 26.09.2017

Mst. Gulzar Bibi W/o Jamshed Khan,
Staff Nurse, R.H.C Gara Tajak, D.H.O Peshawar. ... (Appellant)

VERSUS

Director General, Health Services, Health Department, Khyber Pakhtunkhwa,
Peshawar and 6 others.

... (Respondents)

MR. JEHANGIR KHAN
Advocate

For appellant.

MR. ZIAULLAH
Deputy District Attorney

...

For respondents.

MR. NIAZ MUHAMMAD KHAN,
MR. AHMAD HASSAN

...

CHAIRMAN
MEMBERJUDGMENTNIAZ MUIHAMMAD KHAN, CHAIRMAN.-

Arguments of the

learned counsel for the parties heard and record perused.


ARGUMENTS

2. The learned counsel for the appellant argued that the appellant is not paid his salary for the period mentioned in the appeal. That according to para-3 of reply the department admits the claim of the appellant. That only the sanction of the investigation claim of arrears is pending before the concerned authority.

3. On the other hand, the learned DDA argued that though the arrears have been accepted by the department but there is not original or final order against the appellant, hence this Tribunal has no jurisdiction.

CONCLUSION.

4. It is correct that there is no original or appellate order where from the appellant is aggrieved and this Tribunal is not in a position to comment on the merit of the present appeal. However, in the interest of justice the department is directed to conclude the pending bills on merit within two months. In the event of any adverse order, the appellant shall have a new cause of action against which she can resort to the available remedy under the law. The appeal is disposed of in the above terms. Parties are left to bear their own costs. File be consigned to the record room.


(AHMAD HASSAN)
MEMBER


(NIAZ MUHAMMAD KHAN)
CHAIRMAN

ANNOUNCED
26.09.2017

01.06.2017

None present on behalf of the appellant. Dr. Arshed, Litigation Officer and Mr. Abid Munir, Assistant Account Officer alongwith Mr. Kabirullah Khattak, Assistant AG for respondents present. Notice be issued to appellant and her counsel for attendance for 26.09.2017 before D.B.

(GUL ZEB KHAN)
MEMBER

(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

26.09.2017

Appellant alongwith counsel and Mr. Usman Ghani, District Attorney alongwith Syed Mastan Ali Shah, Assistant and Zakiullah, AAO for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, this appeal is disposed of. Parties are left to bear their own costs. File be consigned to the record room.

Member

Chairman


ANNOUNCED

26.09.2017

1278/14

30.05.2016

Agent of counsel for the appellant, Ansar Ahmad, AAO for respondent No. 4 and Mr. Muhammad Irshad, Section Officer for the respondents No. 5 with Addl. AG for respondents present. Written reply by respondents No. 1 to 3 submitted. Written reply by respondent No. 4 already submitted. Learned AAG relies on the same on behalf of respondents No. 5 to 7. The appeal is assigned to D.B for rejoinder and final hearing for 26.10.2016.


Chairman

26.10.2016

Counsel for the appellant and Dr. Irshad, Litigation Officer D.H.O Peshawar alongwith Mr. Mohammad Jan, GP for respondents present. Arguments could not be heard due to general strike of the Bar. To come up for argument on 22.02.2017.


(PIR BAKHSH SHAH)
MEMBER


(ABDUL LATIF)
MEMBER

22.02.2017

Appellant in person and Mr. Yar Gul Senior Clerk alongwith Assistant AG, for respondents present. Argument could not be heard due to general strike of the bar. To come up for arguments on 01.06.2017 before D.B.


(AHMAD HASSAN)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER

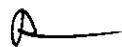
06.08.2015

Neither anyone on behalf of the appellant nor representative of the respondents present. Addl: A.G present. Notice be issued to the respondents for submission or written reply for 29-09-2015


Member

29.09.2015

Mr. Jamshaid Khan, Husband of the appellant present and filed Power of Attorney as well as other documents copy of which is handed over to the respondent-department. Mr. Dilawar Taj, Assistant to Litigation Officer for respondents No. 2 and Anzar Ahmad, AAO for respondents No. 4 alongwith Addl: AG for respondents present. Representative of respondent No. 4 submitted written reply which is placed on file. To come up for written reply/comments of the remaining respondents on 16-2-16.


Member

16.02.2016

Appellant in person, M/S Muhammad Arshed, SO and Anzar Ahmed, AAO alongwith Addl: A.G for respondents present. Written reply by respondents No. 1 to 3 and 5 to 7 not submitted. Requested for further time. To come up for written reply/comments on behalf of respondents No. 1 to 3 and 5 to 7 on 30-5-2016


Member

Appeal No. 1278/2014
Mr. Gulzar Bilei

5 08.04.2015

Counsel for the appellant, Mr. Muhammad Gul, Assistant and Mr. Yar Gul, Senior Clerk with Asst: AG for the respondents present. Preliminary arguments heard and case file perused.

The learned counsel for the appellant argued that the appellant was transferred from Hayatabad Medical Complex Peshawar to R.H.C Gara Tajak, Peshawar on 30.05.2002. She resumed the charge on 08.06.2002 in R.H.C Gara Tajak, Peshawar. The appellant has not been paid her monthly salary from 30.06.2002 to 30.06.2008 for which she time and again approached to the competent authority and upon so many requests only current salary was released to the appellant. She preferred departmental appeal on 16.06.2014 which has not been responded within the statutory period and hence the instant appeal on 15.10.2014.

The learned AAG while assisting the Court was of the view that the instant appeal is not maintainable. The appellant has made successive departmental appeal. There is no impugned order on record. Moreover, the salaries were stopped on 2002 where as she preferred departmental appeal on 16.06.2014 which is badly time barred. He relied on 2012 SCMR 195. He requested that the instant appeal may be dismissed in limine.

Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notices be issued to the respondents. To come up for written reply/comments on 06.06.2015.


Member

04.06.2015

Counsel for the appellant and Asstt: AG for the respondents present. Written reply not submitted. Learned AAG is directed to contact the respondents for submission of written reply/comments on 06.08.2015 before S.B.


Member

3

21.01.2015

Counsel for the appellant present, and requested for adjournment. Request accepted. To come up for preliminary hearing on 25.02.2015.

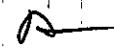


Member

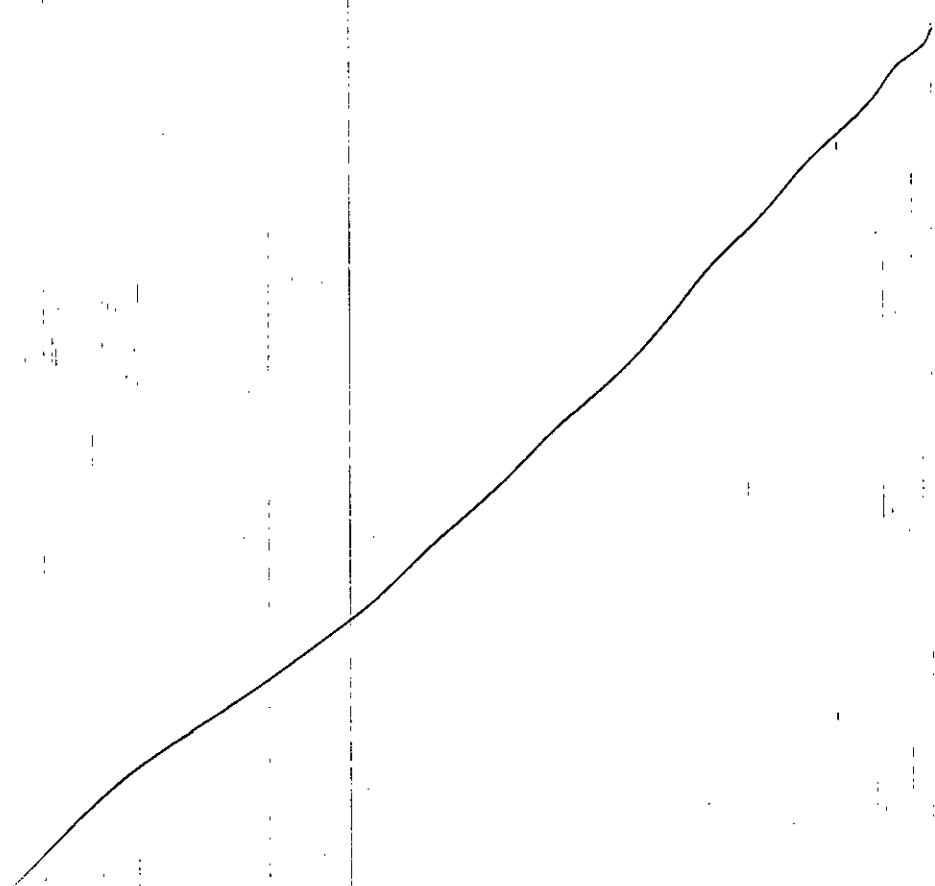
4

25.02.2015

Counsel for the appellant present. Preliminary arguments partly heard. Through the instant appeal the appellant prayed for grant of arrear from June,2002 to June, 2008. Since the matter required further clarification, therefore, pre-admission notice to the learned AAG/GP to assist the Tribunal and to contact the respondents for submission of complete record of the appellant. To come up for preliminary hearing on 08.04.2015.




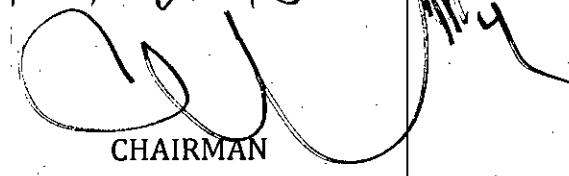
Member



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1278/2014


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	27/10/2014	<p>The appeal of Mst. Gulzar Bibi resubmitted today by Mr. Jehangir Khan Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	29-10-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>21-1-2015</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The joint appeal of Mst. Gulzar Bibi wife of Jamshed Khan Staff Nurse RHC Gara Tajak Peshawar received today i.e. on 15.10.2014 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal may be got signed by the appellant. ✓
- 2- Index of the appeal may be prepared according to the Khyber Pakhtunkhwa Service Tribunal rules.
- 3- Address of respondent No.6 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 4- Copy of Impugned order is not attached with the appeal which may be placed on it. ✓
- 5- Copy of departmental appeal against the impugned order is not attached with the appeal which may be placed on it.
- 6- Annexures of the appeal may be attested.
- 7- Nine more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1484 /S.T,

Dt. 16-10 /2014.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Jehangir Khan Adv. Peshawar.

Sir,

Re-submitted



24-10-14

- ① Appeal is signed by the appellant
- ② Index is prepared according to KPK Service Tribunal rules
- ③ Address of respondent No. 6 is mentioned in the appeal.
- ④ Impugned order is not mentioned in the appeal. ✓ She claims only for appeal.
- ⑤ Copy of departmental appeal is attached as annexure-13 on page 8
- ⑥ Annexure of appeal are attested
- ⑦ Nine more copies are along with appeal. ✓

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No 1278/2014


Mst: Gulzar Bibi

VERSUS


Director General Health and others

I N D E X

S NO	DESCRIPTION	ANNEX	PAGE
1.	Grounds of Appeal alongwith affidavit	-	01 - 06
2.	Copy of the order dated 30-05-2002	'A'	07
3.	Copies of the application etc	'B'	08 - 11
4.	Wakalat Nama (In original)	-	12


Appellant

Through:


(JEHANGIR KHAN)
Advocate,
High Court, Peshawar
Cell # 0334-1600044

Dated: -23-10-2014

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No 1278 /2014

~~1263~~
~~15-10-2014~~

Mst: Gulzar Bibi W/O Jamshed Khan, Staff Nurse, R.H.C Gara
Tajak, D.H.O Peshawar

(Appellant)


VERSUS

- ✓1. Director General, Health Services, Health Department, Khyber
Pakhtunkhwa, Peshawar
2. Executive District Officer, Health Department, Khyber
Pakhtunkhwa, Peshawar
3. Medical Officer Incharge, R.H.C, Gara Tajak, District Peshawar
4. Accountant General, Government of Khyber Pakhtunkhwa,
Peshawar
5. Secretary Finance, Government of Khyber Pakhtunkhwa,
Peshawar
6. Section Officer, (Budget) Government of Khyber Pakhtunkhwa,
Peshawar, Accountant General Office, Peshawar
7. Budget Officer-VI, Finance Department, Khyber Pakhtunkhwa,
Peshawar

(Respondents)

Appeal under Section 4 of the Khyber
Pakhtunkhwa Service Tribunal Act, 1974 for
grant of arrear from June, 2002 to June, 2008

As submitted to ~~459~~
and filed.


29/10/14.

Respectfully Sheweth:-

Brief facts of the case are as under:-

- 1) That the Appellant is working as Staff Nurse (BPS-16) at R.H.C, Gara Tajak Peshawar in Health Department.
- 2) That the Respondent No 1 vide order dated 30-05-2002 transferred the Appellant from the Hayatabad Medical Complex Peshawar to R.H.C Gara Tajak, Peshawar and since then the Appellant resuming charge is continuously working there with full obedience, punctuality and sincerity. (Copy of the order dated 30-05-2002 is attached as Annex 'A').
- 3) That when the Appellant was transferred vide order dated 30-05-2002 from Hayatabad Medical Complex, Peshawar to R.H.C Gara Tajak Peshawar, not a single penny was paid to the Appellant till June, 2008 and the Appellant had to borrow money from others in order to service.
- 4) That in this respect, the Appellant time and again approached to the Respondent and upon so many requests only current salary was released to the Appellant and nothing was given in arrears (unpaid salaries etc). (Copies of the application etc are attached as Annex 'B').
- 5) That thereafter, the Appellant made departmental representation to the Respondent No 2 but the same has

not been decided/considered within statutory period, hence the instant appeal.

- 6) That now the Appellant approaches this Honourable Court for redress inter-alia on the following grounds:-

GROUND OF APPEAL:-

- A) That the Appellant is entitled to be considered for arrears from June, 2002 to June, 2008.
- B) That negligence lies on the part of Respondents and not on the part of the Appellant.
- C) That withholding the salaries without any legal justification is highly condemnable act in the eyes of law on the part of the Respondents.
- D) That the above said act of the Respondent by not paying the unpaid salaries/arrears to the Appellant is against the law, constitution and principle of natural justice.
- E) That the Appellant reserves her right to argue further grounds with leave to this Tribunal at the time of arguments or when the stance of the Respondents come in black and white.

It is, therefore, respectfully prayed that on acceptance of this Appeal, this Honourable Tribunal may be pleased to make an appropriate order/directions to the Respondents for the grant of arrears to the Appellant from June, 2002 to June, 2008.

Any other remedy to which the Appellant is found fit in law, justice and equity may also be awarded.



Appellant
Mst: Gulzar Bibi

Through:



(JEHANGIR KHAN)
Advocate,
High Court, Peshawar

Dated: -03-10-2014

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Mst: Gulzar Bibi

VERSUS

Director General Health and others

AFFIDAVIT

I, Mst: Gulzar Bibi W/O Jamshed Khan, Staff Nurse, R.H.C Gara Tajak, D.H.O Peshawar, do hereby solemnly affirm and declare on Oath that all the contents of accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed OR withheld from this Honourable Court.

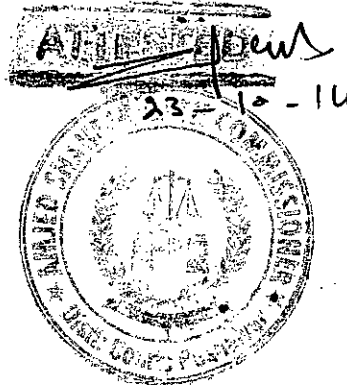


DEPONENT

Identified by



(JEHANGIR KHAN)
Advocate
High Court, Peshawar



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Mst: Gulzar Bibi

V E R S U S

Director General Health and others


MEMO OF ADDRESSES

APPELLANT


Mst: Gulzar Bibi W/O Jamshed Khan, Staff Nurse, R.H.C Gara Tajak, D.H.O Peshawar

RESPONDENTS

1. Director General, Health Services, Health Department, Khyber Pakhtunkhwa, Peshawar
2. Executive District Officer, Health Department, Khyber Pakhtunkhwa, Peshawar
3. Medical Officer Incharge, R.H.C, Gara Tajak, District Peshawar
4. Accountant General, Government of Khyber Pakhtunkhwa, Peshawar
5. Secretary Finance, Government of Khyber Pakhtunkhwa, Peshawar
6. Section Officer, (Budget) Government of Khyber Pakhtunkhwa, Peshawar, Accountant General Office, Peshawar
7. Budget Officer-VI, Finance Department, Khyber Pakhtunkhwa, Peshawar


Appellant

Through:


(JEHANGIR KHAN)
Advocate,
High Court, Peshawar

Dated: -23-10-2014

1

Annexure "A"

A

A

7

DIRECTORATE GENERAL HEALTH SERVICES NWFP, PESHAWAR.

OFFICE ORDER.

Mrs. Gulzar Jehanid Change Kanne, attached to HMO, Peshawar is hereby transferred/posted to HMO, Gara Tajik, Peshawar against the vacant post in the interest of public service..

Ed/ x x x
DIRECTOR GENERAL HEALTH SERVICES NWFP, PESHAWAR.

NO. 15242-43 /E-II, dated Peshawar the, 30.05.2002.

Copy forwarded to the:-

1. MS, HMO, Peshawar.
2. EDO(U), Peshawar.

For information and n/action.

FOR DIRECTOR GENERAL HEALTH SERVICES NWFP, PESHAWAR.

3/5

OFFICE OF THE EXECUTIVE DISTRICT OFFICER HEALTH PESHAWAR.

NO. 6239 /EDOH/E-12A. Dated Peshawar the, 31/5/2002.

1. Medical Officer Incharge R.H.C. Gara Tajik D/Peshawar.
2. Accountant General H.W.F.P. Peshawar.
3. Account Section EDCH Office Peshawar.
4. Record Section.

For information and necessary action.

M. Anwar
EXECUTIVE DISTRICT OFFICER, HEALTH PESHAWAR.

ATTESTED
OR

"B" سند نمبر
Answer

8

محترم جناب وزیر صحت صاحب خیبر پختونخواہ پشاور
درخواست بمراد فوری انصاف

جناب عالی!

انتہائی احترام کے ساتھ گزارش کی جاتی ہے کہ میں انتہائی غریب عورت بحیثیت سٹاف نرس عرصہ دراز سے محکمہ صحت کے ساتھ اپنے فرائض انجام دے رہی ہوں۔
جناب عالی! مجھے 30 مئی DGHS 2002 نے بحوالہ آرڈر نمبر II-E-43/15242-DHO نیات آباد میڈیکل کیمپس سے DHO پشاور تہدیل کر دیا۔ اس وقت
یعنی جون 2002 سے لے کر آج بغیر کسی غیر حاضری کے میں DHO پشاور کے زیر نگرانی خدمات انجام دے رہی ہوں۔
(میرے تمام سروس رپورٹس درخواست کے ساتھ منسلک ہیں)۔

لیکن جناب عالی، ستم ظریفی کا یہ عالم ہے کہ جون 2002 سے لے کر تقریباً 2008 تک مجھے تنخواہ نہیں ملتی رہی جس کے لئے میں دتھا فوتاً افسران بالا کو درخواستیں اور منت
ساجت کرتی رہی یہ پانچ ساڑھے پانچ سال بچوں سمیت فاقوں اور ادھار لے لے کر گزارا کرتی رہی۔ بلاخر DHO صاحب نے 2008 سے موجودہ تنخواہ جاری کرنے کے
احکامات کے ساتھ ساتھ سابقہ تنخواہ کا بل تمام معلومات کے بعد بنا کر (جو کہ تقریباً 8 لاکھ روپے بنتے ہیں) محکمہ کاروائی کے لئے سروس بک سمیت آگے بھیج دیا۔ جس پر محکمہ
فنانس اور محکمہ صحت کے اعلیٰ افسران نے بل ترتیب بحوالہ نمبر CN/2005-06/1-1/SOB/HD/1-1 تاریخ 18-11-2009
اور BVI/FD/1-2/08-09/Vol-II تاریخ 06-01-2010 اور نمبر 6086 تاریخ 25-06-2010 صرف کاغذی کاروائی کی حد تک عمل کیا (مختلف آرڈر کے
نوٹوشیٹ منسلک ہیں)۔ لیکن مجھے آج یعنی دس سال بیت جانے کے بعد بھی میرا حق محکمہ صحت کے افسران نے نہیں دیا۔ جسکی وجہ سے آج بھی میں انتہائی مقررہ ہو چکی ہوں اور
میرے بچے اکثر فاقوں کا شکار ہوتے رہتے ہیں۔

محترم وزیر صحت صاحب آپ فوری انصاف اور تبدیلی کا فرہ لے کر آئے ہیں اسلئے میں محکمہ صحت کے ایک اہلکار کی حیثیت سے نہیں بلکہ ایک متاثرہ ماں کی حیثیت سے آپ
ساجبان سے میرے ساتھ اس طویل نا انصافی کے فوری حل کے لئے منتظر ہوں۔
اللہ تعالیٰ آپ کو ہمیشہ اپنے حفظ و آمان میں رکھے۔ آمین۔

Enclosure 21 Pags

دعا گو۔

گلزار بی بی زوجہ جمشید خان

سٹاف نرس RHC گاڑہ تا جک DHO پشاور

المرقوم: 05-09-2013

DHO Peshawar

As ordered by the Hon.
Minister Health, the case may
be re-processed and extend
full cooperation so that
justice could be done.

Principals Secretary to Govt
Ministry of Health
Khyber Pakhtunkhwa
10/13

Diasy
4474
31/10/13

Accepted

9

درخواست بمراد ادائیگی بقایا جات از جون 2002ء تا جون 2008ء

جناب عالی!

مودبانہ گزارش ہے کہ سائلہ بطور سٹاف نرس عرصہ دراز سے محکمہ صحت میں اپنی خدمات سرانجام دے رہی ہے۔ من سائلہ کو بحوالہ آفس آرڈر نمبر II-E-43/15242 مورخہ 30-05-2002 کو حیات آباد میڈیکل کسپلیس سے آرائج سی گاڑہ تاجک پشاور ٹرانسفر کیا گیا اور تب سے لیکر آج تک سائلہ وہاں پر اپنی خدمات نہایت جانفشانی اور ایمانداری سے نبا رہی ہے اور آج تک سائلہ کے خلاف کسی قسم کی کوئی شکایت وغیرہ موقع اپنے افسران بالا کو نہیں دیا ہے۔ لیکن سائلہ کو جون 2002ء تا جون 2008ء تک کوئی تنخواہ ادا نہیں کی گئی ہے اور سائلہ نے قرض لیکر اپنی اور اپنے بچوں کی ضروریات زندگی پوری کیں اس سلسلے میں سائلہ نے آپ جناب کو قبل ازیں بھی کئی درخواستیں گزاری لیکن جناب کے حکم سے سائلہ کو صرف کرنٹ تنخواہ ملنا شروع ہوئی ہے جبکہ بقایا جات کی مد میں ایک پیسہ بھی نہیں ملا۔

اس لیے درخواست ہذا کے ذریعے آپ جناب سے گزارش کی جاتی ہے کہ من سائلہ کے تمام بقایا جات ادا کرنے کے احکامات صادر فرمائیں تاکہ سائلہ کو اس ذہنی اذیت اور عذاب سے نجات مل سکے۔

گلزار بی بی زوجہ جمشید خان
سٹاف نرس RHC گاڑہ تاجک ڈی ایچ او پشاور

2618
16-6-14

Attest
08

PAYROLL SYSTEM
AMENDMENT FORM
MULTIPLE EMPLOYEE ENTRY

9

OFFICE OF THE _____
FOR THE MONTH OF 12/2008

Date _____
Page No. 2

DDO Code (Cost Center) PR 2012 Description Rite.

~~2008~~
~~2008~~

GENERAL DATA CHANGE			GENERAL DATA CHANGE				CHANGE IN PAYMENTS/DEDUCTIONS				Step Sal.	Effective Date	Remarks
Employee's Number	Employee Name	NIC Number	Info Type	Field ID	New Contents	Wage Type	Amount						
							Success	Fail	Ad.				
100435084	Mt. Gulzar. Pk.				Adj: B/P	5801	486080			7	15		
	E/Worse.				" M.R.T.	5002	69634						
					" M.A.	5012	17028						
					" S.A.A.	5081	37565						
					" Untd-A.	5026	16320						
					" S.R.A.	5244	54324						
					" A/R-15	5255	44172						
					" P.A.	6142	33980						
					" G.P. Prnt	6070	35640						
					" B/P Prnt	6085	2310						
					" G/P Prnt	6006	4950						

Abstract of Pys. for
21/6/2008 to 30/6/2008
Checked down by
[Signature]

Attested
[Signature]

[Signature]
District Officer
[Signature]

Audited/Checked by 6145

Entered/Verified by _____

FORM : PAY03 INSTRUCTIONS

General Instructions:

This form is to be used to enter monthly monetary and non-monetary adjustments.

This form is to be used for adjustments in Payroll only.

This form is to be used to enter adjustment for multiple employees within a DDO.

Adjustments to be included in the following format:

DD/MM/YY

For example: To input 1 January 2002 use 01/01/2002

For List of Codes please refer to List of Codes Booklet provided to support these Input Forms.

As a general rule where the following is seen:

--	--

The boxes imply that there is a code that go into the field. The Description will follow on the line provided

For Example:

Current Government:

N	W	NWFP
---	---	------

CODE DESCRIPTION

Specific Instructions:

- 1 Add the date of submission of this form.
- 2 Add the page number of this form.
- 3 Add the office name: e.g. AG NWFP
- 4 Add the month to which this adjustment relates: e.g. October
- 5 Refer to List # 3 from the Lists of Codes booklet
- 6 Enter the Description of the DDO Code.
- 7 Add Computer Generated Personnel Number. This is a 9 digit code in the new SAP system, while 11 digit in the Legacy system.
- 8 Add name of the employee
- 9 Add National ID Card Number. This is a 11 or 13 digit code (depending upon issuing authority).
- 10 Please refer to Form PAY01 to select info type: e.g. 00 for change in NIC Number.
- 11 These are Non Monetary changes: e.g. Change of Address.
- 12 From each Info Type choose the field that requires adjustment: e.g. 05 for change in NIC Number.
- 13 Enter the new contents of change: e.g. 12345678910 as a change in NIC Number.
- 14 These are Monetary changes: e.g. Change of amount in an allowance
- 15 Refer to List # 25 from the Lists of Codes booklet.
- 16 Add Amount in Rupees and Paise.
- 17 Add "P" if the adjustment is in the form of "Payment". Add "D" if the adjustment is a "Debit" adjustment.
- 18 In case salary is to be stopped for this employee select "Stop". Where salary payment of an employee whose payment was stopped is to be revived, select "Start".
- 19 Add date from which this change becomes effective.





**PAYROLL SYSTEM
AMENDMENT FORM
MULTIPLE EMPLOYEE ENTRY**

10

FORM: PAY03

OFFICE OF THE _____

Date: _____

FOR THE MONTH OF: 12/2007

Page No.: _____

DDC Code (Cost Center): 11012 Description: RHE

[Handwritten signature]

GENERAL DATA CHANGE			GENERAL DATA CHANGE				CHANGE IN PAYMENT/DEDUCTIONS				
Employee's Number	Employee Name	NIC Number	Field No	New Contents	Wage Type	Amount			Effective Date	Remarks	
						Types	Pa	sa	Ad		
10435084	M. Gulzar Ali			Adj. B/P	5801		18680				
	E/W			" HRA	5002		6954				
				" H.A.	5012		1708				
				" S.A.A.	5081		3755				
				" H.A.	5086		1632				
				" P.R.A.	5944		51224				
				" A.R-15	5955		4172				
				" P.A.	6148		73320				
				" G.P.P.	6075		3544				
				" B/P	6085		2710				
				" G/P	6006		4950				

[Handwritten signature]

District Health
Office Rawalpindi

Audited/Checked by: 6145

D

Instructions to be followed

FORM : PAY03 INSTRUCTIONS

10

General Instructions:

This form is to be used to enter monthly and salary and non-monetary adjustments
 this form is to be used for adjustments in payee only on

This form is to be used to enter adjustments for multiple employees within a DDO
 Dates are to be included in the following format:

DD / MM / YYYY

For example: to input 1 January 2002 use 01/01/2002

For List of Codes please refer to List of Codes Booklet provided to support these Input Form.

As a general rule where the following is seen

--	--	--

The boxes imply that there is a code that go into the field. The Description will follow on the line provided

For Example:

Current Government:

N	AW	NWFP
---	----	------

CODE- DESCRIPTION

Specific Instructions:

Add the date of submission of this form

Add the page number of this form.

Add the office name: e.g. AG- NWFP

Add the month to which this adjustment relates: e.g. 01/2002

Refer to List # 3 from the Lists of Codes booklet

Enter the Description of the DDO Code

Add Computer Generated Personnel Number. This is an eight digit code in the new MRP system when it is put in the legacy system

Add name of the employee

Add National ID Card Number. This is a 11 or 12 digit code (depending on type of issuing authority)

Please refer to Form PAY01 to select Intro type: e.g. 00 for change in HR Number.

These are Non-Monetary changes: e.g. Change of Address

From each Intro type choose the field that require adjustment: e.g. 05 for change in HR Number

Enter the new contents of change: e.g. 12345678910 as a change in HR Number

These are Monetary changes: e.g. Change of amount in an allowance

Refer to List # 25 from the Lists of Codes booklet.

Add Amount in Rupees and Paisa

Add "P" if the adjustment is in the form of "Payment". Add "D" if the adjustment is a "Debit" adjustment.

In case salary is to be stopped for this employee select "stop". Where salary payment of an employee whose payment was stopped is to be revived, select "Start".

Add date from which this change becomes effective

DUE DRAWN STATEMENT IN RESPECT OF MISS GULZAR JAMSHAD CHARGE NURSE

(11)

	PAY	HRA	MA	SAA	U/Allo	R/A	SPA 15%	AR 15%	DA 15%	Total	GP Fund	B/Fund	G.Ins	total	Net
	5500	688	210	516	150	500									
0/6/2002	4400	544	168	413	120	400				6045	540	35	75	650	5395
30/11/2002	27500	3440	1050	2580	750	2500				37820	2700	175	375	3250	34570
	5500	688	210	516	150	500	825			8389	540	35	75	650	7739
TO 30/11/2003	66000	8256	2520	6192	1800	6000	4125			94893	6480	420	900	7800	87093
	5740	688	210	516	150	500	861	861		9526					9526
to 30.11.2004	68880	8256	2520	6192	1800	6000	10332	4305		108285	6480	420	900	7800	100485
	5980	688	210	516	150	500	897	897		9838	540	35	75	650	9188
to 30.6.2005	41860	4816	1470	3612	1050	3500	6279	6279		68866	3780	245	525	4550	64316
	6865	1069	425	516	300	500	933	933		11541	540	35	75	650	10891
to 30.11.2006	34325	5345	2125	2580	1500	2500	4665	4665		57705	2700	175	375	3250	54455
	7140	1069	425	516	300	500	933	933	1112	12928	540	35	75	650	12278
to 30/11/2006	85680	12828	5100	6192	3600	6000	11196	11196	12352	154644	2700	175	375	3250	151394
	7415	1069	425	516	300	500	933	933	1112	13203	540	35	75	650	12553
to 30/04/2007	37075	5345	2125	2580	1500	2500	4665	4665	5560	66015	2700	175	375	4550	61465
BPS-16	7455	1312	0	516	300	500	933	933	1112	13061	540	35	75	650	12411
to 30/06/2007	14910	2624	0	1032	600	1000	1866	1866	2224	26122	1080	70	150	1300	24822
	8560	1515	0	516	300	500	933	933	1112	14369	540	35	75	650	13719
30/11/2207	42800	7575	0	2580	1500	2500	4665	4665	5560	71845	2700	175	375	3250	68595
	8950	1515	0	516	300	500	933	933	1112	14759	540	35	75	650	14109
to 30/06/2008	62650	10605	0	3612	2100	3500	6531	6531	7784	103313	3780	245	525	4550	98763
al:	486080	69634	17078	37565	16320	36400	54324	44172	33980	795553	35640	2310	4950	44200	751353

Attested
02

[Signature]
Executive District
Officer Health Peshawar



رسید کنندہ

2014ء پنجاب

انتونیس

15 مارچ

مورخہ

بنام ڈاکٹر بلال خیریل ہیڈ آف

مصیبت

مجلس

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام کیلئے صاحب مندرجہ کاروائی کے مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

2014ء

انتونیس

ماہ

15

المرقوم

Handwritten signature/initials

العبد گواہ العبد
مقام سند و توثیق تہم کاروائی کا مکمل ہے۔

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No.1278/2014.

Mst, Gulzar Bibi.....Appellant.

V/S

Director General Health Services, Health Department,
Khyber Pakhtunkhwa Peshawar and other's.....Respondents.


(Reply on behalf of respondent No. 4)

Respectfully Sheweth:-

Para No.1 to 6:- No Comments.

Being an administrative matter, the case totally relates to administrative department of the appellant. They are in better position to satisfy the grievances of the appellant. Beside above, the appellant has raised no grievances against this office.

Keeping in view the above mentioned facts, it is humbly prayed that the name of this office may be removed from the list of respondents.


**ACCOUNTANT GENERAL
KHYBER PAKHTUNKHWA**

IN THE HONORABLE COURT (SERVICE TRIBUNAL) PESHAWAR.

Subject :- **POWER OF ATTORNEY**

Respectable Sir,

In the response of my appeal No 1278 of 2014, and in the reply of the notice given to me by this worthy Court on dated 12 Aug, 2015,

I Mst. Gulzar bibi W/o Jamshid Khan, authorize my husband along with my advocate Mr. Jahangir Khan to pursue my case in the court of law for the justice for which I am waiting for almost for **one and half decade**.

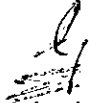
Honorable Sir, my this statement are supported by some documents of the Concerned health department, which clearly enhance my **Cry for granting earlier Justice** from this worthy Court.

Thanks

With Great Regards

Date:28/03/2015


Truly Your's

Gulzar Bibi 
W/o Jamshid Khan
Charge Nurse RHC Gara
Tajik, **DHO Peshawar**

OFFICE OF THE DISTRICT HEALTH OFFICER PESHAWAR

NON-PAYMENT CERTIFICATE

Certified that I have personally satisfied myself with reference to the arrear bill and other relevant record relating to the claim of Mrs. Gulzar Bibi W/O Jamshed Khan Charge Nurse RHC Gara Tajak Peshawar and found that the amount of Rs. 751353/- (Rs. Seven lac fifty one thousand three hundred and fifty three only) on the account of belated pay and allowances claim has not been passed/paid in the past for the period from 7/6/2002 to 30/6/2008 (6 years).


District Health Officer
Peshawar
District Health Officer Peshawar 3/6/15

OFFICE OF THE DISTRICT HEALTH OFFICER PESHAWAR

Service Certificate

Certified that Mrs. Gulzar Jamshed W/O Jamshed Khan is working as Charge Nurse BPS-16 under the control of the District Health Officer Peshawar at RHC Gara Tajak since 1/6/2002 regularly.


District Health Officer

Peshawar

~~17/05/14~~

17/05/14

OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT PESHAWAR
Phone No. 091-9212911

No. 7376 /DHO, dated Pesh: 4/7/2014

To:-

The Director General Health Services,
Khyber Pakhtunkhwa Peshawar.

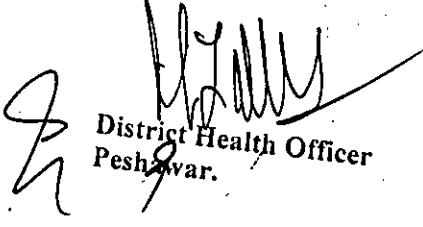
Subject:
Dear Sir,

SANCTION TO THE INVESTIGATION OF ARREARS CLAIM

I have the honour to submit that Mrs. Gulzar Bibi Charge Nurse was transferred from HMC Peshawar to RHC Gara Tajak Peshawar vide your office order No.15242-43/E.II dated 30/5/2002. She has reported her arrival to RHC Gara Tajak on 13/6/2002 and since that date she is performing her duty as reported by the Incharge of the facility. She has been paid by the HMC Peshawar upto 6/6/2002, but due to an inquiry of recovery of overpayment, her service documents received to this office on 6/6/2007. After receiving her service documents, this office processed her case with District Accounts Office Peshawar which were repeatedly returned and finally make observation for the grant of sanction of arrear investigation claim from the Finance Department. However after receiving her service documents, the official was regularly paid with effect from 1/7/2008 and in between also processed her case alongwith all details and breakup for the same purpose which is shown in the attached proforma.

It is therefore once again requested that the competent authority in the Finance Department may please be approached for the grant of necessary sanction for arrear of investigation of pay and allowances for the period and amount mentioned in the attached proforma to proceed further in the matter and avoid legal issues.

(Enclosures Attached).

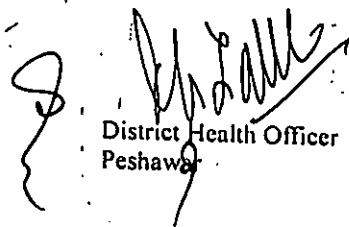

District Health Officer
Peshawar.

CC:/

1. Section Officer (Budget) Health Department Peshawar
2. Accounts Section

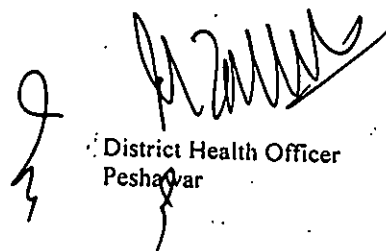
PROFORMA FOR INVESTIGATION OF ARREAR CLAIM

01	NAME AND DESIGNATION	MRS. GULZAR BIBI CHARGE NURSE BPS-16 RHC GARA TAJAK PESHAWAR.
02	Office/Department to which attached	Health Department/ District Health Officer Peshawar.
03	Nature and amount of arrear of claim	Pay and allowances y.e. from 7/6/2002 to 30/6/2008 Rs.751353/-
04	Period to which relates	7/6/2002 to 30/6/2008 (6 years)
05	Detail statement of arrear claim which is admissible	Pay and allowances for the above period
06	When did the claimant 1 st apply for the payment of her arrears claim and what subsequent steps taken by her for having the payment of her claim.	Case was submitted to the DGHS, vide letter No.5736 dated 24/9/2008, subsequent letter No.274 dated 13/1/2009, the case was sent to Secretary Health on 4/2/2009, again submitted to the DGHS, on 6/7/2009 alongwith detail justification and break up which was returned by the FD Department on 6/1/2010.
07	Cause of delay	Late submission of service documents by the official concerned.
08	What action has been taken or intended to be taken by the department against the official at fault	According to the service documents of the official concerned, the pay was not drawn previously i.e. 6/2002 to 6/2008.
09	Nonpayment certificate on the prescribed form to be attached.	Attached
10	Reason, justification for special treatment contemplated under the rules in matter of entertainment of arrear claim.	Yes, time barred arrear claim due to the late submission of service documents and this office take all steps well in time.


 District Health Officer
 Peshawar

NON-PAYMENT CERTIFICATE

Certified that I have personally satisfied myself with reference to the arrear bill and other relevant record relating to the claim of official and found that the amount of Rs. 751353/- (Rs. Seven lace fifty one thousand three hundred and fifty three only) on the account of belated pay and allowances claim has not been passed/paid in the past.


 District Health Officer
 Peshawar

REMINDER

OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT PESHAWAR
Phone No. 091-9212911

No. 8406-08/DHO dated Pesh: 11/8/2014

To:-

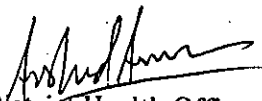
The Director General Health Services,
Khyber Pakhtunkhwa Peshawar.

Subject:
Dear Sir,

SANCTION TO THE INVESTIGATION OF ARREARS CLAIM

Please refer to this office letter No.7376/DHO dated 4/7/2014, the progress in the matter is still awaited.

You are once again requested that the competent authority in the Finance Department may please be approached for the grant of necessary sanction for arrear of investigation of pay and allowances for the period and amount mentioned in the above cited letter to proceed further in the matter and avoid legal issues.


District Health Officer
Peshawar

CC:/

1. Section Officer (Budget) Health Department Peshawar
2. Accounts Section

REMINDER-II

OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT PESHAWAR
Phone No. 091-9212911

No. 11259-6A/DHO dated Pesh: 16/10/2014

To:-

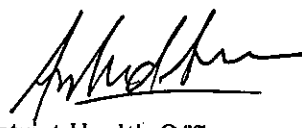
The Director General Health Services,
Khyber Pakhtunkhwa Peshawar.

Subject:
Dear Sir,

SANCTION TO THE INVESTIGATION OF ARREARS CLAIM

Please refer to this office letter No.7376/DHO dated 4/7/2014 and No.8406-08/DHO dated 11/8/2014, the progress in the matter is still awaited.

You are once again requested that the competent authority in the Finance Department may please be approached for the grant of necessary sanction for arrear of investigation of pay and allowances for the period and amount mentioned in the above cited letter to proceed further in the matter and avoid legal issues.


District Health Officer
Peshawar

CC:

1. Section Officer (Budget) Health Department Peshawar
2. Litigation Officer DHO Office Peshawar
3. Accounts Section

OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT PESHAWAR
Phone No. 091-9212911

No. 1664-67/DHO dated Pesh: 04/3/2015

To:-


The Director General Health Services,
Khyber Pakhtunkhwa Peshawar.

Subject: SANCTION TO THE INVESTIGATION OF ARREARS CLAIM

Dear Sir,

Please refer to this office letter No.7376/DHO dated 4/7/2014, No.8406-08/DHO dated 11/8/2014 and No.11259-62/DHO dated 16/10/2014, the progress in the matter is still awaited.

You are once again requested that the competent authority in the Finance Department may please be approached for the grant of necessary sanction for arrear of investigation of pay and allowances for the period and amount mentioned in the above cited letter to proceed further in the matter and avoid legal issues.


District Health Officer
Peshawar.

CC:

1. Section Officer (Budget) Health Department Peshawar
2. Litigation Officer DHO Office Peshawar
3. Accounts Section

خدمت میں - F.D.O. میسرہ علی شاہ

میں - عالی

گذشتہ کی حالت میں گلزار چشید گڑھا صاحب R.H.C
میں بطور چارج ترس کام کر رہے ہیں۔

ڈاکٹر میرا تبادلہ 30/5/2002 R.H.C گڑھا صاحب
D.G.H.S office order NO 15242-43/E-11

کو ہوئی ہے۔

یہ کہ میں نے کئی مرتبہ درخواستوں کا سہارا بھی لیا لیکن پھر ان کو شیوں
کے باوجود دفتر احوال سے میری تنخواہ Release نہیں ہوئی۔

یہ کہ میری جمعہ جمعے کے دن اور اس وقت بھی کے دو دنوں

لغیر تنخواہ اسکو پالنا نہایت ہی مشکل کام ہے۔

دفتر احوال میں پہلی تاشی کارڈ کا مسئلہ اٹھایا تھا جب تاشی کارڈ

پہلی تو دفتر ہذا کے ایشیاریٹ ولوں کے کام سے رہے۔

میرا آپ سے اپنا ہے کہ میری تنخواہ 30/5/2002 سے 31/5/2008 تک
کو Release کرنے کا حکم صادر فرمائیں

میں تمام عمر دکانوں میں رہی۔
گلزار چشید گڑھا صاحب

Forwarded to

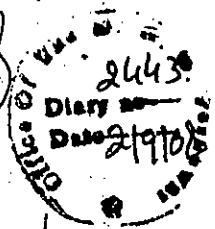
EDO(H) for
Sympathetic Consideration

19/1/2008



may be processed
immediately

62/09/06



(19)

To,

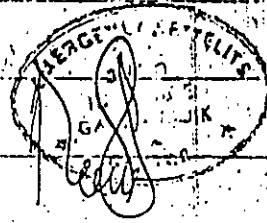
The Executive District Officer Health, Peshawar
From: Senior Medical Officer RHC, Gasa Tajik
Subject: Service Continuity Report:-

Respected Sir,

It is honourably stated that Mrs. Gulzar Jamshed
Charge Nurse - transferred from HMC Pesh, vide DGH S,
office order no 15242-43, dt 30-5-2002 to
RHC Gasa Tajik, is serving continuously without
any gap, in this RHC, very honestly, therefore,
her pay may please be released at the
earliest of your honour.

Thanks

Ld: 01-02-08



From:

Senior Medical Officer Incharge,
RHC, Gasa Tajik Pesh.

محترم جناب وزیر صحت صاحب خیبر پختونخواہ پشاور

درخواست بمراد فوری انصاف

جناب عالی!

انتہائی احترام کے ساتھ گزارش کی جاتی ہے کہ میں انتہائی غریب عورت بحیثیت سٹاف نرس عرصہ دراز سے محکمہ صحت کے ساتھ اپنے فرائض انجام دے رہی ہوں۔

جناب عالی! مجھے 30 مئی 2002 DGHS نے بحوالہ آرڈر نمبر DHO15242-43/E-II حیات آباد میڈیکل کیمپس سے DHO پشاور تبدیل کر دیا۔ اس وقت یعنی جون 2002 سے لے کر آج بغیر کسی غیر حاضری کے میں DHO پشاور کے زیر نگرانی خدمات انجام دے رہی ہوں۔ (میرے تمام سروس رپورٹس درخواست کے ساتھ منسلک ہیں)۔

لیکن جناب عالی، ستم ظریفی کا یہ عالم ہے کہ جون 2002 سے لے کر تقریباً 2008 تک مجھے تنخواہ نہیں ملتی رہی جس کے لئے میں وقتاً فوقتاً افسران بالا کو درخواستیں اور منت سماجت کرتی رہی یہ پانچ ساڑھے پانچ سال بچوں سمیت فاقوں اور ادھار لے لے کر گزارا کرتی رہی۔ بلاخر DHO صاحب نے 2008 سے موجودہ تنخواہ جاری کرنے کے احکامات کے ساتھ ساتھ سابقہ تنخواہ کا بل تمام معلومات کے بعد بنوا کر (جو کہ تقریباً 8 لاکھ روپے بنتے ہیں) حکمانہ کاراوائی کے لئے سروس بک سمیت آگے بھیج دیا۔ جس پر محکمہ فنانس اور محکمہ صحت کے اعلیٰ افسران نے بلز ترتیب بحوالہ نمبر SOB/HD/1-1/2005-06/CN تاریخ 18-11-2009 اور BVI/FD/1-2/08-09/Vol-II تاریخ 06-01-2010 اور نمبر 6086 تاریخ 25-06-2010 صرف کاغذی کاروائی کی حد تک عمل کیا (مختلف آرڈر کے نوٹیفکیشن منسلک ہیں)۔ لیکن مجھے آج یعنی دس سال بیت جانے کے بعد بھی میرا حق محکمہ صحت کے افسران نے نہیں دیا۔ جسکی وجہ سے آج بھی میں انتہائی مقروض ہو چکی ہوں اور میرے بچے اکثر فاقوں کا شکار ہوتے رہتے ہیں۔

محترم وزیر صحت صاحب آپ فوری انصاف اور تبدیلی کا نعرو لے کر آئے ہیں اسلئے میں محکمہ صحت کے ایک اہلکار کی حیثیت سے نہیں بلکہ ایک متاثرہ ماں کی حیثیت سے آپ صاحبان سے میرے ساتھ اس طویل نا انصافی کے فوری حل کے لئے منتظر ہوں۔

اللہ تعالیٰ آپ کو ہمیشہ اپنے حفظ و آمان میں رکھے۔ آمین۔

Enclosure 21 Pages

دعا گو

المرقوم: 05-09-2013

گلزار بی بی زوجہ جمشید خان

سٹاف نرس RHC گاڑہ تاجک DHO پشاور


DHO Peshawar

As ordered by the Hon. Minister Health, the case may be processed and extended full cooperation so that justice could be done.

Principal Secretary Health
Ministry of Health
Khyber Pakhtunkhwa
10/13

DUE DRAWN STATEMENT IN RESPECT OF MISS GULZAR JAMSHAD CHARGE NURSE

Period	PAY	HRA	MA	SAA	U/Allo	R/A	S ^{PA} 15%	AR 15%	DA 15%	Total	GP Fund	B/Fund	G.Ins	total	Net
Rate	5500	688	210	516	150	500									
7/6/02 to 30/6/2002	4400	544	168	413	120	400				6045	540	35	75	650	5395
1/7/2002 to 30/11/2002	27500	3440	1050	2580	750	2500				37820	2700	175	375	3250	34570
Rate	5500	688	210	516	150	500	825			8389	540	35	75	650	7739
1/12/2002 TO 30/11/2003	66000	8256	2520	6192	1800	6000	4125			94893	6480	420	900	7800	87093
Rate	5740	688	210	516	150	500	861	861		9526					9526
1/12/2003 to 30.11.2004	68880	8256	2520	6192	1800	6000	10332	4305		108285	6480	420	900	7800	100485
Rate	5980	688	210	516	150	500	897	897		9838	540	35	75	650	9188
1/12/2004 to 30.6.2005	41860	4616	1470	3612	1050	3500	6279	6279		68866	3780	245	525	4550	64316
Rate	6865	1069	425	516	300	500	933	933		11541	540	35	75	650	10891
1/12/2005 to 30.11.2006	34325	5345	2125	2580	1500	2500	4665	4665		57705	2700	175	375	3250	54455
Rate	7140	1069	425	516	300	500	933	933	1112	12928	540	35	75	650	12278
1/12/2005 to 30/11/2006	85080	12828	5100	6192	3600	6000	11196	11196	12852	154644	2700	175	375	3250	151394
Rates	7415	1069	425	516	300	500	933	933	1112	13203	540	35	75	650	12553
1/12/2006 to 30/04/2007	37075	5345	2125	2580	1500	2500	4665	4665	5560	66015	2700	175	375	4550	61465
Rates BPS-16	7455	1312	0	516	300	500	933	933	1112	13061	540	35	75	650	12411
1/05/2007 to 30/06/2007	14910	2624	0	1032	600	1000	1866	1866	2224	26122	1080	70	150	1300	24822
Rate	8560	1515	0	516	300	500	933	933	1112	14369	540	35	75	650	13719
1/7/2207 to 30/11/2207	42800	7575	0	2580	1500	2500	4665	4665	5560	71845	2700	175	375	3250	68595
Rate	8950	1515	0	516	300	500	933	933	1112	14759	540	35	75	650	14109
1/12/2007 to 30/06/2008	62650	10635	0	3612	2100	3500	6531	6531	7784	103313	3780	245	525	4550	98763
Grant Total:	486080	69634	17078	37565	16320	36400	54324	44172	33980	795553	35640	2310	4950	44200	751353


**Executive District
 Officer Health Peshawar**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APEAL NO.1278/2014.

Mst: GULZAR BEGUM

.....PETITIONER.

V/S

- 1. Director General Services Khyber Pakhtunkhwa, Peshawar.**
- 2. District Health Officer Peshawar.**
- 3. Medical officer incharge, RHC, Garha Tajik, Peshawar.**
- 4. Accountant General Khyber Pakhtunkhwa, Peshawar.**
- 5. Secretary Finance Govt of Khyber Pakhtunkhwa, Peshawar.**
- 6. Section Officer (Budget Department of K.P.K, Accountant General Office, Peshawar.**
- 7. Budget officer VI, Finance Department Khyber Pakhtunkhwa, Peshawar.**

Parawise Reply on behalf of respondent No. 1 and 2.

Respectfully shewith

Preliminary objection:

- 1. The appellant has neither cause of action, nor locus standi to file the present appeal.**
- 2. The appeal is not maintainable in its present form.**
- 3. The appellant has not come to the court with clean hands.**
- 4. The appeal is time barred.**
- 5. That appeal is bad due to mis joinder and non joinder of necessary parties.**

Parawise reply On facts.

Para-1 is correct.

Para -2. Pertains to record.

Para-6. This Para is legal and needs no reply on the part of answering respondents.

Reply On Grounds.

Para -A. As replied in Para 3 of facts.

Para - B. Incorrect. Delay in the release of salaries of the mentioned period accrued due to very late submission of service documents by the appellant herself.

Para- C. Incorrect, answering respondents have not withheld her salary & they rather processed her case to the competent authority repeatedly for the release of her salary .

Para- D. Incorrect. As explained in the above Para.

Para- E. That the answering respondent seek permission to raise additional grounds at the time of arguments.

It is humbly prayed that the claim of the appellant against the answering respondents is devoid of merit & may graciously be dismissed with cost.



**Respondent NO.1
Director General Health Services
Khyber Pakhtunkhwa Peshawar.**



**Respondent No.2
District Health Officer
Peshawar.**

LAST PAY CERTIFICATE

Pay No 1771579

Last Pay Certificate of Mst Gulzar Bibi Charge Nurse
 of the HMC Peshawar
 proceeding to Edo Health Peshawar on transfer
 He has been paid upto 16-6-2008

as the following rates:—

Particulars:

Substantive Pay:—

Officiating Pay:—

Exchange Compensation Allowance:—

Pay 5500-0
 516-0
 340-0
 680-0
 210-0
 500-0
 150-0
 7904-0

S. 1000
 L. 10
 H. 10
 R. 10
 Uni. 10

900 P/c m.v. gm/18720/crs

Deductions:—

540-20-90-1/57

He made over charge of the Office of Charge Nurse HMC
Peshawar

on the 7th / noon of June, 2008

Recoveries are to be made from the pay of the Government servant as detailed on the reverse.

He has been paid leave salary as detailed below. Deductions have been made as noted on the reverse.

Verified and she has been paid upto 06-06-2008

from	to	at Rs.	of which
			a month
			a month
			a month

entitled to draw the following:—

also entitled to joining time for _____ days.

The details to the Income Tax recovered from him upto the date from the beginning of the current year are noted on the reverse.

Note: Recovery of pay & allowances for the period from 1st 6/2008 may please made from the official at the rate noted above.

NO: 11869

Signature: [Signature]
 Designation: Medical Superintendent
Hayat Abad Medical Complex
Peshawar,

Dated at 26.9.2009 19

P.T.O.

D. No - 999-91-77679
②

Annex - B 1

GS&PD.NWFP---545---PFC---100,000 Forms---7.4.06---(24)



Employee Master File Creation Form

(Applicable for both Payroll and GP Fund)

Form: PAY01

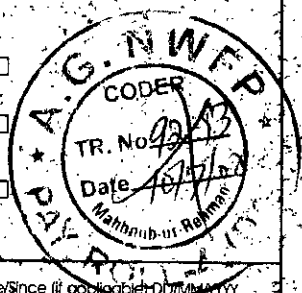
Employee ID (To be assigned by office)

Employee ID grid

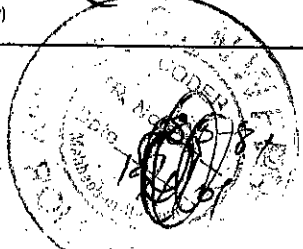
01 OFFICE OF THE S.D.O (H) Peshawar
02 FOR THE MONTH OF 7/2008
03 DDO Code (Cost Center) DDG/49 Description RHC

PERSONNEL ACTIONS-INFO TYPE 00
05 Date of Entry (DD/MM/YYYY) 07/07/2008
06 Current Govt. P
07 Employee group NA-2
08 Employee grade (Sub Group) SDS-16
09 Employee NIC Number 17301-3016161-4
10 DOB (DD/MM/YYYY) 16/09/1965
11 Date of entry into Govt service (DD/MM/YYYY) 07/07/1998
12 Reason for action Transfer from Govt H.M.C.

PERSONNEL DATA - INFO TYPE 0002
13 Title
14 Last name Bishi
15 First name Shah Zaid
16 Father/Husband name Muhammad Sadik
17 District of domicile Charsadda
18 Marital status
19 City of Birth
20 Date of Marriage/Since (if applicable) (DD/MM/YYYY)
21 Province of Domicile NWFP
22 No. of dependents
23 Nationality Pakistan
24 Religion Islam



ORGANISATIONAL ASSIGNMENT - INFO TYPE 0001
25 DDO Code (Cost Centre) DDG/49 RHC
26 DDO Code (Fund Centre)
27 District (Sub area) Pesh.
28 Contract Government
29 Position
30 Designation DDG/49 RHC
31 Ministry (Organisational Unit) DDG/49
32 Fund Section 101
33 Payroll Section 104
34 Buckle no (if any)



Annex B

EDUCATION AND QUALIFICATIONS
ACADEMIC EDUCATION

(Code)	Type of Institute	(Code)	Description	Education	Date Obtained	Marks (if any)
1						
2						
3						
4						

PROFESSIONAL QUALIFICATION

(Code)	Description of Professional Qualification	Date Obtained	Proficiency
1			
2			
3			

(3) - Overwriting in Page 18 & 19 of the S/Book in the LFC may be corrected.

Apply in support of the claim by EDO(H) may be from school.

For a great reasons for late submission of the claim by conducting enquiry by EDO(H) was done.

EDOL Certified by the EDOL leaving the DDO that the official center

that he actually performed his duties on the spot with the was posted.

post availability position may also be furnished to this office.

Return my pass with the pay of that the 0 years

more than 0 years

the investment sanction

Dept according to

(Note = 3) balance of the

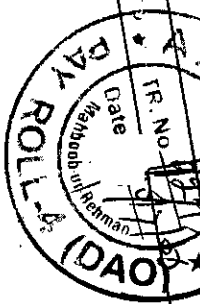
of financial powers Rules 201

the change name

10-7-2007

(B-14) was non gazetted upto 10-4-2007 & should be honoured on the non gazetted through ministerial bill w.e.f 7-6-2002 to 10-4-07 after fulfilling the all code for medicals at the non gazetted side.

Prepared By 21



Audited & Inspected By 22

B/F

amb

Note in the NOA a

T No 32

10-7-2007

Muhammad Bilal
District Accounts Officer

Amer - C(a)

To: - Executive District Officer,
Health City District Peshawar.

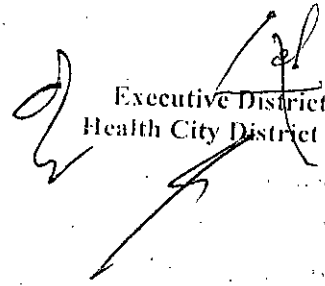
The Director General Health
Services, NWFP, Peshawar.

Subject: - SERVICE DOCUMENTS IN RESPECT OF MST: GULZAR
BIBI CHARGE NURSE.

Sir,

I have the honour to submit herewith the service document in the above named official working under the control of EDO Health Peshawar, the pay bill was submitted so many time to A.G, NWFP Office Peshawar but returned un-passed with the remarks that investigation of arrear claim with effect from 06/2002 to 06/2008 which has already mentioned in the proforma (attached herewith for ready reference).

It is therefore requested accord necessary sanction for investigation of arrear claim pay and allowances with effect from 06/2002 to 06/2008 being a competent authority according to the delegation of power 2001 vide page No.35.


Executive District Officer,
Health City District Peshawar

Amer (C)

Min. Chronicle Government
San Francisco, California

Annex D

NO. 1 (for claim),
Dated 4/2 1969.

The Secretary to Govt: of Calif
Health Department Washington.

Subject to - WFOU 250, with LR/O 1311, Governmental Commission
Sir,

I have the honour to submit herewith copy of
LR (a) 244 and letter no. 5736/LR (h) dated 12.21.63
along with the enclosures regarding accord of settlement investigation
of arrears and allowance in r/o non-arrival of service documents
for the period from 06/1967 to 06/2073 for a view of further
necessary action.

Specific reason for non-arrival of service documents is
submission of service documents from the National Government
Registry Office Complex, Washington D.C. on 13.01.67.

(Enc: 244 ch. 2).
original -

Yours faithfully,
J. S. [Signature]

ASST: Dir. Govt. Accounts,
Dir. Chronicle of the Human
Services, Washington

NO. 470 (for claim),

Copy forwarded to the Executive Director of the
Bureau for information with reference to LR letter no. 214/LR,
dated 13.01.69.

[Signature]
ASST: Dir. Govt. Accounts,
Dir. Chronicle of the Human
Services, Washington

Account Clerk:
for 2 factors
4/12/69



Annex D

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
HEALTH DISTRICT PESHAWAR
Phone No: 091-9212911

No. ⁸⁷ 52865/EDOH dated 6/7/2009

To: The Director General Health Services, NWFP, Peshawar

Subject: SERVICE DOCUMENTS IN R/O MST: GULZAR JAMSHED CHARGE NURSE

Ref: your endst: No.2164/AR (Arrear claim) dated 13/5/2009 on the subject noted above.

I have the honour to submit that Mrs. Gulzar Jamshed charge nurse was transferred from HMC Peshawar to RHC Gara Tajak Peshawar vide your good office order No.15242-43/E.II dated 30/5/2009. She has reported her arrival to RHC Gara Tajak on 13/6/2009 and since that date she is performing her duty there as reported by the incharge of RHC Gara Tajak dated 6/7/2007 and 1/2/2008. She has received her pay from HMC Peshawar upto 6/6/2002 but due to an inquiry of recovery of overpayment, her service documents received to this office on 6/6/2007. After receiving her service documents, this office processed her case with District Accounts Office Peshawar which were repeatedly returned and finally make observations for the grant of sanction of arrear investigation claim from the Finance Department. So this office forwarded the case alongwith a detail and arrear investigation proforma vide this office letter No.5736/EDOH dated 24/9/2008.

The breakup of pay and allowances is as under:

Period	Pay	Allowances	Total
7/6/2002 to 30/6/2008	486080/-	309473/-	795553/-

It is therefore requested that the competent authority in the Finance Department may please be approached for the grant of necessary sanction for arrear of investigation of pay and allowance for the period and amount mentioned above to proceed further in the matter.


EXECUTIVE DISTRICT OFFICER
HEALTH DISTRICT PESHAWAR

CC:/EDOH/Accounts

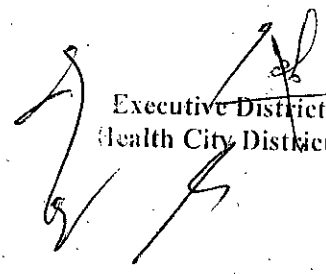
1. Khan Zali Section Officer (Budget) for information w/r to his letter No.SOB/HD/1-1/2005-06/CN dated 14/4/2009.

any E

FOR SANCTION TO THE INVESTIGATION OF ARREAR CLAIM.

1	NAME OF APPLICANT	MST: GULZAR BIBI CHARGE NURSE RHC, GARA TAJIK
2	Officer or Deptt: in which she was working when claim arrears	EDO (H) Peshawar.
3	Nature and amount of claim (S) and the period to which it relate.	Pay and allowances with effect from 07/06/2002 to 06/2008.
4	Detailed statement of the arrears' claims showing therein rules orders under which it is admissible.	07/06/2002 to June 2008 6 years under the delegation rules 2001 the administrative department i.e. DCO being a competent authority for investigation of arrears claim under page-35.
5	When did the claimant (s) first apply for the payment of her arrears claim and what subsequent step was taken by the claim expedited.	According to this office D. No. 6869 dated 31/12/2004 but the service documents were returned back to Hayatabad Medical Complex for verification of LPC and resubmitted to this office after the verification on 06/06/2007.
6	Cause of delayed preference of the arrear claim	Late submission of service documents by the official concerned.
7	Official responsible for the delay referred in column (6)	Official concerned herself
8	What action has been taken or ins intended to be taken by the Department against the official at fault.	None, no fault of any official at this office.
9	Non-payment certificate in the prescribed form to be attached.	According to the service documents the official concerned the pay was not drawn previously i.e. 06/2002 to 06/2008.
10	In case if arrears claim relating to the pre-independence period weather the affidavit the unben duty bond required under orders of the late Punjab Govt. attached with the claim.	No.
11	Reasons justifying special treatment contemplated under rule in the matter or entertainment payment of time barred/arrear claim.	Yes time barred arrear claim due the late submission of services documents and this office taken all steps well in time.

D.G.H.S, NWFP,
PESHAWAR


Executive District Officer,
Health City District Peshawar

Answer

OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT PESHAWAR
Phone No. 091-9212911

No. P. 222-23DHO dated P. No. 211/2012

The Director General Health Services
Khyber Pakhtunkhwa Peshawar

To:

Subject:

Dear Sir:

SANCTION TO THE INVESTIGATION OF ARREARS CLAIM (DRS. GULZAR BEGUM CHARGE NURST RHC GARA TALAK)

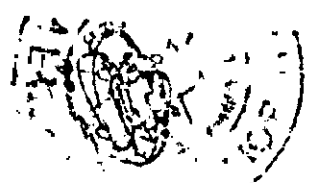
Please refer to this office letter No. 7376DHO dated 4/7/2014, No. 8405-08DHO dated 11/8/2014, No. 11250-62DHO dated 16/10/2014, No. 1664-67DHO dated 4/3/2013 and No. 6014-17DHO dated 6/7/2012, the progress in the matter is still awaited. You are once again requested that the competent authority in the Finance Department may please be approached for the grant of necessary sanction for start of investigation of pay and allowances for the period and amount mentioned in the above cited letter to proceed further in the matter and avoid legal issues.

[Signature]
District Health Officer
Peshawar

Section Officer (Budget-II) Health Department KPK Peshawar
Liaison Officer DHO Office Peshawar
Accounts Section

CC
1
2
3

copy



BEFORE THE PESHAWAR HIGH COURT PESSHAWAR.

SERVICE APEAL NO.1278/2014.

Mst: GULZAR BEGUM

.....Petitioner


V/S

Director General Health K.P.K Pesh etc

.....Respondents.

Affidavit.

I, Dr.Arshad Rasheed, Principal Medical Officer /Litigation Officer, DHO Office Peshawar. Do hereby solemnly affirm and declare on oath that the contents of Parawise Comments on behalf of Respondent No.1 & 2 are true and correct to best of my knowledge and belief that nothing has been concealed from this honorable court.


DR. ARSHAD RASHID

Deponent.

17301-0500163-9



KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

No. 7164 /ST Dated: 31/8/2017

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262


To,

The DG Health Services,
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: - JUDGMENT IN APPEAL NO. 1278/2014, MST. GULZAR BIBI.

I am directed to forward herewith a certified copy of judgment dated 26/09/2017 passed by this tribunal on the above subject for strict compliance.

Encl: as above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 1831 /ST

Dated 2 / 8 / 2017

To

The Capital City Police Officer, .
Government of Khyber Pakhtunkhwa,
Dir Upper.

Subject: -

JUDGMENT IN APPEAL NO. 596/2012, FARHAD HUSSAIN.

I am directed to forward herewith a certified copy of Judgement dated 24.07.2017 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

IN THE HONORABLE COURT (SERVICE TRIBUNAL) PESHAWAR.

Subject :- **POWER OF ATTORNEY**

Respectable Sir,

In the response of my appeal No 1278 of 2014, and in the reply of the notice given to me by this worthy Court on dated 12 Aug, 2015,

I Mst. Gulzar bibi W/o Jamshid Khan, authorize my husband along with my advocate Mr. Jahangir Khan to pursue my case in the court of law for the justice for which I am waiting for almost for **one and half decade**.


Honorable Sir, my this statement are supported by some documents of the Concerned health department, which clearly enhance my **Cry for granting earlier Justice** from this worthy Court.

Thanks

With Great Regards

Date:28/03/2015


Truly Your's

Gulzar Bibi 
W/o Jamshid Khan
Charge Nurse RHC Gara
Tajik, **DHO Peshawar**

OFFICE OF THE DISTRICT HEALTH OFFICER PESHAWAR

NON-PAYMENT CERTIFICATE

Certified that I have personally satisfied myself with reference to the arrear bill and other relevant record relating to the claim of Mrs. Gulzar Bibi W/O Jamshed Khan Charge Nurse RHC Gara Tajak Peshawar and found that the amount of Rs. 751353/- (Rs. Seven lac fifty one thousand three hundred and fifty three only) on the account of belated pay and allowances claim has not been passed/paid in the past for the period from 7/6/2002 to 30/6/2008 (6 years).


District Health Officer
Peshawar
District Health Officer Peshawar 3/6/15

OFFICE OF THE DISTRICT HEALTH OFFICER PESHAWAR

Service Certificate

Certified that Mrs. Gulzar Jamshed W/O Jamshed Khan is working as Charge Nurse BPS-16 under the control of the District Health Officer Peshawar at RHC Gara Tajak since 1/6/2002 regularly.


District Health Officer
Peshawar

~~17/05/14~~ 17/05/14
~~(District Health Officer)~~

OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT PESHAWAR
Phone No. 091-9212911

No. 7376 /DHO dated Pesh; 4/7/2014

To:-

The Director General Health Services,
Khyber Pakhtunkhwa Peshawar.

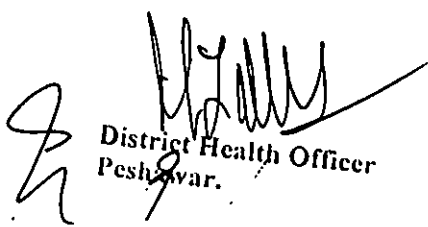
Subject:
Dear Sir,

SANCTION TO THE INVESTIGATION OF ARREARS CLAIM

I have the honour to submit that Mrs. Gulzar Bibi Charge Nurse was transferred from HMC Peshawar to RHC Gara Tajak Peshawar vide your office order No.15242-43/E.II dated 30/5/2002. She has reported her arrival to RHC Gara Tajak on 13/6/2002 and since that date she is performing her duty as reported by the Incharge of the facility. She has been paid by the HMC Peshawar upto 6/6/2002, but due to an inquiry of recovery of overpayment, her service documents received to this office on 6/6/2007. After receiving her service documents, this office processed her case with District Accounts Office Peshawar which were repeatedly returned and finally make observation for the grant of sanction of arrear investigation claim from the Finance Department. However after receiving her service documents, the official was regularly paid with effect from 1/7/2008 and in between also processed her case alongwith all details and breakup for the same purpose which is shown in the attached proforma.

It is therefore once again requested that the competent authority in the Finance Department may please be approached for the grant of necessary sanction for arrear of investigation of pay and allowances for the period and amount mentioned in the attached proforma to proceed further in the matter and avoid legal issues.

(Enclosures Attached).

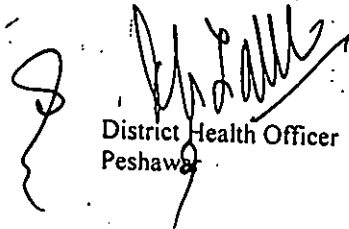

District Health Officer
Peshawar.

CC:/

1. Section Officer (Budget) Health Department Peshawar
2. Accounts Section

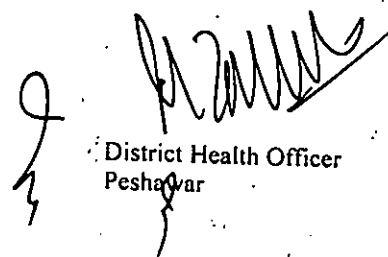
PROFORMA FOR INVESTIGATION OF ARREAR CLAIM

01	NAME AND DESIGNATION	MRS. GULZAR BIBI CHARGE NURSE BPS-16 RHC GARA TAJAK PESHAWAR.
02	Office/Department to which attached	Health Department/ District Health Officer Peshawar.
03	Nature and amount of arrear of claim	Pay and allowances w.e.from 7/6/2002 to 30/6/2008 Rs.751353/-
04	Period to which relates	7/6/2002 to 30/6/2008 (6 years)
05	Detail statement of arrear claim which is admissible	Pay and allowances for the above period
06	When did the claimant 1 st apply for the payment of her arrears claim and what subsequent steps taken by her for having the payment of her claim.	Case was submitted to the DGHS, vide letter.No.5736 dated 24/9/2008, subsequent letter No.274 dated 13/1/2009, the case was sent to Secretary Health on 4/2/2009, again submitted to the DGHS, on 6/7/2009 alongwith detail justification and break up which was returned by the FD Department on 6/1/2010.
07	Cause of delay	Late submission of service documents by the official concerned.
08	What action has been taken or intended to be taken by the department against the official at fault	According to the service documents of the official concerned, the pay was not drawn previously i.e. 6/2002 to 6/2008.
09	Nonpayment certificate on the prescribed form to be attached.	Attached
10	Reason, justification for special treatment contemplated under the rules in matter of entertainment of arrear claim.	Yes, time barred arrear claim due to the late submission of service documents and this office take all steps well in time.


 District Health Officer
 Peshawar

NON-PAYMENT CERTIFICATE

Certified that I have personally satisfied myself with reference to the arrear bill and other relevant record relating to the claim of official and found that the amount of Rs. 751353/- (Rs. Seven lacs fifty one thousand three hundred and fifty three only) on the account of belated pay and allowances claim has not been passed/paid in the past.


 District Health Officer
 Peshawar

REMINDER

OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT PESHAWAR
Phone No. 091-9212911

No. 8406-08/DHO dated Pesh: 11/8/2014

To:-

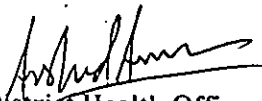
The Director General Health Services,
Khyber Pakhtunkhwa Peshawar.

Subject:
Dear Sir,

SANCTION TO THE INVESTIGATION OF ARREARS CLAIM

Please refer to this office letter No.7376/DHO dated 4/7/2014, the progress in the matter is still awaited.

You are once again requested that the competent authority in the Finance Department may please be approached for the grant of necessary sanction for arrear of investigation of pay and allowances for the period and amount mentioned in the above cited letter to proceed further in the matter and avoid legal issues.


District Health Officer
Peshawar

CC:/

1. Section Officer (Budget) Health Department Peshawar
2. Accounts Section

REMINDER-II

OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT PESHAWAR
Phone No. 091-9212911

No. 11259-6A/DHO dated Pesh: 16/10/2014

To:

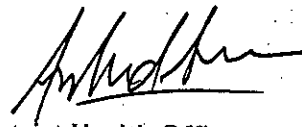
The Director General Health Services,
Khyber Pakhtunkhwa Peshawar.

Subject:
Dear Sir,

SANCTION TO THE INVESTIGATION OF ARREARS CLAIM

Please refer to this office letter No.7376/DHO dated 4/7/2014 and No.8406-08/DHO dated 11/8/2014, the progress in the matter is still awaited.

You are once again requested that the competent authority in the Finance Department may please be approached for the grant of necessary sanction for arrear of investigation of pay and allowances for the period and amount mentioned in the above cited letter to proceed further in the matter and avoid legal issues.


District Health Officer
Peshawar

CC:

1. Section Officer (Budget) Health Department Peshawar
2. Litigation Officer DHO Office Peshawar
3. Accounts Section

OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT PESHAWAR

Phone No. 091-9212911

No. 1664-67/DHO dated Pesh: 04/3/2015

To:-


The Director General Health Services,
Khyber Pakhtunkhwa Peshawar.

Subject:
Dear Sir,

SANCTION TO THE INVESTIGATION OF ARREARS CLAIM

Please refer to this office letter No.7376/DHO dated 4/7/2014 , No.8406-08/DHO dated 11/8/2014 and No.11259-62/DHO dated 16/10/2014, the progress in the matter is still awaited.

You are once again requested that the competent authority in the Finance Department may please be approached for the grant of necessary sanction for arrear of investigation of pay and allowances for the period and amount mentioned in the above cited letter to proceed further in the matter and avoid legal issues.


District Health Officer
Peshawar.

CC:

1. Section Officer (Budget) Health Department Peshawar
2. Litigation Officer DHO Office Peshawar
3. Accounts Section

خدمت میں F.D.O سید علی شاہ

میاں عالی

گزارش کی جاتی ہے میں گلزار چشتی گڑھا نامک R.H.C
میں بطور چارج ترقی کام کر رہی ہوں۔

ڈی آر میرا تبادلہ 30/5/2002 R.H.C گڑھا نامک
D.G.H.S office order NO 15242-43/E-11

کو ہوئی ہے۔

جس کے سبب کی مرتبہ درخواستوں کا سہارا بھی بنا لیں ہزار اکریشن

کے باوجود دفتر اہواز سے میری سمواہ Release نہیں ہوئی۔

جس کے سبب میری سمواہ جمع کر کے میں اور اس میں سبب کی صورتوں

لغیر سمواہ اسنو پالنا نہایت پریشان کن ہے۔

دفتر اہواز میں پہلی ترقی کا رد کا مسئلہ آٹھ ماہ تک سناٹا ہوا

ہوا تو دفتر ہذا کے اہواز لیت و لعل کے کام کر رہی ہے۔

میرا آپ سے اپنا ہے کہ میری سمواہ 30/5/2002 سے 31/8/2008 تک

کو Release کرنے کا حکم صادر فرمائیں

میں تاکہ عمر دیا گیا ہو گی۔

گلزار چشتی
R.H.C گڑھا نامک

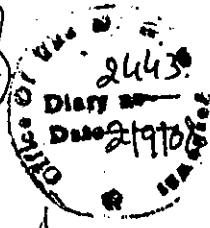
Forwarded to EDO(H) for Sympathetic Consideration

19/2008



may be processed immediately

02/09/06



19

To,

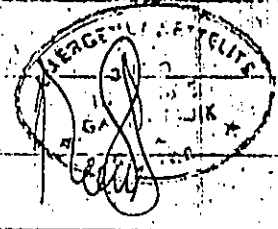
The Executive District Officer Health, Pesh.
 From: Senior Medical Officer RHC, Gasa Tajik
 Subject: Service Continuity Report:

Respected Sir,

It is honourably stated that Mrs. Gulzar Jamshed
 Charge Nurse - transferred from HMC Pesh, vide DGH S,
 offic. order no 15242-43, dt 30-5-2002 to
 RHC Gasa Tajik, is serving continuously without
 any gap, in this RHC, very honestly, therefore,
 her pay may please be released at the
 earliest of your honour.

Thanks

ld: 01-02-08



From:
 Senior Medical Officer Incharge
 RHC Gasa Tajik Pesh.

محترم جناب وزیر صحت صاحب خیبر پختونخواہ پشاور

درخواست بمراد فوری انصاف

جناب عالی!

انتہائی احترام کے ساتھ گزارش کی جاتی ہے کہ میں انتہائی غریب عورت بحیثیت سٹاف نرس عرصہ دراز سے محکمہ صحت کے ساتھ اپنے فرائض انجام دے رہی ہوں۔ جناب عالی! مجھے 30 مئی 2002 DGHS نے بحوالہ آرڈر نمبر II-E-43/15242-DHO حیات آباد میڈیکل کیمپس سے DHO پشاور تبدیل کر دیا۔ اس وقت یعنی جون 2002 سے لے کر آج تک کسی غیر حاضری کے میں DHO پشاور کے زیر نگرانی خدمات انجام دے رہی ہوں۔ (میرے تمام سروس رپورٹس درخواست کے ساتھ منسلک ہیں)۔

لیکن جناب عالی، ستم ظریفی کا یہ عالم ہے کہ جون 2002 سے لے کر تقریباً 2008 تک مجھے تنخواہ نہیں ملتی رہی جس کے لئے میں دقتاً وقتاً افسران بالا کو درخواستیں اور منت سماجت کرتی رہی یہ پانچ ساڑھے پانچ سال بچوں سمیت قانون اور ادھار لے لے کر گزارا کرتی رہی۔ بلاخر DHO صاحب نے 2008 سے موجودہ تنخواہ جاری کرنے کے احکامات کے ساتھ ساتھ سابقہ تنخواہ کا بل تمام معلومات کے بعد بنوا کر (جو کہ تقریباً 8 لاکھ روپے بنتے ہیں) محکمہ کاروائی کے لئے سروس بک سمیت آگے بھیج دیا۔ جس پر محکمہ فنانس اور محکمہ صحت کے اعلیٰ افسران نے بلز تیب بحوالہ نمبر SOB/HD/1-1/2005-06/CN تاریخ 18-11-2009 اور II-Vol/2/08-09/BV/1-FD/1 تاریخ 06-01-2010 اور نمبر 6086 تاریخ 25-06-2010 صرف کاغذی کاروائی کی حد تک عمل کیا (مختلف آرڈر کے فوٹو منسلک ہیں)۔ لیکن مجھے آج یعنی دس سال بیت جانے کے بعد بھی میرا حق محکمہ صحت کے افسران نے نہیں دیا۔ جسکی وجہ سے آج بھی میں انتہائی مقروض ہو چکی ہوں اور میرے بچے اکثر فاقوں کا شکار ہوتے رہتے ہیں۔

محترم وزیر صحت صاحب آپ فوری انصاف اور تبدیلی کا نعرہ لے کر آئے ہیں اسلئے میں محکمہ صحت کے ایک اہلکار کی حیثیت سے نہیں بلکہ ایک متاثرہ ماں کی حیثیت سے آپ صاحبان سے میرے ساتھ اس طویل نا انصافی کے فوری حل کے لئے منتظر ہوں۔

اللہ تعالیٰ آپ کو ہمیشہ اپنے حفظ و آمان میں رکھے۔ آمین۔

Enclosure 21 Pags

ذمہ دار

المرقوم: 05-09-2013

گلزار بی بی زوجہ جمشید خان

سٹاف نرس RHC گاڑہ تاجک DHO پشاور

DHO Peshawar


As ordered by the Hon. Minister Health, the case may be processed on an extended full cooperation so that Justice could be done.

Secretary to Govt. of Punjab
Ministry of Health
Khyber Pakhtunkhwa
10/11/13

Diary
4474
31/10/13

DUE DRAWN STATEMENT IN RESPECT OF MISS GULZAR JAMSHAD CHARGE NURSE

Period	PAY	HRA	MA	SAA	U/Allo	R/A	SPA 15%	AR 15%	DA 15%	Total	GP Fund	B/Fund	G.Ins	total	Net
Rate	5500	688	210	516	150	500									
7/6/02 to 30/6/2002	4400	544	168	413	120	400				6045	540	35	75	650	5395
1/7/2002 to 30/11/2002	27500	3440	1050	2580	750	2500				37820	2700	175	375	3250	34570
Rate	5500	688	210	516	150	500	825			8389	540	35	75	650	7739
1/12/2002 TO 30/11/2003	66000	8256	2520	6192	1800	6000	4125			94893	6480	420	900	7800	87093
Rate	5740	688	210	516	150	500	861	861		9526					9526
1/12/2003 to 30.11.2004	68880	8256	2520	6192	1800	6000	10332	4305		108285	6480	420	900	7800	100485
Rate	5980	688	210	516	150	500	897	897		9838	540	35	75	650	9188
1/12/2004 to 30.6.2005	41860	4816	1470	3612	1050	3500	6279	6279		68866	3780	245	525	4550	64316
Rate	6865	1069	425	516	300	500	933	933		11541	540	35	75	650	10891
1/12/2005 to 30.11.2006	34325	5345	2125	2580	1500	2500	4665	4665		57705	2700	175	375	3250	54455
Rate	7140	1069	425	516	300	500	933	933	1112	12928	540	35	75	650	12278
1/12/2005 to 30/11/2006	85880	12828	5100	6192	3600	6000	11196	11196	12852	154644	2700	175	375	3250	151394
Rates	7415	1069	425	516	300	500	933	933	1112	13203	540	35	75	650	12553
1/12/2006 to 30/04/2007	37075	5345	2125	2580	1500	2500	4665	4665	5560	66015	2700	175	375	4550	61465
Rates BPS-16	7455	1312	0	516	300	500	933	933	1112	13061	540	35	75	650	12411
1/05/2007 to 30/06/2007	14910	2624	0	1032	600	1000	1866	1866	2224	26122	1080	70	150	1300	24822
Rate	8560	1515	0	516	300	500	933	933	1112	14369	540	35	75	650	13719
1.7/2207 to 30/11/2207	42800	7575	0	2580	1500	2500	4665	4665	5560	71845	2700	175	375	3250	68595
Rate	8950	1515	0	516	300	500	933	933	1112	14759	540	35	75	650	14109
1/12/2007 to 30/06/2008	62650	10605	0	3612	2100	3500	6531	6531	7784	103313	3780	245	525	4550	98763
Grant Total:	486080	69634	17078	37565	16320	36400	54324	44172	33980	795553	35640	2310	4950	44200	751353


Executive District
Officer Health Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No.1278/2014.

Mst, Gulzar Bibi.....Appellant.

V/S

Director General Health Services, Health Department,
Khyber Pakhtunkhwa Peshawar and other's.....Respondents.

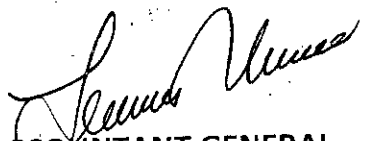
(Reply on behalf of respondent No. 4)

Respectfully Sheweth:-

Para No.1 to 6:- No Comments.

Being an administrative matter, the case totally relates to administrative department of the appellant. They are in better position to satisfy the grievances of the appellant. Beside above, the appellant has raised no grievances against this office.

Keeping in view the above mentioned facts, it is humbly prayed that the name of this office may be removed from the list of respondents.


ACCOUNTANT GENERAL
KHYBER PAKHTUNKHWA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APEAL NO.1278/2014.

Mst: GULZAR BEGUM

.....PETITIONER.

V/S

1. Director General Services Khyber Pakhtunkhwa, Peshawar.
2. District Health Officer Peshawar.
3. Medical officer incharge, RHC, Garha Tajik, Peshawar.
4. Accountant General Khyber Pakhtunkhwa, Peshawar.
5. Secretary Finance Govt of Khyber Pakhtunkhwa, Peshawar.
6. Section Officer (Budget Department of K.P.K, Accountant General Office, Peshawar.
7. Budget officer VI, Finance Department Khyber Pakhtunkhwa, Peshawar.

Parawise Reply on behalf of respondent No. 1 and 2.

Respectfully shewith

Preliminary objection:

1. The appellant has neither cause of action, nor locus standi to file the present appeal.
2. The appeal is not maintainable in its present form.
3. The appellant has not come to the court with clean hands.
4. The appeal is time barred.
5. That appeal is bad due to mis joinder and non joinder of necessary parties.

Parawise reply On facts.

Para-1 is correct.

Para -2. Pertains to record.

Para -3. Is correct to the extent the she has not been paid her salary from June 2002 to June 2008. The main reason was that the appellant submitted her service documents to the office of respondent No.2 (DHO Peshawar.) very late, 5 year after her transfer from Hayat abad Medical Complex to RHC Garha Tajik. Her LPC (Last Pay Slip) from the accounts office of HMC was released on 18/06/2007 (Annexure A). on receiving the documents , office of respondent No.2 prepared the salary bill in favour of the appellant and submitted to the Accountant General office for approval ,which was returned on 10/07/2008, for arrears investigation claim from Finance department (Annexure B). Office of the respondent No.2 also processed the case according to the instructions vide letter No.5738 dated 24/09/2008(annexure C) which was forwarded by respondent No.1 to Secretary Health vide letter dated 04/02/2009. Reply to this letter is still awaited(annexure D).

Service documents with detailed report were again submitted by the respondent No.2 for sanction of arrears of investigation by the competent authority vide letter No.5286-87 dated 06/07/2009(annexure E), reply to which is awaited.

Office of the respondent No.2 once again initiated for sanction of arrears of investigation claim (according to the observation of AG-Office)vide letter No.7376 dated 04/07/2014.(annexure F) & a final reminder vide letter No.9259-62/DHO on 05/11/2015(annexure G) showing all the reference . The progress still awaited.

Para -4. Is Correct to the extent that the appellant had addressed the answering respondents, the respondent No.2 acted upon her request & repeatedly processed her case to the competent authority, the reply of which is still awaited.

Para-5. Reply to this Para is explained in above Para.

Para-6. This Para is legal and needs no reply on the part of answering respondents.

Reply On Grounds.

Para -A. As replied in Para 3 of facts.

Para - B. Incorrect. Delay in the release of salaries of the mentioned period accrued due to very late submission of service documents by the appellant herself.

Para- C. Incorrect, answering respondents have not withheld her salary & they rather processed her case to the competent authority repeatedly for the release of her salary .

Para- D. Incorrect. As explained in the above Para.

Para- E. That the answering respondent seek permission to raise additional grounds at the time of arguments.

It is humbly prayed that the claim of the appellant against the answering respondents is devoid of merit & may graciously be dismissed with cost.



Respondent NO.1
Director General Health Services
Khyber Pakhtunkhwa Peshawar.



Respondent No.2
District Health Officer
Peshawar.

LAST PAY CERTIFICATE

P.No 1771579

Last Pay Certificate of Mst Gulzar Bibi Charge Nurse
 of the HMC Peshawar
 proceeding to Edo Health Peshawar on transfer
 He has been paid upto 6-6-2002

as the following rates:—

Particulars:

Substantive Pay:—

Officiating Pay:—

Exchange Compensation Allowance:—

Pay	5500-00
S.A.A	516-00
L.A	340-00
H.A	680-00
Med. Ael	210-00
Ret. Ael	500-00
Uni. Ael	150-00
Total	7904-00

908 A/c No 14-200/18720/02

Deductions:—

Sho-20-91-1/57

He made over charge of the Office of Charge Nurse HMC
Peshawar

on the 7th / noon of June, 2002.

Recoveries are to be made from the pay of the Government servant as detailed on the reverse.

He has been paid leave salary as detailed below. Deductions have been made as noted on the reverse.

06-06-2002	to	06-06-2002	at Rs.	_____	a month
	to		at Rs.	_____	a month
	to		at Rs.	_____	a month

entitled to draw the following:—

also entitled to joining time for _____ days.

5. The details to the Income Tax recovered from him upto the date from the beginning of the current year are noted on the reverse.

Note: Recovery of pay & allowances for the period from 1st 6/01 to 1/5/02 may please made from the official at the rate noted above.

NO: 11869

Dated at 24.9.2004 19

Signature: [Signature]
 Designation: Medical Superintendent
Hayat Abad Medical Complex
Peshawar.

B.T.O.

D. No - 999-91-77579

Annex - B, 1

GS&PD.NWFP---546---PFC---100,000 Forms---7.4.06---(24)



Employee Master File Creation Form

(Applicable for both Payroll and GP Fund)

Form: PAY01

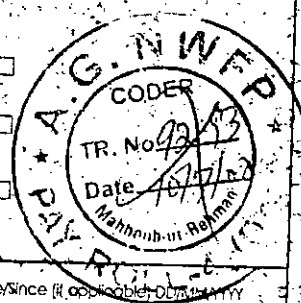
Employee ID (To be assigned by office)

Employee ID grid

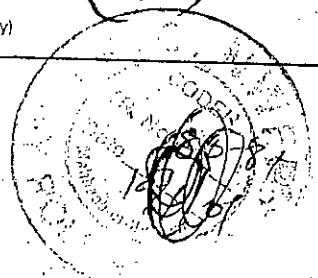
01 OFFICE OF THE S.D.O. CH2 P
02 FOR THE MONTH OF 7/2008
03 DDO Code (Cost Center) DDG/49 Description RHC

PERSONNEL ACTIONS-INFO TYPE 00
05 Date of Entry (DDMMYYYY) 01/02/2008
06 Current Govt. P
07 Employee group Non-G.
08 Employee grade (Sub Group) SDS-16
09 Employee NIC Number 17501-3016161-4
10 Date of entry into Govt service (DDMMYYYY) 16/09/1995
11 Date of entry into Govt service (DDMMYYYY) 01/02/1998
12 Reason for action Transfer from Govt H.M.-e.

PERSONNEL DATA - INFO TYPE 0002
13 Title
14 Last name Bibi
15 First name Farzana
16 Father/Husband name Muhammad Sadik
17 District of domicile Charsadda
18 Marital status
19 City of Birth
20 Date of Marriage/Since (if applicable) (DDMMYYYY)
21 Province of Domicile NWFP
22 No. of dependents
23 Nationality Pakistani
24 Religion Islam



ORGANISATIONAL ASSIGNMENT - INFO TYPE 0001
25 DDO Code (Cost Centre) DDG/49 RHC
26 DDO Code (Fund Centre)
27 District (Sub area) Peshawar
28 Contract Government
29 Position Gazetted Non Gazetted
30 Designation Assistant Commissioner
31 Ministry (Organisational unit) DDG/49
32 Fund Section 14
33 Payroll Section 12-04
34 Buckle no (if any)



Annex B

GP FUND SUBSCRIPTION - INFO TYPE 0057

62 Wage Type 63 GPF Subscription

GP FUND - INFO TYPE 9202

64 Interest Applied 65 GPF balance

Yes No

66 GPF Bal date (DD/MM/YYYY) 67 Old GP Fund Account Number

CREATE DATA SPECIFICATION - INFO TYPE

68 Date appointed as Gazetted Officer (DD/MM/YYYY) 69 Suspension Date

70 Expiry of Adhoc/Contract Date

INTERNAL DATA - INFO TYPE 0032

71 Previous Personnel Number (if any) 72 National Tax Number (NTN)

73 Leave without pay

74 Cash Center

75 FAMILY INFORMATION - INFO TYPE 0021

S No.	Relation	Last name	First Name	Nominee	Gender	DOB	City of birth	Nationality	%age of share	Emp Type	Other Nationality
1											
2											
3											
4											
5											
6											
7											
8											
9											
10											

76 RECURRING PAYMENTS (ALLOWANCES) - INFO TYPE 0014

Wage Type	Description	Amount
1000	HAH	1312
1250	MA	1235
1576	UA	500
1502	AA	500

Wage Type	Description	Amount
1776	SAA	516
1830	SAA	897
1091	AA	930
1864	DA	1153

77 RECURRING PAYMENTS (DEDUCTIONS) - INFO TYPE 0014

Wage Type	Description	Amount

Wage Type	Description	Amount

PAYROLL STATUS - INFO TYPE 003

78 SALARY STATJS Start Payment Stop Payment

Executive District
Officer Health Peshawar

S. Attar

EDUCATION AND QUALIFICATIONS
ACADEMIC EDUCATION

(Code)	Type of Institute	(Code)	Description	Education	Date Obtained	Marks (if any)
1						
2						
3						
4						

PROFESSIONAL QUALIFICATION

(Code)	Description of Professional Qualification	Date Obtained	Proficiency
1			
2			
3			

(3) - Overwriting in page 18 & 19 of the S/Booklet in the CPC may be corrected.

Code of Type of Institute can be found in the 'Book of Codes' together with description.
Code of Description of Education can be found in the 'Book of Codes' together with description.
Code of Description of Professional Qualification can be found in the 'Book of Codes' together with description.
Date Obtained: Date on which this education/qualification was obtained. For example 10/09/1990.
Type of marks: For example High School, Business School etc.
Description of Education: The description of the education obtained. For example Business School.
Marks (if any): Marks obtained e.g. 80%, 60%.
Description of Profession: For example CA, ACMA, LLB, MBBS etc.
Proficiency: How to rate your professional expertise. For example High, Poor, Exceptional.
FOUR PART INSTRUCTIONS
General Instructions
A This form is to be used at the time of joining a new employee.
B This form can also be used at the time of joining a GP Field only employee.
C Dates are to be included in the following format: DD/MM/YYYY
For example: To input 1 January 2002 use 01/01/2002.
D For List of Codes please refer to List of Codes Booklet provided to Support these Input Forms.
E As a general rule where the following is seen:
The boxes imply that there is a code that go into the field. The Description will follow on the line provided. For example:
Current Government: GOVT NWFP
CODE DESCRIPTION
General Instructions
Add the office name: AG/NWFP
Refer to List #3 from the Lists of Codes booklet.
Enter date when this information is entered into the Computer.
Refer to List #20 from the Lists of Codes booklet.
9 Self Explanatory
10 Self Explanatory
11 Self Explanatory
12 Reason for Action Choose 01 for Fresh Appointment, Choose 02 for Transfer in from Non-Computer Office.
13 Self Explanatory
14 Enter Your last name:
e.g. Name in Mr. Javed Saleem Arif
Last Name will be: Saleem Arif
16 Full Father or Husband's Name
18 Self Explanatory. Options can be Single, Married, Widow, Divorced, Unknown
20 If applicable when did an employee get married.
22 Self Explanatory
24 Self Explanatory e.g. Islam
26 Refer to List #3 from the Lists of Codes booklet.
28 Tick the appropriate Column with a government.
30 Refer to List #8 from the Lists of Codes booklet.
32 Refer to List #8 from the Lists of Codes booklet.
In case of Police add Buckle Number here.
34 Self Explanatory
35 Self Explanatory
36 Self Explanatory
37 Self Explanatory
38 Self Explanatory
39 Self Explanatory
40 Self Explanatory
41 Add Phone Number here.
42 Self Explanatory
43 Self Explanatory
44 Self Explanatory
45 Self Explanatory
46 Self Explanatory
47 Self Explanatory
48 Self Explanatory
49 Add Phone Number here.
50 Self Explanatory
51 Refer to List #13 from the Lists of Codes booklet.
52 Refer to List #13 from the Lists of Codes booklet.
53 Wage Type Refer to List #10 from the Lists of Codes booklet. Add Description using the list and Enter the Amount in Rupees.
54 Refer to List #28 from the list enclosed with these instructions.
55 Self Explanatory
56 Enter Employees Bank Account Number Here.
57 Refer to List #26 from the Lists of Codes booklet. Only enter code in the Range of 300034999
58 This is an Amount Column
59 This is an Amount Column
60 GP Field Account Number (in case of GP Field only)
61 Self Explanatory
62 Self Explanatory
63 Self Explanatory
64 Self Explanatory
65 Enter No. of Family In the field. For Emp Type refer to List #22 from the Lists of Codes booklet.
66 Wage Type Refer to List #22 from the Lists of Codes booklet. Add Description using the list and Enter the Amount in Rupees.

Instructions in support of the claim by EDO (H) may be furnished.
Reasons for late submission of claim by conducting enquiry by EDO (H) may be furnished.
Certified by the EDO
The official center has frequently performed his duties on the spot & posted there was posted.
Post availability position may also be furnished to this office.

Note approved by the Director of the Government of NWFP

Return my pass with the 0 of pay & that the 0 of pay & more than 8 years the investigation sanction requires the investigation sanction to be made according to the change nurse.

T No 92
10-7
(B-14) was now gazetted upto 10-4-2007 & should be honoured on the non gazetted through ministerial bill w.e.f 7-6-2002 to 10-4-07 after fulfilling the all code for medicals at the non gazetted side.

Prepared By 21



Audited & checked By 22

Muhammad Arif
District Accounts Officer

5736 /EDO (H)/Account

Dated Peshawar The 24/09/2008

From:

Executive District Officer,
Health City District-Peshawar.

Amex - Cca

To: -

The Director General Health
Services, NWFP, Peshawar.

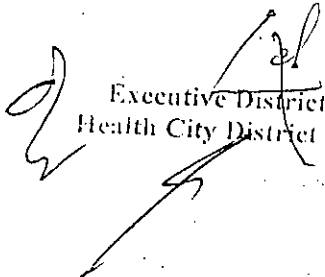
Subject:

SERVICE DOCUMENTS IN RESPECT OF MST: GULZAR
BIBI CHARGE NURSE.

Sir,

I have the honour to submit herewith the service document in the above named official working under the control of EDO Health Peshawar, the pay bill was submitted so many time to A.G, NWFP Office Peshawar but returned un-passed with the remarks that investigation of arrear claim with effect from 06/2002 to 06/2008 which has already mentioned in the proforma (attached herewith for ready reference).

It is therefore requested accord necessary sanction for investigation of arrear claim pay and allowances with effect from 06/2002 to 06/2008 being a competent authority according to the delegation of power 2001 vide page No.35.


Executive District Officer,
Health City District Peshawar

Amex (C)

amr

DIRECTORATE GENERAL HEALTH SERVICES, NWFP - PESHAWAR.

Annex D

NO. 470 (Arrear Claim).

Dated 4/2/2009.

The Secretary to Govt: of NWFP
Health Department Peshawar.

Subject :- SERVICE DOCUMENTS IN R/O Mst: Gulzar Bibi Charge Nurse.
Sir,

I have the honour to submit herewith a copy of
MDO (H) Peshawar letter No. 5736/LDO (H) dated 26.09.2008
alongwith its enclosures regarding accord sanction of investigation
of arrear pay and allowance in r/o Mst: Gulzar Bibi Charge Nurse
for the period from 06/2002 to 06/2003 for favour of further
necessary action.

Specific reason for non-drawal of pay is due to late
submission of Service documents from the Medical Superintendent
Hayatabad Medical Complex, Peshawar i.e. on 18.6.2007.

(Encl: attached).

original

YOURS FAITHFULLY,

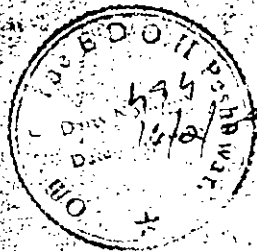
ASST: DIRECTOR (Accounts),
DIRECTORATE GENERAL HEALTH
SERVICES, NWFP - PESHAWAR.

NO. 470 (Arrear Claim).

Copy forwarded to the Executive Distt: Officer (Health)
Peshawar for information with reference to his letter No. 27/LDOH,
dated 13.01.2009.

ASST: DIRECTOR (Accounts),
DIRECTORATE GENERAL HEALTH
SERVICES, NWFP - PESHAWAR.

Accounts Clerk
for inspection
12/01/09



Annex D
any

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
HEALTH DISTRICT PESHAWAR
Phone No: 091-9212911

No. 5286⁸⁷/EDOH dated 6/17/2009

To: The Director General Health
Services, NWFP, Peshawar

Subject: SERVICE DOCUMENTS IN R/O MST: GULZAR JAMSHED
CHARGE NURSE

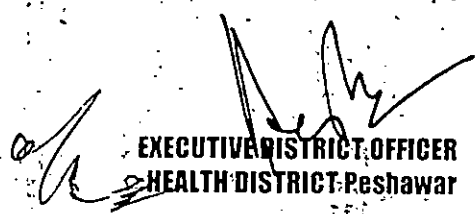
Ref: your erdst: No.2104/AR (Arrear claim) dated 13/5/2009 on the
subject noted above.

I have the honour to submit that Mrs. Gulzar Jamshed charge nurse was transferred from HMC Peshawar to RHC Gara Tajak Peshawar vide your good office order No.15242-43/E.II dated 30/5/2009. She has reported her arrival to RHC Gara Tajak on 13/6/2009 and since that date she is performing her duty there as reported by the incharge of RHC Gara Tajak dated 6/1/2007 and 1/2/2008. She has received her pay from HMC Peshawar upto 6/6/2002 but due to an inquiry of recovery of overpayment, her service documents received to this office on 6/6/2007. After receiving her service documents, this office process her case with District Accounts Office Peshawar which were repeatedly returned and finally make observation for the grant of sanction of arrear investigation claim from the Finance Department. So this office forwarded the case alongwith all detail and arrear investigation proforma vide this office letter No.5736/EDOH dated 24/9/2008.

The breakup of pay and allowances is as under:

Period	Pay	Allowances	Total
7/6/2002 to 30/6/2008	486080/-	309473/-	795553/-

It is therefore requested that the competent authority in the Finance Department may please be approached for the grant of necessary sanction for arrear of investigation of pay and allowance for the period and amount mentioned above to proceed further in the matter.


EXECUTIVE DISTRICT OFFICER
HEALTH DISTRICT Peshawar

CC:/EDOH/Accounts

I, Khan Zali Section Officer (Budget) for information w/r to his letter No.SOB/HD/1-
2005-06/CN dated 14/4/2009.

any E

FOR SANCTION TO THE INVESTIGATION OF ARREAR CLAIM.

1	NAME OF APPLICANT	MST: GULZAR BIBI CHARGE NURSE RHC. GARA TAJIK
2	Officer or Deptt: in which she was working when claim arrears	EDO (H) Peshawar.
3	Nature and amount of claim (S) and the period to which it relate. Detailed statement of the arrears claims showing therein rules orders under which it is admissible.	Pay and allowances with effect from 07/06/2002 to 06/2008. 07/06/2002 to June 2008 6 years under the delegation rules 2001 the administrative department i.e. DCO being a competent authority for investigation of arrears claim under page-35.
4	When did the claimant (s) first apply for the payment of her arrears claim and what subsequent step was taken by the claim expedited.	According to this office D. No. 6869 dated 31/12/2004 but the service documents were returned back to Hayatabad Medical Complex for verification of LPC and resubmitted to this office after the verification on 06/06/2007.
5	Cause of delayed preference of the arrear claim	Late submission of service documents by the official concerned.
6	Official responsible for the delay referred in column (6)	Official concerned herself
7	What action has been taken or intended to be taken by the Department against the official at fault.	None. no fault of any official at this office.
8	Non-payment certificate in the prescribed form to be attached.	According to the service documents the official concerned the pay was not drawn previously i.e. 06/2002 to 06/2008.
9	In case if arrears claim relating to the pre-independence period weather the affidavit the unbent duty bond required under orders of the late Punjab Govt: attached with the claim.	No.
10	Reasons justifying special treatment contemplated under rule in the matter or entertainment payment of time barred/arrear claim.	Yes time barred arrear claim due the late submission of services documents and this office taken all steps well in time.

D.G.H.S. NWFP,
PESHAWAR

Executive District Officer,
Health City District Peshawar

Amnep F

OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT PESHAWAR
Phone No. 091-9212911

No. 7376 /DHO dated Pesh: 4/7/2014

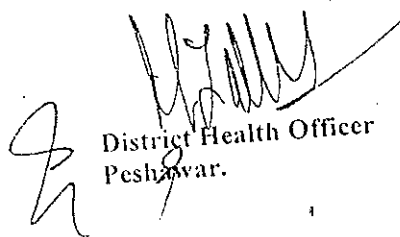
To:-
The Director General Health Services,
Khyber Pakhtunkhwa Peshawar.

Subject: SANCTION TO THE INVESTIGATION OF ARREARS CLAIM
Dear Sir,

I have the honour to submit that Mrs. Gulzar Bibi Charge Nurse was transferred from HMC Peshawar to RHC Gara Tajak Peshawar vide your office order No.15242-43/E.II dated 30/5/2002. She has reported her arrival to RHC Gara Tajak on 13/6/2002 and since that date she is performing her duty as reported by the Incharge of the facility. She has been paid by the HMC Peshawar upto 6/6/2002, but due to an inquiry of recovery of overpayment, her service documents received to this office on 6/6/2007. After receiving her service documents, this office processed her case with District Accounts Office Peshawar which were repeatedly returned and finally make observation for the grant of sanction of arrear investigation claim from the Finance Department. However after receiving her service documents, the official was regularly paid with effect from 1/7/2008 and in between also processed her case alongwith all details and breakup for the same purpose which is shown in the attached proforma.

It is therefore once again requested that the competent authority in the Finance Department may please be approached for the grant of necessary sanction for arrear of investigation of pay and allowances for the period and amount mentioned in the attached proforma to proceed further in the matter and avoid legal issues.

(Enclosures Attached).


District Health Officer
Peshawar.

- CC:/
1. Section Officer (Budget) Health Department Peshawar
 2. Accounts Section

any F

Ames G



OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT PESHAWAR
Phone No. 091-9212911

No. 9259-62/DHO dated Pesh: 6/5/11 /2015

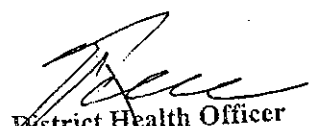
To:-
The Director General Health Services,
Khyber Pakhtunkhwa Peshawar.

Subject: SANCTION TO THE INVESTIGATION OF ARREARS CLAIM (MRS. GULZAR BEGUM CHARGE NURSE RHC GARA TAJAK)

Dear Sir,

Please refer to this office letter No.7376/DHO dated 4/7/2014, No.8406-08/DHO dated 11/8/2014, No.11259-62/DHO dated 16/10/2014, No.1664-67/DHO dated 4/3/2015 and No.6014-17/DHO dated 6/7/2015, the progress in the matter is still awaited.

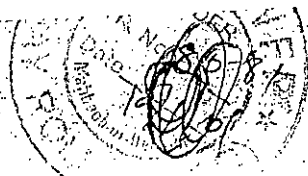
You are once again requested that the competent authority in the Finance Department may please be approached for the grant of necessary sanction for arrear of investigation of pay and allowances for the period and amount mentioned in the above cited letter to proceed further in the matter and avoid legal issues.


District Health Officer
Peshawar

CC:/

1. Section Officer (Budget-II) Health Department KPK Peshawar
2. Litigation Officer DHO Office Peshawar
3. Accounts Section

Ames G



BEFORE THE PESHAWAR HIGH COURT PESSHAWAR.

SERVICE APEAL NO.1278/2014.

Mst: GULZAR BEGUM

.....Petitioner

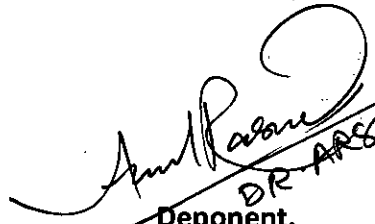
V/S

Director General Health K.P.K Pesh etc

.....Respondents.

Affidavit.

I, Dr.Arshad Rasheed, Principal Medical Officer /Litigation Officer, DHO Office Peshawar. Do hereby solemnly affirm and declare on oath that the contents of Parawise Comments on behalf of Respondent No.1 & 2 are true and correct to best of my knowledge and belief that nothing has been concealed from this honorable court.


DR ARSHAD RASHEED
Deponent.

17301-0500163-9

taj

BEFORE THE PESHAWAR HIGH COURT PESSHAWAR.

SERVICE APEAL NO.1278/2014.

Mst: GULZAR BEGUM

.....Petitioner


V/S

Director General Health K.P.K Pesh etc

.....Respondents.

Affidavit.

I, Dr.Arshad Rasheed, Principal Medical Officer /Litigation Officer, DHO Office Peshawar. Do hereby solemnly affirm and declare on oath that the contents of Parawise Comments on behalf of Respondent No.1 & 2 are true and correct to best of my knowledge and belief that nothing has been concealed from this honorable court.



DR. ARSHAD RASHEED

Deponent.

17301-0500163-9