

CANNED
KPSI
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
(CAMP COURT, ABBOTTABAD)

Appeal No. 916/2018

SCA
K
Peshawar

Date of Institution ... 19.07.2018

Date of Decision ... 17.11.2021

Mst. Safia Bibi wife of Muhammad Anwar (Ex-LHV/PHCT) BHU Teloos, Resident
Of Jabba Feroz Tehsil and District, Battagram. ... (Appellant)

VERSUS

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

Present.

Mr. Hamayun Khan,
Advocate. ...

For appellant.

Mr. Muhammad Rasheed,
Deputy District Attorney ...

For respondents.

MR. AHMAD SULTAN TAREEN
MRS. ROZINA REHMAN, ...

CHAIRMAN
MEMBER(J)

JUDGEMENT

AHMAD SULTAN TAREEN, CHAIRMAN:- Through the above titled appeal
described in the heading, the jurisdiction of this Tribunal has been invoked by
the appellant with the prayer as copied below:-

"On acceptance of instant appeal impugned order dated
10.04.2018 passed by respondent No. 3 may kindly be declared
void ab-initio, unlawful and appellant be reinstated in service
alongwith all back benefits."

2. The factual account as given in the Memo of Appeal and deducible from copies of the supporting documents annexed therewith is precisely that the appellant was initially appointed as PHCT/LHV in BPS-12 on 20.07.2016 and was posted at BHU Teloos Allai. The appellant performed her duty with full devotion and liability upto the satisfaction of her high-ups and local inhabitants. On 21.03.2018 at 12.00 O'clock she applied for half duty leave due to illness of her son and after obtaining permission from incharge, appellant went to home. On the same day respondent No. 3 visited BHU Tailoos Allai and marked the appellant absent from duty. On 22.03.2018, respondent No. 3 issued transfer order of appellant from BHU Tailoos Allai to DHO office Battagram (i.e. office of respondent No. 3). On 26.03.2018 respondent No. 3 issued show cause notice to the appellant. The above said transfer order and show cause notice was received to the appellant on 02.04.2018. The appellant submitted reply to show cause notice on 04.04.2018. Finally the respondent No. 3 issued the impugned order dated 10.04.2018, whereby the appellant was removed from service. Feeling aggrieved, the appellant filed departmental appeal before respondent No. 4 but till date no order has been passed on the same, hence the present appeal on 19.07.2018.

3. The appeal was admitted for regular hearing on 05.07.2021. The respondents have submitted written reply/comments 30.08.2021, refuting the claim of the appellant with several factual and legal objections and asserted for dismissal of appeal.

4. We have heard the arguments and perused the record.

5. Learned counsel for the appellant argued that the job description of appellant was only treatment and look-after of the female, children and new born babies and such duties can be performed only in CD, RHC, BHU and DHQs

etc. and could not be performed in the office of DHO (respondent No. 3). He further argued that no regular enquiry was conducted nor she has been afforded opportunity of hearing and cross-examination, which were mandatory under the law. All the proceedings conducted by respondent No. 3 is clear violation of Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011. That the impugned order dated 10.04.2018 is illegal, against the law & facts and requested that the appeal may be accepted as prayed for.

6. While rebutting the arguments of learned counsel for the appellant, learned Deputy District Attorney argued that during surprise visit of DHO Battagram the appellant was found absence on the relevant day and her performance was found unsatisfactory as per her job descriptions. He further argued that the transfer of the appellant was made to DHO office for the purpose of departmental proceedings against her. He requested that the appeal may be dismissed with costs.

7. The appellant is aggrieved from the order dated 10.04.2018 of her removal from service which as annexed with the appeal is available on file. The said order by its context reveals that the appellant was attached to the office of DHO Battagram i.e. respondent No. 3, was proceeded against under Government Servants (E&D) Rules, 2011 for the charges including absence from official duty on 21.03.2018 at 11.00 AM, not obeying transfer order dated 22.03.2018, alteration, wrong entry/tempering in attendance register, no entry in birth and family planning register since 08.02.2018 and of her usual sitting at Al-Syed Hospital Banna during official duty hours. The reference of the show cause notice dated 26.03.2018 proposing the major penalty has also been given in the impugned order. The copy of the show cause notice as annexed with the appeal is also available on record. The charges as enumerated herein before



with reference to the impugned order are there in the show cause notice besides another charge that she was previously terminated on her chronic absenteeism. The concluding parts of the show cause notice reveals that the competent authority on the said charge sheet directly issued show cause notice to the appellant directing her to explain her position and submit reply within seven days under Government Servants (E&D) Rules, 2011. There is no reason in show cause notice that why formal enquiry was dispensed with. Copy of the reply to the show cause notice purportedly given by the appellant is also annexed with the appeal. She explained with sufficient causes her absence referred in the show cause notice. She refused any cutting in the attendance register and termed the same as baseless allegation. She also gave plausible explanation of her previous termination reflected in the show cause notice and in proof of the allegation being wrong, she was reinstated by the Director General Health Services. Apart from the reply to the show cause notice, a copy of an application sent to the Provincial Ombudsman for legal action against Muhammad Khan Afridi DHO Battagram has also been annexed. She therein levelled certain allegations about harassment at the workplace and misuse of authority by the District Health Officer in relation to her for certain ulterior motives. According to copy of the departmental appeal against the impugned order, allegation of her harassment has also been reiterated therein and reference of the application made to the Provincial Ombudsman has also been given by its annexation with the departmental appeal. She categorically mentioned in the departmental appeal that she was subjected to disciplinary action and removal from service on account of undue exercise of authority by District Health Officer, Battagram.

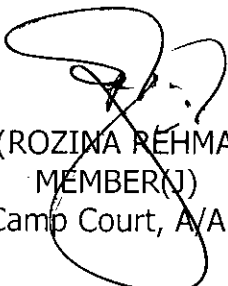
8. In view of the overall defence revealed by the appellant against the show cause notice and by her other applications/appeal, there was a need of full

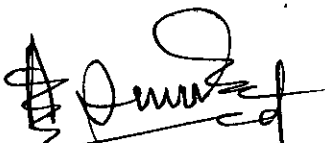
fledge enquiry and if it was not got conducted by the DHO because of direct allegation against him, the appellate authority was supposed to reinstate the appellant and remand the case for full-fledged enquiry by an impartial enquiry committee to be constituted by the appellate authority i.e. respondent No. 2. However, he also omitted to order any such enquiry and no reason has been advanced in reply of the respondents that why such enquiry was not got conducted. Mere denial of the facts and grounds of appeal by respondents is not sufficient in particular circumstances of the case. Rather it is deemed as evasive reply, when the respondents could not hold the impartial enquiry into the charges against the appellant and for rebuttal of her counter allegations. In the given circumstances, the disciplinary proceedings and consequent imposition of major penalty upon her by the impugned order is held as malicious and revengeful not conforming to the rules on the subject to disciplinary proceedings.



9. For what has gone above, the appeal is accepted as prayed for. The impugned order is set aside. The appellant is reinstated into service with all back benefits including the arrears of salary. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

17.11.2021


(ROZINA REHMAN)
MEMBER(J)
(Camp Court, A/Abad)



(AHMAD SULTAN TAREEN)
CHAIRMAN
(Camp Court, A/Abad)

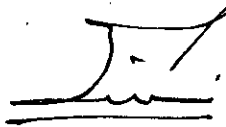
S.No.	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	17.11.2021	<p><u>Present.</u></p> <p>Mr. Hamayun Khan, ... For appellant. Advocate</p> <p>Mr. Muhammad Rasheed, ... For respondents. Deputy District Attorney</p> <p>Vide our detailed judgment; the appeal is accepted as prayed for. The impugned order is set aside. The appellant is reinstated into service with all back benefits including the arrears of salary. Parties are left to bear their own costs. File be consigned to the record room.</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  (ROZINA REHMAN) Member (J) (Camp Court A/Abad) </div> <div style="text-align: center;">  CHAIRMAN (Camp Court A/Abad). </div> </div> <p><u>ANNOUNCED</u> 17.11.2021</p>

22.09.2021

Mr. Hamayun Khan, Advocate, for the appellant present.
Mr. Riaz Ahmed Paindkhel, Assistant Advocate General for the respondents present.

Learned counsel for the appellant sought adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments before the D.B on 17.11.2021 at Camp Court Abbottabad.


(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)
CAMP COURT ABBOTTABAD


(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT ABBOTTABAD

18.01.2021

Due to COVID-19, the case is adjourned for the same on 16.02.2021 before D.B.



READER


16.02.2021

Nemo for appellant.

Noor Zaman learned District Attorney alongwith Masar Jan A.D for respondents present.


Preceding date was adjourned on a reader's note, therefore, notice be issued to the appellant/counsel for 19.05.2021 for arguments before D.B at Camp Court Abbottabad.


(Atiq ur Rehman Wazir)
Member (E)
Camp Court, Abbottabad


(Rozina Rehman)
Member (J)
Camp Court, Abbattabad

19.5.21

Due to covid-19, The case is adjourned to 22.9.21 as before.

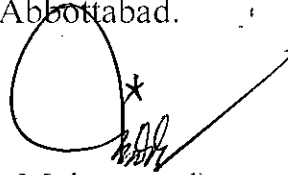

Reader

15.09.2020

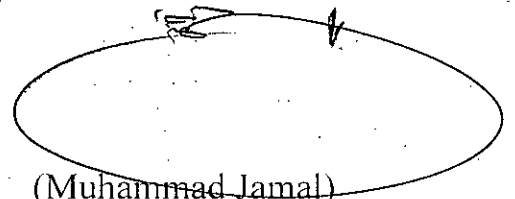
Counsel for the appellant is person. Mr. Muhammad Riaz Khan Painsdakhel, Assistant Advocate General for respondents present.

Learned counsel for the appellant requested for adjournment.

Adjourned to 18.11.2020 for arguments before D.B at camp court Abbottabad.



(Mian Muhammad)
Member(E)

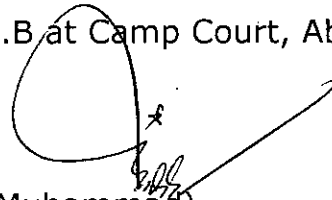


(Muhammad Jamal)
Member
Camp Court A/Abad

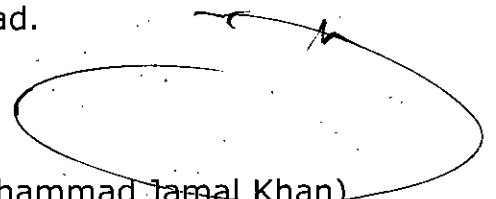
18.11.2020

Mr. Hamayun Khan, Advocate for appellant is present. Mr. Riaz Ahmad Painsdakhel, Assistant Advocate General and Mr. Yasir Parsla, Dental Surgeon, for the respondents are also present.

Learned counsel for appellant requested for adjournment that he has not prepared the brief. Adjourned to 18.01.2021 on which date file to come up for arguments before D.B at Camp Court, Abbottabad.



(Mian Muhammad)
Member (Executive)
Camp Court Abbottabad




(Muhammad Jamal Khan)
Member (Judicial)
Camp Court Abbottabad

20.01.2020

Clerk to counsel for the appellant present. Mr. Muhammad Jan, DDA alongwith Mr. Fayaz Shah, Assistant for respondents present. Due to general strike of the bar on the call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for further proceedings/arguments on 19.02.2020 before D.B at camp court Abbottabad.


Member


Member
Camp Court A/Abad

Due to covid ,19 case to come up for the same on / /
at camp court abbottabad.

Reader

Due to summer vacation case to come up for the same on
15 19 1 20 at camp court abbottabad.


Reader

19.08.2019


Appellant absent. Learned counsel for the appellant absent. Mr. Bilal learned DDA present. No one present on behalf of respondents. Notice be issued to the appellant. Notice be also issued to the respondents for reply/comments. Adjourn. To come up for written reply/comments on 17.09.2019 before S.B at camp court Abbottabad.



Member
Camp Court A/Abad

17.09.2019

Counsel for the appellant and Mr. Muhammad Bilal Khan, Deputy District Attorney alongwith M/S Irfan, Section Officer, Amjid Ali, Assistant, Naeem, Assistant Director and Jaffar Shah, Assistant for the respondents present. Para-wise comments on behalf of respondents submitted. Case to come up for rejoinder and arguments on 20.11.2019 before D.B at Camp Court Abbottabad.



(Muhammad Amin Khan Kundi)

Member
Camp Court Abbottabad

20.11.2019

Counsel for the appellant present. Mr. Usman Ghani, District Attorney for respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 20.01.2020 before D.B at camp court Abbottabad.




Member



Member
Camp Court Abbottabad


21.03.2019

Clerk of counsel for the appellant present. Mr. Muhammad Bilal Khan, Deputy District Attorney alongwith M/S Amjid Ali, Assistant & Jaffar Shah, Assistant for the respondents present. Written reply on behalf of respondents not submitted. Learned Deputy District Attorney requested for further adjournment. Adjourned. To come up for written reply/comments on 17.06.2019 before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

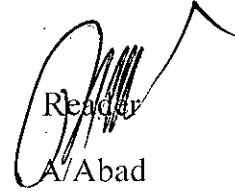
17.06.2019

Counsel for the appellant and Mr. Muhammad Bilal, DDA for respondents present. Written reply/comment not submitted. Requested for adjournment. Adjourned. Notices be issued to the respondents for submission of written reply/comments. Case to come up for written reply/comments on 19.08.2019 before S.B at camp court Abbottabad.


(Ahmad Hassan)
Member
Camp Court A/Abad

15.11.2018

Counsel for the appellant present. Due to retirement of the Hon'ble Chairman the Service Tribunal is incomplete. Tour to Camp Court Abbottabad has been cancelled. To come up for the same on 16.01.2019 at camp court Abbottabad.


Reader
A/Abad

16.01.2019

Learned counsel for the appellant present. Preliminary arguments heard.

The appellant Ex-P.H.CT (MCH) has filed the present service appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against the order dated 10.04.2018 whereby she was awarded major penalty of removal from service.

Points urged need consideration. The present appeal is admitted for regular hearing subject to all just legal objections including the issue of limitation. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 21.03.2019 before S.B at Camp Court Abbottabad.


Appellant Deposited
Security & Process Fee


Member

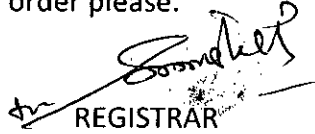


Camp Court Abbottabad

Form -A

FORM OF ORDER SHEET

Court of _____

Case No. 916/2018

S.No.	Date of Order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	19/07/2018 27-7-2018 19.09.2018	<p>The appeal of Mst. Safia Bibi presented by Mr. Hamayun Khan Advocate may be entered in the Institution register and put up to the Wrothy Chairman for proper order please.</p> <p> REGISTRAR</p> <p>The case is entrusted to Touring S. Bench at Abbottabad for preliminary hearing to be put up there on <u>21-09-2018</u>.</p> <p> CHAIRMAN</p> <p>Since 21st September, 2018 has been declared as public holiday on account of Moharram, therefore, case is adjourned to 15.11.2018 for preliminary hearing before the S.B at camp court, Abbottabad.</p> <p> Chairman Camp court, A/Abad</p>

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Appeal No. 916 /2018

Mst. Safia Bibi wife of Muhammad Anwar, (EX LHV/ PHCT) BHU Teloos,
resident of Jabba Feroz Tehsil and District, Battagram.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Health Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

INDEX

<i>ST. #</i>	<i>Description</i>	<i>Page No.</i>	<i>Annexure</i>
1.	Memo of Appeal	1 to 8	
2.	Copies of order & show cause notice	9-10	"A"
3.	Copy of reply of show cause notice dated 04/04/2018	11-12	"B"
4.	Copy of application	13	"C"
5.	Copy of order dated 10/04/2018	14-17	"D" "E"
6.	Wakalatnama		"E"

Safia
...APPELLANT

Through

Dated: 17-7 /2018

H. Hamayun Khan
(HAMAYUN KHAN)
Advocate High Court, Abbottabad

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1182

Appeal No. 916 /2018

Dated 19/07/2018

Mst. Safia Bibi wife of Muhammad Anwar, (EX LHV/ PHCT) BHU Teloos,
resident of Jabba Feroz Tehsil and District, Battagram.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Health Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa, Peshawar.
3. District Health officer Battagram.

...RESPONDENTS

**APPEAL UNDER ARTICLE 212 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN 1973 READ WITH SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
1974, AGAINST THE IMPUGNED ORDER DATED
10/04/2018 PASSED BY THE RESPONDENT NO. 3
WHEREBY RESPONDENT NO. 3 IMPOSED MAJOR
PENALTY OF REMOVAL FROM SERVICE WHICH
IS ILLEGAL, UNLAWFUL, AGAINST THE LAW,**

Filed 19/07/18 day

Registrar

FACTS AND NATURAL JUSTICE AND LIABLE TO
BE SET ASIDE.

PRAYER: ON ACCEPTANCE OF INSTANT APPEAL
IMPUGNED ORDER DATED 10/04/2018 PASSED BY
RESPONDENT NO. 3 MAY KINDLY BE DECLARED
VOID ABI-INITIO, UNLAWFUL AND APPELLANT
BE REINSTATED IN SERVICE ALONGWITH ALL
BACK BENEFITS.

Respectfully Sheweth;-

Appellant beg to solicit through instant appeal on the
following legal and factual back grounds:-

1. That initially appellant was appointed as
PHCT/LHV in BPS-12 on 20/07/2016.
2. That thereafter appellant submitted arrival report
and joined duty and was posted at BHU Teloos
Allai.

3. That appellant performed her duty with full devotion and liability, upto the satisfaction of her high-ups and local inhabitants.
4. That on 21/03/2018 at 12:00 O'clock appellant applied for half duty leave due to illness of son after obtaining permission from in charge appellant went to home.
5. That on the same day respondent No.3 visited BHU Tailoos Allai and marked the appellant absent from duty.
6. That, on 22/03/2018 respondent No.3 issued transfer order of appellant from BHU Tailoos Allai to DHO office Battagram (i.e office of respondent No.3).
7. That, it is worth to mention that albeit the appellant is a civil servant under the administrative control of respondents, but at no way is their private servant. As the respondent No. 3 had harrassed her for his unlawful/ immoral pleasure, which was

refused bluntly by the appellant, resultantly respondent No. 3 had make a final attempt on 22/03/2018 to obtain his immoral pleasures and objects and he had transferred the appellant from BHU Tailoos Allai to DHO office of respondent No. 3. This act clearly reveals the intentions of respondent No. 3, because there are no duties to be assigned to appellant in DHO Office as she is a LHV/PHCT.

8. That, on 26/03/2018 respondent No.3 issued show cause notice to appellant, the above said transfer order and show cause notice was received to the appellant on 02/04/2018. Copies of order & show cause notice are attached as Annexure "A".
9. That, the appellant has submitted the reply of show cause notice in the office of respondent No.3 on 04/04/2018. Copy of reply of show cause notice dated 04/04/2018 is annexed as Annexure "B".
10. That, the appellant also submitted an application regarding the harassment before the provincial

ombudsman. Copy of application is annexed as Annexure "C".

11. That, finally the respondent No.3 on 10/04/2018 issued the impugned order, whereby the appellant was removed from service. Copy of order dated 10/04/2018 is annexed as Annexure "D".

12. That, the appellant filed departmental appeal against order dated 10/04/2018, before respondent No.2 but till date respondent No.2 not passed any order on the same. *Annexure "E"*

13. That, being aggrieved from the order dated 10/04/2018 of respondent No.3 appellant is before this August Tribunal with the appeal in hand inter-alia on the following amongst other grounds;-

GROUND:-

- a. That, the impugned order is illegal, against the law & facts, hence is liable to be set aside.

- b. That job description of appellant is only and only treatment and look after of the females Childs and new born babies, and such duties can be performed in CD, RHC, BHU, DHQ etc and could not be performed in the office room of the DHO/respondent No.3.
- c. That, impugned order is based on personal grudges and interests which is not sustainable.
- d. That, impugned order is against the rules, no regular inquiry was conducted nor the opportunity of defence and hearing was given to the appellant.
- e. That, all the proceeding conducted by respondent No.3 is clear violation of E&D rules and issued impugned order for obtaining his immoral goals, in this respect appellant filed complaint before learned

ombudsman for protection of her honor and dignity.

f. That, the act of respondent is against guaranteed constitutional rights of the appellant, which are also against the norms and dictates of Islam.

g. That, office of DHO/respondent No.3 is an administrative and establishment / management office and the appellant has no concern with the administration work under the control of respondent No.3.

h. That, impugned order is issued in a hasty manner, which did not fulfill the codal requirement, hence having no legal value, is liable to be struck down.


i. That other points would be argued at the time of argument with the kind permission of this Honourable Court.

It is, therefore humbly prayed that on acceptance of instant appeal impugned order dated 10/04/2018 passed by respondent no. 3 may kindly be declare null and void, abi-initio, unlawful and appellant be reinstated in service alongwith all back benefits.


...APPELLANT

Through

Dated: 7-7 /2018


(HAMAYUN KHAN)
Advocate High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.


...APPELLANT

Annexure "A" 9



OFFICE OF THE DISTRICT HEALTH OFFICER

Battagram (Khyber Pakhtunkhwa)

Phone & Fax: # (0997) 310507

No. 652-55 / Dated 22/03 / 22 / 2018.

OFFICE ORDER.

Mst: Safia Bibi PHCT (MCH) BPS-12 attached to BHU Tailoos is hereby posted/ adjusted at DHO office on administrative ground with immediate effect as OSD.

09:00 AM To 05:00PM

08:00 AM to 04:00 PM

District Health Officer,
Battagram

No. 652-55 /

Dated: March 22, 2018

Copy to the:-

- 1) Incharge BHU Tailoos for information
- ✓ 2) Official concerned for information
- 3) Account section office of the undersigned for information
- 4) Office copy

MV AWP
District Health Officer,
Battagram

Attested
HA *ASR*

P-T-O



10

OFFICE OF THE DISTRICT HEALTH OFFICER

Battagram (Khyber Pakhtunkhwa)

Phone & Fax: # (0997) 310507

No. 725 /Dated 26/03 /2018.

SHOW CAUSE.

I Dr Muhammad Khan DHO Battagram, as competent authority under Khyber Pakhtunkhwa Government Servants (E&D) Rule 2011 do hereby serve you Mst. Safia Bibi PHCT (MCH) attached to BHU Tailoos as follows:-

1. "Absent from duty during surprise visit of undersigned at BHU Tailoos on 21/03/2018 at 11:00 AM without prior permission or sanction leave"
2. Not obeying transfer order vide this office No. 652-55 Dated 22/03/2018
3. (a) Alteration and wrong entry/tempering in the attendance register
(b) No entry in the chief minister initiative program for pregnant women's register since 08/02/2018
(c) No entry in Birth register since 08/02/2018
(d) No entry in Family Planning Register. It show your least interest in your Government duty
(e) You used to set in the morning time at Al-Sayed Hospital at Banna Amai.
3. You are previously also terminated on your chronic absentism

On the above charge sheet the competent authority issue show cause notice you Mst: Safia Bibi PHCT (MCH BPS-12 directed to explain your position the reply must reach this office within 07 days, under E&D rules 2011 section 05 failing which lead to your termination from service

Mx. Amjad
District Health Officer
Battagram ✓

No. _____ /

Dated / /2018.

Copy forwarded to the:-

1. Director General Health Services KPK Peshawar for information
2. Incharge BHU Tailoos for information
3. Official Concerned for compliance.
4. Accounts Section Office of the undersigned for information.

District Health Officer,
Battagram

Attested
H

Annexure 'B' 11


گورنمنٹ جناب ڈسٹرک ہسپتال، منیر صاحب روڈ، منیر
 جوا۔ ایبٹ شو کاہل 725 فورسز $\frac{3}{018}$ 26 جناب محبان صفی بی بی
 (MCH) PHCT منیر

جناب عالی :-

جوا۔ ذیل مرض ہے۔

- 1- یہ کہ فورسز $\frac{3}{018}$ کو من سائلہ نابوقت 3-1 بجے دن BHU منیر میں الٹی میں الٹی
 دی گئی سرالجام دہلی میں تھی۔ اور اس نے پھر سائلہ نے الٹی بیماری کو THQ ہسپتال
 میں الٹی ہر 2 دکانہ لے گئی اور 1-45 بجے اجناب BHU منیر میں
 کا وزٹ کیا ہے۔ اور شو کاہل نوٹس میں 11 بجے علی طور پر در 2 کیا ہے۔
 اور ڈیٹی کی بیماری کی وجہ سے میں من سائلہ $\frac{3}{018}$ سے نقل گئی جس پر الٹی کو الٹی
 2- مذکورہ ٹرانسفر کا حکم کی اطلاع سائلہ کو فورسز $\frac{4}{018}$ 3 بجے وقت 9 بجے رات تک تھی
 اور Showcahl لہذا اور Transfor کا حکم نامہ کہیں سائلہ کو الٹی کی تاریخ پر
 ہوا ہے۔ اور جس کو من سائلہ نے ایک ہی تاریخ کو وصول کیا ہے۔ فورسز $\frac{3}{018}$
 سے قبل سائلہ کو ٹرانسفر کا حکم نامہ نہیں ملے ہے۔ اور BHU لہذا 2 بجے رات 9 بجے فورسز کو الٹی
 3- اور حادثہ اور الٹی میں کوئی کٹنگ نہیں ہے۔ جو الٹی من سائلہ پر لگائی ہے، وہ سائلہ پر
 فورسز $\frac{4}{018}$ تک من سائلہ الٹی ڈیٹی BHU منیر میں سرالجام دہلی ہے۔
 4- کہ جب بیمار اس میں لہذا آئے ہیں تو وہ الٹی میں الٹی کر کے ہیں وہ لہذا
 نہیں ہوتے ہیں۔ تو ہم فعلی الٹی الٹی میں الٹی کر سکتے ہیں۔ جو الٹی
 ہو چکے ہیں۔ ان کی الٹی الٹی میں موجود ہیں۔
 5- متعلقہ شعبہ منیر الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی
 کرتے ہیں۔ اور ادویات دیکھ کر ہیں۔
 6- یہ کہ بینہ میں مہری الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی
 کو الٹی مہری الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی
 7- قبل ازیں مہری الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی
 الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی الٹی

P-T-O

Attested


کہ مہر کی فیصلگی کو اس کا سہرا میں مفردہ حل رہا تھا۔ جس کی وجہ سے
 مہر کی سہرا سے مہر کو اس سہرا سے جو تھا اور سہرا سے
 سے Release نہیں کیا جا رہا تھا۔ اور سہرا سے اسی وجہ سے
 مہر کی سہرا کی اس رہا تھا۔ اور الزام عطا ثابت ہو گیا ہے DA
 سہرا کے ساتھ ساتھ دو بارہ حال کرنے کا اہتمام جاری رہا تھا۔
 لہذا اس سہرا سے -

13702-2348404-4
 BHU-LHU
 04-04/08
 مہر کی سہرا سے
 04/08

Handwritten signature or name at the top left.

Handwritten text, possibly a date or reference number.

LHV

03-04-018 = (Date)

Handwritten notes in Urdu, organized into numbered points (1-4) and sub-points (A-C). The text discusses various aspects of LHV and DHO, including their uses, benefits, and specific instructions. Key phrases include:

- 1- ... (Point 1)
- 2- ... (Point 2)
- 3- ... (Point 3)
- 4- ... (Point 4)
- A- ... (Sub-point A)
- B- ... (Sub-point B)
- C- ... (Sub-point C)

Handwritten text at the bottom of the page, possibly a signature or a concluding note.

Annexure "C" B



Annexure "D" B 14

OFFICE OF THE DISTRICT HEALTH OFFICER

Battagram (Khyber Pakhtunkhwa)

Phone & Fax: # (0997) 310507

No. 802-06 / Dated 10/04 / 2018.

OFFICE ORDER.

Whereas, Mst: Safia Bibi PHCT (MCH) BPS-12 attached to undersigned office was proceeded under the E&D Rules 2011 for the charges mentioned bellow :-

- Absent from official duty during surprise visit of undersigned on 21.03.2018 at 11:00 AM.
- Not obeying transfer order vide this office order No 652-55 Dated 22.03.2018.
- Alteration and wrong entries/ tempering in attendance register, no entry in birth and family planning register since 08.02.2018.
- Used to set at Al-Syed Hospital Banna during official duty hours.

According to Para (6) of the terms & conditions of her appointment order No 1283-87 Dated 18/07/2016, she had violated the relevant rules and were previously terminated on chronic absentism vide office order No 3139-43 Dated 07/11/2017.

AND WHEREAS, A show cause notice was served to her vide this office order No 725 Dated 26.03.2018 where in major penalty of removal from service was proposed to be imposed upon her.

AND WHEREAS, the competent authority was not satisfied from her reply and she was advised to attend the office of undersigned for personal hearing at 02:00 PM on 06/04/2018, but she showed no interest and failed to do so.

NOW WHEREAS, the undersigned being the competent authority is pleased in exercise of the powers conferred under the Khyber Pakhtunkhwa E&D rules to imposed the major penalty mentioned in show cause notice served "**Removal from service**" upon Mst: Safia Bibi W/O Muhammad Anwar PHCT (MCH) BPS-12 with immediate effect.

District Health Officer
Battagram

Attested
[Signature]

No 802-06 / Dated 10/04/2018

Copy forwarded to the:-

- Director General Health Services KPK Peshawar for information.
- District Accounts officer Battagram for information and necessary action
- ✓ Mst: Safia Bibi W/O Muhammad Anwar
- Accounts Section Office of the undersigned for necessary action.
- Personal file for record

District Health Officer
Battagram

[Signature]

Annexure

مختصر ڈائری میں مندرجہ ذیل کے بارے میں P.I.A کا پتلا

16

اپریل 1954ء کو 10/18 سے
DHO سے سگرم کے سائلہ و لقبیری
وہم اختیار کے جائز استعمال کے
نوٹری سے Termination

استدلال

جہاں اپریل 1954ء میں ہے
اس سائلہ کی لقبیری 20/7 کو مختصراً LHV

مختصراً سگرم میں ہوئی
اس کی سائلہ اپنی ڈیوٹی خوش اسلوبی میں انجام
دینی رہی اور علاقے کے لوگوں کی خدمات اس طریق
سے ادا کیے اور علاقے لوگوں کی طرف سے کسی قسم کا کوئی
شکایت سائلہ کے خلاف نہیں آیا ہے

کہ DHO سگرم سائلہ کو مختلف طریقوں سے
ہیک میں رہا اور مرض 26/3 کو سائلہ کو شکار
نوٹس جاری کیا جو کہ سائلہ 2/4 کو کھینچ کر
اور حوصلہ سوار نقل لے گیا ہے

Attested
سگرم

کہ DHO نے 2/3 کو BHU وڑا کیا اور
2/3 کو سائلہ کی ٹرانسفر آرڈر جاری کیا، نقل لے گیا
کہ ہے اور ٹرانسفر آرڈر DHO نے سائلہ کو ہیک

کہنے کے لیے اپنے آفس میں ٹرانسفر کیا۔
کہ سائل H.V کی پوسٹ پر تعینات ہے جبکہ DHO
میں H.V کی پوسٹ نہیں ہے اور اسی طرح DHO آفس
کام مکمل کر کے ایڈمنسٹریٹیشن کا ہے جسے سائل کا کوئی
تعلق نہ ہے۔

کہ 18/4/18 کو سائل نے show cause نوٹس کا جواب
دفعہ DHO میں جمع کیا تھا۔ نقل لفت ہے

کہ اس کے دوران سائل بیمار رہا اور ڈیوٹی دینے کے قابل
نہیں رہا۔
کہ مذکورہ ٹرانسفر اور سائل کو ٹیکہ ملنے کی وجہ سے سائل ایک
عدد درخواستیں دی گئیں تاکہ اس کی سزا کی تازہ کاری کی
جس پر محفوظ ہو جائے۔ نقل لفت ہے۔

کہ مورخ 10/04/18 کو DHO نے اختیار کا ناجائز استعمال
کرتے ہوئے سائل کو نوٹس سے Terminate کیا تھا۔ نقل لفت ہے۔
کہ سائل کے خلاف کسی قسم کی نوٹس انکوائری نہیں ہوئی اور نہ ہی سائل
کو charge sheet یا statement of allegation دیا گیا
اور کسی طور پر سائل کو Terminate کیا گیا۔
کہ سائل کو کوئی حق دفاع نہیں دیا گیا اور نہ ہی اسے
کے لیے جو ہو سکتی ہیں نوٹس سے فارغ کیا گیا۔
کہ تمام کارروائی عدالت قانون اور عدالت کا مقصد عمل لاتی ہے
کہ مذکورہ تمام کارروائی E & P Rules کے خلاف ہے اور سائل سے
ذاتی انتقام کا نتیجہ ہے۔

کہنا کہ عام کے سائل کے اپیل منظور
فرمائیں سائل کو نوٹس پر عین تمام سببہ مراعات
بجائے فراہمی جاوے۔
المترجم 4/18/15

معاہدہ صیفی بی بی سالیہ (BHU UHU) ٹیپوس (سکتہ جسبہ فیروز
پانٹال روڈ تحصیل و ضلع بہاولپور۔

کورٹ فیس

وکالت نامہ

BEFORE THE KPIC SERVICE TRIBUNAL بعدالت

Mr. SAFIABIRI بنام Govt of KPK عنوان:

Appellant منجانب:

Appeal نوعیت مقدمہ:

Abandoned باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کارروائی متعلقہ آن مقام

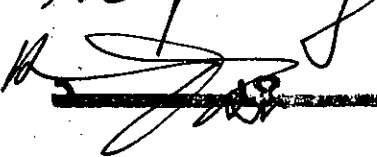
Humayan Khan & Fazulullah Ishaq

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ بر حلف دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داختم مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ دہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست برآمد استجارت ناشر بیختم مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 17-7-2018

بمقام:

Accepted by


حجۃ صفیہ بی بی

Safar

17/7/2018

BEFORE THE SERVICE TRIBUNAL AT CAMP COURT ABBOTTABAD

~~Appeal~~ NO 916 OF 2018
Mst. Safia bibi ----- Appellant

VERSUS

Govt of Khyber Pakhtunkhawa ----- Respondents

PARA WISE COMMENTS OF BEHALF OF RESPONDENTS

Preliminary Objections:-

1. That the appellant has filed to instant appeal with mala -fide intention hence liable to be dismissed.
2. That the petitioner have not come to this honorable court with clean hands
3. That the instant appeal is against the prevailing Law and Rules
4. That the appellant has filed the instant appeal just to personalizes the respondents
5. For protection of herself from disciplinary action the appellant produce a fake maternity leave certificate i.e OPD Slip, Verification letter from DHO Battagram to MS DHQ Hospital Battagram as (Annexure 1). In response to which the District Gynecologist called the appellant to re -examined but the appellant being on false grounds failed to appear before the Lady Doctor.
6. That the appellant has got no case of action or locus standi to file instant appeal.
7. That the appellant is stopped by his own conduct to file the instant appeal

Respectfully Sheweth :

1. Correct
2. In Correct , she joined the duty at BHU Bateela instead of BHU Talioss
3. In Correct, she was terminated for the first time upon her unsatisfactory performance on 07/11/2016 by the then District Health Officer Dr. Saif Ullah Khalid vide DHO Office Battagram order No 3139-43 dated 07/11/2016. (Copy attached as Annexure "A") within four months of her service. And then reinstated by Director General Health Services through her mercy Appeal vide Office Order No 6685-92/AE-VI dated 05/05/2017. (Copy attached as Annexure "B")
4. In Correct, the appellant was absent on the said day, as no attendance was marked in daily attendance register and thus no permission for short leave was obtained from the In-charge Health Facility. (Copy of attendance register attached as Annexure "C")
5. Correct
6. Correct, the transfer was made as the part of disciplinary action as the appellant was found absent and her duties were found unsatisfactory as per her job descriptions.
7. Not correct, being administrative head, the Respondent No 3 has the authority to visit and check the Health Care Facilities. On that day 22/03/2018, the then DHO visit Type D Hospital Banna and the said BHU Tailoos. During his visit the appellant was found absent and all her record related to MNCH services was found tempered with having fake entries being entered she was transferred to the post of LHV MCH BPS 12 at DHO Office budget book copy attached as (Annexure "D") . The allegations of the appellant regarding harassment by the then DHO, the grade 20 Officer is extremely shocking and painful the appellant may be investigated for any proof for such activities.
The appellant was terminated by pervious District Health Officer too for her unsatisfactory performance. Unfortunately the appellant is using harassment card for hiding her unsatisfactory performance.
8. Not correct, the appellant was relieved by center In-charge on 23/03/2018 which means that the transfer order was received by the concerned persons simultaneously. The appellant was informed by the Center Incharge to attend DHO Office for her personal hearing Statement of the Center Incharge is attached as (Annexure G)

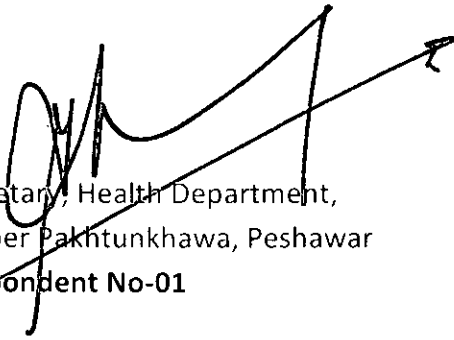
9. In Correct, the District Health Officer Respondent no 03 had not received any such documents from the appellant
10. No Comments
11. Correct, all the codal formalities were respected i.e transfer order (copy attached as Annexure "E" not obeyed by the appellant followed by show cause notice (copy attached as Annexure "F") which was not being dared to be answered.
12. No comments
13. No Comments


Grounds :-

- a. In Correct that the competent authority has passed the order after fulfilling all the codal formalities hence the appeal is liable to be dismissed with any other processing
- b. The appellant being non dutiful and non-welling employ was transfer to DHO Office on administrative ground to monitor her attendance with vigilant eye.
- c. in correct, all the proofs related to this case are against the appellant
- d. In correct, the appellant not responded to any of the official correspondence related to her transfer order, show cause notice etc.
- e. No Comments
- f. In correct
- g. In correct , being habitual absent employ, the appellant was transferred as OSD to DHO Office to be directly observed on the existing post of PHCT MCH BPS-12 copy attached as (Annexure "D")
- h. In correct all the codal formalities were respected
- i. No comments

Prayer:

Keeping in view of the above, it is prayed that the instant appeal may graciously be dismissed with cost.


Secretary, Health Department,
Khyber Pakhtunkhawa, Peshawar
Respondent No-01


Director General Health Services,
Khyber Pakhtunkhawa, Peshawar
Respondent No-02


District Health Officer, Battagram
Respondent No-03

Annex (1)

(3)

OFFICE OF THE DISTRICT HEALTH OFFICER

Battagram (Khyber Pakhtunkhwa)

Phone & Fax: # (0997) 310507

No. _____ / Dated _____ / 2018.

To,

The Medical Superintendent
DHQ Hospital Battagram

Subject: - **VERIFICATION & PENALTY AGAINST THE MEDICAL OFFICER/ WOMEN MEDICAL OFFICER.**

Memo,

Mst: Safia Bibi PHCT (MCH) BPS-12 was found absent on 21st March 2018 during surprise visit of undersigned at BHU Tailoos it was confirmed that she was absent from official duty since long back for charge sheet was issue followed by show cause, personal hearing she was at the verge of dismissal from service in the mean time she sanded this bogus Medical certificate for Maternity leave. You attested without any antenatal record without any delivery certificate then again through inquiry it was confirmed that her last baby at the age of six years since that she never became pregnant she never delivered child since the last baby.

It all show that this false certificate will affect your future further more you have a designated Gynecologist and so many WMOs how this certificate is attested by you then.

Therefore I want your reply/ verification of this Medical certificate today very very urgent. Thanks for your reply.

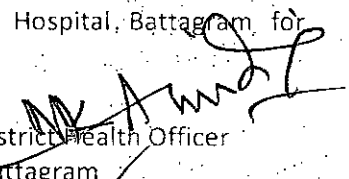
District Health Officer,
Battagram

No. 764-671

Dated: 06 / 04 / 2018

Copy forwarded to the;-

1. PS to secretary Health KPK Peshawar for information
2. PA Director General Health Services KPK Peshawar for information
3. Deputy Commissioner Battagram with reference to your office letter No 2828 Dated 05/04/2018 the latter issue to Medical Superintendent DHQ Hospital, Battagram for verification of Medical Certificate.


District Health Officer
Battagram

(41)

OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL BATTAGRAM

MS Office Phone No. 0997-311518 Email Address:

Casualty Dept Phone No. 0997-310018 Fax No.

dhqbtg518@yahoo.com
0997-311518

No. 109298 /Medical dated 10.04.2018

to

The District Health Officer,
Battagram

Subject: VERIFICATION & PENALTY AGAINST THE MEDICAL OFFICER/WOMEN MEDICAL OFFICER.

Reference: Your office letter No 764-67 DATED 06.04.2018.

It is submitted that this office sent the requisite report received from your office to concerned Gynecologist for prompt response. She requested that the concerned LHV may be directed to appear before the Gynecologist to verify & reassess her maternity leave please (Copy attached)

Enclosed (01)

Handwritten signature
Medical Superintendent
DHQ Hospital Battagram
No & date given above;

Copy forwarded to the:-
1 Dr. Ghazala Rasheed Gynecologist for information.

Handwritten signature
Medical Superintendent
DHQ Hospital Battagram

(4)

(3)

measure

(A)

Termination order

etc

leave

register

18.

(18)

(5)

(6)

DHIS-02(F)

no:

OUT DOOR PATIENT TICKET

District: _____ CRP No: _____

Facility Name: Verdha

Name: _____ Age: _____ Sex: _____

Father's / Husband's Name: _____

Monthly OPD Serial No. 4826

Provisional Diagnosis: _____

Date

Clinical Findings / Investigations / Treatment / Referred / Test Findings

5/4/18

This is certified that
LHV & h. Dept. Bhus BHU
Maha is a driver professional
Red being 45 days w.o.p

3.4.18 - 17.5.18

Medical Superintendent
D.H.Q Hospital,
Battagram

Medical Officer
D.H.Q Hospital
Battagram

DHIS - 02(F) OPD TICKET

Handwritten notes at the bottom of the page, including "5/4/18" and other illegible text.

کوتاه مدت و DHO
کوتاه مدت

کوتاه مدت

کوتاه مدت

- 1- کوتاه مدت ...
- 2- کوتاه مدت ...
- 3- کوتاه مدت ...
- 4- کوتاه مدت ...

03 04 2018

کوتاه مدت ...

ENIC # 13202-2348404-4

M/N/O: 0309-9167943

Signature

کوتاه مدت



(A) 7

OFFICE OF THE DISTRICT HEALTH OFFICER

Battagram (Khyber Pakhtunkhwa)

Phone & Fax: # (0997) 310507

No. 3137-43 / Dated 7/11 /2016.

OFFICE ORDER.

Whereas Mrs. Safia Bibi PHCT (MCH) attached to undersigned office was proceeded against under the E&D Rule 2011 for the charges mentioned below:

1. You have been absent from your duty without information w.e.f 03.08.2016 to till date.
2. You was transfer to DHO Office vide order No. 1950-52 dated 27.09.2016 which you did not obey and failed to resume your duty.
3. Your explanation was called vide letter No. 2006 dated 06.10.2016 in which you were directed to submit your reply within three days but you also failed to submit your reply.
4. You was transfer to DHO Office Mansehra vide DGHS KPK Peshawar order No. 7131-63/AE.VI dated 7.10.2016, but you did not attend the office of undersigned for your clearance/Departure.

According to para (6) of terms and condition of your appointment order, you have violated the relevant rules.

AND WHEREAS, A show because notice was served upon her vide this office Letter No. 2108 dated 10.10.2016, where in major penalty of removal from service was proposed to be imposed upon her.

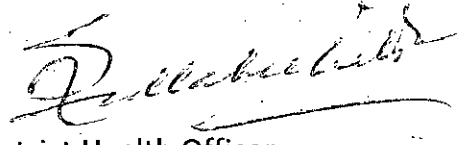
AND WHEREAS; upon non receipt of reply to the show cause notice and non appearance of personal hearing. This seems that she has no valid/cogent reason to prove herself innocent.

NOW WHEREAS, the undersigned being the competent authority in exercise of power conferred under the Khyber Pakhtunkhwa E&D rule 2011 am pleased to imposed major penalty of removal from service upon Mrs. Safia Bibi W/O Muhammad Anwar PHCT (MCH) from the date of appointment.

District Health Officer,
Battagram.

Copy forwarded to the:-

1. Director General Health Services KPK Peshawar for information please.
2. District Accounts Officer Battagram.
3. District Health Officer Mansehra.
4. Mrs: Safia Bibi W/O Muhammad Anwar
5. Accounts Section office of the undersigned for n/a.


District Health Officer,
Battagram.

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



8

Office Ph# 091 - 9210269

Exchange# 091 - 9210187, 091 - 9210196.

Fax #091 - 9210230

All communications should be addressed to the Director General Health Services Peshawar and not to any

Official by name.

OFFICE ORDER.

Whereas Mst.Safia Bibi PHC Technician (MCH)/LHV attached to District Health Officer, Battagram on account of absenteeism from duty was proceed against under E&D Rules 2011 and removed from Service with effect from 07/11/2016, by District Health Officer, Battagram vide his order No.3139-43, daed 7/11/2016.

AND WHEREAS she has submitted review appeal for re-instatement in service to the competent authority (DGHS KPK) on 09/03/2017.

AND WHEREAS she was personally heard by the competent authority on 04/05/2017.

Now therefore I Dr.Shabina Raza, Director General Health Services Khyber Pakhtunkhwa, Peshawar being competent authority in exercise of power under Rules-3 of KPK E&D Rules 2011 am pleased to reinstate Mst.Safia Bibi, PHC Technician (MCH)/LHV attached to DHO, Battagram.

Sd/xxxxxxxx
**DIRECTOR GENERAL HEALTH
SERVICES KPK, PESHAWAR.**

No. 6687-99/AE-VI

Dated Peshawar the 05/05/2017.

Copy forwarded to the: -

- ✓ 1) District Health Officer, Battagram.
- 2) District Accounts Officer, Battagram.
- 3) DHIS Cell DGHS KPK Peshawar.
- 4) Supdt. Promotion Cell DGHS Office Peshawar.
- 5) Mst.Safia Bibi PHC Technician (MCH)/LHV, DHO Battagram.
- 6) PA to Director General Health Services Khyber Pakhtunkhwa, Peshawar.
- 7) DA concerned.

For information and necessary action.

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

br/05/17

ATTENDANCE ROLL FOR THE

MONTH OF **JANUARY** 2018

(C) 9

No.	Name	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
1	Muhammad Younis (P.H-Teak)	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
2	Azi Muhammad (E.P.(Teak))	AL	AL	AL	AL	AL	AL	AL	AL	AL	AL	AL	AL	AL	AL	AL	AL	AL	AL	AL	AL
3	Dilroy Shah (W/O)	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
4	Ismael Khan (B/S)	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il
5	Khalid Ullah (Cousin)	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M
6	Aysha Gul (L.H.V)	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
7	Safid Bili (L.H.V)	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A

21	22	23	24	25	26	27	28	29	30	31	Total late		Casual Leave		Holidays		REMARKS
											Current Month	To end of Current month	Current Month	To end of Current month	Current Month	To end of Current month	
Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y							
AL	AL	AL	AL	AL	AL	AL	AL	AL	AL	AL							
B	B	B	B	B	B	B	B	B	B	B							
il	il	il	il	il	il	il	il	il	il	il							
M	M	M	M	M	M	M	M	M	M	M							
Transferred																	
Transfer to H.O Hospital Bara																	
Absent																	
Transfer from Bara Road Koral to Bara Road																	

ATTENDANCE ROLL FOR THE

MONTH OF ⁽¹⁰⁾ FEBRUARY 2018

No.	Name	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
		1	Muhammad Younis (PH) Taid	Y	Y	Y			Y	Y	Y	Y			Y	Y	Y	Y	Y	Y	Y
2	Sabia Bilec (L.H.V)	A	A	A			A	A	A	A			A	A	A	A	A	A	A	A	A
3	Alli Muhammad (E.P.I.T.A.S)	A	A	A			A	A	A	A			A	A	A	A	A	A	A	A	A
4	Didar Shah w/o	D	D	D			D	D	D	D			D	D	D	D	D	D	D	D	D
5	Smail Khan B/S	I	I	I			I	I	I	I			I	I	I	I	I	I	I	I	I
6	Khalid Ullah (Chaudhary)	K	K	K			K	K	K	K			K	K	K	K	K	K	K	K	K

21	22	23	24	25	26	27	28	29	30	31	Total late		Casual Leave		Holidays		REMARKS
											Current Month	To end of Current month	Current Month	To end of Current month	Current Month	To end of Current month	
Y	Y	Y			Y	Y	Y										
A	A	A			A	A	A										
A	A	A			A	A	A										
D	D	D			D	D	D										
I	I	I			I	I	I										
K	K	K			K	K	K										

ATTENDANCE ROLL FOR THE

MONTH OF MARCH 2018

No.	Name																					Total late		Casual Leaves		Holidays		REMARKS
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	Current Month	To end of Current month	Current Month	To end of Current month	Current Month	To end of Current month	
1	Muhammad Yousaf (EN) Tmt	y	y	y	y	y	y	y	y	y	y	y	y	y	y	y	y	y	y	y								
2	Safia Bilal (LHV)	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
3	Ali Muhammad (E.P.C Tmt)	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al	Al
4	Didar Shah (w/o)	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D
5	Imail Khan (B/S)	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il	il
6	Khalid Ullah (Inspector)	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn	Kn

Checked by AC
Atal
29/3/18
AC Atal

19

ATTENDANCE ROLL FOR THE

MONTH OF APRIL 2018

No.	Name	Days																				REMARKS
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
1	Murphy, Jason																					
2	Sullivan, Brian																					
3	Leah, David																					
4	Smith, John																					
5	Johnson, Mary																					
6	Williams, Robert																					
7	Miller, Susan																					

Total late	Casual Leave	Holidays	REMARKS
Current Month: 2	Current Month: 0	Current Month: 0	
Total Current Month: 2	Total Current Month: 0	Total Current Month: 0	

Handwritten notes in the bottom right corner, including "APRIL 2018" and "REMARKS".

Annex
LHV post at
office

(18)

(D)

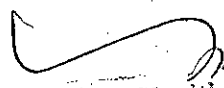
(B)



OFFICE OF THE EXECUTIVE DISTRICT HEALTH OFFICER
Battagram (Khyber Pakhtunkhwa)
Phone & Fax: # (0997) 310507

CERTIFICATE

It is certified that post of LHV (PHCT MCH) BPS-12 is budgeted in
Administrative DDO in BM-6011.


District Health Officer
BATTAGRAM
Battagram

TO

(18)

(14)

OFFICE OF THE DISTRICT HEALTH OFFICER

Battagram (Khyber Pakhtunkhwa)

Phone & Fax: # (0997) 310507


No. 652-55 / Dated 22/03/12/2018

OFFICE ORDER.

Mst: Safia Bibi PHCT (MCH) BPS-12 attached to BHU Tailoos is hereby posted/ adjusted at DHO office on administrative ground with immediate effect as OSD.

09:00 AM To 05:00PM

08:00 AM to 04:00 PM

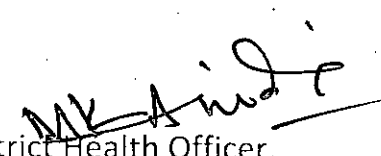

District Health Officer,
Battagram

No. 652-55

Dated: March 22, 2018

Copy to the:-

- 1) Incharge BHU Tailoos for information
- 2) Official concerned for information
- 3) Account section office of the undersigned for information
- 4) Office copy


District Health Officer,
Battagram



OFFICE OF THE DISTRICT HEALTH OFFICER

Battagram (Khyber Pakhtunkhwa)

Phone & Fax: # (0997) 310507

No. _____ / Dated _____ / 2018.

SHOW CAUSE.

I Dr Muhammad Khan DHO Battagram, as competent authority under Khyber Pakhtunkhwa Government Servants (E&D) Rule 2011, I do hereby serve you Mst. Safia Bibi PHCT (MCH) attached to BHU Tailoos as follows:-

1. "Absent from duty during surprise visit of undersigned at BHU Tailoos on 21/03/2018 at 11:00 AM without prior permission or sanction leave"
2. Not obeying transfer order vide this office No. 652-55 Dated 22/03/2018
3. (a) Alteration and wrong entry/ tempering in the attendance register
(b) No entry in the chief minister initiative program for pregnant women's register since 08/02/2018
(c) No entry in Birth register since 08/02/2018
(d) No entry in Family Planning Register. It show your least interest in your Government duty
(e) You used to set in the morning time at Al-Sayed Hospital at Banna Allai.
3. You are previously also terminated on your chronic absentism

On the above charge sheet the competent authority issue show cause notice you Mst: Safia Bibi PHCT (MCHI BPS-12 directed to explain your position the reply must reach this office within 07 days, under E&D rules 2011 section 05 failing which lead to your termination from service

District Health Officer,
Battagram

No. 726-29/

Dated 26 / 03 / 2018.

Copy forwarded to the:-

1. Director General Health Services KPK Peshawar for information.
2. Incharge BHU Tailoos for information
3. Official Concerned for compliance.
4. Accounts Section Office of the undersigned for information.

District Health Officer
Battagram

Mr. Ahmad
26/3/18

16

17. Mr. Dhanraj Kumar

Written Statement of the Officer in Charge.

صاحب عالی

میں سے شہر پولیس و لانسڈی ایگم ایچ آر بی بی بی

صاحب لگو کے رہتا ہوں کے میں نے Satish کے شوہار کو

997844 کو اس کے سوا کچھ 344-9717991 6:30

میرا کئی اور یہ اطلاع دی تھی کے مورف 4/5 کو دن

اور ڈی ڈی (D.D. (Hindi) میں آئی ہے

اور ڈی ڈی (D.D. (Hindi) میں آئی ہے

میں نے لکھنا کہ لکھنا یعنی شہر پولیس میں جو نام میں

میں نے لکھنا کہ لکھنا یعنی شہر پولیس میں جو نام میں

اور میرا ان سے راج کوئی رشتہ نہیں ہے

میں نے لکھنا کہ لکھنا یعنی شہر پولیس میں جو نام میں

دستخط

✍

شہر پولیس و لانسڈی ایگم

ای آر جی ایچ پولیس

5/5

مورف

ID Card No 13504-3645626-9



(17)

17

OFFICE OF THE DISTRICT HEALTH OFFICER

Battagram (Khyber Pakhtunkhwa)

Phone & Fax: # (0997) 310507

No. 802-06 /Dated 10/04 /2018.

OFFICE ORDER.

Whereas, Mst: Safia Bibi PHCT (MCH) BPS-12 attached to undersigned office was proceeded under the E&D Rules 2011 for the charges mentioned bellow :-

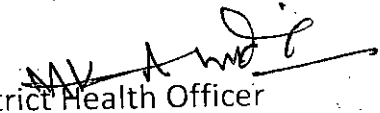
- a. Absent from official duty during surprise visit of undersigned on 21.03.2018 at 11:00 AM.
- b. Not obeying transfer order vide this office order No 652-55 Dated 22.03.2018.
- c. Alteration and wrong entries/ tempering in attendance register, no entry in birth and family planning register since 08.02.2018.
- d. Used to set at Al-Syed Hospital Banna during official duty hours.

According to Para (6) of the terms & conditions of her appointment order No 1283-87 Dated 18/07/2016, she had violated the relevant rules and were previously terminated on chronic absentism vide office order No 3139-43 Dated 07/11/2017.

AND WHEREAS, A show cause notice was served to her vide this office order No 725 Dated 26.03.2018 where in major penalty of removal from service was proposed to be imposed upon her.

AND WHEREAS, the competent authority was not satisfied from her reply and she was advised to attend the office of undersigned for personal hearing at 02:00 PM on 06/04/2018, but she showed no interest and failed to do so.


NOW WHEREAS, the undersigned being the competent authority is pleased in exercise of the powers conferred under the Khyber Pakhtunkhwa E&D rules to imposed the major penalty mentioned in show cause notice served "**Removal from service**" upon Mst: Safia Bibi W/O Muhammad Anwar PHCT (MCH) BPS-12 with immediate effect.


District Health Officer
Battagram ✓

No 802-06 /Dated 10 /04/2018

Copy forwarded to the:-

1. Director General Health Services KPK Peshawar for information.
2. District Accounts officer Battagram for information and necessary action
3. Mst: Safia Bibi W/O Muhammad Anwar
4. Accounts Section Office of the undersigned for necessary action.
5. Personal file for record


District Health Officer
Battagram ✓