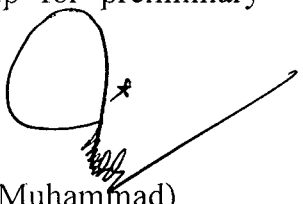



21.06.2022

Junior of learned counsel for the appellant present and requested for adjournment on the ground that learned senior counsel for the <sup>appellant</sup> is busy in the august Peshawar High Court, Peshawar today. Adjourned. To come up for preliminary hearing on 10.08.2022 before S.B.

  
(Mian Muhammad)  
Member (E)

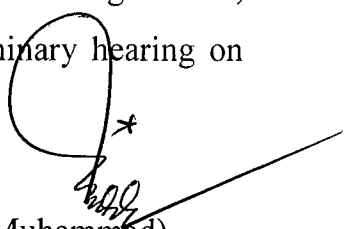
10.08.2022

Counsel for the appellant present and requested for adjournment on the ground that he has not prepared the brief. Adjourned. To come up for preliminary hearing on 23.09.2022 before S.B.

  
(Fareeha Paul)  
Member (E)

23.09.2022

Junior of learned counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for preliminary hearing on 20.10.2022 before S.B


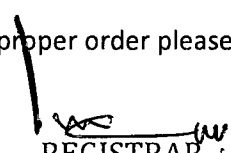
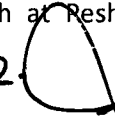

  
(Mian Muhammad)  
Member (E)

Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 211/2022

| S.No. | Date of order proceedings  | Order or other proceedings with signature of judge   |  |
|-------|--|--|--|
| 1     | 2  | 3  |  |
| 1-    | 21/02/2022<br><br> | <p>The joint appeal of Haji Akbar and Two others resubmitted today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"><br/>REGISTRAR</p> <p>2-</p> | <p>This case is entrusted to S. Bench at Reshawar for preliminary hearing to be put there on <u>05-04-2022</u>.</p> <p style="text-align: right;"><br/>CHAIRMAN</p> <p>05.04.2022</p> <p>Counsel for the appellant present.</p> <p>Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the brief. Adjourned. To come up for preliminary hearing on 21.06.2022 before S.B.</p> <p style="text-align: right;"><br/>(MIAN MUHAMMAD)<br/>MEMBER(E)</p> |

This is a joint appeal filed by Mr. Haji Akbar and two others today on 09/02/2022 against the seniority list dated 31.03.2021 against which they preferred/made departmental appeal/representation on 17.11.2021 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority report as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellants/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

1. Copy of Degree in respect of appellant no.3 mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
2. Annexures C & E of the appeal are illegible which may be replaced by legible/better one.

No. 316 /ST,

Di. 10/02/2022.

Mr. Noor Muhammad Khattak Adv. Pesh.

  
REGISTRAR-  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

*objection - 1 - has been removed.*

*objection 2 - has been removed attached legible  
copy as attached. ANNEX "C"*

*All objection has been removed*

*Resubmitted after completion.*

*S. Khan  
21/2/2022*

Member Copy

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

SERVICE APPEAL NO. 211 /2022

**HAJI AKBAR**

**V/S**

**HEALTH DEPTT:**

**INDEX**

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| 2        | Affidavit                                 | .....    | 4     |
| 3        | Stay application                          | .....    | 5     |
| 4        | Appointment orders                        | A        | 6-8   |
| 5        | Degrees & rules                           | B & C    | 9-23  |
| 6        | Seniority list                            | D        | 24-26 |
| 7        | Departmental appeal,<br>Forwarding letter | E        | 27-30 |
| 8        | Judgment                                  | F        | 31-35 |
| 9        | Wakalat Nama                              | .....    | 36    |

Dated: \_\_\_\_\_/.02./2022

**APPELLANT**

Through:

**NOOR MOHAMMAD KHATTAK  
ADVOCATE  
0345-9383141**

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

**APPEAL NO. \_\_\_\_\_/2022**

1. Mr. Haji Akbar, Clinical Technician (BPS 12),  
Office of the District Health Officer, Khyber.
2. Mr. Majeed Khan, Clinical Technician (BPS 12),  
O/O the District Health Officer, District Khyber.
3. Mr. Mashooq Ali, Clinical Technician (BPS 12),  
O/O the DHQ Hospital, Kohat Development Authority, Kohat

..... **APPELLANTS**

**VERSUS**

- 1- The Government of Khyber Pakhtunkhwa through Chief  
Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Health Department, Khyber Pakhtunkhwa,  
Peshawar.
- 3- The Director General Health Services Department, Khyber  
Pakhtunkhwa, Peshawar.

..... **RESPONDENTS**

**SERVICE APPEAL UNDER SECTION-4 OF THE SERVICE  
TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED  
SENIORITY LIST ISSUED ON 31.3.2021 WHEREBY THE  
RESPONDENTS ASSIGNED/RECKONED SENIORITY OF  
THE APPELLANTS FROM THE DATE OF ACQUIRING  
DEGREES AND NOT AS PER RULE 17 OF THE  
APPOINTMENT, PROMOTION AND TRANSFER) RULES,  
1989 AND AGAINST NOT TAKING ACTION ON THE  
DEPARTMENTAL APPEALS OF THE APPELLANT WITHIN  
THE STATUTORY PERIOD OF NINETY DAYS**

**PRAYER:** That on acceptance of this appeal the impugned seniority list issued on 31.3.2021 may very kindly be set aside and the respondents may kindly be directed to issue seniority list as per Rule 17 of the Appointment, promotion and transfer Rules, 1989 i.e. w.e.f. the date of initial appointment of the appellants. Any other remedy which this august Tribunal deems fit that may also be awarded in favour of the appellants.

**R/SHEWETH:**  
**ON FACTS:**



**Brief facts giving rise to the present service appeal are as under:**

1. That the appellants were initially appointed as Dispensers in the respondent Department and were later on re-designated as Clinical Technician with up gradation to BPS 12. That right from appointment till date the appellants are serving the respondents department quite efficiently and to the entire satisfaction of their superiors. Copies of appointment orders are at Annexure ..... **A.**
2. That during service the appellants acquired Master of Public Health Degrees making themselves eligible for promotion to the post of Technologist BPS-17 under the rules. Copies of the Degrees are at Annexure..... **B.**
3. That according to rules notified in the year 2016 and further amended vide Notification dated 4/11/2020 the post of Technologist BPS 17 has to be filled @ 40% by promotion on the basis of seniority-cum-fitness from amongst the Chief Technicians, Chief Technicians and technicians having qualification prescribed by initial recruitment with 03 years services as such in the relevant technology. Copies of the rules are attached as Annexure ..... **C.**
4. That in light of the *ibid* rules the appellants were quite hopeful for their promotion to the next higher scale of BPS-17 but astonishingly the respondents issued and assigned the seniority from the date of acquiring degrees and not as per rule 17 of the Appointment, Promotion and Transfer) Rules, 1989 . That in the final seniority list the seniority of the appellants has been affected by assigning the seniority from the date of acquiring degree instead of from the date of initial regular appointment. Copy of the seniority list is attached as Annexure ..... **D.**
5. That on the basis of *ibid* seniority list the respondents are ready/intended to convene departmental promotion committee whereby the juniors to the appellants have been ranked senior in the *ibid* seniority list.
6. That feeling aggrieved the appellants filed departmental appeals followed by writ petition No.5088-P/2021 before the Peshawar High Court which was disposed of with the direction to decide the Departmental appeals of the appellants within thirty days. That despite of clear directions the respondents are not willing to decide the Departmental appeals of the appellants. That after the lapse of ninety days the appellant filed the instant appeal on the following grounds amongst the others. Copies of the departmental

appeals, forwarding letter and judgment are annexed as Annexure..... E & F.

**GROUND:**

- A- That the impugned seniority list dated 31.3.2021 issued by the respondents whereby the respondents assigned/reckoned seniority from the date of acquiring degree and not from the date of initial appointment to the appellants is against the law, facts, norms of natural justice hence not tenable and liable to be set aside.
- B- That appellants have not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the respondents acted in arbitrary and malafide manner by issuing the impugned seniority list and not considering the appellants for promotion to the post of technologist (BPS-17).
- D- That the respondents violated Section 8 & 9 of the Civil Servant Act, 1973 read with Rule 17 of the APT rules, 1989 by issuing the impugned seniority list and not considering the appellants for promotion to the post of technologist (BPS-17).
- E- That the respondents discriminated the appellants by issuing the impugned seniority list and not considering the appellants for promotion to the post of technologist (BPS-17).
- F- That appellants seeks permission to advance other grounds and proofs at the time of hearing.

Appellants

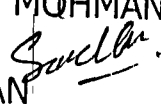
  
Haji Akbar & Others

Through:

  
NOOR MUHAMMAD KHATTAK

KAMRAN KHAN

  
UMER FAROOQ MOHMAND

&   
SAID KHAN  
ADVOCATES

4

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

**SERVICE APPEAL NO. \_\_\_\_\_/2022**

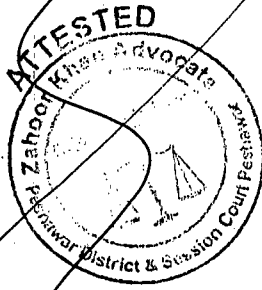
**HAJI AKBAR**

**V/S**

**HEALTH DEPTT:**

**AFFIDAVIT**

Stated on oath that the contents of the accompanying service appeal are correct to best of my knowledge and belief and nothing has been concealed from this Honorable Service Tribunal.



*Zahoor Khan*  
**DEPONENT**

**CERTIFICATE:**

Certify that no earlier service appeal has been filed by the appellant in the instant matter before this Honorable Service Tribunal.

*Zahoor Khan*  
**CERTIFICATION**



5

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

C.M. NO. \_\_\_\_\_/2022

IN

APPEAL NO. \_\_\_\_\_/2022

HAJI AKBAR & OTHERS

VS

GOVT: OF KPK & OTHERS

**APPLICATION FOR RESTRAINING THE RESPONDENTS**  
**NOT TO FILL UP THE POSTS OF TECHNOLOGIST (BPS-**  
**17) ON THE BASIS OF IMPUGNED SENIORITY LIST**  
**TILL THE FINAL DISPOSAL OF THE INSTANT APPEAL**

**R.SHEWETH:**

1. That, the appellants has filed the above titled service appeal before this Honorable Tribunal in which no date has been fixed so far.
2. That, appellant filed the above mentioned service appeal against the impugned seniority list dated \_\_\_\_\_ whereby the respondents assigned/ reckoned seniority from the date of acquiring degree and not from the date of initial appointment to the appellants.
3. That the respondents intending/ready to issue promotions on the basis of the impugned seniority list dated 31.3.2021.
4. That, all the three ingredients required for grant of stay are in favor of the appellant.
5. That, any other ground would be taken at the time of arguments with prior permission of this Honorable Tribunal.

It is therefore, most humbly prayed that on acceptance of this application the respondents may kindly be restrained not to make promotions to the posts of Technologist (BPS-17) till the disposal of the instant service appeal.

APPELLANTS

  
HAJI AKBAR & OTHERS

THROUGH:

  
NOOR MOHAMMAD KHATTAK

ADVOCATE,  
Supreme Court

ANNEXURE A

**GOVERNOR'S SECRETARIAT FATA, PESHAWAR**  
**DIRECTORATE HEALTH SERVICES, FATA, PESHAWAR**

&: 091 - 9212109, 9212207

Fax: 091-9210212

No. \_\_\_\_\_ /DHS/FATA/Admn

Dated: \_\_\_\_\_ /2002

6

Appointment Letter

Consequent upon the approval of Departmental Selection committee held on

17/10/2002 Mr. Haji Akber S/O Mohmand Khan

Resident of: \_\_\_\_\_ Khyber Agency

Is here by appointed as Dispenser BPS No.6 plus usual allowances as admissible under the rules.

His appointment will be subject to the following terms and conditions: -

1. That your appointment is on the contract basis for period of one year and your services is liable to be terminated at any time with out any notice or resign being assigned.
2. That you are declared medically fit for Govt. service.
3. The post is not transferable, and you must serve for one year on the said post.
4. That you will be governed by such rules and orders as may be issued by the Government of NWFP, from time to time for the category of the Government servant to which he/she belong.
5. That if you wish to resign, at any time, he/she will resign in written within 30 days of notice or He/She will forfeit one month pay in lieu thereof and will continue to serve the government till the acceptance of your resignation by the competent authority.
6. That you will be posted any where in FATA/FR.
7. That you will not be entitle to any TA / DA for Medical examination and joining the first appointment.
8. The offer is subject to the availability of vacant post.
9. If you accept the post on above terms and conditions you should report to (Agency Surgeon / EDOH) Khyber within 15 days. The offer will be cancelled if you fail to report for duty within above mention period.

-----Sd-----  
**Director Health Services**  
**FATA, NWFP, Peshawar**

No. 18003-06 /DHS / FATA / Admn

Dated: 28/11/2002

Copy forwarded to the :-

1. Deputy Director (Admn) DHS FATA NWFP, Peshawar.
2. Agency Surgeon Miranshah, Khyber, & Mohmand.
3. Executive District Officers Health Bannu.
4. Agency Account Officers Miranshah, Khyber, & Mohmand.
5. District Account Officer Bannu.
6. Official Concerned.

A.T.  
AdB  
Director Health Services,

~~ATTACHED~~

**GOVERNOR'S SECRETARIAT FATA,  
DIRECTORATE HEALTH SERVICES, FATA, PESHAWAR.**

☎: 091-9212109, 9212207.

Fax: 091-9210212.

No: DHS FATA Admn

Dated: 2003

\*\*\*\*\*

**Appointment Letter**

Consequent upon the approval of Departmental Selection committee held on

17-10-2002 Mr. Majeed Khan

S. O Major Ahmad

Resident of: Khyber Agency

7

Is here by appointed as **Dispenser BPS No.6** plus usual allowances as admissible under the rules.

His appointment will be subject to the following terms and conditions: -

1. That your appointment is on the contract basis for period of one year and your services is liable to be terminated at any time with out any notice or resign being assigned
2. That you are declared medically fit for Govt: service.
3. The post is not transferable, and you must serve for one year on the said post.
4. That you will be governed by such rules and orders as may be issued by the Government of NWFP, from time to time for the category of the Government servant to which he/she belong.
5. That if you wish to resign, at any time, he/she will resign in written within 30days of notice or He/She will forfeit one month pay in lieu thereof and will continue to serve the government till the acceptance of your resignation by the competent authority.
6. That you will be posted any where in FATA / FR.
7. That you will not be entitle to any TA / DA for Medical examination and joining the first appointment
8. The offer is subject to the availability of vacant post.
9. If you accept the post on above terms and conditions you should report to Agency Surgeon Khyber within 15 days. The offer will be cancelled if you fail to report for duty within above mention period.

-----Sd-----  
**Director Health Services  
FATA, NWFP, Peshawar**  
Dated: / / 2003

No. / DHS / FATA / Admn

**Copy forwarded to the: -**

1. Accountant General AGPR, Peshawar.
2. Deputy Director ( Admn) DHS FATA NWFP, Peshawar
3. Agency Surgeon Khyber.
4. Agency Account Officer Khyber.
5. Official concerned.



*[Handwritten signature]*

*[Handwritten signature]*

8

**OFFICE OF THE MEDICAL SUPERINTENDENT  
DHQ TEACHING HOSPITAL KDA KOHAT**

No. 67341 /PF

Dated Kohat the: 29 /11/2021

**SERVICE CERTIFICATE**

It is certified that **Mr. Mashooq Ali s/o Daftar Ali**; holding CNIC No.21603-7479404-5; is an employee of Government of Khyber Pakhtunkhwa Health Department since 27.11.1994 and working as Clinical Technician – Pharmacy (BS – 12) at DHQ Teaching Hospital KDA Kohat.

*[Signature]*  
MEDICAL SUPERINTENDENT  
DHQ TEACHING HOSPITAL  
KOHAT

*[Stamp]*  
Medical Superintendent  
DHQ Teaching Hospital  
Kohat

*[Signature]*  
T.

~~ADDED~~

Serial No. 010355

# Abdul Wali Khan University Mardan

Reg No. 18-AU-BIP-M-20

Roll No. 46295

Session: Fall 2018-20

The University in recognition of the fulfillment of prescribed requirements has awarded

Mr. HAJI AKBAR S/O Mr. MOHMAND KHAN

The Degree of

**MASTER OF PUBLIC HEALTH**

Together with all honors, rights and privileges belonging to the degree.

In witness whereof this degree is granted.

Controller of Examinations

Registrar



Vice Chancellor

Result Declaration Date. 01-03-2021

9

B

ANNEXURE



# ABDUL WALI KHAN UNIVERSITY

MARDAN, PAKISTAN

## TRANSCRIPT

BURAQ INSTITUTE OF HIGHER STUDIES, PESHAWAR  
MPH (Master of Public Health)

10

Name: Haji Akbar

Father's Name: Mohmand Khan

Roll No: 46295

Registration No: 18-AU-BIP-M-20

| 1st Semester (Fall, 2018)            |             |                |           |       |      |              |             |                 |
|--------------------------------------|-------------|----------------|-----------|-------|------|--------------|-------------|-----------------|
| Title of Course                      | Total Marks | Marks Obtained | CR Hrs    | Grade | NG   | GP           | GPA         | Remarks         |
| Epidemiology                         | 100         | 68             | 3         | B-    | 2.9  | 8.7          |             |                 |
| Biostatistics                        | 100         | 66             | 3         | B-    | 2.8  | 8.4          |             |                 |
| Public Health                        | 100         | 68             | 3         | B-    | 2.9  | 8.7          |             |                 |
| Diseases of Public Health Importance | 100         | 82             | 3         | A-    | 3.6  | 10.8         |             |                 |
| Occupational & Environmental Health  | 100         | 68             | 3         | B-    | 2.9  | 8.7          |             |                 |
| Basic Communication Skills           | 100         | 77             | 3         | B+    | 3.35 | 10.05        |             |                 |
| <b>TOTAL</b>                         | <b>600</b>  | <b>429</b>     | <b>18</b> |       |      | <b>55.35</b> | <b>3.08</b> | <b>Promoted</b> |
| 2nd Semester (Spring, 2019)          |             |                |           |       |      |              |             |                 |
| Title of Course                      | Total Marks | Marks Obtained | CR Hrs    | Grade | NG   | GP           | GPA         | Remarks         |
| Health Policy Planning               | 100         | 79             | 3         | B+    | 3.45 | 10.35        |             |                 |
| Health Management                    | 100         | 67             | 3         | B-    | 2.85 | 8.55         |             |                 |
| Reproductive & Child Health care     | 100         | 69             | 3         | B-    | 2.95 | 8.85         |             |                 |
| Primary Health Care                  | 100         | 67             | 3         | B-    | 2.85 | 8.55         |             |                 |
| Health Systems                       | 100         | 67             | 3         | B-    | 2.85 | 8.55         |             |                 |
| Hospital Management                  | 100         | 67             | 3         | B-    | 2.85 | 8.55         |             |                 |
| <b>TOTAL</b>                         | <b>600</b>  | <b>416</b>     | <b>18</b> |       |      | <b>53.4</b>  | <b>2.97</b> | <b>Promoted</b> |
| 3rd Semester (Fall, 2019)            |             |                |           |       |      |              |             |                 |
| Title of Course                      | Total Marks | Marks Obtained | CR Hrs    | Grade | NG   | GP           | GPA         | Remarks         |
| International Health                 | 100         | 84             | 3         | A-    | 3.7  | 11.1         |             |                 |
| Health Edu. & Promotion              | 100         | 81             | 3         | A-    | 3.55 | 10.65        |             |                 |
| Health Planning                      | 100         | 83             | 3         | A-    | 3.65 | 10.95        |             |                 |
| Nutrition                            | 100         | 75             | 3         | B+    | 3.25 | 9.75         |             |                 |
| Health Research                      | 100         | 81             | 3         | A-    | 3.55 | 10.65        |             |                 |
| Health Care Financing                | 100         | 81             | 3         | A-    | 3.55 | 10.65        |             |                 |
| <b>TOTAL</b>                         | <b>600</b>  | <b>485</b>     | <b>18</b> |       |      | <b>63.75</b> | <b>3.54</b> | <b>Promoted</b> |
| 4th Semester (Spring, 2020)          |             |                |           |       |      |              |             |                 |
| Title of Course                      | Total Marks | Marks Obtained | CR Hrs    | Grade | NG   | GP           | GPA         | Remarks         |
| Disaster Management                  | 100         | 70             | 3         | B     | 3    | 9            |             |                 |
| Health Needs Assessment              | 100         | 70             | 3         | B     | 3    | 9            |             |                 |
| Thesis/ Dissertation                 | 200         | 145            | 6         | B     | 3.1  | 18.6         |             |                 |
| Field Practicum                      | 100         | 80             | 3         | A-    | 3.5  | 10.5         |             |                 |
| <b>TOTAL</b>                         | <b>500</b>  | <b>365</b>     | <b>15</b> |       |      | <b>47.1</b>  | <b>3.14</b> | <b>Passed</b>   |

69

219.6

CGPA **3.18**

Errors & Omissions are subject to subsequent rectification

Result Declaration Date: - March 01, 2021

Prepared by: Computer Cell

Checked by: Kaleem Ullah

*[Handwritten signatures]*

*[Handwritten signature]*

Serial No. 010353

# Abdul Wali Khan University Mardan



Reg No. —18-AU-BIP-M-19

Roll No. 46294

Session Fall-2018-20

The University in recognition of the fulfillment of prescribed requirements has awarded

Mr. MAJEED KHAN S/O-Mr. MAJOR AHMAD

The Degree of

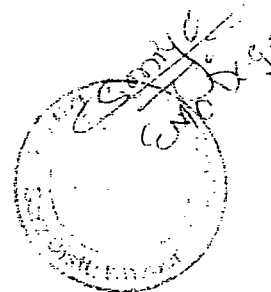
**MASTER OF PUBLIC HEALTH**

Together with all honors, rights and privileges belonging to the degree.

In witness whereof this degree is granted.

Controller of Examinations

Registrar



Vice Chancellor

Result Declaration Date. 01-03-2021



# ABDUL WALI KHAN UNIVERSITY

MARDAN, PAKISTAN

## TRANSCRIPT

BURAQ INSTITUTE OF HIGHER STUDIES, PESHAWAR  
MPH (Master of Public Health)

12

Name: Majeed Khan

Father's Name: Majar Ahmad

Roll No: 46294

Registration No: 18-AU-BIP-M-19

| 1st Semester (Fall, 2018)            |             |                |           |       |      |               |             |                 |  |
|--------------------------------------|-------------|----------------|-----------|-------|------|---------------|-------------|-----------------|--|
| Title of Course                      | Total Marks | Marks Obtained | CR Hrs    | Grade | NG   | GP            | GPA         | Remarks         |  |
| Epidemiology                         | 100         | 69             | 3         | B-    | 2.95 | 8.85          |             |                 |  |
| Biostatistics                        | 100         | 68             | 3         | B-    | 2.9  | 8.7           |             |                 |  |
| Public Health                        | 100         | 71             | 3         | B     | 3.05 | 9.15          |             |                 |  |
| Diseases of Public Health Importance | 100         | 74             | 3         | B     | 3.2  | 9.6           |             |                 |  |
| Occupational & Environmental Health  | 100         | 68             | 3         | B-    | 2.9  | 8.7           |             |                 |  |
| Basic Communication Skills           | 100         | 73             | 3         | B     | 3.15 | 9.45          |             |                 |  |
| <b>TOTAL</b>                         | <b>600</b>  | <b>423</b>     | <b>18</b> |       |      | <b>54.45</b>  | <b>3.03</b> | <b>Promoted</b> |  |
| 2nd Semester (Spring, 2019)          |             |                |           |       |      |               |             |                 |  |
| Title of Course                      | Total Marks | Marks Obtained | CR Hrs    | Grade | NG   | GP            | GPA         | Remarks         |  |
| Health Policy Planning               | 100         | 60             | 3         | C+    | 2.5  | 7.5           |             |                 |  |
| Health Management                    | 100         | 61             | 3         | C+    | 2.55 | 7.65          |             |                 |  |
| Reproductive & Child Health care     | 100         | 62             | 3         | C+    | 2.6  | 7.8           |             |                 |  |
| Primary Health Care                  | 100         | 61             | 3         | C+    | 2.55 | 7.65          |             |                 |  |
| Health Systems                       | 100         | 62             | 3         | C+    | 2.6  | 7.8           |             |                 |  |
| Hospital Management                  | 100         | 73             | 3         | B     | 3.15 | 9.45          |             |                 |  |
| <b>TOTAL</b>                         | <b>600</b>  | <b>379</b>     | <b>18</b> |       |      | <b>47.85</b>  | <b>2.66</b> | <b>Promoted</b> |  |
| 3rd Semester (Fall, 2019)            |             |                |           |       |      |               |             |                 |  |
| Title of Course                      | Total Marks | Marks Obtained | CR Hrs    | Grade | NG   | GP            | GPA         | Remarks         |  |
| International Health                 | 100         | 83             | 3         | A-    | 3.65 | 10.95         |             |                 |  |
| Health Edu. & Promotion              | 100         | 80             | 3         | A-    | 3.5  | 10.5          |             |                 |  |
| Health Planning                      | 100         | 80             | 3         | A-    | 3.5  | 10.5          |             |                 |  |
| Nutrition                            | 100         | 76             | 3         | B+    | 3.3  | 9.9           |             |                 |  |
| Health Research                      | 100         | 78             | 3         | B+    | 3.4  | 10.2          |             |                 |  |
| Health Care Financing                | 100         | 82             | 3         | A-    | 3.6  | 10.8          |             |                 |  |
| <b>TOTAL</b>                         | <b>600</b>  | <b>479</b>     | <b>18</b> |       |      | <b>62.85</b>  | <b>3.49</b> | <b>Promoted</b> |  |
| 4th Semester (Spring, 2020)          |             |                |           |       |      |               |             |                 |  |
| Title of Course                      | Total Marks | Marks Obtained | CR Hrs    | Grade | NG   | GP            | GPA         | Remarks         |  |
| Disaster Management                  | 100         | 69             | 3         | B-    | 2.95 | 8.85          |             |                 |  |
| Health Needs Assessment              | 100         | 63             | 3         | C+    | 2.65 | 7.95          |             |                 |  |
| Thesis/ Dissertation                 | 200         | 140            | 6         | B     | 3    | 18            |             |                 |  |
| Field Practicum                      | 100         | 80             | 3         | A-    | 3.5  | 10.5          |             |                 |  |
| <b>TOTAL</b>                         | <b>500</b>  | <b>352</b>     | <b>15</b> |       |      | <b>45.3</b>   | <b>3.02</b> | <b>Passed</b>   |  |
|                                      |             |                | <b>69</b> |       |      | <b>210.45</b> |             |                 |  |

CGPA **3.05**

Errors & Omissions are subject to subsequent rectification

Result Declaration Date: - March 01, 2021

Prepared by: Computer Cell

*[Handwritten signature]*

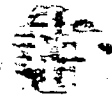


Serifin No. 010354

# Abdul Wali Khan University Mardan

(13)

Reg. No. M.A. 810-5826  
Roll No. 46301



Corvum Hall 2018-20

The University in recognition of the fulfillment of prescribed requirements has awarded

Mr. SHAHJAHAN S/O Mr. DAFARALL

The Degree of

**MASTER OF PUBLIC HEALTH**

conferred with all honors, rights and privileges belonging to the degree.

On witness whereof this degree is granted.

Controller of Examinations



Vice Chancellor

Recd. Declaration Date: 01.03.2021



# RAJSHAHI UNIVERSITY

MAJORAN, DAKSHINA

P H A M S E R I P Y

14

PHILADELPHIA COLLEGE, THE UNIVERSITY OF THE STATE OF NEW YORK  
 STATE COLLEGE OF PUBLIC INSTRUCTION

Source: Schedule VII  
 Form No. 10-1011

Teacher's Name: **Baron III**  
 Registration No. or Affiliation: **04 20**

|              |     | 1st Semester (Fall, 1918) |                |           |          |            |            |                     |  |
|--------------|-----|---------------------------|----------------|-----------|----------|------------|------------|---------------------|--|
|              |     | Total Marks               | Marks Obtained | Pct. Hrs. | Grade    | RD         | UP         | CPA Remarks         |  |
| 100          | 100 | 100                       | 70             | 70        | B        | 1.0        | 99         |                     |  |
| 100          | 100 | 100                       | 62             | 62        | C        | 1.0        | 7.0        |                     |  |
| 100          | 100 | 100                       | 60             | 60        | D        | 1.0        | 6.0        |                     |  |
| 100          | 100 | 100                       | 60             | 60        | C        | 1.0        | 7.0        |                     |  |
| 100          | 100 | 100                       | 58             | 58        | D        | 1.0        | 6.0        |                     |  |
| 100          | 100 | 100                       | 58             | 58        | D        | 1.0        | 6.0        |                     |  |
| <b>TOTAL</b> |     | <b>600</b>                | <b>402</b>     | <b>67</b> | <b>D</b> | <b>1.0</b> | <b>6.0</b> | <b>2.0/Prepared</b> |  |

|              |     | 2nd Semester (Spring, 1919) |                |           |          |            |             |                     |  |
|--------------|-----|-----------------------------|----------------|-----------|----------|------------|-------------|---------------------|--|
|              |     | Total Marks                 | Marks Obtained | Pct. Hrs. | Grade    | RD         | UP          | CPA Remarks         |  |
| 100          | 100 | 100                         | 68             | 68        | B        | 1.0        | 0.70        |                     |  |
| 100          | 100 | 100                         | 58             | 58        | C        | 1.0        | 1.2         |                     |  |
| 100          | 100 | 100                         | 60             | 60        | A        | 1.0        | 2.0         |                     |  |
| 100          | 100 | 100                         | 62             | 62        | A        | 1.0        | 0.80        |                     |  |
| 100          | 100 | 100                         | 60             | 60        | A        | 1.0        | 1.0         |                     |  |
| 100          | 100 | 100                         | 62             | 62        | A        | 1.0        | 1.0         |                     |  |
| <b>TOTAL</b> |     | <b>600</b>                  | <b>372</b>     | <b>62</b> | <b>B</b> | <b>1.0</b> | <b>1.00</b> | <b>2.0/Prepared</b> |  |

|              |     | 3rd Semester (Fall, 2019) |                |           |          |            |             |                     |  |
|--------------|-----|---------------------------|----------------|-----------|----------|------------|-------------|---------------------|--|
|              |     | Total Marks               | Marks Obtained | Pct. Hrs. | Grade    | RD         | UP          | CPA Remarks         |  |
| 100          | 100 | 100                       | 1              | 1         | B        | 1.00       | 0.10        |                     |  |
| 100          | 100 | 100                       | 76             | 76        | D        | 1.00       | 0.20        |                     |  |
| 100          | 100 | 100                       | 50             | 50        | B        | 1.00       | 0.60        |                     |  |
| 100          | 100 | 100                       | 70             | 70        | A        | 1.00       | 0.40        |                     |  |
| 100          | 100 | 100                       | 70             | 70        | A        | 1.00       | 1.00        |                     |  |
| 100          | 100 | 100                       | 60             | 60        | D        | 1.00       | 1.00        |                     |  |
| <b>TOTAL</b> |     | <b>600</b>                | <b>252</b>     | <b>42</b> | <b>B</b> | <b>1.0</b> | <b>0.90</b> | <b>2.0/Prepared</b> |  |

|              |     | 4th Semester (Spring, 1920) |                |           |          |             |             |                     |  |
|--------------|-----|-----------------------------|----------------|-----------|----------|-------------|-------------|---------------------|--|
|              |     | Total Marks                 | Marks Obtained | Pct. Hrs. | Grade    | RD          | UP          | CPA Remarks         |  |
| 100          | 100 | 100                         | 61             | 61        | C        | 1.00        | 1.00        |                     |  |
| 100          | 100 | 100                         | 62             | 62        | C        | 1.00        | 1.00        |                     |  |
| 100          | 100 | 100                         | 1.0            | 1.0       | D        | 1.00        | 0.00        |                     |  |
| 100          | 100 | 100                         | 61             | 61        | A        | 1.00        | 0.00        |                     |  |
| <b>TOTAL</b> |     | <b>500</b>                  | <b>275</b>     | <b>55</b> | <b>D</b> | <b>1.00</b> | <b>1.00</b> | <b>2.0/Prepared</b> |  |

I certify that the above are correct as entered by the student in the record books of the State College of Public Instruction.  
 The record book is compared with the books of the student (Handwritten initials)

*Handwritten Signature*

Secretary of Examination

EXTRAORDINARY  
GOVERNMENT



REGISTERED NO. P.III  
GAZETTE

C-9

# KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, TUESDAY, 10TH MAY, 2016

GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

## NOTIFICATION

Peshawar dated the 10<sup>th</sup> May, 2016.

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

### APPENDIX

| S. No. | Nomenclature of the post.   | Qualification for appointment by initial recruitment. | Age limits. | Method of recruitment.   |
|--------|---|---|-------------|--|
| 1      | 2   | 3   | 4           | 5  |
| 1      | <u>Principal Technologist</u> (BS-20)<br>(i) Principal Clinical Technologist Dental;<br>(ii) Principal Clinical Technologist Pharmacy;<br>(iii) Principal Clinical Technologist Radiology;<br>(iv) Principal Clinical Technologist Pathology; |   |             | By promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technologists and Chief PIC Technologists with five years service in BS-19 or seventeen years service in BS-17 and above as such in the relevant technology. |

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ANNEX C 15

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|   |  |  |   |
|---|--|--|---|
| <p>(v) Principal Clinical Technologist Anesthesia;<br/>                 (vi) Principal Clinical Technologist Cardiology;<br/>                 (vii) Principal Clinical Technologist Surgical;<br/>                 (viii) Principal Clinical Technologist Dialysis;<br/>                 (ix) Principal Clinical Technologist Physiotherapy;<br/>                 (x) Principal Clinical Technologist Pulmonology;<br/>                 (xi) Principal Clinical Technologist Gastroenterology, and<br/>                 (xii) Principal Clinical Technologist Ophthalmology / otorhinolaryngology, and</p> <p><u>Principle PHC Technologist</u></p> <p>(i) Principal PHC Technologist (Multi Purpose); and<br/>                 (ii) Principal PHC Technologist (MCH).</p>  |  |  |   |
| <p>2 Chief Technologist <i>CS-18</i></p> <p>(i) Chief Clinical Technologist Dental;<br/>                 (ii) Chief Clinical Technologist Pharmacy;<br/>                 (iii) Chief Clinical Technologist Radiology;<br/>                 (iv) Chief Clinical Technologist Pathology;<br/>                 (v) Chief Clinical Technologist Anesthesia;<br/>                 (vi) Chief Clinical Technologist Cardiology;<br/>                 (vii) Chief Clinical Technologist Surgical;<br/>                 (viii) Chief Clinical Technologist Dialysis;<br/>                 (ix) Chief Clinical Technologist Physiotherapy;<br/>                 (x) Chief Clinical Technologist Pulmonology;<br/>                 (xi) Chief Clinical Technologist Gastroenterology; and<br/>                 (xii) Chief Clinical Technologist Ophthalmology / Otorhinolaryngology; and</p> |  |  | <p>By promotion; on the basis of seniority-cum-fitness, from amongst Senior Technologists and Senior PHC Technologists with seven years service in BPS-18 or twelve years service in BPS-17 and above as such in the relevant technology.</p> |

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*[Signature]*

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|   |   |                    |  |
|---|---|--------------------|--|
| <p>Chief PHC Technologist</p>   |   |                    |  |
| <p>(i) Chief PHC Technologist (Multi-Purpose); and<br/>(ii) Chief PHC Technologist (MCH).</p>   |   |                    |  |
| <p>3 Senior Technologist (BS-18)</p> <p>(i) Senior Clinical Technologist Dental;<br/>(ii) Senior Clinical Technologist Pharmacy;<br/>(iii) Senior Clinical Technologist Radiology;<br/>(iv) Senior Clinical Technologist Pathology;<br/>(v) Senior Clinical Technologist Anesthesia;<br/>(vi) SCT Senior Clinical Technologist Cardiology;<br/>(vii) Senior Clinical Technologist Surgical;<br/>(viii) Senior Clinical Technologist Dialysis;<br/>(ix) Senior Clinical Technologist Physiotherapy;<br/>(x) Senior Clinical Technologist Pulmonology;<br/>(xi) Senior Clinical Technologist Gastroenterology; and<br/>(xii) Senior Clinical Technologist Ophthalmology/Otorhinolaryngology; and</p> <p>Senior PHC Technologist</p> <p>(i) Senior PHC Technologist (Multi-Purpose); and<br/>(ii) Senior PHC Technologist (MCH).</p> | <p>At least Second-Class Master's Degree or B.SC Honours/ BS (04-years) in the relevant technology or equivalent qualification from a recognized University/ Institution.</p> | <p>20-35 years</p> | <p>(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Technologists and PHC Technologists with five years service as such in the relevant technology; and<br/>(b) fifty percent by initial recruitment.</p> |
| <p>Technologist (BS-15)</p> <p>(i) Clinical Technologist Dental;<br/>(ii) Clinical Technologist Pharmacy;<br/>(iii) Clinical Technologist Radiology;<br/>(iv) Clinical Technologist Pathology;<br/>(v) Clinical Technologist Anesthesia;</p>  | <p>At least Second Class Bachelor's Degree in the relevant Technology from a recognized University/ Institution.</p>  | <p>18-32 years</p> | <p>(a) Forty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technicians and Chief PHC Technicians with three years service as such in the relevant technology;</p>  |

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|  |  |  |  |
|--|--|--|--|
| <p>(vi) Clinical Technologist Cardiology;<br/>                 (vii) Clinical Technologist Surgical;<br/>                 (viii) Clinical Technologist Dialysis;<br/>                 (ix) Clinical Technologist Physiotherapy;<br/>                 (x) Clinical Technologist Pulmonology;<br/>                 (xi) Clinical Technologist Gastroenterology; and<br/>                 (xii) Clinical Technologist Ophthalmology /<br/>                 Otorhinolaryngology); and</p> <p><b>PHC Technologist</b></p> <p>(i) PHC Technologist (Multi-Purpose), and<br/>                 (ii) PHC Technologist (MCH).</p>  |  |  | <p>(b) twenty percent by promotion, on the basis of <del>seniority-cum-fitness, from amongst the Chief Technicians, Senior Technicians and Technicians</del> having qualification prescribed for initial recruitment with three years service as such in the relevant technology.</p> <p><b>Note:</b> For the purpose of promotion, there shall be maintained a joint seniority list of Chief Technicians, Senior Technicians and Technicians with reference to the dates of their acquiring qualification prescribed for initial recruitment as in column No. 3:</p> <p>Provided that if two or more officials acquired the qualification prescribed for initial recruitment in the same session, then the official who obtains the highest marks or grade in the examination shall be deemed to be senior to the other officials; and</p> <p>(c) forty percent by initial recruitment.</p> |
| <p>5 Chief Technician <i>(CBS-16)</i></p> <p>(i) Chief Clinical Technician Dental;<br/>                 (ii) Chief Clinical Technician Pharmacy;<br/>                 (iii) Chief Clinical Technician Radiology;<br/>                 (iv) Chief Clinical Technician Pathology;<br/>                 (v) Chief Clinical Technician Anesthesia;<br/>                 (vi) Chief Clinical Technician Cardiology;<br/>                 (vii) Chief Clinical Technician Surgical;<br/>                 (viii) Chief Clinical Technician Dialysis;<br/>                 (ix) Chief Clinical Technician Physiotherapy;<br/>                 (x) Chief Clinical Technician Pulmonology;<br/>                 (xi) Chief Clinical Technician Gastroenterology; and</p> |  |  | <p>By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Technicians and Senior PHC Technicians with at least two years service as such in the relevant technology.</p>   |

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|   |  |   |                    |  |
|---|--|---|--------------------|--|
|   | <p>(x ii) Chief Clinical Technician Ophthalmology, (Otorhinolaryngology); and<br/>Chief PHC Technician</p>   |   |                    |  |
| 6 | <p>(i) Chief PHC Technician (Multi-Purpose); and<br/>(ii) Chief PHC Technician (MCH).<br/>Senior Technician (BS-14)<br/>(i) Senior Clinical Technician Dental;<br/>(ii) Senior Clinical Technician Pharmacy;<br/>(iii) Senior Clinical Technician Radiology;<br/>(iv) Senior Clinical Technician Pathology;<br/>(v) Senior Clinical Technician Anesthesia;<br/>(vi) Senior Clinical Technician Cardiology;<br/>(vii) Senior Clinical Technician Surgical;<br/>(viii) Senior Clinical Technician Dialysis;<br/>(ix) Senior Clinical Technician Physiotherapy;<br/>(x) Senior Clinical Technician Pulmonology;<br/>(xi) Senior Clinical Technician Gastroenterology; and<br/>(xii) Senior Clinical Technician Ophthalmology/Otorhinolaryngology); and<br/>Senior PHC Technician<br/>(i) Senior PHC Technician (Multi-Purpose); and<br/>(ii) Senior PHC Technician (MCH).</p> |   |                    | <p>By promotion, on the basis of seniority-cum-fitness, from amongst the Technicians and PHC Technicians with at least two years service as such in the relevant technology.</p> |
| 7 | <p>Technician (BS-12)<br/>(i) Clinical Technician Dental;<br/>(ii) Clinical Technician Pharmacy;<br/>(iii) Clinical Technician Radiology;<br/>(iv) Clinical Technician Pathology;<br/>(v) Clinical Technician Anesthesia;<br/>(vi) Clinical Technician Cardiology;<br/>(vii) Clinical Technician Surgical;<br/>(viii) Clinical Technician Dialysis;<br/>(ix) Clinical Technician Physiotherapy;<br/>(x) Clinical Technician Pulmonology;<br/>(xi) Clinical Technician Gastroenterology; and</p>  | <p>(i) Technician/PHC Technician : At least Second Division Secondary School Certificate with Science from a recognized Board with Diploma in the relevant Paramedical Technology from Khyber Pakhtunkhwa Medical Faculty or Diploma in the relevant Paramedical technology from any recognized institution; provided that the same is registered with the Medical Faculty Khyber Pakhtunkhwa Peshawar; and</p> | <p>18-30 years</p> | <p>By initial recruitment</p>  |

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952 KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 10<sup>th</sup> MAY, 2016

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

SECRETARY TO  
GOVERNMENT OF THE KHYBER PAKHTUNKHWA,  
HEALTH DEPARTMENT.

4



## KHYBER PAKHTUNKHWA

PUBLISHED BY AUTHORITY

PESHAWAR, FRIDAY, 6<sup>TH</sup> NOVEMBER, 2020

## GOVERNMENT OF THE KHYBER PAKHTUNKHWA

## HEALTH DEPARTMENT

## NOTIFICATION

Peshawar dated 04<sup>th</sup> November 2020

No. SOH-III/8-60/2020/paramedics/SSRC/1440-82L in pursuance of the provision contained in Sub-Rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil servants (Appointment, promotion and transfer) Rules, 1989 the health department, in consultation with the establishment department and the finance department, hereby directs that in this department's notification No. SOH-III/HD/3-5/2014 dated 10.05.2016, the following amendments shall be made namely:

AMENDMENTS**In the appendix;**

- (a) Against serial No. 1 in column NO. 2 and 5 for the existing entries, the following shall be substituted, namely:

| 2                      | 5   |
|------------------------|---|
| Principal technologist | <p>“by promotion on the basis of seniority-cum-fitness, from amongst the Chief Technologists and Chief PHC technologists with five years service in BPS-19 or sentient years service in BPS-17 and above as such.</p> <p>Note; A joint seniority of Chief Technologists and Chief PHC Technologists shall be maintained for the purpose of promotion.</p> |

- (b) Against serial No. 2 in column NO. 2 and 5 for the existing entries, the following shall be substituted, namely:

| 2   | 5  |
|---|--|
| Chief Technologists/Chief PHC Technologists | <p>“by promotion on the basis of seniority-cum-fitness, from amongst the Chief Technologists and Chief PHC technologists with seven years service in BPS-17 as such.</p> <p>Note; A joint seniority of senior clinical Technologists and senior PHC technologists shall be maintained for the purpose of promotion.”</p> |

- (c) Against serial No. 3 in column NO. 2,3,4 & 5 for the existing entries, the following shall be substituted, namely:

EXTRAORDINARY  
GOVERNMENT



REGISTERED NO. PIII  
GAZETTE

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## KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, FRIDAY, 6TH NOVEMBER, 2020.

GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

### NOTIFICATION

Peshawar dated the 04<sup>th</sup> November, 2020

**No. SOH-III/8-60/2020/Paramedics/SSRC/1440-82:-** In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Health Department, in consultation with the Establishment Department and the Finance Department, hereby directs that in this Department's Notification No. SOH-III/11D/3-5/2014, dated: 10-05-2016, the following amendments shall be made, namely:-

### AMENDMENTS

In the Appendix:-

- (a) against Serial No. 1, in Columns No. 2 and 5, for the existing entries, the following shall be substituted, namely:

| 2                       | 5   |
|-------------------------|---|
| Principal Technologist. | "By promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technologists and Chief PHC Technologists with five years service in BPS-19 or seventeen years service in BPS-17 and above as such.<br><br>Note: A joint seniority of Chief Technologists and Chief PHC Technologists shall be maintained for the purpose of promotion." |

- (b) against Serial No. 2, in Columns No. 2 and 5, for the existing entries, the following shall be substituted, namely:

| 2  | 5   |
|--|---|
| Chief Technologist/<br>Chief PHC Technologist. | "By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Clinical Technologists and Senior PHC Technologists with seven years service in BPS-18 or twelve years service in BPS-17 and above as such.<br><br>Note: A joint seniority of Senior Clinical Technologists and Senior PHC Technologists shall be maintained for the purpose of promotion." |

- (c) against Serial No. 3, in Columns No. 2, 3, 4 and 5, for the existing entries, the following shall be substituted, namely:

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KHYBER PAKHTUNKHWA GOVT: GAZETTEE, EXTRAORDINARY, 6<sup>TH</sup> NOVEMBER 2020

| 2  | 3  | 4                         | 5  |
|--|--|---------------------------|--|
| <p><u>“senior Technologists/senior PHC Technologists.</u></p> <p>i) <u>Senior Clinical Technologists dental</u></p> <p>ii) <u>Senior Clinical Technologists pharmacy</u></p> <p>iii) <u>Senior Clinical Technologists Radiology</u></p> <p>iv) <u>Senior Clinical Technologists Pathology</u></p> <p>v) <u>Senior Clinical Technologists anesthesia</u></p> <p>vi) <u>Senior Clinical Technologists Cardiology</u></p> <p>vii) <u>Senior Clinical Technologists Surgical</u></p> <p>viii) <u>Senior Clinical Technologists Dialysis</u></p> <p>ix) <u>Senior Clinical Technologists Physiotherapy</u></p> <p>x) <u>Senior Clinical Technologists Pulmonologist</u></p> <p>xi) <u>Senior Clinical Technologists</u></p> | <p><u>At least MS/M.Phil in the relevant technologies from recognized University</u></p> | <p><u>23-40 years</u></p> | <p>(a) <u>Seventy percent (70%) by promotion on the basis of seniority cum fitness from amongst the clinical technologists and PHC techlogists with five years service in the relevant technologies as such in case the required length of service is less than five years then half of the service in BS-16 and one fourth service in below BPS-16 shall be counted as service in BPS-17 in the relevant technology;</u></p> <p><u>NOTE: A joint seniority list of clinical technologists and PHC Technologists shall be maintained for the purpose of promotion and</u></p> <p>(b) <u>Thirty percent (30%) by initial recruitment.</u></p> |

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KHYBER PAKHTUNKHWA

| 2  | 3   | 4                   | 5  |
|--|---|---------------------|--|
| <p>Senior Technologist/ Senior PHC Technologist.</p> <p>i) Senior Clinical Technologist <u>Dental</u>.</p> <p>ii) Senior Clinical Technologist <u>Pharmacy</u>.</p> <p>iii) Senior Clinical Technologist <u>Radiology</u>.</p> <p>iv) Senior Clinical Technologist <u>Pathology</u>.</p> <p>v) Senior Clinical Technologist <u>Anaesthesia</u>.</p> <p>vi) Senior Clinical Technologist <u>Cardiology</u>.</p> <p>vii) Senior Clinical Technologist <u>Surgical</u>.</p> <p>viii) Senior Clinical Technologist <u>Dialysis</u>.</p> <p>ix) Senior Clinical Technologist <u>Physiotherapy</u>.</p> <p>x) Senior Clinical Technologist <u>Pulmonology</u>.</p> <p>xi) Senior Clinical Technologist</p> | <p>At least MS/ M.phil in the relevant technologies from a recognized University.</p> | <p>23-40 Years.</p> | <p>(a) Seventy percent (70%) by promotion, on the basis of seniority-cum-fitness, from amongst the Clinical Technologists and PHC Technologists with five years service in the relevant technologies as such. In case the required length of service is less than five years then half of the service in BS-16 and one fourth service in below BPS-16 shall be counted as service in BPS-17 in the relevant technology.</p> <p>Note: A joint seniority list of Clinical Technologists and PHC Technologists shall be maintained for the purpose of promotion; and</p> <p>(b) thirty percent (30%) by initial recruitment</p> |

AK

*[Signature]*

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|  |  |  |  |
|--|--|--|--|
| <u>Gastroenterology</u><br><u>xii). Senior Clinical Technologists</u><br><u>Ophthalmology/otolaryngology.</u><br><u>xiii). Senior PHC Technologists (Multi Purpose).</u><br><u>xiv) Senior PHC Technologists (MCH)</u> |  |  |  |
|--|--|--|--|

(d). against serial No. 4

(i). in column No. 3 for the existing entries, the following shall be substituted namely;

“at least second class BS/BSC (04 years) (Honors)/Master degree in the relevant Technologists from a recognized university.

Note: for the purpose of clause (b). in column No. 5 apart from the enhanced qualification. BSc two years degree from a recognized university shall be applicable up to seven (07 years from the commencement of this amending notification.”

(ii). In column No. 4 for the existing entries, the following shall be substituted namely;

22-35 years and

(iii). In column No. 5 in clause (b) after the proviso, the following shall be inserted namely;

Note: Master in public health degree from a recognized university shall be considered for promotion only for those categories where degree in the relevant technologies does not exist. In case of non availability of MPH or relevant degree in their relevant categories, vacant posts shall be considered for promotion on the basis of seniority-cum-fitness, from amongst the chief clinical technicians and chief PHC technicians in their relevant technologies with at least three years service as such”

(c). against serial No. 5 in column No. 5 for the existing entries, the following shall be substituted namely;

“by promotion, on the basis of seniority-cum-fitness from amongst the senior clinical technicians (BS-14) and senior PHC technicians (BS-14) with two years service in the relevant technology as such in case the required length of service is less than two years then one fourth service in lower basic scales shall be counted as service in BPS-14.”

Note: (i) The continue of one fourth service in lower basic scales as service in BS-14 shall be one time exercise in order to remove the anomaly created in the paramedics service structure after the upgradation of posts in (BS-12) without upgrading the incumbents to higher grades vide finance department notification of even no. Date 15.05.2018. Upon promotion of the existing incumbents this relaxation shall be discontinued.

22

| <u>Gastroenterology</u> |  |  |  |  |
|-------------------------|--|--|--|--|
| xii)                    | Senior Clinical Technologist<br>Ophthalmology/Otolaryngology |  |  |  |
| xiii)                   | Senior PHC Technologist<br><u>[Multi Purpose]</u>            |  |  |  |
| xiv)                    | Senior PHC<br>Technologist <u>[MCH]</u>                      |  |  |  |

(d) against Serial No. 4.-

(i) in Column No. 3, for the existing entries, the following shall be substituted, namely:

"At least Second Class BS/BSc (04-years) (Honors)/ Master Degree in the relevant technologies from a recognized University.

Note: For the purpose of clause (b), in Column No. 5, apart from the enhanced qualification, B.Sc two years Degree from a recognized University shall be applicable up to seven (07) years from the commencement of this amending notification."

(ii) in Column No. 4, for the existing entries, the following shall be substituted, namely:

"22-35 Years"; and

(iii) in Column No. 5, in clause (b), after the proviso, the following shall be inserted, namely:

"Note: Master in Public Health Degree from a recognized University shall be considered for promotion only for those categories where Degree in the relevant technologies does not exist. In case of non availability of MPH or relevant degree in their relevant categories, vacant posts shall be considered for promotion on the basis of seniority-cum-fitness, from amongst the Chief Clinical Technicians and Chief PHC Technicians in their relevant Technologies with at least three years service as such."

(e) against Serial No. 5, in Column No. 5, for the existing entries, the following shall be substituted, namely:

"By promotion, on the basis of Seniority-cum-fitness, from amongst the Senior Clinical Technicians (BS-14) and Senior PHC Technicians (BS-14) with two years service in the relevant Technology as such. In case the required length of service is less than two years then one fourth service in lower basic scales shall be counted as service in BPS-14.

Note: (i) The counting of one fourth service in lower basic scales as service in BS-14 shall be one time exercise in order to remove the anomaly created in the Paramedics service structure after the up-gradation of posts in (BS-12) without upgrading the incumbents to higher grades vide Finance Department Notification of even No. dated: 15-05-2018. Upon promotion of the existing incumbents this relaxation shall be discontinued

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|   |  |  |  |
|---|--|--|--|
| <p><u>Gastroenterology</u><br/> <u>xii). Senior Clinical Technologists</u><br/> <u>Ophthalmology/otolaryngology.</u><br/> <u>xiii). Senior PHC Technologists (Multi Purpose).</u><br/> <u>xiv) Senior PHC Technologists (MCH)</u></p> |  |  |  |
|---|--|--|--|

(d). against serial No. 4

(i). in column No. 3 for the existing entries, the following shall be substituted namely;

“at least second class BS/BSC (04 years) (Honors)/Master degree in the relevant Technologists from a recognized university.

Note: for the purpose of clause (b). in column No. 5 apart from the enhanced qualification. BSc two years degree from a recognized university shall be applicable up to seven (07 years from the commencement of this amending notification.”

(ii). In column No. 4 for the existing entries, the following shall be substituted namely;

22-35 years and

(iii). In column No. 5 in clause (b) after the proviso, the following shall be inserted namely;

Note: Master in public health degree from a recognized university shall be considered for promotion only for those categories where degree in the relevant technologies does not exist. In case of non availability of MPH or relevant degree in their relevant categories, vacant posts shall be considered for promotion on the basis of seniority-cum-fitness, from amongst the chief clinical technicians and chief PHC technicians in their relevant technologies with at least three years service as such”

(c). against serial No. 5 in column No. 5 for the existing entries, the following shall be substituted namely;

“by promotion, on the basis of seniority-cum-fitness from amongst the senior clinical technicians (BS-14) and senior PHC technicians (BS-14) with two years service in the relevant technology as such in case the required length of service is less than two years then one fourth service in lower basic scales shall be counted as service in BPS-14.”

Note: (i) The continue of one fourth service in lower basic scales as service in BS-14 shall be one time exercise in order to remove the anomaly created in the paramedics service structure after the upgradation of posts in (BS-12) without upgrading the incumbents to higher grades vide finance department notification of even no. Date 15.05.2018. Upon promotion of the existing incumbents this relaxation shall be discontinued.

23

| <u>Gastroenterology.</u> |  |  |  |  |
|--------------------------|--|--|--|--|
| xii)                     | Senior Clinical Technologist<br>Ophthalmology/Otolaryngology |  |  |  |
| xiii)                    | Senior PHC Technologist<br><u>(Multi Purpose)</u>            |  |  |  |
| xiv)                     | Senior PHC<br>Technologist <u>(MCH)</u>                      |  |  |  |

(d) against Serial No. 4.-

(i) in Column No. 3, for the existing entries, the following shall be substituted, namely:

"At least Second Class BS/BSc (04-years) (Honors)/ Master Degree in the relevant technologies from a recognized University.

Note: For the purpose of clause (b), in Column No. 5, apart from the enhanced qualification, B.Sc two years Degree from a recognized University shall be applicable up to seven (07) years from the commencement of this amending notification."

(ii) in Column No. 4, for the existing entries, the following shall be substituted, namely:

"22-35 Years"; and

(iii) in Column No. 5, in clause (b), after the proviso, the following shall be inserted, namely:

"Note: Master in Public Health Degree from a recognized University shall be considered for promotion only for those categories where Degree in the relevant technologies does not exist. In case of non availability of MPH or relevant degree in their relevant categories, vacant posts shall be considered for promotion on the basis of seniority-cum-fitness, from amongst the Chief Clinical Technicians and Chief PHC Technicians in their relevant Technologies with at least three years service as such."

(e) against Serial No. 5, in Column No. 5, for the existing entries, the following shall be substituted, namely:

"By promotion, on the basis of Seniority-cum-fitness, from amongst the Senior Clinical Technicians (BS-14) and Senior PHC Technicians (BS-14) with two years service in the relevant Technology as such. In case the required length of service is less than two years then one fourth service in lower basic scales shall be counted as service in BPS-14.

Note: (i) The counting of one fourth service in lower basic scales as service in BS-14 shall be one time exercise in order to remove the anomaly created in the Paramedics service structure after the up-gradation of posts in (BS-12) without upgrading the incumbents to higher grades vide Finance Department Notification of even No. dated: 15-05-2018. Upon promotion of the existing incumbents this relaxation shall be discontinued.

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ANNEXURE "D"

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

All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.  
Exchange Ph: 091-9210187 Fax: 091-9211130 Web: www.healthkp.gov.pk

24



dated 31-3-2021

To:

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

Subject:

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

Memo:

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

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

Sdxxxxxxxxxxxxx

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

No. 1583 /AE-VII Dated 31/3 /2021

Copy forwarded to:-

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

*[Signature]*  
Additional Director General (HRM)  
Directorate General Health Services,  
Khyber Pakhtunkhwa Peshawar.

*[Handwritten initials]*

**FINAL SENIORITY LIST OF DEGREE HOLDERS PARAMEDICS (CLINICAL TECHNICIANS  
PHARMACY) ON THE BASIS OF MPH.**

| S. No. | Name & Father Name                 | Date of 1st appointment/Designation | Date of Passing Degree | Total/ Obtained Marks & Division. | %age  | University             | Present Posting | Date of Birth & Domicile | Date of Retirement | Remarks. |
|--------|------------------------------------|-------------------------------------|------------------------|-----------------------------------|-------|------------------------|-----------------|--------------------------|--------------------|----------|
| 1.     | Munir Ahmad S/O Shah Ahmad         | 14.05.2002<br>CT (Pharmacy) B-12    | 11.07.2011             | 333/600                           | 61.33 | Gomal UNI D.I Khan     | DHO D. Khan     | 10.04.1975<br>D.I Khan   | 02.04.2035         |          |
| 2.     | Ali Rahman S/O M. Zareen           | 26.03.1990<br>CT (Pharmacy) B-12    | 24.05.2011             | 1533/2000<br>3.3 CGPA             | 76.08 | PHSA Peshawar          | DHO Swat        | 02.04.1952<br>Swat       | 01.04.2028         |          |
| 3.     | Naeem Jan S/O Haji Abdul Jabar     | 23.11.1992<br>CT (Pharmacy) B-12    | 10.10.2011             | 1527/2000<br>3.6 CGPA             | 77.35 | PHS Peshawar           | DHC Peshawar    | 05.03.1971<br>Peshawar   | 05.03.2031         |          |
| 4.     | Aurang Zeb S/O Fazli Subhan        | 07.11.2003<br>CT (Pharmacy) B-12    | 11.12.2011             | 1393/2000<br>2.5 CGPA             | 69.09 | Gandhara UNI Peshawar  | DHQ Hord Mardan | 11.01.1975<br>Mardan     | 10.01.2038         |          |
| 5.     | Amin Jan S/O Muhammad Jan          | 05.09.2009<br>CT (Pharmacy) B-12    | 15.03.2012             | 1435/2000<br>3.0 CGPA             | 71.75 | Ganadhra UNI Peshawar  | DHC Peshawar    | 15.12.1975<br>Peshawar   | 14.12.2033         |          |
| 6.     | Noor Halim Jan S/O Noor Ali Jan    | 23.08.2003<br>CT (Pharmacy) B-12    | 03.04.2011             | 1641/2300<br>3.15 CGPA            | 71.34 | AWKU Mardan            | DHQ Hord Bajaur | 10.03.1975<br>Bajaur     | 09.03.2035         |          |
| 7.     | Javed Akbar S/O Muhammad akbar     | 25.07.2000<br>CT (Pharmacy) B-12    | 14.04.2017             | 1223/2000                         | 61.15 | Peshawar UNI           | DHO Peshawar    | 10.02.1975<br>Peshawar   | 09.02.2036         |          |
| 8.     | Aftab S/O Zulqadar                 | 08.11.2013<br>CT (Pharmacy) B-12    | 23.04.2011             | 2.91                              | 72.75 | AWKU Mardan            | DHC Peshawar    | 02.03.1950<br>Peshawar   | 01.03.2050         |          |
| 9.     | Yasir Ali S/O Khan Malik           | 04.05.2018<br>CT (Pharmacy) B-12    | 23.04.2011             | 2.89                              | 72.25 | AWKU Mardan            | DHO Mardan      | 15.03.1994<br>Mardan     | 14.03.2054         |          |
| 10.    | Zafar Iqbal S/O Shah Rasul Shannim | 24.10.1985<br>CT (Pharmacy) B-12    | 07.03.2019             | 2100/1513                         | 72.04 | UNI of Peshawar        | DHO Peshawar    | 01.04.1952<br>Mansehra   | 31.03.2022         |          |
| 11.    | Shakeel Ahmad S/O Wadood Ur Rahman | 03.08.1992<br>CT (Pharmacy) B-12    | 07.03.2019             | 1336/2100                         | 63.51 | University of Peshawar | DHO Peshawar    | 13.04.1971<br>Peshawar   | 17.04.2031         |          |

(25)

Handwritten initials and marks on the left side of the table, including a large '25' in a circle and some scribbles.

Handwritten signature or mark at the bottom right of the page.

26

Passing  
D.O. Degree

|     |                                 |                                  |            |           |       |                           |                       |                            |            |  |
|-----|---------------------------------|----------------------------------|------------|-----------|-------|---------------------------|-----------------------|----------------------------|------------|--|
| 12. | Anwar Khan S/O<br>Shereen Zada  | 31.05.1995<br>CT (Pharmacy) B-12 | 07.03.2019 | 1200/2100 | 57.14 | University of<br>Peshawar | DHO<br>Peshawar       | 15.04.1973<br>Peshawar     | 14.04.2033 |  |
| 13. | Muhammad Younas<br>S/O Shamshad | 01.03.1995<br>CT (Pharmacy) B-12 | 11.10.2019 | 3.27      | 81.75 | AWKU<br>Mardan            | DHO Hosp:<br>Easkhela | 27.02.1974<br>Mardan       | 26.02.2034 |  |
| 14. | Abdul Qadir S/O Noor<br>Ahmad   | 01.11.2001<br>CT (Pharmacy) B-12 | 11.11.2019 | 2.72      | 68    | AWKU<br>Mardan            | DHO<br>Peshawar       | 09.05.1973<br>Mohmand Agy: | 01.05.2030 |  |
| 15. | Mashooq Ali S/O<br>Daftar Ali   | 01.11.2002<br>CT (Pharmacy) B-12 | 23.07.2020 | 3.18      | 79.05 | AWKU<br>Mardan            | DHO Hosp;<br>Kohat    | 05.01.1974<br>Kohat        | 04.01.2034 |  |
| 16. | Haji Akbar S/O<br>Mohmand Khan  | 01.11.2002<br>CT (Pharmacy) B-12 | 23.07.2020 | 3.54      | 88.5  | AWKU<br>Mardan            | DHO Hosp;<br>Lahore   | 15.04.1977<br>Khyber       | 14.04.2037 |  |
| 17. | Majeed Khan S/O<br>Majar Ahmad  | 01.12.2003<br>CT (Pharmacy) B-12 | 23.07.2020 | 3.49      | 87.25 | AWKU<br>Mardan            | DHO<br>Khyber         | 19.05.1977<br>Khyber       | 18.05.2037 |  |

*[Signature]*  
ADDITIONAL DIRECTOR GENERAL (HRM)  
DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PUKHTUNKHWA, PESHAWAR  
*[Signature]*

To,

**The Honorable Secretary Health,  
Khyber Pakhtunkhwa, Peshawar**

Subject

**DEPARTMENTAL APPEAL AGAINST THE MASTER  
DEGREE HOLDER (MPH) SENIORITY LIST/CHEIE  
CLINIC TECHNICIAN LIST/NOTIFICATION**

**Most Respected Sir**

With due respect and humble submission, that we are Working as clinical technicians (BPS-12) under the kind disposal of Director General Health Services, Khyber Pakhtunkhwa. It is stated in your Honour that the final seniority list was approved on dated 31-3-2021 which was presented before the Honorable Departmental Committee at Secretariat on dated 11-11-2021 for DPC (BPS-17) and the appellants namely, (1) Mashooq Ali s/o Daftar Ali (2) Haji Akbar s/o Mohmand Khan (3) Majeed Khan s/o Major Ahmad were enlisted at serial No, 15,16,& 17. The quota for the MPH list was reserved 15.6 for promotion which was approved by the D,G,H,S. When the applicants met Section Officer, (III) In his office at Secretariat whereby they informed us, that the appellants dropped from the promotion and 2 new persons namely, Mushtag & Shahbaz has been promoted and replaced us without the penal or seniority list of MPH.

The list was also ignored the seniority of the appellants, that whereby according to Section 8 of the civil servant Act, 1973 read with rules 17 of the appointment, promotion and transfer rules, 1989" seniority shall be reckoned from the dated of initial/first appointment but astonishingly in the said Impugned services rules seniority has been reckoned from the date of acquiring the requisite qualification which is not tenable in light of the above mentioned law and rules.

It is therefore, requested that your Honor please give us a chance for promotion & please keep pending the DPC/MPH list till for Our deserving rights. Seniority list for MPH is attached with application.

We will pray for ever.

Dated: 16-11-20211

Obediently Yours,

Haji Akbar,

Cell 0333-9363849

ANNEXURE E

DAFTY NO: 20156  
DATE: 10-11-21  
HEALTH DEPARTMENT

To: Honorable Secretary Health,  
Khyber Pakhtunkhwa, Peshawar

27

Subject: DEPARTMENTAL APPEAL AGAINST THE MASTER  
DEGREE HOLDER (MPH) SENIORITY LIST/CHEIF  
CLINICAL TECHNICIAN LIST/NOTIFICATION

Most Honorable Sir,  
With due respect and humble submission, we  
were employed as clinical technicians (BPS-12) under the  
disposal of Director General Health Services, Khyber Pakhtunkhwa.  
It is stated to your honour that the final seniority list was approved  
dated 11-11-2021 which was presented before the Honorable  
Departmental Committee at Secretariat on dated 11-11-2021 for DGP  
(BPS-17) and the appellants namely, (1) Mashooq Ali s/o Daftar Ali, (2)  
Haji Akbar s/o Mohmand Khan (3) Majeed Khan s/o Major Ahmad  
were enlisted at serial No, 15, 16, & 17. The quota for the MPH list was  
reserved 15.6 for promotion which was approved by the D.G.H.S.  
When the applicants met Section Officer, (iii) in his office at  
Secretariat whereby they informed us, that the appellants dropped  
from the promotion and 2 new persons namely, Mushtaq & Shahbaz  
has been promoted and replaced us without the penal or seniority list  
of MPH.

The list was also ignored the seniority of the appellants, that whereby  
according to Section 8 of the civil servant Act, 1973 read with rules  
17 of the appointment, promotion and transfer rules, 1989 seniority  
shall be reckoned from the dated of initial/first appointment but  
astonishingly in the said impugned services rules seniority has been  
reckoned from the date of acquiring the requisite qualification which  
is not tenable in light of the above mentioned law and rules.

It is therefore, requested that your Honor please give us a  
chance for promotion & please keep pending the DPC/MPH list till for  
our deserving rights. Seniority list for MPH is attached with  
application.

We will pray for ever.  
Dated: 10-11-2021

Obediently Yours,

Haji Akbar,  
Cell 0333-9363849

Subdt  
s/o DGP  
PLS

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Plex  
e speak  
12/11/21

MTC

To,

**The Honorable Secretary Health,  
Khyber Pakhtunkhwa, Peshawar**

Subject

**DEPARTMENTAL APPEAL AGAINST THE MASTER  
DEGREE HOLDER (MPH) SENIORITY LIST/CHEIE  
CLINICAL TECHNICIAN LIST/NOTIFICATION**

**Most Respected Sir**

With due respect and humble submission, that we are Working as clinical technicians (BPS-12) under the kind disposal of Director General Health Services, Khyber Pakhtunkhwa. It is stated in your Honour that the final seniority list was approved on dated 31-3-2021 which was presented before the Honorable Departmental Committee at Secretariat on dated 11-11-2021 for DPC (BPS-17) and the appellants namely, (1) Mashooq Ali s/o Daftar Ali (2) Haji Akbar s/o Mohmand Khan (3) Majeed Khan s/o Major Ahmad were enlisted at serial No, 15,16,& 17. The quota for the MPH list was reserved 15.6 for promotion which was approved by the D,G,H,S. When the applicants met Section Officer, (III) In his office at Secretariat whereby they informed us, that the appellants dropped from the promotion and 2 new persons namely, Mushtag & Shahbaz has been promoted and replaced us without the penal or seniority list of MPH.

The list was also ignored the seniority of the appellants, that whereby according to Section 8 of the civil servant Act, 1973 read with rules 17 of the appointment, promotion and transfer rules, 1989" seniority shall be reckoned from the dated of initial/first appointment but astonishingly in the said Impugned services rules seniority has been reckoned from the date of acquiring the requisite qualification which is not tenable in light of the above mentioned law and rules.

It is therefore, requested that your Honor please give us a chance for promotion & please keep pending the DPC/MPH list till for Our deserving rights. Seniority list for MPH is attached with application.

We will pray for ever.

Dated: 16-11-20211

Obediently Yours,

MAJEED KHAN

28

DAIRY NO: 20757  
DATE 16/11/21  
HEALTH DEPARTMENT

To,  
The Honorable Secretary Health,  
Khyber Pakhtunkhwa, Peshawar

Subject:

**DEPARTMENTAL APPEAL AGAINST THE MASTER DEGREE HOLDER (MPH) SENIORITY LIST/CHEIF CLINICAL TECHNICIAN LIST/NOTIFICATION**

Most Respected Sir,

With due respect and humble submission, that we are working as clinical technicians (BPS-12) under the kind disposal of Director General Health Services, Khyber Pakhtunkhwa. It is stated in your Honour that the final seniority list was approved on dated 31-3-2021 which was presented before the Honorable Departmental Committee at Secretariat on dated 11-11-2021 for DPC (BPS-17) and the appellants namely, (1) Mashooq Ali s/o Daftar Ali (2) Hajji Akbar s/o Mohmand Khan (3) Majeed Khan s/o Major Ahmad were enlisted at serial No, 15, 16 & 17. The quota for the MPH list was reserved 15.6 for promotion which was approved by the D.G.H.S. When the applicants met Section Officer, (III) in his office at Secretariat whereby they informed us, that the appellants dropped from the promotion and 2 new persons namely, Mushtaq & Shahbaz has been promoted and replaced us without the penal or seniority list of MPH.

The list was also ignored the seniority of the appellants, that whereby according to Section 8 of the civil servant Act, 1973 read with rules 17 of the appointment, promotion and transfer rules, 1989 seniority shall be reckoned from the dated of initial/first appointment but astonishingly in the said impugned services rules seniority has been reckoned from the date of acquiring the requisite qualification which is not tenable in light of the above mentioned law and rules.

It is therefore, requested that your Honor please give us a chance for promotion & please keep pending the DPC/MPH list till for our deserving rights. Seniority list for MPH is attached with application.

We will pray for ever.  
Dated: 16-11-2021

Obediently Yours,

Majeed Khan  
Cell: 0322-9075488

16/11/2021

*Handwritten notes:*  
SO (III) please  
17/11/2021  
MTC



The Honorable Secretary Health,  
Khyber Pakhtunkhwa, Peshawar

DPH: MISS

16/11/21

Subject:

29

**DEPARTMENTAL APPEAL AGAINST THE MASTER  
DEGREE HOLDER (MPH) SENIORITY LIST/CHEIF  
CLINICAL TECHNICIAN LIST/NOTIFICATION**

Most Respected Sir,

With due respect and humble submission, that we are working as clinical technicians (BPS-12) under the kind disposal of Director General Health Services, Khyber Pakhtunkhwa. It is stated in your Honour that the final seniority list was approved on dated 31-3-2021 which was presented before the Honorable Departmental Committee at Secretariat on dated 11-11-2021 for DPC (BPS-17) and the appellants namely, (1) Mashooq Ali s/o Daftar Ali (2) Haji Akbar s/o Mohmand Khan (3) Majeed Khan s/o Major Ahmad were enlisted at serial No, 15, 16, & 17. The quota for the MPH list was reserved 15.6 for promotion which was approved by the D, G, H, S. When the applicants met Section Officer, (iii) in his office at Secretariat whereby they informed us, that the appellants dropped from the promotion and 2 new persons namely, Mushtaq & Shahbaz has been promoted and replaced us without the penal or seniority list of MPH.

The list was also ignored the seniority of the appellants, that whereby according to Section 8 of the civil servant Act, 1973 read with rules 17 of the appointment, promotion and transfer rules, 1989" seniority shall be reckoned from the dated of initial/first appointment but astonishingly in the said impugned services rules seniority has been reckoned from the date of acquiring the requisite qualification which is not tenable in light of the above mentioned law and rules.

It is therefore, requested that your Honor please give us a chance for promotion & please keep pending the DPC/MPH list till for our deserving rights. Seniority list for MPH is attached with application.

We will pray for ever.  
Dated: 16-11-2021

Obediently Yours,

Mashooq Ali,  
Cell 0333-9612416

16/11/2021

*Handwritten notes:*  
Khyber Pakhtunkhwa  
Director General Health Services  
Peshawar

*Handwritten notes:*  
SO (iii)  
Chief of  
Clinical  
Spent

*Handwritten date:* 17/11/21

*Handwritten initials:* hr  
T.C



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT**

No. SOH-III/8-60/2021 ( HajiAkbar & others  
Dated the Peshawar 23rd Nov, 2021

To

**The Director General,  
Health Services, Khyber Pakhtunkhwa,  
Peshawar**

SUBJECT : **DEPARTMENTAL APPEAL AGAINST THE MASTER DEGREE  
HOLDER MPH) SENIORITY LIST/CHIEF CLINICAL TECHNICIAN  
LIST/ NOTIFICATION,**

I am directed to refer to the subject noted and to enclose herewith copies of Self-explanatory appeals & other enclosures received from Mr. Haji Akbar , Majeed Khan & Mashooq Ali, Clinical Technicians (BPS-12), for necessary action as per rules/policy at your end, please.

Encl: As above.

**(Naseer Ahmad)  
Section Officer-III**

Endst: even no & date

Copy forwarded to the:

PS to Secretary Health, Khyber Pakhtunkhwa.

**Section Officer-III**

~~CONFIDENTIAL~~

(30)



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT**

No. SOH-III/8-60/2021 (Hajj Affairs) Letter  
Dated the Peshawar 27/10/2021

Director General,  
Health Services, Khyber Pakhtunkhwa,

Subject:

ADMINISTRATIVE APPEAL AGAINST THE MASTER DEGREE HOLDER  
AND SENIORITY LIST/CHIEF CLINICAL TECHNICIAN LEVEL  
REGISTRATION.

Reference is made to the subject noted and to the information received from  
the enclosed enclosures received from Mr. Hajj [Name] regarding  
his appointment as Chief Clinical Technician (BPS-12) for necessary action.

Enclosure

Respectfully,  
[Signature]

[Name]

[Designation]

MTC

[Handwritten signature]

**BEFORE THE PESHAWAR HIGH COURT PESHAWAR**WRIT PETITION NO. 5088 P / 2021

1. Mr. Haji Akbar, Clinical Technician (BPS 12),  
Office of the District Health Officer, Khyber.
2. Mr. Majeed Khan, Clinical Technician (BPS 12),  
O/O the District Health Officer, District Khyber.
3. Mr. Mashooq Ali, Clinical Technician (BPS 12),  
O/O the DHQ Hospital, Kohat Development Authority, Kohat

..... PETITIONERS

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Chief  
Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Health Department, Khyber Pakhtunkhwa,  
Peshawar.
- 3- The Secretary Establishment Department, Khyber  
Pakhtunkhwa, Peshawar.
- 4- The Director General Health Services Department, Khyber  
Pakhtunkhwa, Peshawar.

..... RESPONDENTS

**WRIT PETITION UNDER ARTICLE 199 OF THE  
CONSTITUTION OF ISLAMIC REPUBLIC OF  
PAKISTAN, 1973 AS AMENDED UPTO DATE****R/SHEWETH:  
ON FACTS:****ATTESTED**EXAMINER  
Peshawar High Court**FILED/TODAY**  
Deputy Registrar

03 DEC 2021

**Brief facts giving rise to the present writ petition  
are as under:**

1. That the petitioners were initially appointed as Dispensers in the respondent Department and were later on re designated as Clinical Technician with up gradation to BPS 12. That right from appointment till date the petitioners are serving the respondents department quite efficiently and to the entire satisfaction of their superiors. Copies of appointment orders are at Annexure ..... **A.**
2. That during service the petitioners acquired Master of Public Health Degrees making themselves eligible for promotion to the post of Technologist BPS-17 under the rules. Copies of the Degrees are at Annexure..... **B.**

- 3. That according to rules notified in the year 2016 and further amended vide Notification dated 4/11/2020 the post of Technologist BPS 17 has to be filled @ 40% by promotion on the basis of seniority-cum-fitness from amongst the Chief Technicians, Chief Technicians and technicians having qualification prescribed by initial recruitment with 03 years services as such in the relevant technology. Copies of the rules are attached as Annexure ..... C.
- 4. That in light of the ibid rules the petitioners were quite hopeful for their promotion to the next higher scale of BPS-17 but astonishingly the respondents issued and assigned the seniority from the date of acquiring degrees and not as per rule 17 of the Appointment, Promotion and Transfer) Rules, 1989 . That in the final seniority list the seniority of the petitioners has been affected by assigning the seniority from the date of acquiring degree instead of from the date of initial regular appointment. Copy of the seniority list is attached as Annexure ..... D.
- 5. That on the basis of ibid seniority list the respondents are ready/intended to convene departmental promotion committee whereby the juniors to the petitioners have been ranked senior in the ibid seniority list.
- 6. That feeling aggrieved the petitioners filed departmental appeals against the inaction of the respondents by not considering them for promotion to the post of Technologists BPS-17 but no reply has been received so far. Copy of the departmental appeals and forwarding letter are annexed as Annexure..... E & F.
- 7. That the petitioners having other remedy filed the instant writ petition on the following grounds interalia as under:-

**GROUND:**

**ATTESTED**  
EXAMINER  
Peshawar High Court

A- That the action and inaction of the respondents by assigning the seniority from the date of acquiring the degree by not considering the petitioners for promotion to the post of Technologist (BPS-17) is against the law, facts, norms of natural justice.

**FILED TODAY**  
**Deputy Registrar**  
**03 DEC 2021**

That petitioner has not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

C- That the respondents acted in arbitrary and malafide manner by issuing the impugned seniority list and not considering

the petitioners for promotion to the post of technologist (BPS-17).

- D- That the respondents violated Section 8 & 9 of the Civil Servant Act, 1973 read with Rule 17 of the APT rules, 1989 by issuing the impugned seniority list and not considering the petitioners for promotion to the post of technologist (BPS-17).
- E- That the respondents discriminated the petitioners by issuing the impugned seniority list and not considering the petitioners for promotion to the post of technologist (BPS-17).
- F- That petitioners seeks permission to advance other grounds and proofs at the time of hearing.

That on acceptance of the instant writ petition the action inaction of the respondents by convening the Departmental Promotion Committee for the post of Technologist (BPS-17) and not deciding the Departmental appeals of the petitioners may kindly be declared as illegal, unconstitutional and ineffective upon the rights of the petitioners. That the respondents may further please be directed not to convene the Departmental Promotion Committee for the post of technologist (BPS-17) and the respondents may further lease be directed to decide/ disposed of the Departmental appeals of the petitioners one way or the other. Any other remedy which this august Court deems fit that may also be awarded in favour of the petitioners.

**INTERIM RELIEF:** That the respondents may kindly be restrained from convening the Departmental Promotion Committee for the post of technologist (BPS-17) till the disposal of the instant writ petition.

Petitioners

Haji Akbar & Others

Through:

NOOR MUHAMMAD KHATTAK  
 ADVOCATE  
 KAMRAN KHAN  
 UMER FAROOQ MOHMAND  
 & SAID  
 SAID KHAN  
 ADVOCATES

*Soleif*  
**FILED TODAY**  
**Deputy Registrar**  
**03 DEC 2021**

Authorised Under Order No. 186  
 The General Statutes of 1986  
 15 JAN 2022

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VERIFICATION:

It is verified that no other earlier writ petition was filed between the parties.

DEPONENT

LIST OF BOOKS:

1. CONSTITUTION OF PAKISTAN.
2. SERVICES LAWS BOOK.
3. ANY OTHER CASE LAW AS PER NEED


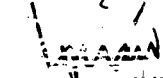
FILED TODAY  
Deputy Registrar  
03 DEC 2021

ATTESTED  
EXAMINER  
Peshawar High Court

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**PESHAWAR HIGH COURT PESHAWAR  
ORDER SHEET**



| Date of Order or Proceedings | Order or other Proceedings with Signature of Judge or that of counsel where necessary  |
|------------------------------|--|
| 1                            | 2  |
| 13.01.2022.                  | <p><u>Writ Petition No. 5088-P/2021.</u></p> <p>Present: Mr. Noor Muhammad Khattak, advocate for the petitioners.</p> <p>Mr. Muhammad Riaz, Addl. AG for respondents.</p> <p>*****</p> <p><b><u>LAL JAN KHATTAK, J.-</u></b> Through the petition in hand filed under Article 199 of the Constitution of Islamic Republic of Pakistan 1973, petitioner Haji Akbar and two others have prayed to this Court for issuance of a writ restraining the respondents from holding the meeting of Departmental Promotion Committee (DPC) for filling the post of Technologist (BPS-17) till decision of their departmental appeals.</p> <p>2. On second thought learned counsel for the petitioners stated at the bar that he would not press this petition anymore if respondents are directed to decide the petitioners' departmental appeals pending before respondent No.4 to which the learned Addl. AG did not object.</p> <p>3. In view of the above, we dispose of this petition by directing the respondent No.4 to decide the petitioners' appeals pending before him strictly in accordance with law but within a period of one month from the receipt of copy of this order.</p> <p style="text-align: right;"><br/>JUDGE</p> <p style="text-align: right;"><br/>JUDGE</p> |

13.01.2022

DB, Mr. Justice Lal Jan Khattak, HJ & Justice Musarrat Hiral, HJ.

EXAMINED  
Peshawar High Court, Peshawar  
Authorized Under Article 87 of  
The Constitution of Pakistan

15 JAN 2022

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**VAKALATNAMA**

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

APPEAL NO: \_\_\_\_\_ OF 2022

Haji Akbar & others

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Health Deptt

(RESPONDENT)  
(DEFENDANT)

I/We \_\_\_\_\_

Do hereby appoint and constitute **NOOR MUHAMMAD KHATTAK Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_\_/\_\_\_\_/2022

Haji Akbar  
**CLIENTS**

**ACCEPTED**

**NOOR MUHAMMAD KHATTAK**  
**UMER FAROOQ MOHMAND**

**KAMRAN KHAN**

**SAID KHAN**

**HAIDER ALI**

**&**

**KHANZAD GUL**  
**ADVOCATES**