

Syed Iqbal Shah

13.04.2022

Let it be fixed before S.B on 19.04.2022 at Camp Court Abbottabad.



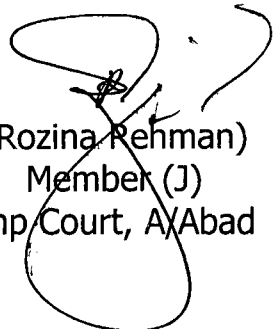
Chairman

19.04.2022

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of reply/comments. To come up for reply/comments on 14.06.2022 before S.B at Camp Court, Abbottabad.

Rs-600/-
Appellant Deposited
Security & Process Fee
A. Butt
26/4/22




(Rozina Rehman)
Member (J)
Camp Court, A/Abad

14.06.2022

Appellant alongwith counsel present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Reply on behalf of respondents not submitted. Notices be issued to the respondents for submission of written reply/comment by way of last chance. To come up for the same on or before 18.08.2022 before S.B at Camp Court Abbottabad.



(Fareeha Paul)
Member (E)
Camp Court A/Abad

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

Service Appeal No: 539 of 2022

Syed Iqbal Shah S/O Syed Mir Muhammad Shah, **Retired**, Senior Primary Health Technician Multipurpose **PHC (MP)**, Basic Health Unit (BHU) Mohar, District Mansehra R/O Village & Post Office Tarrapi, Tehsil & District Mansehra.

Appellant

Versus

The Director General, Health Services Khyber Pakhtunkhwa, Peshawar and 03 others.

Respondents

SERVICE APPEAL

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3	Copy of Notification dated 11/08/2015 issued by respondent no 4	B	9 to 10
4	Copy of three relevant pages of office order No 4227-4826 dated 14/05/2021.	C	11 to 13
5	Copy of Retirement application.	D	14
6	Copy of Departmental representation/appeal dated 21/03/2022.	E	15
7	Copy of Final order dated 21/03/2022.	F	16
8	Power of attorney.	G	17

Dated 11/04/2022

Syed Iqbal Shah

(Syed Iqbal Shah)
Appellant

Through

Rashid Iqbal Khan Jadoon
(Rashid Iqbal Khan Jadoon)
Attorney Abbottabad.

(1)

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

Service Appeal No: _____ of 2022

Syed Iqbal Shah S/O Syed Mir Muhammad Shah, **Retired**, Senior Primary Health Technician Multipurpose **PHC Tech: (MP)**, Basic Health Unit (BHU) Mohar, District Mansehra. R/O Village & Post Office Tarrapi, Tehsil & District Mansehra.

Appellant

Versus

- 1 The Director General, Health Services Khyber Pakhtunkhwa, Peshawar.
- 2 The District Health Officer, District Mansehra.
- 3 Government of Khyber Pakhtunkhwa through Secretary Health Department, Peshawar.
- 4 Government of Khyber Pakhtunkhwa through Secretary Finance Department, Peshawar.

Respondents

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, AGAINST THE IMPUGNED FINAL ORDER NO 1067 DATED 21/03/2022, PASSED BY RESPONDENT NO 1, WHEREIN IT HAS SHOWN THAT PROMOTION AS CHIEF PHC TECHNICIAN (MP) IN BPS 16, CAN NOT BE ACCEDED, BEING NOT COVERED UNDER THE LAW.

PRAER:-

ON ACCEPTANCE OF INSTANT SERVICE APPEAL, IMPUGNED FINAL ORDER NO 1067 DATED 21/03/2022, PASSED BY RESPONDENT NO 1, MAY PLEASE BE SET ASIDE AND RESPONDENTS MAY PLEASE BE DIRECTED TO ISSUE NOTIFICATION/ORDER RELATING TO APPELLANT'S

(2)

PROMOTION AS CHIEF PHC TECHNICIAN (MP) IN BPS 16 WITH EFFECT FROM ITS DUE DATE UNDER THE LAW ALONGWITH ALL BACK BENEFITS.

ANY OTHER RELIEF FOR WHICH THE APPELLANT IS ENTITLED AND THE SAME IS NOT ASKED/PRAYED SPECIFICALLY, MAY VERY KINDLY BE GRANTED IN FAVOUR OF THE APPELLANT.

Respectfully Sheweth,

FACTS

- 1) That appellant had joined Health Department on 28/12/1979 as Medical/Health Technician in BPS 09, and remained in same scale with no service structure, for the period of 26 years, while a statutory Notification relating to Paramedics service structure with effect from 27/12/2005, had approved by competent Authority and respondent No 03 issued its Notification on 10/05/2006. Copy of statutory Notification dated 10/05/2006 is annexed as Annexure "A"
- 2) That the above Notification dated 10/05/2006, was not implemented by the respondents, and the post of appellant, after 36 years of his service, was upgraded and he was awarded in BPS 12, with effect from 11/08/2015. Copy of Notification dated 11/08/2015 issued by respondent no 4, is annexed as Annexure "B"
- 3) That in the previous year 2021, on the provincial level, 867 PHC Technicians (MP) BPS 12, were promoted to the post of Senior PHC Technicians (MP) BPS 14, by the DPC, wherein appellant's placement is at serial no 54, being most senior, office order was issued by respondent no 1, under No 4227-4826 dated 14/05/2021. Copy of three relevant pages of office order No 4227-4826 dated 14/05/2021 is annexed as Annexure "C".

- 4) That appellant after completing 43 years service on attaining 60 years age, submitted application for his retirement, which is pending and in progress. Copy of application is annexed as Annexure "D"
- 5) That appellant was entitled for his promotion in higher scales on the basis of seniority cum fitness as statutory Notification dated 10/05/2006 (Annexure A), but non-implementation of said Notification with in proper time, appellant submitted his departmental representation for benefits of higher scales in retirement/pension to respondent no 1, on 21/03/2022 which is dis-allowed for the reason, that promotion after retirement can not be acceded being not covered under the rules. Final order passed by respondents no 1 on the same day i.e. 21/03/2022, and appellant's instant appeal is within 30 days after issuance of final order dated 21/03/2022, Copies of Departmental representation/appeal and final order are annexed as Annexure "E" & "F" Hence this appeal inters-alia on the following ground.

Grounds

- a) That the impugned order of respondent no 1 is against all the norms of justice and malafide, respondents are fully responsible for heavy damage of past professional carrier of appellant.
- b) That due to delaying, negligence and non professional attitude of respondents in implementation of Notification dated 10/05/2006 (Annexure A), appellant has completed his **43 years** service with out taking perfect and due promotion/professional status, with in time.
- c) That the reason of dis-allowing of promotion benefits to appellant in final order dated 21/03/2022 (Annexure F) is

upon the respondents as they are responsible for that and entitled for reasonable costs for the issuance of said order as well as non-implementation of service structure Notification dated 10/05/2006.

- (4)
- d) That it is undoubted fact that respondents illegally snatched the legal rights of the appellant in an uncivilized way in a very haste manner, which is against the law and there is no single example is available in the civilized society.
 - e) That the impugned order of respondent no 1 is apparent activity of serious disapproval of the statutory policy of the competent authority, which is beyond its jurisdiction and tried to create self made complications.
 - f) That appellant is dragged into litigation, the conduct of the respondents is admittedly arbitrary capricious unjust and against all norms of justice and as such requires indulgence of this Honourable Court by awarding appropriate Cost to the respondents.
 - g) That respondents ignored the provisions of Article 4 and 25 of the Constitution of Pakistan while exercising their illegal and unlawful delay of statutory Notification for promotion.
 - h) That after considering the above para wise case, there are un-rebuttal facts, based on documents, these are crystal clear that there is no slight responsibility or any negligence on the part of appellant is available in the whole matter, thus impugned order/letter is against all the norms of law & justice and lying for set aside by this Honourable Tribunal.

5

It is, therefore, respectfully prayed that on acceptance of instant Service Appeal, impugned Final order no 1067 dated 21/03/2022, passed by respondent no 1, may please be set aside and respondents may please be directed to issue Notification/order relating to appellant's promotion as chief PHC technician (MP) in BPS-16 with effect from its due date under the law alongwith all back benefits.

Any other relief for which the appellant is entitled, and the same is not asked/prayed specifically, may very kindly be granted in favour of the appellant.

Dated 11/04/2022

Syed Iqbal Shah

(Syed Iqbal Shah)
Appellant

Through

Rashid Iqbal Khan Jadoon

(Rashid Iqbal Khan Jadoon)
Attorney Abbottabad.

Affidavit

I, Syed Iqbal Shah S/O Syed Mir Muhammad Shah, **Retired**, Senior Primary Health Technician Multipurpose **PHC (MP)**, Basic Health Unit (BHU) Mohar, District Mansehra R/O Village & Post Office Tarrapi, Tehsil & District Mansehra, do here by affirm on oath that contents of instant appeal is correct and true according to my best knowledge and belief and nothing has been suppressed from this Honourable Tribunal and this instant appeal is first appeal & same nature of any other appeal is not pending before Honourable Tribunal



Dated 11/04/2022

Syed Iqbal Shah

(Syed Iqbal Shah)
Appellant

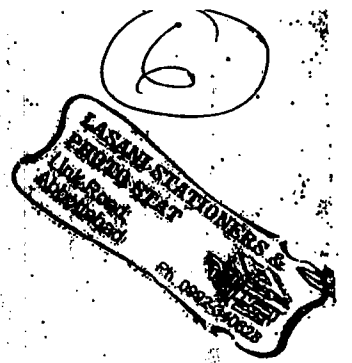
CNIC No 13503-7991107-1

DEPONENT

Annexure A

GOVERNMENT OF NWFP HEALTH DEPARTMENT

Dated Peshawar the 10th May, 2006



NOTIFICATION

NO SOH-III /8-60/05 (paramedics). In pursuance of the decision taken by the provincial cabinet in its meeting held on 27th December 2005, the Competent Authority is pleased to approve eight stage paramedics services structure of NWFP with effect from 27-12-2005. The salient features whereof shall be as under:-

1. The existing 57 different categories of paramedics as mentioned in annexure A to this notification are restructured into 14 cadres as per annexure B.
2. In all the aforesaid cadres/specialties, the posts in various pay scales shall be integrated/categorized and re-nomenclatured as under:-

S.No.	Existing Posts	Re-structured posts
i)	Posts in BPS-5 to BPS-9 in all specialties.	Junior Technicians (BPS-9)
ii)	Posts in BPS-10 to BPS-12 in all specialties.	Technicians (BPS-12)
iii)	Posts in BPS-13 to BPS-14 in all specialties.	Senior Technicians (BPS-14)
iv)	Posts in BPS-15 to BPS-16 in all specialties	Chief Technicians (BPS-16)
v)	Posts in BPS-17 in all specialties.	Technologist (BPS-17)
vi)	Posts in BPS-18 in all specialties.	Senior Technologist (BPS-18)
vii)	Posts in BPS-19 in all specialties.	Chief Technologist (BPS-19)
viii)	Posts in BPS-20 in all specialties	Principal Technologists (BPS-20)

The words "clinical" shall be mentioned with the categories of posts meant for paramedics working in the hospitals and "Primary Health Care" with the paramedics working in the field along with mention of specific specialty (e.g. Junior Clinical Technician (Radiology) and Junior Primary Health Care Technician (Multi purpose)).

3. The number of Posts in BPS-20, BPS-19, BPS-18, BPS-17, BPS-16, BPS,14, BPS-12 and BPS-9 shall be according to the proportionate ratio based on the total 8965 posts as mentioned in the provincial budget book for financial year 2005-2006. The proportionate ratio of 8 stage formula shall be as under:-

Atty...
5/10/06

BPS	%	NO. OF POSTS
Post in BPS-9	80%	7172
Post in BPS-12	12%	1076
Post in BPS-14	3.5%	314
Post in BPS-16	2.5%	224
Post in BPS-17	1.86%	167
Post in BPS-18	0.09%	8
Post in BPS-19	0.04%	3
Post in BPS-20	0.01%	1

However additional posts shall be created for any of the left over personals of paramedics cadre (if any). Moreover, subsequent creation of posts in any of the 14 paramedics cadres in any scale shall also be included in the aforesaid proportionate ratio of posts in the 8 tiers formula. The proportionate ratios of posts in BPS-12 and above shall be modified accordingly as and when new creation of posts are made in BPS-9 in each of the 14 cadres subsequently.

4. Seniority of the incumbents of the posts in the 14 cadres so merged shall be caused on the basis of scale wise seniority as well as date of regular appointment in the pay scale. (e.g. in joint seniority list of BPS-12, the official already in BPS-12 will be placed on the top of the list and the officials in the lower pay scale shall be accordingly placed step by step in the list, invariably keeping intact the inter-Sc-seniority of the incumbents in the same pay scales).
5. In the first instance, the higher posts in the re-structured 14 paramedics cadres as per annexure "C" shall be filled in by way of promotion, as one time exercise, where-after the service rules duly prescribed as at annexure D shall be followed in subsequent promotion/ initial recruitment.
6. Promotions in the post in BPS-18, 19 and BPS 20 shall be made on the basis of joint seniority list. The Joint seniority list of all the 14 cadres shall be caused at BPS-17 level keeping in view the principles laid down in section 8 of the NWFP civil servants (ACT), 1973 read with Rule-17 of the NWFP civil servants (appointment, promotion and transfer) rules, 1989.
7. The afore-said paramedics service structure into 14 cadres shall also be applicable mutatis-mutandis to the paramedics working in FATA and employees working in Districts, all autonomous, semi autonomous and corporate bodies.
8. There shall be a council of paramedics to be notified separately.
9. The approved implementation committee and anomaly committee shall also be notified separately.
10. This eight stage paramedics service structure will replace all existing categories, cadres, structures and nomenclatures and will cancel all such cadres /categories rules and regulations etc which are in contravention to the approved paramedics service structure. New posts in all type of Health Delivery System will be created in.

Endorse

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*Attested
per official stamp*

in accordance with the frame work of this service structure.
Any new specialties will be added in the frame work of approved
paramedics service structure.

Sd/xxxx
(ABDUS SAMAD KHAN)
SECRETARY HEALTH

Government No. & date as above

is forwarded to the:-

- 1. Secretary to Governor, NWFP.
- 2. Secretary to Chief Minister, NWFP.
- 3. Secretary (FATA) Governor's Sectt (FATA), Peshawar.
- 4. Secretary to Govt of NWFP; Finance Deptt: with the request to notify all the post duly re-structured and renamed accordingly so that the same may be included in the budget book 2006-07
- 5. All Administrative Secretaries to Govt of NWFP.
- 6. Accountant General, NWFP.
- 7. Director General, Health Services, NWFP with direction to communicate to all concerned and initiate implementation of service structure completing all promotions by 30th June 2006.
- 8. Inspector General of Prisons, NWFP.
- 9. Director General, Social Security, NWFP.
- 10. Director, PHSA, NWFP.
- 11. Dr. Mahmood Alam, Chairman, Paramedics Service Structure Committee, PHSA, NWFP.
- 12. The Chief HSRRU for information with the direction to ensure implementation of service structure in future ADP and regular program.
- 13. The Chief Planning Officer Health Department for information with the direction to ensure implementation of service structure in future ADP and regular program.
- 14. Director Health Services (FATA), Peshawar.
- 15. All Chief Executives in Teaching Hospitals in NWFP.
- 16. All Medical Superintendents in DHQ Hospital in NWFP.
- 17. All Executive District Officers (Health) in NWFP.
- 18. Director of Information, NWFP.
- 19. All Agency Surgeons in FATA.
- 20. Principal KMC/KCD, Peshawar.
- 21. Dean, P.G.M.I, Peshawar.
- 22. All District Accounts Officers in NWFP.
- 23. All Agency Accounts Officers in FATA.
- 24. PS to Chief Secretary, NWFP.
- 25. PS to Minister for Health, NWFP.
- 26. President, Provincial Paramedical Association, NWFP, Peshawar.
- 27. The Manager Govt Printing Press, NWFP.

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Syed...

(Alamzeb Malik)
Section Officer Health -III

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**GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)**

Dated Peshawar, the 11-08-2015

9

NOTIFICATION

Annexure B,

NO. SO(FR)FD/7-3/2015/Paramedics. The competent authority has been pleased to upgrade all the Paramedics Staff appointed under Khyber Pakhtunkhwa Civil Servants Act 1973, with immediate effect:

- I. All the incumbents Paramedics in BS-09 are upgraded to BS-12. In future the initial recruitment will be made in BS-12 instead of BS-09 and the Administrative Department shall immediately amend the service rules through SSRC accordingly.
- II. The incumbents presently serving in BS-12 & BS-14 are allowed 02 steps upgradation respectively with relaxation of condition of 10 years service in the same grade stipulated in the existing upgradation policy.
- III. The Paramedics presently serving in BS-16 and BS-17, having 05 years service in the respective pay scales, are allowed an allowance at the rate of fixation of pay in next grade.
- IV. The Administrative Department shall further streamline the service structure of BPS-16 and above through the mechanism of SSRC.
- V. Pay of existing incumbents of the posts shall be fixed in higher pay scales at a stage next above the pay in the lower pay scale.
- VI. This department notification bearing No. SO(FR)/FD/10-22/2015 dated 30-06-2015 will have no affect on the above employees.

**SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT**

Endst No. & Date even.

Copy of the above is forwarded for information and necessary action to the: -

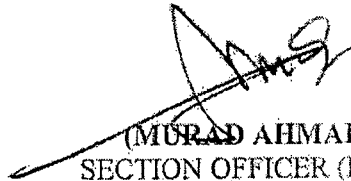
1. PS to Additional Chief Secretary, FATA.
2. All Administrative Secretaries Government of Khyber Pakhtunkhwa.
3. Senior Member, Board of Revenue, Khyber Pakhtunkhwa Peshawar.
4. Accountant General, Khyber Pakhtunkhwa, Peshawar.
5. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar
6. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
7. Secretary Provincial Assembly, Khyber Pakhtunkhwa.
8. All Heads of Attached Departments in Khyber Pakhtunkhwa.
9. Registrar, Peshawar High Court, Peshawar.
10. All Deputy Commissioners, Political Agents, District & Sessions Judges / Executive District Officers in Khyber Pakhtunkhwa.

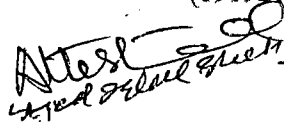
Altaf
22/08/2015

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11. Chairman, Khyber Pakhtunkhwa, Public Service Commission, Peshawar.
12. Registrar, Service Tribunal Khyber Pakhtunkhwa.
13. Secretary to Govt; of Punjab, Sindh and Baluchistan, Finance Department, Lahore, Karachi and Quetta.
14. The District Comptroller of Accounts, Peshawar, Mardan, Kohat, Bannu, Abbottabad, Swat and D.I. Khan.
15. The Senior District Accounts Officer Nowshera, Swabi, Charsadda, Haripur, Manshera and Dir Lower.
16. The Treasury Officer, Peshawar.
17. All District/Agency Accounts Officers in Khyber Pakhtunkhwa / FATA.
18. PSO to Senior Minister for Finance, Khyber Pakhtunkhwa.
19. PSO to Chief Secretary, Khyber Pakhtunkhwa.
20. Director Local Fund Audit, Khyber Pakhtunkhwa Peshawar.
21. PS to Finance Secretary.
22. PAs to All Additional Secretaries/ Deputy Secretaries in Finance Department.
23. All Section Officers/Budget Officers in Finance Department.
24. Mr. Siraj Burki, chairman, All Paramedics Association, Khyber Pakhtunkhwa, Peshawar.
25. Mr. Johar Ali, President, Provincial Paramedical Association, Khyber Pakhtunkhwa.

Dir: FMK


(MURAD AHMAD)
SECTION OFFICER (FR)
(0919212635)

Attest


Annexure C,

11



DIRECTORATE GENERAL HEALTH SERVICES, KHYBER PAKHTUNKHWA, PESHWAR

OFFICE ORDER: -

Consequent upon approval accorded by the Departmental Promotion Committee, the following PHC Technicians (MP) (BS-12) are hereby promoted to the post of ~~Sy~~ PHC Technicians (MP) (BS-14) with immediate effect:-

S.NO	Name	Place of Posting
1.	Bibi Amina D/O Ayub Shah	DHO Peshawar
2.	Mohin Parkash S/O Jamna Das	DHO Buner
3.	Mohin Lal S/O Coor Chand	DHO Daggar Buner
4.	Sardar Ajmal Haq S/O Qazi Afzal Ul Haq	DHO Mansehra
5.	Muhammad Tariq S/O Muhammad Shafi	DHO Mansehra
6.	Ijuz Muhammad S/O Israr Muhammad	DHO Mardan
7.	Muhammad Khalid S/O Muhammad Usman	DHO Mardan
8.	Jamshid Khan S/O Bacha Khan	AS Bajaur
9.	Ishfaq Ahmad S/O Gul Ahmad	DHO Nowshera
10.	Siraj Muhammad S/O Zarin Muhammad	DHO Charsadda
11.	Gorcharan Lal S/O Kilaya Lal	DHO Buner
12.	Muhammad Ajmal S/O Amir Nawab	DHO Charsadda
13.	Sadiq Zaman S/O Said Rehman	AS Mohmand
14.	Inam ur Rehman S/O Ali Rehman	DHO Charsadda
15.	Muhammad Izhar S/O Muhammad Roidar	DHO Nowshera
16.	Sawab Gul S/O Chaman Gul	AHQ Hosp; Ghalanai
17.	Ibni Amin S/O Nawab Khan	DHO Charsadda
18.	Muhammad Ibrar S/O Muhammad Iqbal	DHO Charsadda
19.	Muhammad Jamshad S/O Haji Rukhanuddin	DHO Charsadda
20.	Najam ul Ghani S/O Fazal Hanan	DHO Mardan
21.	Rahim Khan S/O Muslim Khan	DHO Mardan
22.	Shah Hussain S/O Faqir Hussain	DHO Charsadda
23.	Misbahullah S/O Qadeerullah	DHO Mardan
24.	Bahadar Khan S/O Daud Khan	DHO Mardan
25.	Wali Muhammad S/O Faqir Muhammad	DHO Mardan
26.	Nasir Ali S/O Akhtar Munir	DHO Swabi
27.	Bakhtiarullah S/O Maroof Shah	DHO Peshawar
28.	Arshad Khan S/O Saifur Rehman	DHO Nowshera
29.	Abdul Ghaffar S/O Rasool Khan	DHO Charsadda
30.	Muhammad Essa S/O Zain Shah	DHO Mardan
31.	Muhammad Ali S/O Iqbal Ahmad	DHO Mardan

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Attest
Syed Ghafar Ghani

32.	Ahmad Nawaz S/O Hafiz Muhammad Ramzan	DHO Tank
33.	Zahirullah Jan S/O Raza Khan	DHO Peshawar
34.	Zahirullah S/O Mir Said	DHO Charsadda
35.	Anwarullah S/O Ihsanullah	DHO Nowshera
36.	Muhammad Anwar S/O Saadullah Khan	DHO Mardan
37.	Razia Bibi D/O Muhammad Yaqoob	DHO DIKhan
38.	Muhammad Ayaz S/O Ghafar Ali	DHO Haripur
39.	Shaheen Begum D/O Fazli Akbar	DHO Malakand
40.	Rabeela Kousar D/O Muzaffar Shah	DHO Manshera
41.	Fauzia Sultana D/O Rahim Baz	DHO Peshawar
42.	Uzma Ambarin D/O Niaz Muhammad	DHO Mardan
43.	Roshan Bibi D/O Haji Muhammad Younas Khan	DHO Nowshera
44.	Fouzia Yusmin D/O Karimullah	DHO Peshawar
45.	Arshad Hussain S/O Mir Dad Khan	DHO Mansehra
46.	Muhammad Sadiq S/O Abdul Raui	AS Khyber
47.	Musafar Khan S/O Said Wali	AS Bajaur
48.	Rehan Gul S/O Badam	DHO Mardan
49.	Mehboob Ali S/O Jafar Ali	DHO DIKhan
50.	Aurang Zeb S/O Hunar Khan	DHO Peshawar
51.	Khalid Khan S/O Ghazi Khan	DHO Mardan
52.	Shahida Parveen D/O Abdullah	DHO DIKhan
53.	Gul Nasreen D/O Muhammad Nawaz	DHO DIKhan
54.	Syed Iqbal Shah S/O Sayed Mir M. Shah	DHO Mansehra
55.	Malik Shakeel Ahmad S/O Malik Bashir Ahmad	DHO DIKhan
56.	Wajidullah S/O Farid Khan	DHO Charsadda
57.	Zafar Ali S/O Noor Alam	DHO Peshawar
58.	Muhammad Siddiq S/O Abdul Qayyum	DHO Haripur
59.	Rukhsana Naheed D/O Ghulam Din	DHO Haripur
60.	Niaz Parveen D/O Muhammad Zaman	DHO Haripur
61.	Hashmat Ali S/O Ali Akbar	DHO Swat
62.	Khatoon D/O Hazrat Hussain	DHO Mardan
63.	Syed Gohar Shah S/O Syed Yousaf Shah	DHO Swat
64.	Muhammad Anwar S/O Shereen	DHO Swat
65.	Khalid Farooq S/O Muhammad Rafique	AS FR Kohat
66.	Shah Faisal S/O Azizur Rehman	DHO Shangla
67.	Rukhsana Begum D/O Mir Zaman	DHO Peshawar
68.	Hidayat Begum D/O Sirajul Haq	DHO Dir Upper
69.	Islam Badshah S/O Gul Hadshah	DHO Hangu
70.	Abdus Satar S/O Mahmoodul Malik	DHO DIKhan
71.	Muhammad Rafiq S/O Muhammad Irfan	DHO Haripur
72.	Sakhi Rehman S/O Noor paye Khan	DHO Karak

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Attestation
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865.	Rehmanullah S/O Ali Abbas Khan	DHO: Miranshah	DHO Tank	De-
866.	Sahib Zada Inamullah S/O Abdul Ghafoor Jan	DHO Lakki Marwat	DHO Lakki Marwat	De-
867.	Iqbal Hussain S/O Nisar Ali	AS Kurram	DHO Hangu	De-

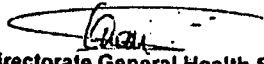
N.B: Arrival/ Departure should be submitted to this Directorate for record.

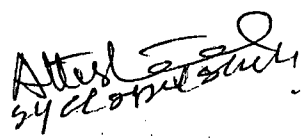
Sd/xxxxx
Director General Health Services,
Khyber Pakhtunkhwa Peshawar

No. 4727-4826 (Promotion Cell) Dated Peshawar the 14/06/2021
Copy forwarded to the:-

1. All DHOs of Health Services in Khyber Pakhtunkhwa.
2. All Hospital Directors MTIs Khyber Pakhtunkhwa.
3. Accountant General Khyber Pakhtunkhwa Peshawar.
4. All District Account Officers in Khyber Pakhtunkhwa
5. Deputy Director (Paramedics), DGHS, KPK, Peshawar.
6. PA to DG Health Services Khyber Pakhtunkhwa Peshawar.
7. Official Concerned.
8. Suplt: Promotion Cell, DGHS, KPK, Peshawar.
9. Personal Files.

For information and necessary action.


Directorate General Health Services,
Khyber Pakhtunkhwa Peshawar.



Annexure D

14

To

District Health Officers,
Manshehra.

Subject: Application for Retirement
from Government Service on
Supernuation.

Respected Sir,

I have the honour
to say that I am going to
be retired on Supernuation (attaining
the age of 60 years) with effect
from 02-02-2022 (Afternoon)

It is humbly requested
that I may kindly be retired
from Government Service on supernuation
with effect from 02.02.2022 (AN)-
with full fringed benefit i.e leave
Encashment, GP fund etc.

it is requested
that necessary sanction may kindly
be accorded.

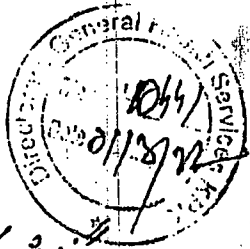
Yours Obediently,
Syed Iqbal Shah,
Senior P.H.C Technician (MP)
BHU Mohar (District Manshehra.)

Attest
syed ul hasnain

محترم جناب ڈائریکٹر جنرل ہیڈ ڈیپارٹمنٹ فینر دکنوٹی خواہ لکھ

درخواست نمبر اسکیم 16
Benefit دیا جائے

۱۱



جناب عالی

تذکرہ پیمانہ ہے اس سائل سید اشبال شاہ ولد سید میر محمد شاہ سان تری
تھیل وندو مانسیرہ کا ہوں۔ سائل جناب ڈائریکٹر جنرل کی خدمت میں
عاجزانہ درخواست کرتا ہوں کہ سائل بتاریخ 02 03 کو بنیت میں تھیل ٹینشن
14 PS میں ریٹائرڈ ہو چکا ہے۔ چونکہ سائل اسٹ میں 16 PS میں
سائل کا نام سید اشبال شاہ ولد سید میر محمد شاہ آیا ہوا ہے۔ لہذا اس سائل کو
Benefit اسکیم 16 دیا جائے۔

بہذا سائل بہت غریب آدمی ہے۔ اور
نام کا ایک ہوا۔ چھوٹے چھوٹے بچے ہیں۔

مقامی فنانس منیجر اور اصر فنانس سائل کو ریٹائرڈ اسکیم 16 Benefit
دینے کا حکم ہمارا فرمایا ہے۔

الذکر 7-96911067-13503

سید اشبال شاہ ولد سید میر محمد شاہ

دستور: Abdul Shakir

تاریخ: 03495843808

(نوٹ: سائل کی درخواست کے ساتھ لکھا ہے)

الذکر
03
21/03/2022

Attested
Syed Ghulam

21/3/22

Annexure F,

16



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

All Communication should be addressed to the Director General Health Services Khyber Pakhtunkhwa and not to any official by name. DG Office PH No. 091-9210269 Fax No. 091-9210269 Exchange No. 091- 9210230 emails add: dghealthkpk2014@gmail.com

No. 1067 /Promotion cell

Dated: 21 /03/2022

To

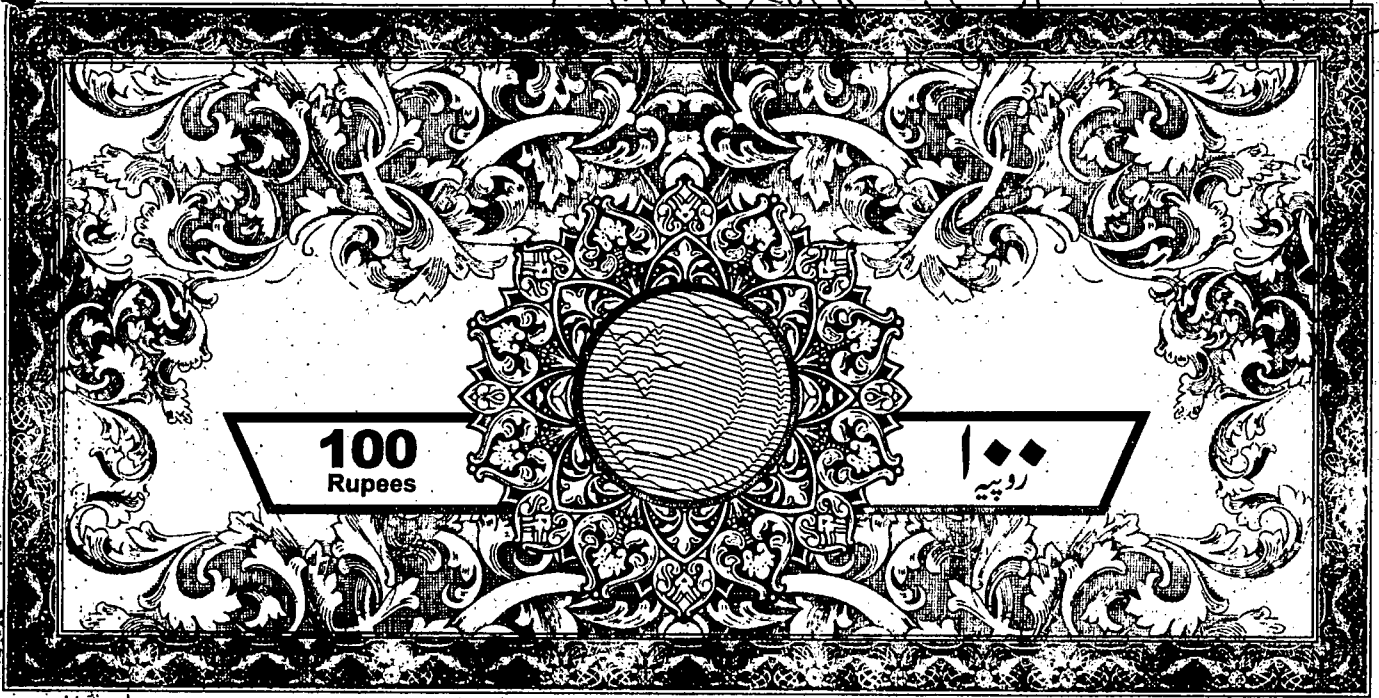
Syed Iqbal Shah

Subject:- REQUEST FOR PROMOTION.

Your request for promotion as Chief PHC Tech: (MP) BS-16 (after retirement) cannot be acceded to being not covered under the rule.

Director HR

Directorate General Health Services,
Khyber Pakhtunkhwa, Peshawar.



BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No: _____ of 2022

Syed Iqbal Shah S/O Syed Mir Muhammad Shah, Retired, Senior Primary Health Technician Multipurpose PHC (MP), Basic Health Unit (BHU) Mohar, District Mansehra R/O Village & Post Office Tarrapi, Tehsil & District Mansehra.

Appellant

Versus

The Director General, Health Services Khyber Pakhtunkhwa, Peshawar and 03 others.
Respondents

SERVICE APPEAL

POWER OF ATTORNEY

NAME & OTHER PARTICULARS OF ATTORNEY

Mr Rashid Iqbal Khan Jadoon S/o Shamarez Khan Jadoon resident of Street no 15, Mohallah Khawaja Ahmad Khail, Jadoon Colony, Link Road Narrian Cantt; Tehsil and District Abbottabad. CNIC No 13101-0944593-9. Cell no 0333-5025002.

I, Syed Iqbal Shah S/O Syed Mir Muhammad Shah, Retired, Senior Primary Health Technician Multipurpose PHC (MP), Basic Health Unit (BHU) Mohar, District Mansehra R/O Village & Post Office Tarrapi, Tehsil & District Mansehra, deponent, do hereby solemnly affirm and declare on oath that I appoint above named as attorney to act on my behalf to appear, plead for me in the titled case in which the same may be tried or heard and any other proceedings arising out of or connected herewith and he would be competent to exercise all the powers which I myself holds as petitioner, he is authorized all powers, to institute case, to submit any kind of application or reply, argue the case, in short, all powers or authority which I am entitled being petitioner, would be transferred to above named attorney through instant power of attorney.

Sworn at Abbottabad Dated this 11th day of April, 2022.

CNIC No 13503-7991107-1

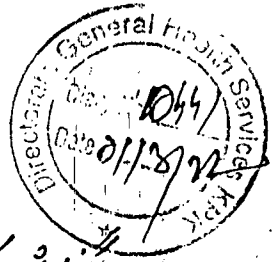
Syed Iqbal Shah
(Syed Iqbal Shah) DEPONENT



محترم جناب ڈائریکٹر جنرل ہیڈ ڈیپارٹمنٹ فیبر وکٹوری خواہ لکھنؤ

درخواست نمبر 16 کیلئے
Benefit دیا جائے

11



جناب عالی

تذکرہ پیمانی ہے کہ سائل سید اشبال شاہ ولد سید میر محمد شاہ سائل تری
کلی و ضلعو مانسہرہ کا ہے۔ سائل جناب ڈائریکٹر جنرل کی خدمت میں
عاجزانه درخواست کرتا ہوں کہ سائل بتاریخ 02/03 کو پنشن میڈیکل ٹینشن
14 BPS میں ریٹائرڈ ہو چکا ہے۔ چونکہ سائل لسٹ میں 16 BPS میں
سائل کا نام سید اشبال شاہ ولد سید میر محمد شاہ آیا ہوا ہے۔ لہذا سائل کو
Benefit کیلئے 16 دیا جائے۔

لہذا سائل بہت غریب آدمی ہے۔ اور
نام کا ایک ہوا۔ چھوٹے چھوٹے ہیں۔

کامیابی فرمائے من فریبہ و اصر فرمائے سائل کو ریٹائرڈ کیلئے 16 Benefit
دینے کا حکم صادر فرمائیں۔

13503-6661107-7

سید اشبال شاہ ولد سید میر محمد شاہ

دستور

0349 5843808

ڈائریکٹر، سیکرٹریٹ درخواست کے سائل لکھنؤ

21/03/2022

21/3/22

74	Aurang Zeb S/O Hunar Khan	Health Tech: BS.09 PHC Tech;(MP)B-12 Sr.PHC Tech;(MP)BS-14	13.11.1989 11.08.2015 20.04.2021	DHO Peshawar	15.08.1962 Khbyer	14.08.2022
75	Khalid Khan S/O Ghazi Khan	Health Tech: BS.09 PHC Tech;(MP)B-12 Sr.PHC Tech;(MP)BS-14	18.11.1989 11.08.2015 20.04.2021	DHO Mardan	16.05.1967 Mardan	15.05.2027
76	Shahida Parveen D/O Abdullah	Health Tech: BS.09 PHC Tech;(MP)B-12 Sr.PHC Tech;(MP)BS-14	16.12.1989 11.08.2015 20.04.2021	DHO DIKhan	14.10.1966 DIKhan	13.10.2026
77	Gul Nasreen D/O Muhammad Nawaz	Health Tech: BS.09 PHC Tech;(MP)B-12 Sr.PHC Tech;(MP)BS-14	20.12.1989 11.08.2015 20.04.2021	DHO DIKhan	28.03.1967 Tank	27.03.2027
78	Syed Iqbal Shah S/O Sayed Mir M. Shah	Health Tech: BS.09 PHC Tech;(MP)B-12 Sr.PHC Tech;(MP)BS-14	24.12.1989 11.08.2015 20.04.2021	DHO Mansehra	03.02.1962 Mansehra	02.02.2022
79	Malik Shakeel Ahmad S/O Malik Bashir Ahmad	Health Tech: BS.09 PHC Tech;(MP)B-12 Sr.PHC Tech;(MP)BS-14	01.01.1990 11.08.2015 20.04.2021	DHO DIKhan	27.12.1966 DIKhan	26.12.2026
80	Wajidullah S/O Farid Khan	Health Tech: BS.09 PHC Tech;(MP)B-12 Sr.PHC Tech;(MP)BS-14	15.01.1990 11.08.2015 20.04.2021	DHO Charsadda	27.03.1966 Charsadda	26.03.2026
81	Zafar Ali S/O Noor Alam	Health Tech: BS.09 PHC Tech;(MP)B-12 Sr.PHC Tech;(MP)BS-14	23.01.1990 11.08.2015 20.04.2021	DHO Peshawar	10.11.1964 Peshawar	09.11.2024
82	Muhammad Siddiq S/O Abdul Qayyum	Health Tech: BS.09 PHC Tech;(MP)B-12 Sr.PHC Tech;(MP)BS-14	28.01.1990 11.08.2015 20.04.2021	DHO Haripur	10.04.1965 Haripur	09.04.2025
83	Rukhsana Nahced D/O Ghulam Din	Health Tech: BS.09 PHC Tech;(MP)B-12 Sr.PHC Tech;(MP)BS-14	28.01.1990 11.08.2015 20.04.2021	DHO Haripur	03.06.1969 Hairpur	02.06.2029
84	Niaz Parveen D/O Muhammad Zaman	Health Tech: BS.09 PHC Tech;(MP)B-12 Sr.PHC Tech;(MP)BS-14	30.01.1990 11.08.2015 20.04.2021	DHO Haripur	22.07.1967 Haripur	21.07.2027
85	Sameena bibi D/O Sarwar Khan	Health Tech: BS.09 PHC Tech;(MP)B-12 Sr.PHC Tech;(MP)BS-14	01.02.1990 11.08.2015 20.04.2021	DHO Abbotabad	01.03.1969 Abbottabad	01.03.2029
86	Muhammad Ilyas S/O Akabar Ali	Health Tech: BS.09 PHC Tech;(MP)B-12 Sr.PHC Tech;(MP)BS-14	07.02.1990 11.08.2015 20.04.2021	DHO Abbotabad	10.03.1968 Abbottabad	09.03.2028
87	Hashmat Ali S/O Ali Akbar	Health Tech: BS.09 PHC Tech;(MP)B-12 Sr.PHC Tech;(MP)BS-14	08.02.1990 11.08.2015 20.04.2021	DHO Swat	05.05.1966 Swat	04.05.2026
88	Khatoon D/O Hazrat Hussain	Health Tech: BS.09 PHC Tech;(MP)B-12 Sr.PHC Tech;(MP)BS-14	17.02.1990 11.08.2015 20.04.2021	DHO Mardan	26.01.1968 Peshawar	25.01.2028