


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1536/2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/10/2022	<p>The appeal of Mrs. Mehr un Nisa resubmitted today by Mr. Bashir Khan Wazir Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mrs. Mehr un Nisa Ex-Nursing Instructor r/o village Takar Tehil Takht Bhai Mardan received today i.e. on 03.10.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Affidavit may be got attested by the Oath Commissioner.
- 2- Memorandum of appeal may be got signed by the appellant.
- 3- Copy of ACR mentioned in para-5 of the memo of appeal is not attached with the appeal which may be placed on it.
- 4- Annexures are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.


No. 2731 /S.T,

Dt. 07/10 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Bashir Khan Wazir Adv. Pesh.

Sir

objection removed, ~~fixed~~ Please fix before the
bench.


24/10/22

**BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA HON'BLE PESHAWAR**

Service Appeal No. 1536/2022

Mehr un Nisa..... Appellant

VERSUS

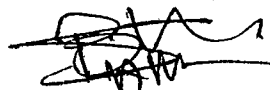
Govt of KPK & others..... Respondents

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-5
2.	Affidavit		6
3.	Application Condonation of Delay		7
4.	Affidavit		8
5.	Copy of Service Book	A	9-24
6.	Copies of the CV and Posting as Instructor Order	B	25-29
7.	Copy of the Notification	C	30
8.	Copies of the Notification dated 04.05.2016	D	31-59
9.	Copies of Departmental Appeals and Notification dated 27.07.2016	E	60-62
10.	Copy of Writ Petition and Judgment dated 23.05.2018	F	63-70
11.	Copy of COC No. 127/2019 and Order dated 27.02.2019	G	71-72
12.	Copy of COC No. 543/2019, order dated 03.09.2019 and 03.10.2019	H	73-78
13.	Copy of COC No. 94/2021 and Order dated 01.03.2022	I	79-84
14.	Copy of the Departmental Appeal	J	85-87
15.	Wakalat Nama		88

Through


Appellant



BASHIR KHAN WAZIR
Advocate, High Court
Peshawar

①

BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA HON'BLE PESHAWAR

Service Appeal No. 1536/2022

Mrs. Mehr un Nisa D/o Abdul Latif

Ex: Nursing Instructor (BPS-17)

R/o Village Takar, Tehsil Takht Bhai District Mardan

..... Appellant

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 Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
5. The Director General Health Services Department, Khyber Pakhtunkhwa, Peshawar.

..... Respondents

SERVICE APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974
AGAINST THE ORDER DATED 24.04.2014, ISSUED BY
THE RESPONDENTS MAY KINDLY BE DIRECTED TO
POMOTE THE PETITIONER TO THE POST OF CHIEF
NURSING SUPERINTENDENT (BPS-18) FROM THE
DATE WHEN HER COLLEAGUES WERE PROMOTED
I.E W.E.F 24.04.2014, AGAINST WHICH THE
DEPARTMENTAL APPEAL WAS FILED, WHICH WAS
NOT DECIDED EVEN THE MANDATORY PERIOD HAS
BEEN EXPIRED.

Respectfully Sheweth:-

1. That the Appellant is peaceful and law abiding citizen of Pakistan and belongs to respectable family and entitled for all the legal and fundamental rights guaranteed under the constitution of Islamic Republic of Pakistan.
2. That the appellant was appointed as Charge Nurse in the respondent Department on the proper recommendation of Departmental Selection Committee vide order dated 29.11.1978. That in response the Appellant submitted her

2

charge report and started performing her charge report and started performing her duty quite efficiently and up to the entire satisfaction of her superiors. **(Copy of Service Book is attached as annexure A)**

3. That during service the Appellant was promoted to the post of Head Nurse (BPS-16) vide order dated 03.03.1990 and subsequently was promoted to the post of Nursing Instructor (BPS-17) vide notification dated 22.11.2000. **(Copies of the CV and Posting as Instructor Order are attached as annexure B & C)**
4. That in the year 2014 total five posts of (BPS-18) were lying vacant under the control of Respondents. That according to the Notification dated 24.04.2014 the respondent No 5 directed the Appellant including her colleagues to submit their ACRs for promotion to the posts of BPS-18. That the above mentioned Notification clearly indicated that Appellant was eligible and entitled for promotion to the post of Chief Nursing Superintendent (BPS-18) on seniority cum fitness basis but the respondents dropped the Appellant from the said promotion without any reason and clear justification. **(Copy of the Notification is attached as annexure D)**
5. That now vide notification dated 04.05.2016 the Appellant was directed by the respondents to submit her ACRs /PERs as her promotion is due to Chief Nursing Superintendent (BPS-18) being senior most employee of the respondent Department. That in response the Appellant submitted her ACR's for the years 2013, 2014 and 2015 before the competent authority. **(Copies of the Notification dated 04.05.2016 and ACR's are attached as annexure E)**
6. That inspite of that the respondents delayed the promotion process for the Chief Nursing Superintendent (BPS-18) though the Appellant time and again requested the respondents to expedite the process as her retirement was due on 11.06.2016. That inspite of repeated requests of the Appellant the respondents did not held the PSB in time and in result the Appellant was got retired from service on superannuation basis vide notification dated 27.07.2016 without availing promotion to the post of Chief Nursing Superintendent (BPS-18). **(Copies of Departmental Appeal and Notification dated 27.07.2016 are attached as annexure F)**
7. That thereafter the Appellant filed Writ Petition No. 3423/2016 before the Hon'ble Peshawar High Court, Peshawar, in which during the arguments the learned AAG stated at the Bar that respondents are going to consider the Appellant for National Promotion to the Post of Chief Nursing Superintendent (BPS-18) from back date i.e 24.04.2014 in the next Provincial Selection Board (PSB) meeting. Moreover the Hon'ble Peshawar High Court Peshawar while disposing of the Writ Petition

directed the Respondents to consider the Appellant for the captioned post in upcoming PSB meeting and issue proforma promotion order since 24.04.2014 vide Judgment dated 23.05.2018. **(Copy of Writ Petition and Judgment dated 23.05.2018 is attached as annexure G)**

8. That thereafter lapse of sufficient time the respondents did not consider the case of the Appellant, the Appellant time and again requested the Respondents Department to implement the Judgment of the Hon'ble Peshawar High Court Peshawar, but in vain, thereafter the Appellant filed COC Petition No. 127-P/2019 for implementation of the order of Peshawar High Court Peshawar, in which the learned AAG wrongly and illegally stated that compliance of the order of this Hon'ble Court dated 23.05.2018 has already been made and the Appellant has been adjusted, hence the COC petition was disposed of vide Order dated 27.02.2019. **(Copy of COC No. 127/2019 and Order dated 27.02.2019 is attached as annexure H)**
9. That after disposal of the above titled of the COC petition the appellant again approached to the respondents department but astonishingly neither the order dated 23.05.2018 was implemented, nor the Appellant was adjusted, the appellant again filed COC Petition No. 543-P/2019, in which the Hon'ble Peshawar High Court stated that the case of the Appellant has been referred to the concerned Department to be placed before the Provincial Selection Board meeting of which is still awaited vide Order dated 03.09.2019, furthermore the respondents stated that the case of the Appellant has already been referred to the PSB, however such statement has already been given by one learned Law Officer but the case of the Appellant was never placed before PSB. As the Appellant has already been retired, even then her case be considered on notional basis by the PSB as soon as possible but not later than 60 days and the COC was disposed of vide order dated 03.10.2019. **(Copy of COC No. 543/2019, order dated 03.09.2019 and 03.10.2019 are attached as annexure I)**
10. That thereafter lapse of more than 1 year the Appellant approached to the respondents for implementation of order of the Hon'ble Peshawar high Court Peshawar, but the respondents given deaf ear to the request of the Appellant and even were reluctant to implement the orders of August High Court and had delayed the case of the Appellant by one way or other, hence the Appellant again filed COC Petition No. 94-P/2021 before the Hon'ble Peshawar High Court Peshawar, in which the respondents submitted wrong information with malafide intention to dispose of the COC and the Hon'ble Peshawar High Court Peshawar dismissed the COC on the basis of wrong information submitted by the Respondents vide order dated 01.03.2022 and even then the right of promotion to BPS-18 of the Appellant is still in field and established from the

above mentioned circumstances and is entitled for the same promotion. **(Copy of COC No. 94/2021 and Order dated 01.03.2022 are attached as annexure J)**

11. That the Appellant submitted a proper Departmental Appeal after getting the impugned order to the Respondent No 2, but after lapse of sufficient time no order whatsoever had issued by the Respondents. **(Copy of the Departmental Appeal is attached as annexure K)**
12. That the Appellant feeling aggrieved, now having no other adequate remedy but to approach this Hon'ble Court, inter alia on the following grounds:

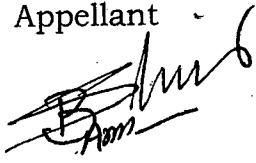
GROUND:-

- A) That the Appellant is peaceful and law abiding citizen of Islamic Republic of Pakistan and is fully entitled to all the basic and fundamental rights as enshrined in the fundamental law of the state, interpreted and guaranteed by the law of the land.
- B) That the fundamental right of the Appellant has blatantly violated by the Respondents and the Appellant have been discriminated and has been denied his due rights under the Constitution of Islamic Republic of Pakistan, 1973.
- C) That the acts of the Respondents of not following the same criteria which has been safeguarded by the law and rules, while in the instant case the respondents have not yet been considered the case of the Appellant, which is illegal, unlawful, unnatural, ab-initio, null and void in the eye of law, hence liable to be declared so.
- D) That the fundamental rights of the Appellant has blatantly violated by the Respondents and the Appellant has been discriminated and has been denied his due rights under the Constitution of Islamic Republic of Pakistan, 1973.
- E) That the Appellant is not treated in accordance with law, rules and Regulations.
- F) That the Appellant is appointed according to rules and on adopted procedure by the respondents and after her appointment she has never ever given an opportunity of any complaint to the respondents and performed her duties with full devotions, the Appellant being eligible for Promotion on the post of Chief Nursing Superintendent BPS-18 being most Senior employee of the Respondents Department serving in the Respondents Department since 1990.
- G) That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

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It is, therefore, humbly prayed that on acceptance of the instant Appeal, the Order of the Hon'ble Peshawar High Court Peshawar in WP No. 423/2016 dated 23.05.2018 may kindly be implemented with letter and spirit and the Notional Promotion in favour of the Appellant to the post of Chief Nursing Superintendent BPS-18 may kindly be issued w.e.f 24.04.2014.

Any other relief not specifically asked for may also graciously extended in favour of the Appellant s in the circumstances of the case.

Appellant
Through 
BASHIR KHAN WAZIR
Advocate, High Court,
Peshawar

CERTIFICATE:

It is certified that no such like Service Appeal has earlier been filed before this Hon'ble Tribunal.

DEPONENT

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BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA HON'BLE PESHAWAR

Service Appeal No. ____/2022

Mehr un Nisa..... Appellant

VERSUS

Govt of KPK & others..... Respondents

AFFIDAVIT

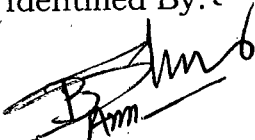
I, **Mrs. Mehr un Nisa D/o Abdul Latif Ex: Nursing Instructor (BPS-17) R/o Village Takar, Tehsil Takht Bhai District Mardan**, do hereby solemnly affirm and declare that the contents of the accompanying **Service Appeal** true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT

CNIC # 1610476185748-9

Cell # 03269985230

Identified By: -



BASHIR KHAN WAZIR
Advocate, Peshawar

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**BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA HON'BLE PESHAWAR**

Service Appeal No. ____/2022

Mehr un Nisa..... Appellant

VERSUS

Govt of KPK & others..... Respondents

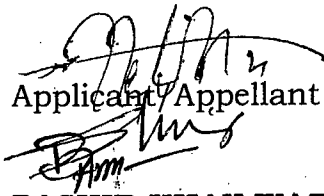
**APPLICATION FOR CONDONATION OF DELAY OF FILING OF
APPEAL IF ANY**

Respectfully Sheweth:

1. That the above noted Appeal is being filed before this Hon'ble Tribunal in which no date of hearing has yet been fixed.
2. That during course of departmental Appeal the Appellant filed Writ Petition before the Hon'ble Peshawar High Court Peshawar, which was disposed off.
3. That there is no legal bar on acceptance of the instant Application.

It is, therefore, most humbly prayed that on acceptance of this application, the delay, if any, may kindly be condoned in the interest of justice.

Through


Applicant/Appellant

BASHIR KHAN WAZIR
Advocate, High Court
Peshawar

(8)

**BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA HON'BLE PESHAWAR**

Service Appeal No. ____/2022

Mehr un Nisa..... Appellant

VERSUS

Govt of KPK & others..... Respondents

AFFIDAVIT

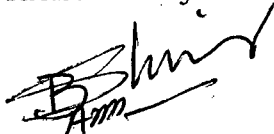
I, **Mrs. Mehr un Nisa D/o Abdul Latif Ex: Nursing Instructor (BPS-17) R/o Village Takar, Tehsil Takht Bhai District Mardan**, do hereby solemnly affirm and declare that the contents of the accompanying **Application** true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT

CNIC # 16101-764857489

Cell # 0336-9965230

Identified By:



BASHIR KHAN WAZIR
Advocate, Peshawar

A-9

SERVICE BOOK

Miss. Mohan-Nisa
of Police Station
of Nuzvid

ATTESTED

[Signature]

[Signature]

11

502
24
526

4

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating state - (i) substantive appointment or (ii) whether service counts for pension under Art. 371, C. S. R.	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "Pay"	Date of appointment	Signature of Government servant
Rs. 390-20-590/22-700 C/ Nurse	Temporary		Pay Rs. 390/ ✓			29 th Feb 1978	M. K. N. M. K. N.
do	"		Pay Rs. 390/ P.M.				
DHO Hospital Gardan do	"		Pay Rs. 390/ P.M.			2 nd Feb 1979	
do	do		PAY Rs. 410/ P.M. ✓			1 st Feb 1979	

9	10	11	12	13	14	15	
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 3	Date of termination of appointment	Reason of termination (such as promotion transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment for censure, or reward or praise of the Government servant
				Nature and duration of leave taken	Allocation of periods of leave on average pay up to four months for which leave salary is debitable to another Government Period to which debitable		

Nisa

29th 1978

Appointed as charge Nurse
vide DMS, NAF, Feb 1978
order no. 811-15/AE-II, 22-1-1978 plus other allowances.

Joint Lady Medical Manager
at PUSBAWAD
04/1/79

Joint Lady Medical Manager
at PUSBAWAD
04/3/79

31st 1979

Transfer to Medical Sublet
District Headquarters Hospital
Mardan vide DMS, NAF
Feb 1978 order no. 811-15/AE-II
of 22-1-1979

Joint Lady Medical Manager
at PUSBAWAD
04/1/79

Joint Lady Medical Manager
at PUSBAWAD
04/3/79

Service verified upto
and from 27-1-1979

Joint Lady Medical Manager
at PUSBAWAD
04/3/79

Service verified for the period
from 1-2-79 FM to 30.11.79 AM

Medical Superintendent
Dist: H Q Hospital,
Mardan.

30th 79 AN Annual Increment Allowed.

Medical Superintendent
Dist: H Q Hospital,
Mardan.

Medical Superintendent
Dist: H Q Hospital,
Mardan.

ATTESTED

Vakua No. 1118 Dated 1/3/79
Post Recreation Allowance Rs. 205/-
Equal to 1/2 Basic Pay for 1980.

2/7
ajad
District Accountant

1	2	3	4	5	6	7	8
Name of post	Whether substan- tive or officiating and whether permanent or temporary	If officiating state - (i) substantive appointment or (ii) whether service counts for pension under Art. 371, C. S. R.	Pay in substantive - post	Additional pay for officiating	Other emoluments falling under the term "Pay"	Date of appointment	Signature of Government servant
<p>National Pay Scale No. 9 Rs. 390-20-500/22-700</p> <p>C. U. P. N. NURSE, D.H.B. HOSPITAL, MARDAN</p>	<p>Off/Temp</p>		<p>PAY Rs. 430/-</p>	<p>✓</p>		<p>12/80 EN</p>	
<p>NPS 39-20-500/22-700/24-880</p> <p>Charg. Nurse D.H.B. David M. Khan</p>	<p>Part</p>	<p>gts.</p>	<p>PAY Rs. 450/-</p>	<p>✓</p>		<p>7/1981 EN</p>	

Signature of Government servant

Signature of Government servant

Signature of Government servant

14

7

9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer	13 Leave Allocation of periods of leave on average pay up to four months for which leave salary is debit-able to another Government Government-Period to which debit-able	14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment for censure, or reward or praise of the Government servant
<p>Medical Superintendent District Hospital 11/4/80 AN</p>	<p>11/4/80 AN</p>	<p>Grant of 30 days earned leave from 12-4-1980 to 17-4-1980 with effect from 12-4-1980 N.W.F.P. Resumption Order No. 9693/AE-11 dated 17-4-1980</p>	<p>Medical Superintendent District Hospital</p>	<p>Allocation of 30 days earned leave on average pay up to four months for which leave salary is debit-able to another Government Government-Period to which debit-able</p>	<p>Medical Superintendent District Hospital</p>	<p>Service verified to the period from 12-7-79 to 11-4-80</p>
<p>Medical Superintendent District Hospital 30-6-81 AN</p>	<p>30-6-81 AN</p>	<p>Resumed duty on 26-4-1980 EN due to the cancellation of the un-expired portion of the earned leave with Director Health Service, N.W.F.P. Resumption Order No. 12783/AE-11 dated 31-5-1980.</p>	<p>Medical Superintendent District Hospital</p>	<p>Allocation of 30 days earned leave on average pay up to four months for which leave salary is debit-able to another Government Government-Period to which debit-able</p>	<p>Medical Superintendent District Hospital</p>	<p>Service verified to the period from 11-4-80 to 30-6-81 AN</p>
<p>Medical Superintendent District Hospital 30-6-81 AN</p>	<p>30-6-81 AN</p>	<p>Payscale raised from 1-8-81 as per order vide Govt. of N.W.F.P. Finance Department notification no. FOLSR/11-8/16 dt. 6-2-81</p>	<p>Medical Superintendent District Hospital</p>	<p>Allocation of 30 days earned leave on average pay up to four months for which leave salary is debit-able to another Government Government-Period to which debit-able</p>	<p>Medical Superintendent District Hospital</p>	<p>Service verified to the period from 17-2-81 to 2-5-81</p>

ATTESTED

[Signature]

15

Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating state - (i) substantive appointment or (ii) whether service counts for pension under Art. 371, C. S. R.	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "Pay"	Date of appointment	Signature Government servant
<p>NPS. 390-20-540/39-200-24-820</p> <p>Ch. nurse D.H.B. Hospital Mardan</p>	<p>offg. Permanent</p>	<p>PAY-R</p>	<p>470/- P</p>	<p>X</p>		<p>12/81 PM</p>	
<p>NPS. No. 11-CP B. 430-24-550/38</p> <p>830-30-980</p> <p>Charge Nurse D.H.B. Hospital Mardan</p>	<p>do</p>	<p>do</p>	<p>Should be 478/-</p>	<p>470/-</p>		<p>18/81 PM</p>	
<p>do</p>	<p>do</p>	<p>do</p>	<p>Pay B. 502/- PM</p>	<p>Should be 502/- PM</p>		<p>12/82 PM</p>	
<p>502 24 478</p>			<p>Pay B. 548/- PM</p>	<p>cutting attached</p>	<p>Signature</p>		<p>Medical Superintendent Dist: D. Hospital. Mardan</p>

11/1/83

1296

2-4-83

263/ =

1405

5.3.83

1-12-81 to 5-30-11-82 AM

30/11 per Annual Increment

18-10-81 - 11-11-81 - 11-21-81 - 1982

1-2/79-11/21-81-21-3-1982

1982

NPS No. 11.430-24-55/28-83-3-902450

with Govt. NIPER PD

Notification No. FD (GR-1)

Two advance in Cont. - 48%

on 18-10-81 - 11-11-81 - 11-21-81 - 1982

Pay on 19-10-81 - 11-11-81 - 11-21-81 - 1982

5.2%

Physical change also allowed

30/11 per Annual Increment

10/11

30-11-1981 AM

from 1-12-80/1

Service under

NIPER PD

1-12-81 to 5-30-11-82 AM

1405

5.3.83

1-12-81 to 5-30-11-82 AM

1296

2-4-83

263/ =

11/1/83

ATTESTED

8	Signature and position of the government servant in attendance	
9	Date of termination of appointment	
10	Reason of termination (such as promotion, transfer, dismissal, etc.)	
11	Signature of the head of the office or other attending officer	
12	Nature and duration of leave taken	
13	Allocation of periods of leave up to four months on average pay for which leave salary is debit-able to another Government	
14	Signature of the head of the office or other attending officer	
15	Reference to any recorded punishment for censure, or reward or praise of the Government servant	

17

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating, and whether permanent or temporary	If officiating state— (i) substantive appointment or (ii) whether service counts for pension under Art. 371, C. S. R.	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term 'Pay'	Date of appointment	Signature of Government servant
<p>Basic Pay scale no. 14 i.e. Rs. 850-50-1850-</p> <p>Charge Nurse D. H. Q. Hospital, Mardan.</p>	<p>Officiating Permanent</p>		<p>Pay @ Rs. 850/- PM.</p>	<p>850/- PM 1050/- PM</p>		<p>7/1983</p>	
<p>— do —</p>	<p>— do —</p>		<p>Pay @ Rs. 900/- PM</p>	<p>900/- PM 1100/- PM cutting allowed</p>	<p>X</p>	<p>12/1983 PM</p>	
<p>— do —</p>	<p>— do —</p>		<p>Pay @ Rs. 950/- PM</p>			<p>12/1984 PM</p>	
<p>Office of the Accountant General N. W. P. Peshawar. Pay fixed in Basic Pay Scales 1980 of Rs. 850-50-1850. B.C. No. 14 @ Rs. 850/- M. v. s. j. 17.88 with next increment on 1.12.82</p> <p>Asst. Accountant General N. W. P. P.</p>			<p>Overpayment @ Rs. 24/- PM w/f 18/81 to 30-6-83 Total amount Rs. 492/-</p> <p>Asst. Major officiating & N.W.P.P.</p>				

12
48
288
144
492

4
2

Asst. Accountant General
N. W. P. P.

Overpayment @ Rs. 24/- PM w/f 18/81
to 30-6-83 Total amount Rs. 492/-

Asst. Major officiating
& N.W.P.P.

1 Name of post	2 Whether substantive or officiating, permanent or temporary	3 If officiating (i) substantive appointment or (ii) whether service counts for pension under Art. 371, C.S.R.	4 Pay in substantive post	5 Additional pay for officiating	6 Other emoluments falling under the term 'Pay'	7 Date of appointment	8 Signature of Government servant
RPS NO. 14 (B. 850-50-1850) Charge Nurse D.H.R. Hospital, Harsim	Officiating Temporary		Pay @ Rs. 1000/- OM			12/1985	
do	do		Pay @ Rs. 1050/- pm			12/1986	
RPS NO. 14 (B. 1100-64-2380) Charge Nurse D.H.R. Hospital, Harsim	do		Pay @ Rs. 1350/- OM			1/1987	

(20)



(21)

9	10	11	12	13		14	15
Signature and designation of the officer attesting in column 1 to 6	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment for censure, or reward or praise of the Government servant
				Nature and duration of leave taken	Allocation of periods of leave on average pay up to four months for which leave salary is debit-able to another Government Period Government to which debit-able		

30/11/1985 Annual increment allowed.

Tammy Zia
Medical Superintendent
D.H.Q. Hospital, Mardan.

Tammy Zia
Medical Superintendent
D.H.Q. Hospital, Mardan.

Service verified for the period from 7-12-1984 F.V. to 30-11-1985 A.V.

Tammy Zia
Medical Superintendent
D.H.Q. Hospital, Mardan.

Granted 90 days Maternity leave from 5-8-1986 to 2-11-1986 (B.D.) vide Divisional Deputy Director Health Services Peshawar Division, Peshawar's letter no. 924 of 200/MS/PT dated 3-8-1986.

Tammy Zia
Medical Superintendent
D.H.Q. Hospital, Mardan.

Resumed duty (after availing 88 days Maternity leave) on 1-11-1986 (A.V.).

Tammy Zia
Medical Superintendent
D.H.Q. Hospital, Mardan.

30/11/1986 Annual increment allowed.

Tammy Zia
Medical Superintendent
D.H.Q. Hospital, Mardan.

Tammy Zia
Medical Superintendent
D.H.Q. Hospital, Mardan.

Service verified for the period from 1-12-1985 F.V. to 30-11-1986 A.V.

Tammy Zia
Medical Superintendent
D.H.Q. Hospital, Mardan.

Pay fixed in the RBS No. 14 is B. 1100-64-2380 with effect from 1-7-1987 as under vide Govt. of NWFP Finance Dept No. F-1(PAC) 1-1/07-VIII dt 22-7-1987.

Pay already fixed in the BPS No. 14 on 30/6/87
Pay fixed in the RBS No. 14 on 1/7/87.

B. 1050/- per month
B. 1356/- per month

ATTESTED

Tammy Zia
Medical Superintendent
D.H.Q. Hospital, Mardan.

1 Name of post	2 Whether substantive or officiating, and whether permanent or temporary	3 If officiating state— (i) substantive appointment or (ii) whether service counts for pension under Art. 371. C. S. R.	4 Pay in substantive post	5 Additional pay for officiating	6 Other emoluments falling under the term 'Pay'	7 Date of appointment	8 Signature of Government servant
<p><u>RBS No. 14</u> <u>B. 1100-64-2380</u> Charge Nurse D.H.R. Hospital, Mardan.</p>	<p>Substantive Officiating</p>		<p>Pay R. B. 1420/- PM.</p>			<p>12/1987 PM.</p>	
<p>do</p>	<p>do</p>		<p>Pay R. B. 1484/- PM.</p>			<p>12/1988 PM.</p>	
<p>do</p>	<p>do</p>		<p>Pay R. B. 1508/- PM.</p>				
<p>do</p>	<p>do</p>		<p>Pay R. B. 1548/- PM.</p>			<p>12/1989 PM.</p>	

Office of the Accounts General
N.W.F.P., Islamabad.
Pay fixed in the Revised Basic Pay Scales 1987
of Rs. 1100-64-2380 (B-14)
at Rs. 1356/- P.M. w. e. i. 1-7-1987
With Next Increment on 1-12-1987

Accounts Officer
N.W.F.P.

[Signature]

Total overpayment
Rs. 492/- already
pointed out in
page 10 of this file
may be reviewed

Accounts Officer
Office of the Accounts General
N.W.F.P., Islamabad.

[Signature]

23

FIXATION OF PAY IN THE REVISED PAY SCALES 1987.

Name of official. Mehrun Nisa.

Designation. Charge Nurse.

Existing pay scale Rs.850-50-1850(BPS-14).
~~admissible on 30-6-1987.~~

Basic Pay scale Rs.1100-64-2380(RBPS-14).
admissible on 1-7-1987.

Basic pay in the Rs.1050/-p.m.
existing pay scale.

No:of stages occupied in 4
the existing BPS.

Pay fixed on 1-7-1987 in Rs.1356/-p.m.
the Revised Basic Pay scale.

Advance increments for
required qualifications:-

i- Matric(only for Class-IV) -

ii) F.A/F.Sc. -

iii) B.A/B.Sc. -

iv) M.A/M.Sc. -

Total pay on 1-7-1987. Rs.1356/-p.m.

Date of next increment. 1-12-1987.

RBI
B.

A.MATIN

Office of the Accounts General
N.W.F.P., Peshawar.
Pay fixed in the Revised Basic Pay Scales 1987,
of Rs. 1100-64-2380 (& B-14)
at Rs. 1356/- p.m. w.e.f. 1-7-1987
With Next Increment on 1-12-1987

Mehrun Nisa
MEDICAL SUPERINTENDENT,
D.H.Q. HOSPITAL, MARDAN.

ATTESTED

3. 492/1987
Pointed out on
page 10 of am.

37 Book may be
removed.
Accounts 23/1/89
Accounts Officer

Accounts 23/1/89
Accounts Officer
N.W.F.P.

Office of the Accounts General
N.W.F.P., Peshawar.

[Signature]

[Signature]

[Signature]

[Handwritten signature]

24

10	11	12	13		14	15	
Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment for censure, or reward or praise of the Government servant	
			Nature and duration of leave taken	Allocation of periods of leave on average pay up to four months for which leave salary is debitable to another Government			
				Period			Government to which debitable
11/1987 AN	Annual increment allowed.	<i>[Signature]</i> Medical Superintendent G.H.Q. Hospital, Mardan			<i>[Signature]</i> Medical Superintendent G.H.Q. Hospital, Mardan	Service verified for the period from 1-12-1986 AN to 30-11-1987 AN	
11/1988 AN	Annual increment allowed.	<i>[Signature]</i> Medical Superintendent G.H.Q. Hospital, Mardan			<i>[Signature]</i> Medical Superintendent G.H.Q. Hospital, Mardan	Services verified for the period from 1-12-1987 AN to 30-11-1988 AN	
11/1989 AN	Annual increment allowed.	<i>[Signature]</i> Medical Superintendent G.H.Q. Hospital, Mardan			<i>[Signature]</i> Medical Superintendent G.H.Q. Hospital, Mardan	Services verified for the period from 1-12-1988 AN to 30-11-1989 AN	
AN	Promoted as a Head Nurse BPS-16 & transferred to Hayat Shaked Teaching Hospital, Peshawar vide O.P.S. No. H.P. Peshawar dated No. 4257-61/E-II dated 3-3-1990.	<i>[Signature]</i> Medical Superintendent G.H.Q. Hospital, Mardan			<i>[Signature]</i> Medical Superintendent G.H.Q. Hospital, Mardan	Services verified for the period from 1-12-1989 AN to 10-3-1990 AN.	

ATTESTED

[Handwritten signature]

B-25

meher_takkar@yahoo.com

Curriculum Vitae

MEHER-UN-NISA (PNC REG # A-12133)

Postal address: C/o principal post graduate college of nursing, sector B-2 street 1, phase 5, hayatabad, Peshawar .

CNIC: 16101-2731293-2

Cell # +92333-9213389

Email: meher_takkar@yahoo.com

OBJECTIVE

- To acquire a challenging position in a dynamic and ever-growing organization, where my educational qualification, professional skills and experience can best be utilized.
- To provide effective and efficient service to the organization.
- To grow on the basis of personal abilities and to become a successful and result oriented professional.

EDUCATION

- **BSN (Post RN) (1 YEAR)**
University: KMU, Peshawar.
Session: 2012-2013
- **Master in Public Health**
University : Sarhad University of Science and Information Technology, Peshawar.
Session: 2008-2010
- **B.Sc (N) 2 Years**
University: University of Peshawar.
Session: 1990-1992
- **Diploma in Teaching Management**
College: Post Graduate college of Nursing, Peshawar.
Session: 1990-1991.
- **Diploma in Ward Management**
College: Post Graduate college of Nursing, Peshawar.
Session: 1989-1990.
- **Diploma in Midwifery (1Year)**
Board: Nursing Examination board, Peshawar
Session: 1980-1981
- **Diploma in general Nursing 3 Years**
School: School of Nursing, LRH, Peshawar
Session: 1975-1978
- **Matric**
Board: N.W.F.P board, Peshawar
Session: 1972

ATTESTED

meher_takkar@yahoo.com



meher_takkar@yahoo.com

EXPERIENCE

- Worked as a Principal in Post Graduate College of Nursing, Peshawar. (From July 2014 to June 2016)
- Worked as lecturer in Post Graduate College of Nursing, Peshawar. (From 2010 to 2014)
- Worked as Principal in M.N.C.H School. (From 2008-2010)
- Worked as Sister Tutor in Nursing school, Hayatabad, Peshawar. (From 2003 to 2008)
- Worked as Nursing Superintendent in HMC, Peshawar. (From 2001 to 2003)
- Worked as Sister Tutor in Nursing school, HMC, Peshawar. (From 2000 to 2001)
- Worked as Sister Tutor in Nursing School KTH, Peshawar. (From 1997 to 2000)
- Worked as Nursing Superintendent in Women and Children Hospital, Abbottabad. (From 1992 to 1997)
- Worked as Head Nurse in KTH, Peshawar. (From 1989 to 1992)
- Worked as Charge Nurse in DHQ, Mardan. (From 1978 to 1989)

**WORKSHOP,
SEMINARS AND
CERTIFICATES**

- Appear as Member in Provincial Public Service Commission as Subject Specialist in 2012, 2013 and 2014.
- Workshop EMONC (2010)
- Shield is awarded in Recognition of services (2010)
- Workshop on training of trainees from community.
- Workshop on Midwifery Tutors at Aga Khan (2009-2010)
- Workshop on Maternal Newborn Child Health Program
- Certificate on Midwifery educators (2009)
- Workshop on integrated management of national childhood illness (2009)
- Certificate on Aimerd capacity building of Nursing professionals (2006)

meher_takkar@yahoo.com

meher_takkar@yahoo.com



- Certificate on curriculum development and implementation (2005)
- PNC curriculum retreat in AGA Khan University (2004)
- Certificate on National seminar and workshop (2003)
- Certificate on AIDS control program (2001)
- Workshop on reproduction CIDA project (2000)
- Certificate awarded on Polio program (1994)
- Workshop on teaching of family planning (1990)
- General Course on Civil Defence Basic Knowledge (1985)

COMPUTER SKILLS

- Basic Knowledge of computer hardware
- Basic applications like MS Windows, Internet, E-mails
- Office Automation
- Internet

MANAGEMENT QUALITIES

- Ability to work in a group
- Ability to lead a group of people
- Can handle social problems tactfully
- Can make effective decisions at right time

LANGUAGES

- English , Urdu , Pashto

REFERENCES

- Dr. Fayyaz Ali
Course Coordinator
Provincial Health Services Academy, Peshawar.
+92-300-9036992
- Arab Begam
Principal Nursing School
Mardan Medical Complex, Mardan.

ATTESTED

meher_takkar@yahoo.com

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DIRECTORATE GENERAL HEALTH SERVICES N. W. F. P., PESHAWAR.

OFFICE ORDER.

The following Posting, Transfer of newly Promoted Sister Tutor, Instructor BPS-17 are hereby ordered in the public interest:-

S.No.	Name	From	To
1.	Mrs. Shamshad Akhtar Sister Tutor B-17	N/ PHS Hayatabad on General duty	N/ PHS Hayatabad against the vacant post of Nursing Instructor B-17
2.	Mrs. Anwar Zia Sister Tutor B-17	LRH, Peshawar	LRH, Peshawar against the vacant post of Sister Tutor B-17
3.	Mrs. Sherin Taj Sister Tutor B-17	LRH, Peshawar.	Public Health School Nishtar Abad against the vacant post.
4.	Mrs. Farhat Jehan Sister Tutor B-17	DHQ: Hosp: Chitral	KTH, Peshawar against the vacant post.
5.	Mrs. Kalsoom Akhtar Sister Tutor B-17	N/ PHS, Hayatabad (on General Duty)	N/ PHS, Hayatabad as Instructor B-17
6.	Mrs. Nasim Himayat Sister Tutor B-17	KTH, Peshawar.	KTH, Peshawar and will perform her duty as Nursing Superintendent,
7.	Mrs. Zubaida Bibi Sister Tutor B-17	N/ PHS, D. I. Khan (on General duty)	N/ PHS, D. I. Khan as Instructor B-17.
8.	Mrs. Rehana Mourin Sister Tutor B-17	Public Health School, Nishtarabad Peshawar on General duty)	N/ PHS, Kohat as Instructor B-17 a substitute of Miss Akhtar Shah.
9.	Mrs. Taslim Bibi Sister Tutor B-17	N/ PHS, Bannu on General duty	N/ PHS, Bannu as Instructor B-17.
10.	Mrs. Mehrun Nisa Sister Tutor B-17	HMC, Peshawar	HMC, Peshawar against the vacant post.

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- ... #32, 14...
- 11. Mrs. Shamim Akhtar Durani KTH, Peshawar KTH, Peshawar against the vacant post of Sister Tutor B-17
 - 12. Mrs. Musarrat Jabeen N, PHS D. I. Khan N, PHS, D. I. Khan as (on General duty) N Instructor B-17. Sister Tutor B-17

All should comply with the order immediately.

Sd, * * *
Director General Health Services NWFP, Peshawar.

No. 27153 - 62 / E-II, dated Peshawar the, 22.11.2000.

Copy forwarded to the:-

- 1. Secretary to Govt: of NWFP, Health Department, with reference to his Notification No. SOH-IIL 10-4, 99 dated 17.11.2000,
- 2. Medical Superintendent, Lady Reading Hospital, Peshawar.
- 3. Medical Superintendent, Khyber Teaching Hospital, Peshawar.
- 4. Medical Superintendent, Hayat abad Medical Complex, Peshawar.
- 5. Director Provincial Health Services Academy Peshawar.
- 6. Accountant General, NWFP, Peshawar.
- 7. Vice Principal, N PHS, Hayat Abad, Bannu, and D. I. Khan.
- 10. Principal, PHS, Nishtar Abad, Peshawar.
- 11. Medical Superintendent, DMJ Hospital, Bannu, Chitral, D. I. Khan.
- 14. District Account Officer, Bannu, D. I. Khan and Chitral.

for information and necessary action.

for Director General Health Services NWFP, Peshawar.

Mukhtiar.
22.11.2000.

22/11



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

No. 9489-91 /E.II,
Dated 24/4 /2014.

To:-

All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.

E-Mail Address: awf@dghs.gov.pk
Office Ph# : 091-9210209
Exchange# : 091-9210187, 9210196
Fax # : 091-9210230

01. The Principal, PGCN Hayatabad Peshawar.
02. The Vice Principal, School of Nursing HMC Peshawar.
03. The Vice Principal, School of Nursing Govt. LRH Peshawar.

Subject:-

PROMOTION OF SISTER TUTOR /NURSING INSTRUCTOR/ NURSING SUPDT. BPS-17 TO THE POST OF CHIEF NURSING SUPDT. BPS-18

Memo :-

I am directed to refer to the subject noted above and to state that the below mention Sister Tutor/Nursing Instructor/Nursing Supdt. BPS-17 are due for Promotion to the post of Chief Nursing Supdt. BPS-18. You are therefore requested to furnish their ACRs for the years and other documents mentioned against their names alongwith other documents :-

S.No.	Names of Officer	Year of ACRs and other documents
01.	Sherin Taj D/O Mohammad Shafi Sister Tutor BPS-17 School of Nursing HMC Peshawar	i. 10 Passport size Photographs. ii. 10 copies of No disciplinary action certificate as well as 10 copies of Bio- data.
02	Kalsoom Bibi D/O Mohammad Siddique, Sister Tutor BPS-17 School of Nursing HMC Peshawar	i. 10 Passport size Photographs. ii. 10 copies of No disciplinary action certificate as well as 10 copies of Bio- data.
03	Rehana Nourin AD (Nursing) BPS-17 DGHS office Peshawar.	i. ACRs, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012 & 2013. ii. 10 Passport size Photographs. iii. 10 copies of No disciplinary action certificate as well as 10 copies of Bio-data.
04	Anwar Zia D/O Said Faqir, Sister Tutor School of Nursing LRH Peshawar.	i. ACRs, 2004, 2006, 2007, 2008, 2009 and 2010. ii. 10 Passport size Photographs. iii. 10 copies of No disciplinary action certificate as well as 10 copies of Bio-data.
05	Mehr-un-Nisa D/O Abdul Latif, Sister Tutor BPS-17 PGCN Hayatabad Peshawar.	i. ACRs, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012 and 2013. ii. 10 Passport size Photographs. iii. 10 copies of No disciplinary action certificate as well as 10 copies of Bio-data.

ATTESTED

24/4/14



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

No. 4122-39 /E.II,
Dated 04/05 /2016

To:-

D-31
All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.

E-Mail Address: nwfpdghs@yahoo.com
Office Ph# 091-9210289
Exchange# 091-9210187, 9210196
Fax # 091-9210230

01. Principal, PGCN Hayatabad Peshawar.
02. Principal Public Health School Nishterabad Peshawar.
03. Principal Public Health School Abbottabad.
04. Medical Supdt. DHQ Hospital KDA Kohat.
05. Vice Principal, School of Nursing Swat.
06. Vice Principal, School of Nursing HMC Peshawar.
07. Vice Principal, School of Nursing KTH Peshawar.
08. Vice Principal, School of Nursing LRH Peshawar.
09. Vice Principal, School of Nursing MMC, Mardan.
10. Vice Principal, School of Nursing DIKhan.
11. Vice Principal, School of Nursing Kohat.
12. Vice Principal, School of Nursing Abbottabad.
13. Director- IKD, Hayatabad Peshawar.
14. Hospital Director, MTI LRH Peshawar
15. Hospital Director, MTI-KTH Peshawar.
16. Hospital Director, MTI / HMC, Peshawar.
17. Incharge Govt. Maternity Hospital Peshawar.
18. Medical Supdt. BBS Teaching Hospital Abbottabad.
19. Medical Supdt. Naseerullah Khan Babar Memorial Hospital Pesh:
20. Medical Supdt. DHQ Hospital Bannu.
21. Medical Supdt. DHQ Hospital Karak.
22. Assistant Director Nursing DGHS Office Peshawar.

Subject:- **PROMOTION OF NURSING SUPDT/ NURSING INSTRUCTOR BPS-17
TO THE POST OF CHIEF NURSING SUPDT. / VICE PRINCIPAL /
NURSING TUTOR BPS-18**

Memo :-

I am directed to refer to the subject noted above and to state that the below mention Nursing Superintendents/Nursing Instructors BPS-17 are due for Promotion to the post of Chief Nursing Superintendents/Vice Principals/Nursing Tutors BPS-18. You are therefore requested to furnish their PERs for the years and other documents mentioned against their names alongwith other documents:-

S.No.	Names of Officer	Year of ACRs and other documents
01	Mrs. Mehr-un-Nisa D/O Abdul Latif, Nursing Instructor/ BPS-17 PGCN Hayatabad Pesh:	i. PERs, 2015. ii. 10 copies of No disciplinary action certificate. <i>ok</i> iii. 10 copies of Bio-data.

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02	Mrs. Musarrat Dildar D/O Mohammad Ishâq, Nursing Supdt. BPS-17 DHQ Hospital, KDA Kohat	i. PERs, 2015. ii. 10 copies of No disciplinary action certificate. iii. 10 copies of Bio-data.	OK
03	Mrs. Akhtar Bano D/O Fazal Ahmad, Sister Tutor BPS-17, PGCN Hayatabad Peshawar.	i. PERs, 2015. ii. 10 copies of No disciplinary action certificate. iii. 10 copies of Bio-data	OK
04	Mrs. Mehr-un-Nisa D/O Muhammad Mustafa, Nursing Instructor BPS-17 (On leave 730 days EOL w.e.from 05-12-2014).	i. PERs, 2010, 2011, 2012, 2014 & 2015. ii. 10 copies of No disciplinary action certificate. iii. 10 copies of Bio-data.	OK
05	Mrs. Najma Sama D/O Qalandar Khan, Nursing Instructor BPS-17 School of Nursing Swat	i. PERs, 2015. ii. 10 copies of No disciplinary action certificate. iii. 10 copies of Bio-data.	OK
06	Mrs. Shahzadi Jamila D/O Abdul Hafeez Gulzar, Nursing Supdt. BPS-17 LRH Peshwar	i. PERs, 2015. ii. 10 copies of No disciplinary action certificate. iii. 10 copies of Bio-data.	OK
07	Mrs. Parveen Akhtar Bukhari D/O Syed Noor Ali Shah, Nursing Supdt. BPS-17 HMC Peshawar	i. PERs, 2015. ii. 10 copies of No disciplinary action certificate. iii. 10 copies of Bio-data.	OK
08	Mr. Faridullah Shah S/O Lal Shah, Nursing Supdt. BPS-17 (working against the post of Assistant Director Nursing) DGHS Office Peshawar	i. PERs, 2015. ii. 10 copies of No disciplinary action certificate. iii. 10 copies of Bio-data.	OK
09	Mrs. Shaheena Rehmat D/O Babu Rehmat Masih, Nursing Instructor BPS-17 School of Nursing HMC, Peshawar	i. PERs, 2015. ii. 10 copies of No disciplinary action certificate. iii. 10 copies of Bio-data.	OK
10	Bibi Naseem D/O Syed Pir Habibullah Shah, Nursing Supdt. BPS-17 IKD Peshawar	i. PERs, 2015. ii. 10 copies of No disciplinary action certificate. iii. 10 copies of Bio-data.	OK
11	Mrs. Lobeth Bertha Nursing Supdt. BPS-17 Govt. Maternity Hospital Peshawar	i. PERs 2011, 2012, 2013, 2014 & 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.	?

ATTESTED

12	Mrs. Shahnaz Begum D/O Hussain Shah; Nursing Supdt. BPS-17 BBS Teaching Hospital Abbottabad.	i. PERs, 2015. ii. 10 copies of No disciplinary action certificate. OK iii. 10 copies of Bio-data.
13	Mrs. Sakina Bibi D/O Abdur Rauf, Nursing Supdt. BPS-17 Naseerulalh Khan Babar Memorial Hospital Peshawar	i PERs 2009, 2010, 2011, 2012, 2013, 2014 & 2015. ii. 10 Copies of Bio-data K iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
14	Mrs. Tasleem Akhtar D/O Muhammad Gul, Nursing Instructor BPS- 17 Nursing School KTH Peshawar	i PERs 2014 & 2015. ii. 10 Copies of Bio-data OK iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
15	Mrs. Jamila Begum D/O Muhammad Yousaf Nursing Instructor BPS- 17 School of Nursing LRH Peshawar	i PERs 2012, 2013, 2014 & 2015. ii. 10 Copies of Bio-data OK iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
16	Mrs. Zeenat Begum D/O Lal Mar Shah, Nursing Supdt. KTH Peshawar	i PERs 2010, 2011, 2012, 2013, 2014 & 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. OK iv 10 Passport size Photographs.
17	Shagufta Naheed D/O Muhammad Ashraf Nursing Instructor BPS- 17 Public Health School Nishterabad Peshawar	i PERs 2010, 2011, 2012, 2013, 2014 & 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. OK iv 10 Passport size Photographs.
18	Parveen Akhtar D/O Jahn Masih, Nursing Instructor BPS-17 Nursing School BBS Teaching Hospital Abbottabad	i PERs 2010, 2011, 2012, 2013, 2014 & 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. OK iv 10 Passport size Photographs.
19	Walida Begum D/O Haji Bahadar, Nursing Instructor BPS-17, Nursing School LRH Peshawar	i PERs 2012, 2013, 2014 & 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. OK iv 10 Passport size Photographs.
20	Arab Begum D/O Sadiquillah Nursing Instructor BPS-17, Nursing School MMC, Mardan	i PERs 2011, 2012, 2013, 2014 & 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. OK iv 10 Passport size Photographs.

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21	Mrs. Ghulam Sakina D/O Muhammad Aslam; Nursing Instructor BPS-17 School of Nursing DIKhan	i PERs 2011, 2012, 2013, 2014 & 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs. OK
22	Mrs. Shaheen Akhtar D/O Mirza Inayat Baig, Nursing Instructor BPS- 17 School of Nursing HMC, Peshawar	i PERs 2010,2011, 2012, 2013, 2014 & 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
23	Mrs. Dilshad Begum D/O Abdul Sattar, Nursing Instructor BPS-17 School of Nursing KTH Peshawar	i PERs 2010,2011, 2012, 2013, 2014 & 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. OK iv 10 Passport size Photographs.
24	Mrs. Razia Begum D/O Wali Muhammad Nursing Supdt. BPS-17 DHQ Hospital Karak	i PERs 2010,2011, 2012, 2013, 2014 & 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. OK iv 10 Passport size Photographs.
25	Mrs. Sahar Bibi D/O Abbas Khan Nursing Instructor BPS-17, School of Nursing Bannu	i PERs 2014 & 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. OK iv 10 Passport size Photographs.
26	Mrs. Naheed Naz D/O Piara Masih, Nursing Instructor BPS-17, School of Nursing LRH Peshawar	i PERs 2014 & 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. OK iv 10 Passport size Photographs.
27	Mrs. Afshan Tabassum D/O Waris Khan Nursing Instructor BPS-17 PGCN Hayatabad Peshawar	i PERs 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
28	Mrs. Zaib un Nisa D/O Muhammad Bashir Nursing Instructor BS-17 School of Nursing Kohat	i PERs 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
29	Mrs. Asma D/O Aurangzeb, Nursing Instructor BPS-17 School of Nursing DHQ Hospital Abbottabad	i PERs 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
30	Mrs. Bakht Pari D/O Khan Bahadar, Nursing Instructor BPS-17 PHS Nishtarabad Peshawar	i PERs 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.

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31	Mrs. Farida D/O Sher Zaman Khan, Nursing Instructor BPS-17 School of Nursing LRH Peshawar	i PERs 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
32	Mrs. Koukab Naheed D/O S.Mourice, Nursing Instructor BPS-17, School of Nursing HMC, Peshawar	i PERs 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
33	Mrs.Ishrat Roohi D/O Fazal Yazdan, Nursing Instructor BPS-17 School of Nursing Swat	i PERs 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
34	Mrs. Gulshan Ara D/O Shahbaz Khan, Nursing Instructor BPS-17, (working against the post of Head Nurse LRH Peshawar)	i PERs 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
35	Mrs. Nasrin Begum D/O Khan Muhammad, Nursing Instructor BPS-17 School of Nursing SGTH, Swat	i PERs 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
36	Mrs. Gule Nasreen D/O Said Kamal, Nursing Instructor BPS-17 PHS Abbottabad	i PERs 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
37	Mrs. Akhtar Bano D/O Nisar Ahmed, Nursing Supdt. B-17, DHQ Hospital Bannu	i PERs 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
38	Mrs. Zeenat Bibi D/O Mohib Gul, Nursing Instructor BPS-17 School of Nursing KTH Peshawar	i PERs 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
39	Mrs. Istikhar Begum D/O Haji Muhammad, Nursing Instructor BPS-17, School of Nursing LRH Peshawar	i PERs 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
40	Mrs. Mehrun Nisa D/O Ghulam Sher khan, Nursing Instructor BPS-17 School of Nursing HMC, Peshawar	i PERs 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.

ATTESTED



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41	Mrs. Amina Khatoon D/O Abdul Ghaffar, Nursing Instructor BPS-17, School of Nursing LRH Peshawar	i PERs 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
42	Mrs. Nusrat Shaheen D/O Abdul Qadir, Nursing Instructor BPS-17 School of Nursing DHQ Hospital Abbottabad	i PERs 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.
43	Mrs. Shama Zarin D/O Allah Diya, Nursing Instructor BPS-17 School of Nursing KTH Peshawar	i PERs 2015. ii. 10 Copies of Bio-data iii. 10 copies of No Disciplinary action certificate. iv 10 Passport size Photographs.

R. Ahmad
DEPUTY DIRECTRESS (NURSING),
DGHS KPK PESHAWAR

2
04/15

ATTESTED

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37
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For Officers in BPS 17 & 18

اسکیل ۱۸ اور ۱۷ کے افسران کے لیے

CONFIDENTIAL

مہیندار

28

GOVERNMENT OF N.-W.F.P.

حکومت صوبہ شمال مغرب

Department/Office HEALTH Service/Group _____
عمر اڈنٹر رولنگ گروپ

PERFORMANCE EVALUATION REPORT

کارکردگی رپورٹ

FOR THE PERIOD 1.1.2012 TO 31.12.2012
۲۰ تا ۲۰ برائے عرصہ

PART I

حصہ اول

(TO BE FILLED IN BY THE OFFICER REPORTED UPON)

(متعلقہ افسر خود پُر کریں)

- Name (in block letters) MEHRUN - NISA
نام (دائیں حروف میں)
 - Personnel number 499 - 91 - 686799
انفرادی نمبر
 - Date of birth 12.6.1956
تاریخ پیدائش
 - Date of entry in service 31.11.1978
ملازمت اختیار کرنے کی تاریخ
 - Post held during the period (with BPS) Sister Tutor BPS 17
پیش نظر عرصہ میں عہدہ (مع اسکیل)
 - Academic qualifications BSc Nursing
تعلیم
 - Knowledge of languages (Please indicate proficiency in speaking (S), reading (R) and writing (W)) (بولنے (ب)، پڑھنے (پ)، اور لکھنے (ل) کی صلاحیت)
زبانوں کا علم
- English (W,R) Urdu (W,R) Pushtoo (W,R)

ATTESTED

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8. Training received during the evaluation period

متعلقہ عرصے کے دوران حاصل کی گئی تربیت

Name of course attended کورس کا نام	Duration with dates تاریخوں کے ساتھ دورانیہ	Name of institution and country ادارے اور ملک کا نام
Fast Track BSCN	Oct 2012 to Oct 2013	Post Graduate

9. Period served = 36 years 26 months

(I) In present post

14 years

(II) Under the reporting officer

14 years

Shamshad adir
Principal

PART II

حصہ دوم

(TO BE FILLED IN BY THE OFFICER REPORTED UPON)

(متعلقہ افسر خود پر کریں)

10. Job description

فہماریاں کی تفصیل

- 1 - management , Teaching , Counselling
Paper setting , Evaluation.
- 2 - Record keeping
- 3 - Co-ordinate with Principal faculty members
and Students Nurses.
- 4 - Responsible for the day to day running of the
Course.

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2. Brief account of performance on the job during the period supported by statistical data where possible. Targets given and actual performance against such targets should be highlighted. Reasons for shortfall, if any, may also be stated.

ذیل غور میں کارکن کی کارکردگی کے ساتھ مختصر بیان کریں۔ دیے گئے اہداف اور کارکردگی کو نمایاں طور پر لکھیں۔ اہداف تکمیل

- 1 - During the reporting period all the assigned tasks related to the students and service were accomplished. The result were achieved as desired.
- 2 - The students activities at PACH were carried out as per schedule.
- 3 - The meetings were ~~arranged~~ seminars attended on time and develop the potential for future progress.
- 4 - Interview conducted for public service Commission.
- 5 - maintained students academic / Personal Record.

PART III

حصہ سوم

(EVALUATION BY THE REPORTING OFFICER)

(رپورٹنگ افسر کا جائزہ)

The rating in Part III should be recorded by initialing the appropriate box. The ratings denoted by alphabets are as follows:

'A' Very Good, 'B' Good, 'C' Average, 'D' Below Average

حصہ سوم میں کارکن کی اصلاح و ترقی کے لئے پیش نظر درج ذیل الفاظ سے کیا جائے۔ حروف کے لحاظ سے درج ذیل کے حساب ذیل ہے:

الف: اچھی بہ اچھا ع: اوسط د: اوسط سے کم

For uniform interpretation of qualities, two extreme shades are mentioned against each quality.

ہر ایک کے لئے دو طرفت کے درج ذیل الفاظ کا ذکر کیا گیا ہے۔

		A الف	B ب	C ع	D د	
1.	Intelligence ذہانت Exceptionally bright; excellent comprehension انجمنی ذہین اور مطالعہ عمیق	ⓐ				Dull; slow کمزور ذہن۔ سست

ATTESTED

		A الف	B ب	C ج	D د	
2.	Confidence and will power خود اعتمادی اور قوت ازادی Exceptionally confident and resolute اعتمادی پر اعتماد اور مستقل مزاج	○				Uncertain; hesitant عدم اعتماد اور ہچکچاہٹ کا شکار
3.	Acceptance of responsibility ذمہ داری اٹھانے کی آمادگی Always prepared to take on responsibility even in difficult cases مشکل معاملات میں بھی ذمہ داری اٹھانے کے لئے ہمیشہ آمادہ		○			Reluctant to take on responsibility; will avoid it when- ever possible ذمہ داری اٹھانے سے گریز کرنے والا
4.	Reliability under pressure دباؤ کی حالت میں کام کرنے کی صلاحیت Calm and exceptionally reliable at all times ہر حالت میں قابل اعتماد		○			Confused and easily flustered even under normal pressure پریشان ہمسولی دباؤ میں حواس باخت
5.	Financial responsibility مالی معاملات میں احساس ذمہ داری Exercises due care and discipline احتیاط سے کام لیتا رہتا ہے تو اعداد و ضوابط کا خیال رکھتا رہتا ہے۔	○				Irresponsible غیر ذمہ دار
6.	Relations with تعلقات i) Superiors اعلیٰ افسران کے ساتھ Cooperative and trusted معاون اور قابل اعتماد	○				Un-cooperative غیر معاون
	ii) Colleagues رفقائے کار کے ساتھ Works well in a team ٹیم میں کام کرتا ہے	○				Difficult colleague مشکل رفیق کار
	iii) Subordinates مختوں کے ساتھ Courteous and effective; encouraging خوش اخلاق، موثر اور حوصلہ دینے والا اور اہل	○				Discourteous and intolerant; بد اخلاق
7.	Behaviour with public عوام کے ساتھ رویہ Courteous and helpful خوش اخلاق اور معاون		○			Arrogant, discour- teous and indiffer- ent مغرور اور لائق

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	A الف	B ب	C ج	D د	
8. Ability to decide routine matters روزمرہ معمولات کے فیصلے کرنے کی صلاحیت Logical and decisive منطقی اور فیصلہ کن	(Handwritten mark)				Indecisive; vancillating متذبذب اور ڈانواں ڈول
9. Knowledge of relevant laws, rules, regulations, instructions and procedures. متعلقہ قوانین، قواعد، ضوابط، ہدایات اور طریق کار سے واقفیت Exceptionally well informed, keeps abreast of latest developments. قواعد و ضوابط پر غیر معمولی عبور، تازہ ترین صورت حال سے آگاہ		(Handwritten mark)			Ignorant and uniformed لاعلم اور ناواقف

(Handwritten mark)

PART IV

حصہ چہارم

(REPORTING OFFICER'S EVALUATION)

(رپورٹنگ افسر کا جائزہ)

1. Please comment on the officer's performance on the job as given in Part II(2) with special reference to knowledge of work, quality and quantity of output. How far was the officer able to achieve targets? Do you agree with what has been stated in Part II(2)?

حصہ دوم (۲) میں بیان کی گئی کارکردگی کا جائزہ لیں۔ کام سے متعلق افسر کے علم اور کارکردگی کے معیار و مقدار کے حوالے سے بھی رائے دیں۔ اہداف کو پورا کرنے میں افسر کس حد تک کامیاب رہا/ رہی؟ کیا آپ حصہ دوم (۲) میں دی گئی معلومات سے متفق ہیں؟

Yes I agree with the officer's statement as given in Part II(2)

ATTESTED

(Handwritten signature)

2. Integrity (Morality, uprightness and honesty)

(راست بازی، ایمان داری) دیانت

Good & honest officer

3. Pen picture with focus on the officer's strengths and weaknesses not covered in Part III (Weakness will not be considered as adverse entries unless intended to be treated as adverse).

قلمی خاک: افسر کی خوبیوں اور کمزوریوں کا جائزہ لیں (کوٹاہی کو اس وقت تک منفی تصور نہیں کیا جائے گا جب تک رپورٹنگ افسر ضروری تصور نہ کرے)

The officer is having full command on her profession and performed her duties well being a hard working officer

4. Special aptitude

خصوصی استعداد

She is interesting in teaching

5. Recommendations for future training

آئندہ تربیت کے لیے سفارشات

The officer has been observed intelligent. Recommended for Higher Education Training

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6. Overall grading

مجموعی درجہ

(Handwritten mark)

		Exaggerated رپورٹنگ افر	Countersigning officer کاؤنٹرسائنگ افر
(i)	Very Good اعلیٰ	(Handwritten mark)	(Handwritten signature)
(ii)	Good اچھا		
(iii)	Average اوسط		
(iv)	Below Average اوسط سے کم		

7. Fitness for promotion

ترقی کے لیے ماسبت

		Reporting Officer رپورٹنگ افر	Countersigning Officer کاؤنٹرسائنگ افر
(i)	Fit for promotion ترقی کے لیے موزوں	(Handwritten mark)	(Handwritten signature)
(ii)	Recently promoted/appointed. Assessment premature حال میں ترقی ہو چکی ہے / مزید ترقی آگے از وقت ہے		
(iii)	Not yet fit for promotion ترقی کے لیے ابھی موزوں نہیں		
(iv)	Unlikely to progress further مزید ترقی کے قابل نہیں		

Name of the reporting officer SHAMSHAD QADIR Signature (Handwritten signature)

(Capital letters) _____
رپورٹنگ افر کا نام (دفاع حروف میں)

Designation PRINCIPAL P.G.N. COLLEGE HYAT - Date _____

ABAD PESHAWAR

Principal
Post Graduate College
Hayatabad Peshawar

ATTESTED

(Handwritten signature)

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PART V

حصہ پنجم

(REMARKS OF THE COUNTERSIGNING OFFICER)

(کاؤنٹرسائنگ افسر کی رائے)

1. How well do you know the officer? If you disagree with the assessment of the reporting officer, please given reasons

آپ افسر کو کس حد تک جانتے ہیں؟ اگر آپ رپورٹنگ افسر کی رائے سے متفق نہیں تو وجہ بیان کریں

Agreed with R/O officer

2. Evaluation of the quality of assessment made by the reporting officer

رپورٹنگ افسر کے جائزہ کے معیار کے بارے میں کاؤنٹرسائنگ افسر کی رائے

Exaggerated
(مبالغہ آمیز)

Fair
(مناسب)

Biased
(جانب دار)

Name of the Countersigning officer

(Capital letters)

کاؤنٹرسائنگ افسر کا نام (واضح حروف میں)

DR. FARUQ DIN
DD(M)

Signature

Fahsade

Principal Health Services Academy
Health Department,
Government of Khyber Pakhtoonkhwa
Peshawar.

Designation

عہدہ

Date

تاریخ

45

PART VI

حصہ ششم

(32)

REMARKS OF THE SECOND COUNTERSIGNING OFFICER (IF ANY)

دوسرے کاؤ سائننگ افسر (بشرط موجودگی) کی رائے

Name _____ Signature _____

Designation _____ Date _____

ATTESTED

[Handwritten signature]

GUIDELINES FOR FILLING UP THE PER

- After initiating their PER, the officers under report should immediately fill up the detachable 'Certificate' giving names of the RO/CO and send the same to the Officer incharge of their respective confidential records. This exercise will ensure proper follow-up of the pending performance evaluation reports by the concerned Ministry/Division/Provincial Government etc.
- Forms should be filled in duplicate. Parts I and II are to be filled by the officer under report and should be typed. Part III and IV will be filled by the Reporting Officer while the Countersigning/Second Countersigning Officers will fill Parts V and VI respectively. The ratings in Part III should be recorded by initiating the appropriate box.
- Each Division, Department, autonomous body and office etc. is required to prepare specific job descriptions giving main duties of each job to be mentioned in Part-II (I). The job descriptions may be finalized with the approval of the Head of the Organization or any person authorized by him.
- The officer under report should fill Part II (2) of the form as objectively as possible and short term and long term targets should be determined/assigned with utmost care. The targets for each job may be formulated at the beginning of the year wherever possible. In other cases, the work performed during the year needs to be specifically mentioned.
- Assessment by the Reporting Officers should be job-specific and confined to the work done by the officer during the period under report. They should avoid giving a biased or evasive assessment of the officer under report, as the Countersigning Officers would be required to comment on the quality of the assessment made by them.
- The Reporting Officers should support their assessment in Part IV through comments against each characteristic. Their opinions should represent the result of careful consideration and objective assessment so that, if called upon, they could justify the remarks/comments. They may maintain a record of the work done by the subordinates in this regard.
- The Countersigning Officers should weigh the remarks of the RO against their personal knowledge of the officer under report and then give their assessment in Part V. In case of disagreement, the Countersigning Officers should give specific reasons in Part V. Similarly, if the Countersigning Officers differ with the grading or remarks given by the Reporting Officer in part III they should score it out and give their own grading by initialing the appropriate box.
- The Countersigning Officers should make an unbiased evaluation of the quality of performance evaluation made by the RO by categorizing the reports as exaggerated, fair or biased. This would evoke a greater sense of responsibility from the reporting officers.
- The Countersigning Officers should underline, in red ink, remarks which in their opinion are adverse and should be communicated to the officer reported upon. All adverse remarks whether remediable or irreparable should be communicated to the officer under report, with a copy of communication placed in the CR dossier. Reporting Officers should ensure that proper counselling is given to the officer under report before adverse remarks are recorded.
- The Reporting and Countersigning Officers should be clear, direct, objective and unambiguous in their remarks. Vague impressions based on inadequate knowledge or isolated incidents should be avoided.
- Reports should be consistent with the pen picture, overall grading and comparative grading.

IMPORTANT

- Part I and II of the PER should be duly filled and dispatched to the Reporting Officer not later than the 15th of January. The ROs should forward the report to the Countersigning Officer within two weeks of receipt after giving their views in Parts III and IV. The COs should then finalize their comments in Part V within two weeks of receipt of PER. The Second Countersigning Officers, if any, should also complete their assessment within a period of two weeks.
- Name and designation of Reporting/Countersigning Officers should be clearly written. Comments should be legible and in the prescribed format and which can be easily scanned.
- Personnel Number is to be filled in by the officer under report, if allotted.
- Proforma has been devised in English/Urdu to provide flexibility to RO/CO in the choice of language.

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2014

75

CERTIFICATE

Certified that I Mehrun Nisa Planning cadre BPS 17
(Name of Officer) (Group/Service) (BS)

have on 19.2.2014 submitted my Performance Evaluation Report
(Date)

to Rehana Manzoor Principal PACS.
(Name/Designation of Reporting Officer)

My countersigning officer is _____
(Name/Designation of Countersigning Officer)

Name/Designation/Department of Officer

Note:- This certificate is required to be dispatched by the officer being reported upon to the Officer Incharge entrusted with the maintenance of his/her C.R. Dossier on the same date the PER is forwarded to his/her reporting officer.

ATTESTED



Guidelines

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For Officers in BPS 17 & 18

ان کیلئے ۱۸ اور ۱۷ کے افسران کے لیے

CONFIDENTIAL

مستند

(Handwritten signature/initials)

GOVERNMENT OF N. W.F.P.

حکومت صوبہ شمال

Department/Office HEALTH

سہ ادارہ

Service/Group _____

گروپ / سروس

PERFORMANCE EVALUATION REPORT

کارکردگی رپورٹ

FOR THE PERIOD

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۲۰

TO

20

برائے ۲۰

PART I

حصہ اول

(TO BE FILLED IN BY THE OFFICER REPORTED UPON)

(متعلقہ افسر خود پُر کریں)

1. Name (in block letters) MEHRUN-NISA

نام (دائیں حروف میں)

2. Personnel number 999-91-686799

انفرادی نمبر

3. Date of birth 12.6.1956

تاریخ پیدائش

4. Date of entry in service 31.11.1978

ملازمت اختیار کرنے کی تاریخ

5. Post held during the period (with BPS) Sister Tutor

پیش نظر عہدہ (بہ سہ اہلی)

6. Academic qualifications B.S.C

تعلیم

7. Knowledge of languages (Please indicate proficiency in speaking (S), reading (R) and writing (W))

زبانوں کا علم

(بولنے (ب)، پڑھنے (پ)، اور لکھنے (ل) کی صلاحیت)

Urdu - english Pushtoo

(R.W) (R.W) (R.W)

ATTESTED

(Handwritten signature)

8. Training received during the evaluation period

معلقہ عرصے کے دوران حاصل کی گئی تربیت

Name of course attended کورس کا نام	Duration with dates تاریخوں کے ساتھ دورانیہ	Name of institution and country انستٹیوٹ کا نام اور ملک

9. Period served

عرصہ ملازمت

(i) In present post

موجودہ عہدے پر

(ii) Under the reporting officer

رپورٹنگ آفیسر کے تحت

PART II

حصہ دوم

(TO BE FILLED IN BY THE OFFICER REPORTED UPON)

(مشاورہ فرمادہ کریں)

10. Job description

ذمہ داریوں کی تفصیل

- 1- Planning and conducting a speciality courses of OT speciality.
- 2- prepared session and teaching students to implement the curriculum according to the module.
- 3- Maintain the students training records.
- 4- Responsible over all Nursing hostals management.
- 5- Co-ordinate with principal faculty members and students nurses.
- 6- Teaching in class Room and clinical area.
- 7- Prepared and maintained students progress Report.
- 8- Evaluated the students performance during course and check their assessabi

50

(Signature)

2. Brief account of performance on the job during the period supported by statistical data where possible. Targets given and actual performance against such targets should be highlighted. Reasons for shortfall, if any, may also be stated.

پیش نظر میں کارکردگی کا اعداد و شمار کے ساتھ مختصر بیان کریں۔ دیئے گئے اہداف اور کارکردگی کو نمایاں طور پر لکھیں۔ اہداف تک پہنچانے کی وجہ بیان کریں

1- During The reporting period all The assigned Tasks related to The students and service were accomplished. The result were achieved as desired

2- The st

PART III

حصہ سوم

(EVALUATION BY THE REPORTING OFFICER)

(رپورٹنگ افسر کا جائزہ)

The rating in Part III should be recorded by initialing the appropriate box.

The ratings denoted by alphabets are as follows:

'A' Very Good, 'B' Good, 'C' Average, 'D' Below Average

حصہ سوم میں کارکردگی اندراج مختلف خانے میں مختصر خط سے کیا جائے۔ حروف کے لحاظ سے درجہ بندی حسب ذیل ہے:

الف: بہت اچھا ب: اچھا ج: اوسط د: اوسط سے کم

For uniform interpretation of qualities, two extreme shades are mentioned against each quality.

ہر صفت کے لئے ہر صفت کے دو انتہائی درجوں کا ذکر کیا گیا ہے۔

	A الف	B ب	C ج	D د	
1. Intelligence ذہانت	(Signature)				ATTESTED Dull; slow کندہن، سست
Exceptionally bright; excellent comprehension انتہائی ذہین اور محاطہ فہم					

51

		A الف	B ب	C ج	D د	
2.	Confidence and will power خود اعتمادی اور قوت ارادی Exceptionally confident and resolute انتہائی پر اعتماد اور مستقل مزاج	P/100				Uncertain; hesitant عدم اعتماد اور ہنگامہ پختہ کا فقدان
3.	Acceptance of responsibility ذمہ داری اٹھانے کی آمادگی Always prepared to take on responsibility even in difficult cases مشکل معاملات میں بھی ذمہ داری اٹھانے کے لئے ہمیشہ آمادہ	P/100				Reluctant to take on responsibility; will avoid it when- ever possible ذمہ داری اٹھانے سے گریز کرنے والا
4.	Reliability under pressure دباؤ کی حالت میں کام کرنے کی صلاحیت Calm and exceptionally reliable at all times ہر حالت میں قابل اعتماد	P/100				Confused and easily flustered even under normal pressure پریشان، معمولی دباؤ میں حواس باختہ
5.	Financial responsibility مالی معاملات میں احساس ذمہ داری Exercises due care and discipline امتیاط سے کام لیتا رہتا ہے، قواعد و ضوابط کا خیال رکھتا رہتا ہے۔	P/100				Irresponsible غیر ذمہ دار
6.	Relations with تعلقات i) Superiors اعلیٰ افسران کے ساتھ Cooperative and trusted معاون اور قابل اعتماد	P/100				Un-cooperative غیر معاون
	ii) Colleagues رفقاءے کار کے ساتھ Works well in a team نہج عمل کو اچھا کام کرتا کرتی ہے	P/100				Difficult colleague مشکل رفیق کار
	iii) Subordinates مختوں کے ساتھ Courteous and effective; encouraging خوش اخلاق، مؤثر اور حوصلہ دینے والا اور اہلی	P/100				Discourteous and intolerant; بد اخلاق
7.	Behaviour with public عوام کے ساتھ رویہ Courteous and helpful خوش اخلاق اور معاون	P/100				Arrogant, discour- teous and indiffer- ent مغرور اور لا اخلق

52

(Signature)

	A الف	B ب	C ج	D د	
8. Ability to decide routine matters روزمرہ معمولات کے فیصلے کرنے کی صلاحیت Logical and decisive منطقی اور فیصلہ کن	<i>P/...</i>				Indecisive; vancillating شذبذب اور ڈانواں ڈول
9. Knowledge of relevant laws, rules, regulations, instructions and procedures متعلقہ قوانین، قواعد و ضوابط، ہدایات اور طریق کار سے واقفیت Exceptionally well informed, keeps abreast of latest developments. قواعد و ضوابط پر غیر معمولی عبور، تازہ ترین صورت حال سے آگاہ	<i>P/...</i>				Ignorant and unformed لاطم اور ناواقف

PART IV

حصہ چہارم

(REPORTING OFFICER'S EVALUATION)

(رپورٹنگ افسر کا جائزہ)

1. Please comment on the officer's performance on the job as given in Part II(2) with special reference to knowledge of work, quality and quantity of output. How far was the officer able to achieve targets? Do you agree with what has been stated in Part II(2)?

حصہ دوم (۲) میں بیان کی گئی کارکردگی کا جائزہ لیں۔ کام سے متعلق افسر کے علم اور کارکردگی کے معیار و مقدار کے حوالے سے بھی رائے دیں۔ اہداف کو پورا کرنے میں افسر کس حد تک کامیاب رہا رہی؟ کیا آپ حصہ دوم (۲) میں دی گئی معلومات سے متفق ہیں؟

*Yes agreed with the statement
as given in para 2*

ATTESTED

(Signature)

53

2. Integrity (Moral, uprightness and honesty)

She is very responsible, honest and hard working.

3. Pen picture with focus on the officer's strengths and weaknesses not covered in Part III (Weakness will not be considered as adverse entries unless intended to be treated as adverse).

She is an efficient, good worker

and has acceptance of responsibility over in difficult. Her performance remaining good through out the year.

4. Special aptitude

She is interesting in teaching

5. Recommendations for future training

She is over all very good, mature, Personality Recommended for higher education.

54

6. Overall grading
مجموعی درجہ

(24)

		Exaggerated رپورٹنگ افسر	Countersigning officer کاؤنٹر سائننگ افسر
(i)	Very Good بہسی	[Signature]	[Signature]
(ii)	Good اچھا		
(iii)	Average اوسط		
(iv)	Below Average اوسط سے کم		

7. Fitness for promotion
ترقی کے لیے مناسب

		Reporting Officer رپورٹنگ افسر	Countersigning Officer کاؤنٹر سائننگ افسر
(i)	Fit for promotion ترقی کے لیے موزوں	[Signature]	[Signature]
(ii)	Recently promoted/appointed. Assessment premature حال میں ترقی ہو چکی ہے / مزید ترقی قبل از وقت ہے		
(iii)	Not yet fit for promotion ترقی کے لیے ابھی موزوں نہیں		
(iv)	Unlikely to progress further مزید ترقی کے قابل نہیں		

Name of the reporting officer Rehana Manzoor Signature [Signature]
(Capital letters) REHANA MANZOOR دستخط
رپورٹنگ افسر کا نام (دائیں حروف میں)

Designation Principal P. G. S. N Date 30/3/2015
تاریخ

ATTESTED

[Signature]

Designation _____
 Date _____
 Name of the Countersigning Officer _____
 Signature _____
 (Capital letters) _____

Exaggerated (مبالغه)
 Fair (عادل)
 Biased (مائل)

2. Evaluation of the quality of assessment made by the reporting officer

1. How well do you know the officer? If you disagree with the assessment of the reporting officer, please give reasons

Agreed with comments of
 R / Officer

(REMARKS OF THE COUNTERSIGNING OFFICER)

PART V

56

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PART VI

حصہ ششم

(33)

REMARKS OF THE SECOND COUNTERSIGNING OFFICER (IF ANY)

دوسرے آڈیٹر یا ایگزیکٹو آفیسر (بشرط موجودگی) کی رائے

Name _____ Signature _____

پب

پب

Designation _____ Date _____

پب

پب

ATTESTED

پب

- Part I and II of the PER should be duly filled and dispatched to the Reporting Officer not later than the 15th of January. The ROs should forward the report to the Countersigning Officer within two weeks of receipt after giving their views in Parts III and IV. The COs should then finalize their comments in Part V within two weeks of receipt of PER. The second Countersigning Officers, if any, should also complete their assessment within a period of two weeks.
- Name and designation of Reporting/Countersigning Officers should be clearly written, Comments should be legible and in the prescribed format and which can be easily scanned.
- Personnel Number is to be filled in by the officer under report, if omitted.
- Proforma has been devised in English/Hindi to provide flexibility to RO/CO in the choice of language.

IMPORTANT

- Reports should be consistent with the pen picture, overall grading and comparative grading remarks. Vague impressions based on inadequate knowledge or isolated incidents should be avoided.
- The Reporting and Countersigning Officers should be clear, direct, objective and unambiguous in their officer under report before adverse remarks are recorded.
- Remediable should be communicated to the officer under report, with a copy of communication and should be communicated to the officer reported upon. All adverse remarks whether remediable or The Countersigning Officers should underline, in red ink, remarks which in their opinion are adverse greater sense of responsibility from the reporting officers.
- The Countersigning Officers should make an unbiased evaluation of the quality of performance evaluation made by the RO by categorizing the reports as exaggerated, fair or biased. This would evoke a give their own grading by initialing the appropriate box.
- Countersigning Officers should give specific reasons in Part V. Similarly, if the Countersigning Officers differ with the grading or remarks given by the Reporting Officer in Part III they should score it out and the officer under report and then give their assessment in Part V. In case of disagreement, the Countersigning Officers should weigh the remarks of the RO against their personal knowledge of record of the work done by the superordinates in this regard.
- The Reporting Officers should support their assessment in Part IV through comments against each the assessment made by them.
- Assessment by the Reporting Officers should be job-specific and confined to the work done by the officer during the period under report. They should avoid giving a biased or evasive assessment of the officer under report, as the Countersigning Officers would be required to comment on the quality of the year needs to be specifically mentioned.
- The officer under report should be determined/assigned with utmost care. The targets for each job may be formulated at the beginning of the year wherever possible. In other cases, the work performed during long term targets should be determined/assigned with utmost care. The targets for each job may be finalized with the approval of the Head of the Organization or any person authorized by him.
- Each Division, Department, autonomous body and office etc. is required to prepare specific job descriptions giving main duties of each job to be mentioned in Part II (i). The job descriptions may be finalized with the approval of the Head of the Organization or any person authorized by him.
- Certificates giving names of the RO/CO and send the same to the Officer incharge of their respective confidential records. This exercise will ensure proper follow-up of the pending performance evaluation reports by the concerned Ministry/Division/Provincial Government etc.
- After initialing their PER, the officers under report should immediately fill up the detachable forms should be filled in duplicate. Parts I and II are to be filled by the officer under report and should be typed. Part III and IV will be filled by the Reporting Officer while the Countersigning/Second Countersigning Officers will fill Parts V and VI respectively. The ratings in Part III should be recorded by initialing the appropriate box.

GUIDELINES FOR FILLING UP THE PER

58

60

11924
1-6-2016

~~11924~~
E-0

To,

The Secretary,
Govt: of Khyber Pakhtunkhwa,
Health Deptt: Peshawar.

Subject: Appeal

R/Sir,

Most respectfully it is stated that I (Mrs. Mehr-Un-Nisa Principal PGCN Hayatabad Peshawar) am going to be retired w.e.f. 12/06/2016. I have been trying for my promotion to BPS-18 since 2014 but my promotion was effected due to non issuance of service rules/notification of final seniority list by your good Department. Now the seniority list/Service rules have been notified by the health department Khyber Pakhtunkhwa (Notified seniority list is here by attached for ready reference) . Therefore I am once again came in action for my promotion after the issuance of the above mentioned 02 Nos of notifications. I have been once again requested for my promotion to BPS-18 since October/2015 but the case is still pending in the Nursing Section Director General Health Services Khyber Pakhtunkhwa due to unknown reasons. As well as the case is ready for PSB and I am near to be retired w.e.f 12/06/2016.

In the view of above you are therefore , requested that kindly my promotion case may be taken individually and may be sent to PSB on sympathetic grounds due to my promotion w.e.f. 12/06/2016. I shall be very thankful to you for this act of kindness and I will pray for your long life

THANKS !

Dated: 01/06/2016

Yours obediently,

L. Nisa
Mrs. Mehr-Un-Nisa Principal,
PGCN Hayatabad, Peshawar.

C.c

01. The Director General Health Services Khyber Pakhtunkhwa Peshawar.
02. The Director PHSA Khyber Pakhtunkhwa Peshawar.
03. The Section Officer-III Health Department Khyber Pakhtunkhwa Peshawar.
04. The Deputy Director Nursing Director General Health Services Khyber Pakhtunkhwa Peshawar.

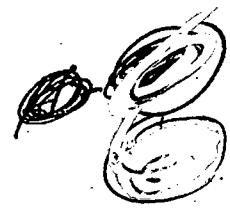
ATTESTED

[Signature]

61

To,

The Secretary,
Establishment Department,
Govt: of Khyber Pakhtunkhwa.



Subject: Appeal

R/Sir,

Most respectfully it is stated that I (Mrs. Mehr-Un-Nisa Principal PGCN Hayatabad Peshawar) am going to be retired w.e.f. 12/06/2016. My promotion case has been submitted by the health department Khyber Pakhtunkhwa Peshawar in your honour for PSB on to-day i.e. 07/06/2016.

In the view of above it is therefore requested that kindly my promotion case may be expedite or may be considered as a special case for PSB on sympathetic grounds as my retirement is due on 12/06/2016. I shall be very thankful to you for this act of kindness and I will pray for your long life

THANKS !

Dated: 07/06/2016

Yours obediently,

Mrs.

Mrs. Mehr-Un-Nisa Principal,
PGCN Hayatabad, Peshawar.

ATTESTED

[Signature]



62
GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated the Peshawar 27th July, 2016

NOTIFICATION.

No. SOH-III/8-117/2016. The Competent Authority is pleased to accord sanction to the grant of leave encashment of 365 days in lieu of LPR as admissible to Mrs. Mehr-un-Nisa D/o Abdul Latif, Ex- Nursing Instructor BS-17, Post Graduate College of Nursing, Hayatabad Peshawar under the Revised Leave Rules 1981.

2. The officer stands retired from Govt. Service w.e.f. 11-06-2016 on attaining the age of superannuation (i.e. 60 years).

Secretary to Govt. of Khyber Pakhtunkhwa
Health Department

Endst No. of even No and Date.

Copy forwarded to:

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa, Peshawar.
3. The Director, PHSA, Peshawar.
4. The Principal, PCGN, Hayatabad Peshawar.
5. PS to Secretary Health, Khyber Pakhtunkhwa.
6. Master File.
7. Officer concerned.

(Muhammad Tariq)
Section Officer-III

ATTESTED

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

WRIT PETITION NO. 3423 P / 2016

Mrs. Mehr-Un-Nisa D/O Abdul Latif,
Ex: Nursing Instructor (BPS-17),
R/O Village Takar, P/O Takar, Tehsil Takht Bhai, District Mardan



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 Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 5- The Director General Health Services Department, Khyber Pakhtunkhwa, Peshawar.

RESPONDENTS

**WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF PAKISTAN 1973 AS AMENDED
UPTO DATE**

R/SHEWETH:
ON FACTS:

ATTESTED

EXAMINER

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

- 1- That petitioner was appointed as charge Nurse in the respondent Department on the proper recommendation of Departmental selection committee vide order dated 29.11.1978. That in response the petitioner submitted her charge report and started performing her duty quite efficiently and up to the entire satisfaction of her superiors. Copy of the service book is attached as annexure **A.**

FILED TODAY

Deputy Registrar

08 SEP 2016

- 2- That during service the petitioner was promoted to the post of Head Nurse (BPS-16) vide order dated 3.3.1990 and subsequently was promoted to the post of Nursing Instructor (BPS-17) vide Notification dated 22.11.2000. Copies of the C.V and posting as Instructor order are attached as annexure **B and C.**

- 64
- 3- That in the year 2014 total five posts of (BPS-18) were lying vacant under the control of respondents. That according to the Notification dated 24.4.2014 the respondent No.5 directed the petitioner including her colleagues to submit their ACR's for promotion to the posts of BPS-18. That the above mentioned Notification clearly indicated that petitioner was eligible and entitled for promotion to the post of Chief Nursing Superintendent (BPS-18) on seniority cum fitness basis but the respondents dropped the petitioner from the said promotion with out any reason and clear justification. Copy of the Notification is attached as annexure **D.**
 - 4- That now vide Notification dated 4.5.2016 the petitioner was directed by the respondents to submit her ACR's/ PER's as her promotion is due to Chief Nursing Superintendent (BPS-18) being senior most employee of the respondent Department. That in response the petitioner submitted her ACR's for the years 2013, 2014 and 2015 before the competent authority. Copies of the Notification dated 4.5.2016 and ACR's are attached as annexure **E and F.**
 - 5- That inspite of that the respondents delayed the promotion process for the post of Chief Nursing Superintendent (BPS-18) though the petitioner time and again requested the respondents to expedite the process as her retirement was due on 11.6.2016. That inspite of repeated requests of the petitioner the respondents did not held the PSB in time and in result the petitioner was got retired from service on superannuation basis vide Notification dated 27.7.2016 without availing promotion to the post of Chief Nursing Superintendent (BPS-18). Copies of the Departmental appeal and Notification dated 27.7.2016 are attached as annexure **G and H.**
 - 6- That petitioner feeling aggrieved and having no other remedy filed the instant writ petition on the following grounds amongst the others.

GROUND:

A- That the impugned order dated 24.4.2014 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.

Dputy Registrar

08 SEP 2016

B- That not considering the petitioner for promotion to the post of Chief Nursing Superintendent (BPS-18) is against the law and norms of natural justice.

ATTESTED
[Signature]
EXAMINER

(42)

65

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

D- That inspite of that the respondents delayed the promotion process for the post of Chief Nursing Superintendent (BPS-18) though the petitioner time and again requested the respondents to expedite the process as her retirement was due on 11.6.2016. That inspite of repeated requests of the petitioner the respondents did not held the PSB in time and in result the petitioner was got retired from service on superannuation basis vide Notification dated 27.7.2016 without availing promotion to the post of Chief Nursing Superintend (BPS-18)

E- That not considering the petitioner for promotion to the post of chief Nursing Superintendent (BPS-18) inspite of eligibility and seniority the respondents violated the appointment, promotion and transfer Rules 1989.

F- That the respondents acted in arbitrary and malafide manner while not considering the petitioner for promotion to the post of Chief Nursing Superintendent (BPS-18).

G- That the respondents intentionally delayed the process of promotion of the petitioner to the post of Chief Nursing Superintendent (BPS-18) and as such the petitioner was reached to the age of superannuation (60 years) before availing the promotion to BPs-18.

H- That the delay on the part of respondents by not considering the petitioner for promotion to the post of BPS-18 is the utter violation of Rules and Regulations.

I- That respondents discriminated the petitioner by not considering him for promotion to the post of Chief Nursing Superintendent (BPS-18).

J- That petitioner is the senior most employee of the respondent Department and at the top of the seniority list but inspite of that the PSB has been delayed of the respondents and as such the petitioner was retired from service before availing the promotion.

FIL'D TODAY
Deputy Registrar

08 SEP 2016

K- That petitioner seeks permission to advance other grounds and proofs at the time of hearing.

ATTESTED


EXAMINER

It is therefore, most humbly prayed that on acceptance of this writ petition the impugned order dated 24.4.2014 issued by the respondents may kindly be declared as illegal, unconstitutional and ineffective upon the rights of the petitioner. That the respondents may please be directed to promote the petitioner to the post of Chief Nursing Superintendent (BPS-18) from the date when her colleagues were promoted i.e. w.e.f. 24.4.2014. Any other remedy which this august Court deems fit that may also be awarded in favor of the petitioner.

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PETITIONER

Mehru
MEHR UN NISA

THROUGH:

Noor
NOOR MOHAMMAD KHATTAK
ADVOCATE
(Mobile No.0345-9383141)

VERIFICATION:

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

Noor
DEPONENT

LIST OF BOOKS:

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

ATTESTED
[Signature]
EXAMINER

FILED TODAY
[Signature]
Deputy Registrar
08 SEP 2016

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

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WRIT PETITION NO. 3923 P / 2016

MEHR UN NISA

VS

GOVT: OF KPK

AFFIDAVIT

I Mehr-Un-Nisa D/O Abdul Latif, R/O Village Takar, P/O Takar, Tehsil Takht Bhai, District Mardan (petitioner) do hereby solemnly affirm that the contents of this writ petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

MUN

Mehr-Un-Nisa D/O Abdul Latif
CNIC NO. 16101-2731293-2

IDENTIFIED BY:
NOOR MOHAMMAD KHATTAK
ADVOCATE HIGH COURT

No:.....	<i>9608</i>
Certified that the above was verified on	
affirmation before me in office, this.....	<i>B.H.</i>
day of.....	<i>Sc.P. 16</i>
.....	<i>Makam Nisa</i>
.....	<i>Mardan</i>
.....	<i>MUTT. Mulla</i>
..... is personally known to me:	
<i>8/9/2016</i>	
Oath Commissioner Peshawar High Court, Peshawar	

FILED TODAY
Deputy Registrar
08 SEP 2016

ATTESTED
[Signature]
EXAMINER

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

WRIT PETITION NO. _____/2016

MEHR UN NISA

VS

GOVT: OF KPK

ADDRESSES OF PARTIES

Mrs. Mehr-Un-Nisa D/O Abdul Latif,
Ex: Nursing Instructor (BPS-17),
R/O Village Takar, P/O Takar, Tehsil Takht Bhai, District Mardan
..... **PETITIONER**

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 Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 5- The Director General Health Services Department, Khyber Pakhtunkhwa, Peshawar.

..... **RESPONDENTS**

PETITIONER

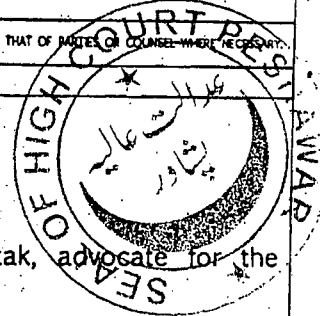
THROUGH: 
NOOR MOHAMMAD KHATTAK
ADVOCATE

FILED TODAY
Deputy Registrar
08 SEP 2016

ATTESTED

EXAMINER

PESHAWAR HIGH COURT, PESHAWAR		
FROM 'A'		
FORM OF ORDER SHEET		
COURT OF _____ CASE NO. _____		
SERIAL NO OF ORDER OR PROCEEDINGS	DATE OF ORDER OR PROCEEDINGS	ORDER OR OTHER PROCEEDINGS WITH SIGNATURE OF JUDGE OR MAGISTRATE AND THAT OF PARTIES OR COUNSEL-WHERE NECESSARY.
1	2	3
23.05.2018		<p>W.P. No. 3423-P/2016.</p> <p>Present: -</p> <p>Mr. Noor Muhammad Khattak, advocate for the petitioner.</p> <p>Mr. Mujahid Ali Khan, AAG alongwith Mr. Fareed Ullah Shah, Deputy Director, Nursing.</p> <p>*****</p> <p>WAQAR AHMAD SETH SPJ:- Petitioner through the instant petition filed under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, prayed that:-</p> <p>"On acceptance of this writ petition the impugned order dated 24.04.2014, issued by the respondents may kindly be declared as illegal, unconstitutional and ineffective upon the rights of the petitioner. That the respondents may please be directed to promote the petitioner to the post of Chief Nursing Superintendent (BPS-18) from the date when her colleagues were promoted i.e. w.e.f. 24.04.2014.</p> <p>Any other remedy which this august Court deems fit that may also be awarded in favour of the petitioner."</p> <p>2. When the case was taken up for hearing, the representative alongwith learned AAG stated at the bar that respondents are going to consider the petitioner for notional promotion to the post of Chief Nursing</p>



69

Amir Bashir Awan, Court Secretary.

(DB) Hon'ble Mr. Justice Waqar Ahmad Seth, Senior Puisne Judge and Mr. Justice Qalandar Ali Khan, H.J.

ATTESTED

[Signature]
=XAMINE

70

Superintendent (BPS-18) from back date i.e. 24.04.2014 in the next Provincial Selection Board (PSB) meeting.

3. Learned counsel for the petitioner when confronted with the situation he also showed his concurrence over the proposition so advanced by the learned AAG.

4. In this view of the matter and especially in the light of statement of the learned AAG as well as of departmental representative, respondents are directed to consider the petitioner for the captioned post in the upcoming PSB meeting and issue proforma promotion order since 24.04.2014. In case of any failure on the part of respondents, petitioner will be at liberty to file contempt petition.

5. With these observations, petition in hand is disposed of accordingly.

SENIOR PUNJAB JUDGE

[Signature]
JUDGE

ANNOUNCED
23.05.2018.

CERTIFIED TO BE TRUE COPY

EXAMINER
Peshawar High Court/Peshawar
Authorised Under Article 87 of
The Constitution of Pakistan Order 1984

27 JUN 2019

ATTESTE
[Signature]
YAMIN

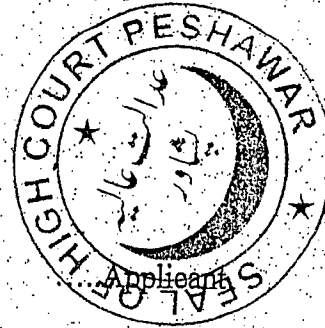
BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.

COC. No...../2019

in

W.P. NO. 3423-P of 2016

Mst. Mehr-un-Nisa D/o Abdul Latif (late)
R/O House No. 419, Street No.14 Sector, 07
Sheikh Maltoon Township Tehsil & District
Mardan.



Versus

Mr Fareedullah Shah
Deputy Director Nursing,
Health Department Khyber Pukhtoonkhwa.
Tehsil and District Peshawar.

...Contemnor

APPLICATION UNDER ARTICLE 204 OF THE CONSTITUTION OF PAKISTAN, 1973 READ WITH SECTION 3 OF THE CONTEMPT OF COURT ACT, 1976 FOR INITIATING CONTEMPT OF COURT PROCEEDINGS AGAINST MR. FAREEUDDLAH SHAH (DDN) DEPUTY DIRECTOR NURSING FOR DISREGARDING THE ORDERS OF THIS HONOURABLE COURT DATED 23.05.2018 AND ALSO TO PUNISH HIM IN ACCORDANCE WITH LAW.

RESPECTFULLY SHEWETH

- 1- That the Applicant has filed the above titled writ petition before this Honourable Court and this Hon'ble Court after hearing both the parties has passed the final order in favour of the applicant/ petitioner in presence of the contemnor/ respondent. The contents of the said writ petition and order of this Honorable Court dated 23.05.2018 may be read as an integral part of this application.
- 2- That the above titled W.P. No. 3423-P of 2016 came up for final hearing on 23/05/2018 in which the Honourable Division Bench of this Honourable Court directed the respondents / contemnor to consider the case of the applicant for promotion the relevant portion of the order of this Honorable Court is re-produce hereunder :-

" in this view of the matter and especially in the light of statement of the learned AAG as well as of departmental representative, respondents are directed to consider the petitioner for the captioned post in the upcoming PSB meeting and issue proforma promotion order since 24-04-2014. In case of any failure on the part of respondents, petitioner will be at liberty to file contempt petition.

With these observations, petition in hand is disposed of accordingly.
(Copy of judgment is annexed as annexure "A")

CERTIFIED TO BE TRUE COPY

EXAMINER
Peshawar High Court, Peshawar
Authorized Under Article 8.7 of
The Qanun-e-Shahadat Order 1984

- 3- That the applicant approached the present contemnor/ respondent and informed him about the orders dated 23-05-2018 of this Hon'ble Court. Despite

PESHAWAR HIGH COURT, PESHAWAR

ORDER SHEET

Date of Order or proceedings	Order or other proceedings with Signature of Judge or that of parties or counsel where necessary.
27.02.2019	<p><u>COC NO. 127-P/2019 In W.P.No. 3423-P/2016</u></p> <p>Present: Mr. Shakeel Asif, Advocate, for the petitioner.</p> <p>Mr. Muhammad Riaz, AAG for the respondent.</p> <p>.....</p> <p><u>MUSARRAT HILALI, J.-</u> Through the instant petition the petitioner seeks initiation of contempt of court proceedings against the respondent for disregarding the orders of this Hon'ble Court dated 23.05.2018.</p> <p>2. <u>When the case was taken up for hearing, the learned A.A.G. stated that compliance of the order of this Court dated 23.05.2018 has already been made and the petitioner has been adjusted.</u></p> <p>3. When so, this petition has achieved its purpose and is no more required to be kept pending.</p> <p>Disposed of accordingly.</p> <p>CERTIFIED TO BE TRUE COPY</p> <p>JUDGE</p> <p>EXAMINER Peshawar High Court, Peshawar Authorized Under Article 8.7 of The Qanun-e-Shahadat Order 1984</p> <p>27 JUN 2019</p> <p>JUDGE</p>

72

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.

COC. No...../2019

In

W.P. NO. 3423-P of 2016

Mst. Mehr-un-Nisa D/o Abdul Latif (late)
R/O House No. 419, Street No.14 Sector, 07
Sheikh Maltoon Township Tehsil & District
Mardan.

Versus

Mr Farcედullah Shah
Deputy Director Nursing,
Health Department Khyber Pukhtoonkhwa.
Tehsil and District Peshawar.



APPLICATION UNDER ARTICLE 204 OF THE CONSTITUTION OF PAKISTAN, 1973 READ WITH SECTION 3 OF THE CONTEMPT OF COURT ACT, FOR INITIATING CONTEMPT OF COURT PROCEEDINGS AGAINST MR. FAREEUDLLAH SHAH (DDN) DEPUTY DIRECTOR NURSING FOR DISREGARDING THE ORDER OF THIS HONOURABLE COURT DATED 23.05.2018 AND ALSO TO PUNISH HIM IN ACCORDANCE WITH LAW.

RESPECTFULLY SHEWETH

1- That the Applicant has filed the above titled writ petition before this Honourable Court and this Hon'ble Court after hearing both the parties has passed the final order in favour of the applicant/ petitioner in presence of the contemnor/ respondent. The contents of the said writ petition and order of this Honourable Court dated 23.05.2018 may be read as an integral part of this application.

2- That the above titled W.P. No. 3423-P of 2016 came up for final hearing on 23/05/2018 in which the Honourable Division Bench of this Honourable Court directed the respondents / contemnor to consider the case of the applicant for promotion the relevant portion of the order of this Honourable Court is re-produce hereunder :-

" in this view of the matter and especially in the light of statement of the learned AAG as well as of departmental representative, respondents are directed to consider the petitioner for the captioned post in the upcoming PSB meeting and issue proforma promotion order since 24-04-2014. In case of any failure on the part of respondents, petitioner will be at liberty to file contempt petition.

With these observations, petition in hand is disposed of accordingly.
(Copy of judgment is annexed as annexure "A")

3- That the applicant approached the present contemnor/ respondent and duly informed him about the orders dated 23-05-2018 of this Hon'ble Court. Despite

74



PESHAWAR HIGH COURT, PESHAWAR

FORM OF ORDER SHEET

Date of Order or Proceedings	Order/Proceedings with Signature of Judge.
03.09.2019	<p>CoC No.543-P/2019 in WP No.3423-P/2016</p> <p>Present:</p> <p>Mr. Shakil Asif, Advocate, for petitioner.</p> <p>Mr. Arshad Ahmad, AAG, along with Safiullah, Focal Person, DGHS, for respondents.</p> <p>****</p> <p>Latter states that case of the petitioner has been referred to the concerned department to be placed before the Provincial Selection Board, meeting of which is still awaited.</p>



[Handwritten signature]

JUDGE
JUDGE

3159

of Presentation of Application *05/9/19*

of Pages *2/2*

ing fee *02*

of Preparation of Copy *12/9/19*

of Delivery of copy *12/9/19*

ised *12/9/19*

CERTIFIED TO BE TRUE COPY

[Signature]

Examiner
Peshawar High Court, Peshawar
Authorised Under Article 8.7.01
The Qanun-e-Shahadat Order 1984

12/9/19

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.

COC. No...../2019

In

W.P. NO. 3423-P of 2016

Mst. Mehr-un-Nisa D/o Abdul Latif (late)
R/O House No. 419, Street No.14 Sector, 07
Sheikh Maltoon Township Tehsil & District
Mardan.

.....Applicant

Versus

Mr Fareedullah Shah
Deputy Director Nursing,
Health Department Khyber Pukhtoonkhwa.
Tehsil and District Peshawar.

...Contemnor



APPLICATION UNDER ARTICLE 204 OF THE CONSTITUTION OF PAKISTAN, 1973 READ WITH SECTION 3 OF THE CONTEMPT OF COURT ACT, 1976 FOR INITIATING CONTEMPT OF COURT PROCEEDINGS AGAINST MR. FAREEUDLLAH SHAH (DDN) DEPUTY DIRECTOR NURSING FOR DISREGARDING THE ORDERS OF THIS HONOURABLE COURT DATED 23.05.2018 AND ALSO TO PUNISH HIM IN ACCORDANCE WITH LAW.

RESPECTFULLY SHEWETH

1- That the Applicant has filed the above titled writ petition before this Honourable Court and this Hon'ble Court after hearing both the parties has passed the final order in favour of the applicant/ petitioner in presence of the contemnor/ respondent. The contents of the said writ petition and order of this Honourable Court dated 23.05.2018 may be read as an integral part of this application.

2- That the above titled W.P. No. 3423-P of 2016 came up for final hearing on 23/05/2018 in which the Honourable Division Bench of this Honourable Court directed the respondents / contemnor to consider the case of the applicant for promotion the relevant portion of the order of this Honourable Court is re-produce hereunder :-

" in this view of the matter and especially in the light of statement of the learned AAG as well as of departmental representative, respondents are directed to consider the petitioner for the captioned post in the upcoming PSB meeting and issue proforma promotion order since 24-04-2014. In case of any failure on the part of respondents, petitioner will be at liberty to file contempt petition.

With these observations, petition in hand is disposed of accordingly.
(Copy of judgment is annexed as annexure "A")

3- That the applicant approached the present contemnor/ respondent and duly informed him about the orders dated 23-05-2018 of this Hon'ble Court. Despite

[Signature]
ATTESTED
EXAMINER
Peshawar High Court

the order of this Hon'ble Court the applicant has become a rolling stone in the department and lastly the respondent / contemnor refused to obey the order of this Honorable Court by not issuing the proforma promotion from the date mentioned in the order of this Honorable Court. Hence this application.

- 4- That Mr. Fareedullah Shah who is the Deputy Director Nursing despite of the fact that on the date of hearing of writ petition mentioned above was present in this Honorable Court which is evident from the judgment and the clear directions of this Honourable Court, has disobeyed the orders of this Hon'ble Court and thus had committed Contempt of Court for which he should be prosecuted.
- 5- That the conduct of Mr. Fareedullah Shah has blatantly disregarded the clear cut directions of this Hon'ble Court and has in fact flouted the process of law by his naked misuse of power. Hence this contempt application.

It is, therefore, most respectfully prayed that on acceptance of this application, this Honourable Court may be pleased to:-

- I- Contempt proceedings may be initiated against Mr. Fareedullah Shah Deputy Director Nursing, Health Department Khyber Pukhtoonkhwa Peshawar.

And

- II- Mr. Fareedullah Shah, Deputy Director Nursing, Health Department Khyber Pukhtoonkhwa be punished in accordance with the relevant law applicable to the matter accordingly

Any other relief deemed appropriate in the circumstances of the case may also be granted in favor of the applicant not specifically prayed for in the circumstances of the case.

K. Asif
 Applicant/
 Through: *[Signature]*
 (Naqeeb Ahmad Talwar)

And
 Shakeel Asif
 Advocates, Peshawar.

[Signature]

[Signature]
ATTESTED
 EXAMINER
 Peshawar High Court

Judgment Sheet

IN THE PESHAWAR HIGH COURT,
PESHAWAR.

Judicial department

COC No.543-P/2019 in

WP No.3423-P/2016 (D)

Mst. Mehr-un-Nisa

Vs

Mr. Fareedullah Shah

JUDGMENT

Date of hearing 03.10.2019

Petitioner (s) by Mr. Nazeem Ahmad Talhar, Advocate

Respondent (s) by Mr. Faridullah, Deputy Director Nursing,
Health Department, Khyber
Pakhtunkhwa, Peshawar

IKRAMULLAH KHAN, J. Through the instant contempt of Court petition, petitioner seeks initiation of contempt proceedings against respondent for non-compliance of order/judgment of this Court rendered in WP No.3423-P/2016 decided on 23.05.2016.

2. Faridullah, Deputy Director Nursing, Health Department, Khyber Pakhtunkhwa present in Court made statement that the case of the petitioner has already been referred to the PSB, however such statement has already

ATTESTED

EXAMINER
Peshawar High Court

78

been given by one learned Law Officer but the case of the petitioner was never placed before PSB. As the petitioner has already been retired, even then her case be considered on notional basis by the PSB as soon as possible but not later than 60 days. This petition is disposed of accordingly.

Announced
03.10.2019

JUDGE

JUDGE

(CO) Hon'ble Mr. Justice Dr. S. K. Sinha & Hon'ble Justice M. S. Raza

S. P. Sinha
CERTIFIED TO BE TRUE COPY

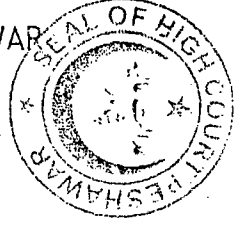
Examinee:
Postmaster High Court, Postmaster
Authorized Under Article 27 of
the Jammu and Kashmir Order 1954

11 DEC 2019

No. 18192
Date of Presentation of Application 11/12/19
No of Pages 3-2
Copying fee: 0
Total 0
Date of Preparation of Copy 11/12/19
Date of Delivery of copy 11/12/19
Received By [Signature]

BEFORE THE HONOURABLE PESHAWAR HIGH COURT, PESHAWAR

94P
COC No 12020 2021
In Re:
W.P No 3423 of 2016



Mst: Mehr-un-Nisa D/O Abdul Latif (late) R/O House 419, Street
No 14, Sector 07 Sheikh Maltoon Township Tehsil and District
Mardan.....(Petitioners)

VERSUS

Mr. Fareed Ullah Shah, Deputy Director Nursing, Health
Department Khyber Pakhtunkhwa (KPK) Tehsil and District
Peshawar(Respondent)

Application under Article 204 of the
Constitution of Islamic Republic of
Pakistan, 1973 r/w Section 3 of Contempt
of Court Act, 1976 for initiating contempt
of Court proceeding against Mr. Fareed
Ullah Shah (DDN) Deputy Director Nursing
for disregarding the orders of this
Honourable Court dated 23-05-2018 and
also to punish him in accordance with law

FILED TODAY
Deputy Registrar
16 FEB 2021

Respectfully Sheweth: -

Ccccc

The Applicant/Petitioner humbly submits as under:-

- 1) That the Applicant has filed the above titled writ petition before this Honourable Court and this Honourable Court

81

(8) 8

Ullah, Deputy Director Health Department KP present in Court made statement that the case of the Petitioner has already been referred to the PBS, however such statement has already been given by one learned Law Officer but the case of the Petitioner was never placed before PSB. As the Petitioner has already been retired, even then her case be considered on notional basis by the PSB as soon as possible but not later than 60 days.

4) That the Applicant approached the present contemnor/ Respondent and duly informed him about the orders dated 23-05-2018 of this Honourable Court. Despite the order of this Honourable Court, the Applicant has become a rolling stone in the department and last the Respondent/ contemnor refused to obey the order of this Honourable Court by not issuing the proforma promotion order from the date mentioned in the order of this Honourable Court. hence this application.

5) That Mr. Fareed Ullah Shah, who is the Deputy Director Nursing despite of the fact that on the date of hearing of writ petition mentioned above was present in this Honourable Court, which is evident from the judgment and the clear directions of this Honourable Court, has disobeyed the orders of this Honourable Court and thus had committed contempt of Court, for which he should be prosecuted.

FILED TODAY
Deputy Registrar
16 FEB 2021

ATTESTED
Deputy Registrar



- 6) That the conduct of Mr. Fareed Ullah Shah has blatantly disregarded the clear cut directions of this Honourable Court and has in fact flouted the process of law by his naked misuse of power, hence this contempt application.
- 7) That any other ground will be raised at the time of arguments with the prior permission of this Honourable Court.

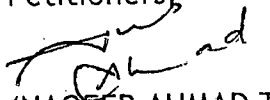
It is, therefore, most respectfully prayed that on acceptance of this Application, this Honourable Court may be pleased to:-

- i. Contempt proceeding may be initiated against Mr. Fareed Ullah Shah Deputy Director Nursing Health Department Khyber Pakhtunkhwa, Peshawar
- ii. Mr. Fareed Ullah Shah Deputy Director Nursing Health Department Khyber Pakhtunkhwa be punished in accordance with the relevant law applicable to the matter accordingly.

Any other relief, which this Honorable Court deems just and appropriate in the circumstances of this case, not specifically asked for, may also be granted in favor of Petitioners against the Respondent

FILED
Deputy Registrar
16 FEB 2021

Dated: -15-12-2020

Petitioners,
Through: 
(NAQEEB AHMAD TAKKAR)
Advocate,
High Court, Peshawar

ATTORNEY
EXAMINER
Peshawar High Court

83

(60)

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.

COC No:- 94 P -P/2021
In
WP No:- 3423-P/2016

Mst: Mehr-un-Nisa **Versus** Fareed Ullah Shah
..... Petitioner Respondents



AFFIDAVIT

I, Oazi Ali Gohar S/o Oazi Johar Zaman R/o Sheikh Maltoon Town, House No 419, Street No 14, Sector S, Mardan.

(Special Attorney of the petitioner), do hereby solemnly affirm and declare on oath that the contents of this accompanying application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Identified by

DEPONENT
CNIC No:-16101-7485748-9 ✓
Cell No:- 0336-9965230

Naqeeb Ahmad Takkar
Advocate, Peshawar.

FILED TODAY

Deputy Registrar
16 FEB 2021

~~DECLARED TO BE TRUE COPY~~
Registered
Peshawar High Court, Peshawar
Registered Under Article 87 of
Constitution of Pakistan Order 162

02 APR 2022

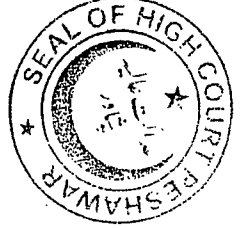
18439
Oazi Johar Zaman
Mardan
Naqeeb Ahmad
28
Oazi Ali Gohar
Mardan
Naqeeb Ahmad
28/01/2021

JUDGMENT SHEET

IN THE PESHAWAR HIGH COURT
JUDICIAL DEPARTMENT.

COC No.94-P/2021
in Writ Petition No.3423-P/2016

J U D G M E N T



Date of hearing : 1st March, 2022
Petitioner : By Mr. Naqeeb Ahmad Takkar,
(Mst. Mehr-un-Nisa) Advocate.
Respondents : By Mr. Saqib Raza, AAG
(Deputy Director Nursing)

QAISER RASHID KHAN, CJ.-The petitioner,

through the instant petition, seeks the initiation of the contempt of court proceedings against the respondent for defying the judgment dated 23.05.2018 of this court rendered in W.P.No.3423-P/2016 by not giving her notional / proforma promotion as a Chief Nursing Superintendent (BS-18).

2. The learned AAG by referring to the written reply states that though the case of the petitioner was considered for notional / proforma promotion but as there were only three posts available, therefore, the top three officials were promoted while the petitioner stood at serial No.4 of the merit list and that is how, she was left out from the contest.

In view of the above stated position, this COC cannot proceed and is accordingly dismissed.

Announced
01.03.2022


CHIEF JUSTICE

JUDGE

85
J-6

To,

The Hon'ble Secretary Health
Khyber Pakhtunkhwa Peshawar

Subject:-

**DEPARTMENTAL APPEAL FOR NOTIONAL
PROMOTION OF THE APPELLANT FROM BPS-17
TO THE POST OF CHIEF NURSING
SUPERINTENDENT BPS-18, DUE FROM
24.04.2014 AS PER THE JUDGMENT OF THE
HON'BLE PESHAWAR HIGH COURT PESHAWAR
IN WP NO. 3423-P/2016 AND TO IMPLEMENT
THE SAME WITH LETTER AND SPIRIT.**

RESPECTFULLY SHEWETH,

1. That the Appellant was appointed as Charge Nurse in the Health Department after proper recommendation of the Departmental Selection Committee and after assumption of charge the Appellant perform her duty with great zeal and zest.
2. That thereafter, after completion of length of service to the promotion of BPS-16 as a Head Nurse on dated 03.03.1990 and thereafter promoted to the BPS-17 vide notification dated 22.11.2000.
3. That in the year 2014 total five posts of BS-18 were laying vacant, while issued notification dated 24.04.2014, according to which the Appellant was mentioned top of their seniority and the concerned authority was directed to submit the SCRs of the mentioned employees serving in BPS-17 for further promotion to BPS-18 on the post of Chief Nursing Superintendent on the basis of Seniority cum-fitness.
4. That according to the notification the Appellant was placed at the top of seniority list amongst the Nursing Instructor BPS-17 and she was quite eligible for promotion to BPS-18 and the concerned authority had submitted SCRs, therefore she was competent as per the Law, rules to be promoted to BPS-18, but due to non-mentioning of any reason the name of the Appellant has been dropped.
5. That thereafter the competent authority once again issued notification dated 04.05.2016, whereby the ACRs / PERs were called by the promotion Board which was submitted to the Departmental Promotion Committee, however inspite of the fact that Appellant was quite eligible for the promotion but the promotion process was delayed due to unknown reasons and the Appellant time and again submitted her Applications for issuance of promotion but in vain and in the meanwhile on dated 27.07.2016 the Appellant got retired.

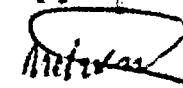
6. That the Appellant filed Departmental Appeal as well as a Writ Petition before the Hon'ble Peshawar High Court Peshawar which was allowed with the consent of competent authority with the observations "When the case was taken up for hearing, the representative along with learned AAG stated at the Bar that Respondents are going to consider the Petitioner for notional promotion to the post of chief Nursing Superintendent BPS-18 from back date i.e 24.04.2014 in the next Provincial Selection Board (PSB) meeting". In the light of this commitment the Writ Petition was allowed and the competent authority was directed to issue proforma promotion order since 24.04.2014.

7. That the Order of Hon'ble Peshawar High Court Peshawar was passed on dated 23.05.2018, however till date no Notional Promotion to BPS-18 of the Petitioner is being issued, which is the violation of the Judgment of the High court and non-consideration the Appellant promotion to BPS-18 is against the law and Justice.
8. That the Appellant served in Health Department about 35 years with great zeal and zest and the promotion in upper scale in accordance with law is the great wish of every employee, however in the present case the Appellant was treated in discriminated manner.
9. That the Appellant got retired in 2016 and inspite of the clear cut direction of the Hon'ble Peshawar High Court Peshawar the Appellant has been deprived from her lawful right and submitting this Departmental Appeal with request to promote her in BPS-18 in the light of Judgment of Peshawar High Court Peshawar.

It is, therefore, humbly prayed that on acceptance of the instant Appeal, the Order of the Hon'ble Peshawar High Court Peshawar in WP No. 423/2016 dated 23.05.2018 may kindly be implemented with letter and spirit and the Notional Promotion in favour of the Appellant may kindly be issued w.e.f 24.04.2014.

Dated: 31.05.2022

Appellant



MEHR UN NISA

S/o Abdul Latif

R/o House No 419, Street No 14,

Sector 07, Sheikh Maltoon

Township Mardan

Ex-Nursing Instructor BPS-17

Cell # 0336-9965320

No. 669

For Insurance Stamps see reverse. RGL81697486

Rs. -Ps.

uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due

50

Received a registered letter addressed to

Secretary State Stamp

*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures)

Health

Insurance fee Rs.

Ps.

(in words)

Weight

Kilo

Grams

Name and address of sender

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24.04.2014 AS PER HON'BLE PESHAWAR IN WP NO. 3423-P/20 THE SAME WITH LETTE

RESPECTFULLY SHEWETH,

That the Appellant was appointed Health Department after proper Departmental Selection Committee charge the Appellant perform her duty best.

That thereafter, after completion of promotion of BPS-16

88, (A)

بعد االت جناب سر و سر ٹریبونل خیریتو نفاہ بشار

B. C 09-2022
0333 9732419

2022 مخاب سائل

صبر النساء بنام حکومت خیریتو نفاہ وغیرہ

موزخہ
مقدمہ
دعوی
جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام بشار کیلئے بشیر خان وزیر اینڈ وکیل
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلاف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو یہی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائے التوائے مقدمہ کے سبب سے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ مندر ہے۔

صبر النساء

Accepted by

2022

_____ ماہ _____ المرقوم

_____ واہ العب

کے لئے منظور ہے۔

بمقام