

25.10.2022

Appellant present through counsel.

Kabir Ullah Khattak, learned Additional Advocate General alongwith Syed Javid Ali Litigation Officer present and submitted comments on behalf of respondent No.3.

On the preceding date, pre-admission notice was given to the respondents to submit reply which admission notice was accepted on behalf of all the respondents by Dr. Rizwan Ullah Senior Medical Officer as well as learned AAG. Today, comments were not submitted on behalf of respondents No.1 & 2, therefore, learned AAG is directed to make sure the presence of representative on behalf of respondents No.1 & 2 not below Grade-17 with further direction to submit comments on or before the next date. To come up for reply/preliminary hearing on 23.11.2022 before S.B at Camp Court, D.I Khan.



(Rozina Rehman)
Member (J)
Camp Court, D.I.Khan

27th Sept 2022

Learned counsel for the appellant present and argued the appeal at certain length. Where-after the appearance of the District Health Officer, D.I.Khan was felt who was summoned through the learned Addl: AG but because of death of the relative of the DHO, D.I.Khan, Dr. Muhammad Rizwan, Senior Medical Officer put appearance on his behalf. Since the Doctor put appearance on behalf of the DHO D.I.Khan is not in a position to assist the Tribunal on certain points, therefore, it is deemed appropriate that a pre-admission notice be given to the respondents to submit detail reply within fifteen days. The pre-admission notice accepts on behalf of the respondents by the Dr. Muhammad Rizwan, Senior Medical Officer on their behalf as well as by the Learned AAG. To come up for reply/preliminary hearing on 25.10.2022 before S.B at camp court D.I.Khan.







(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 870/2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/06/2022	<p>The appeal of Mst. Robina Bibi resubmitted today by Mr. Rizwanullah Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	03.6.22	<p>This case is entrusted to touring Single Bench at D.I.Khan for preliminary hearing to be put there on <u>28-6-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p> CHAIRMAN</p>
28 th June 2022		<p>Learned counsel for the appellant present and sought adjournment to prepare the case. To come up for preliminary hearing on 26.07.2022 before S.B at camp court D.I.Khan.</p> <p> (Kalim Arshad Khan) Chairman Camp Court D.I.Khan</p> <p>26.7.22</p> <p>Due to summer vacation to come up for the same on 27/9/22</p> <p> Registrar</p>

The appeal of Mst. Robina Bibi D/O Abdul Karim r/o Wanda Jani Khel Tehsil Paharpur District D.I.Khan received today i.e. on 18.05.2022 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Copy of impugned order from removal from service bearing no. 1391/96/DHS/IHP dated 4.9.2020 mentioned in the departmental appeal is not attached with the appeal which may be placed on it.
- 3- One more copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1099 /S.T,

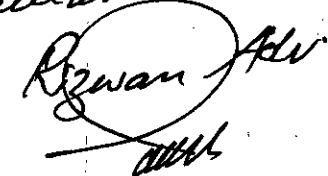
Dt. 20/5 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Rizwanullah Khan Adv.
High Court D.I.Khan.

- 1) check list attached.
- 2) copy of impugned order was not delivered to petitioner which is mentioned in Representation / Departmental appeal.
- 3) One more copy is Annexed.

Hence all objections are removed.

petitioner's Counsel,

1/6/2022

**BEFORE HONOURABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR CAMP COURT DERA ISMAIL KHAN.**

Service Appeal No.870/2022.

Robina Bibi

Versus

Govt: of Khyber Pakhtunkhwa etc

Service appeal

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*Distt: Health Officer
Dera Ismail Khan*

Your Humble Respondent No.3

7

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Service appeal

Comments on Behalf of Respondent No.3

Respectfully Submitted:-

Respondent No.3 humbly submit as under:-

Preliminary Objections:-

1. That Petitioner has got no locus standai.
2. That Petitioner has got no cause of action.
3. That Petitioner has not come to this Court with clean hands.
4. That Service Appeal is not maintainable in its present form.
5. That Service Appeal Hopelessly and badly time barred.

Para-Wise Reply to Facts:-

1. That Para No.1 needs no comments.
2. That Para No.2 needs no comments..

3. That Para No.3 is incorrect. Petitioner was removed from service in accordance with law vide Office Order No. 12309-14/PF on 27-11-2019. The committee was constituted by Project Director but petitioner was failed to do so and Inquiry was conducted as per law and petitioner was found guilty of poor performance and non-resident. Hence, order dated: 27-11-2019 was implemented in true letter and spirit through Inquiry report dated: 30-12-2019. Copy of Inquiry report 30-12-2019 is attached as **Annexure "A"**.
4. That Para No.4 is incorrect, not admitted. No diary and dispatch number is mentioned on said application. Hence, denied.
5. That Para No.5 needs no comments.
6. That Para No.6 is incorrect. Petitioner was removed from service in accordance with law vide Office Order No. 12309-14/PF on 27-11-2019. Later on Office Order No. 12538-43/PF 29-11-2019 in which aforesaid order of removal from service was withdrawn on the basis of appearing before the committee conducted by Project Director but petitioner was failed to do so and Inquiry report was submitted on 30-12-2019 in which petitioner was found guilty of poor performance and non-resident. Moreover, petitioner was provided ample opportunities to clear her status but in vain. No diary and dispatch number is available on alleged departmental representation. Hence, this service appeal is hopelessly time barred and liable to rejected.
7. That Para No.7 needs no comments.

Reply to grounds:-

- a. That Ground No.1 is incorrect. Not admitted. Petitioner was provided ample opportunities to defend herself but petitioner didn't bother to do so even earlier many explanations were called from petitioner to defend herself regarding dutifulness but inspite of this on 13-06-2018 lady Health Supervisor (LHS) visited the concerned Wanda Maddat but petitioner was found missing in her Office. Copy of explanations and complaint report are attached as **annexure" B & C"**.

3

- b. That Ground No. 2 is incorrect. Not admitted..
- c. That Ground No.3 is incorrect hence not admitted. Petitioner never remain honest to her job and career which is quite evident from available record and department several times gave an opportunity to petitioner not to repeat her mistakes again in future but she willfully repeated the same and shows her negligence towards her respective Job..

Therefore, it is requested that service appeal may kindly be dismissed.

*Respondent No.3
Distt: Health Officer
Dera Ismail Khan*

[Signature]
District Co-ordinator
LHW Program, no FP & PHC
D.I.Khan



OFFICE OF THE DISTRICT HEALTH OFFICER

DERA ISMAIL KHAN

Phone# 0966-933199

Email: dhodikhan@yahoo.com

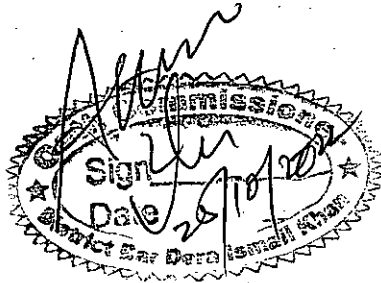
No. 15041

IC-6

Dated: 25/10/2022

AUTHORITY LETTER

Dr. Muhammad Rizwan and Mr. Syed Javed Ali Shah is hereby authorized to submit Parawise comments of Service appeal No: 870/2022 in the Honorable Service Tribunal Khyber Pakhtunkhawa Peshawar on the behalf of District Health Officer DIKhan in case of Robina Bibi Vs Government of Khyber Pakhtunkhawa.



District Health Officer
Dera Ismail Khan

W

 No. 11080
 Date 30/12/19
 Signature
INQUIRY REPORT

It is with reference to the office order No, 5152-56/DHS/IHP/2018-19 dated 28-11-2019, whereby the undersigned have been nominated as inquiry officers to probe in to the appeal of Mst. Rubina Bibi LHW attached to BHU Wanda Madat District D.I Khan regarding her termination on account of poor performance and non resident status.

BACKGROUND OF THE CASE:

LHW Rubina Bibi serving for BHU Wanda Madat has been reported as a poor performer since 2015, when her health was visited by concerned Field Program Officer and she was found absent from her field duties rather found at Peshawar for obtaining course in Ultra Sound therefore reported (Annex-I), after that without informing her high-ups LHW Rubina Bibi found engaged in Public Health Schools as student of LHV during 2016-2017, thus during two years she remained at D.I Khan city leaving behind her job duties, after which she started LHV Practice at Wanna which was reported by concerned Field Monitoring Officer as (Annex-II A) and as well as her concerned Lady Health Supervisor during reported that LHW Rubina is fully involved in her LHV practice at Wanna leaving behind her job of LHW in catchment area of Wanda Jani of BHU Wanda Madat, therefore she was recommended for termination from the then District Coordinator (Annex-II B). LHW Rubina Bibi during the whole period found poor performer even during the monitoring visit by concerned Field monitoring Officer during October 2019 she found Non Resident from her area due to her marriage and settled in the area of Miali Mahra D.I Khan, which was again reported (Annex-III).

FACTS AND FINDINGS:

On 11-12-2019 enquiry team visited that area of Wanda Jani attached to BHU Wanda Madat, to check the status and performance of LHW Rubina Bibi, where she was completely found absent, as said LHW has been married and living in the area of Miali Mahra attached to BHU Mahra with her husband and in laws from March 2019 till date, on one hand LHW Rubina was supposed to address/inform her high ups regarding her shifting but she failed to do so, while on the other hand LHWs program is a community embedded where adjustments/transfers cannot be exercised, therefore, in the both cases LHW Rubina found non resident. Furthermore, due to her poor performance and non resident status she was Charge sheeted by District Health Officer (Annex-IV), upon which enquiry conducted by Deputy District Health Officer (Annex-V), whereupon LHW Rubina found poor former, non resident, and willful absent from her official duties therefore recommended for termination.


for
 Mst. D...
 In favour
 8/01/22

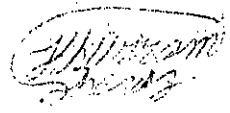
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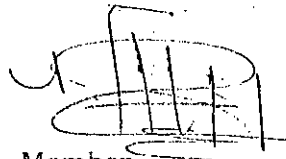
Therefore LHW Rubina on account of her poor performance and non resident status was terminated vide office order No 12309-14/PF dated 27-11-2019 (**Annex-VI**), however upon the appeal submitted by LHW Rubina to the provincial Office of Provincial Coordinator, enquiry constituted under office order No 5152-56/DHS/IHP/2018-19 dated 28-11-2019, therefore, District Health Officer withdrawn the termination order of LHW Rubina vide office order No 12538-43/PF dated 29-11-2019 (**Annex-VII**), till the decision/recommendation by the enquiry officers under office order No office order No. 5152-56/DHS/IHP/2018-19 dated 28-11-2019.

RECOMMENDATIONS:

It has been found that LHW Rubina has always found a constant and deliberate poor performer as well as non resident for her allocated catchment area where she was and is supposed to deliver her services, currently her status is still Non Resident due to her marriage and she has left her area from March 2019 till date, therefore, her termination on account of Poor Performance and Non Resident Status that has been followed by all the codal formalities must be retained, therefore, office order No 12538-43/PF dated 29-11-2019 (**Annex-VII** above) that pertains to cancellation of her termination may be withdrawn and Office order No 12309-14/PF dated 27-11-2019 (**Annex-VI** above) regarding her termination may be implemented.


Chairman
Dr. Majid Salim Ustrana
District Coordinator
LHWs Program D.I Khan.


Member
Khurram Sheraz
Field Monitoring Officer
Integrated Health Project


Member
Syed Musanif Shah
Administrative Officer
Integrated Health Project

خدمت صا - LHW گوارڈینز ڈی آئی خان صا

Anni (B)

Subject: complaint about Robina
wanda madat (Paniala circle)

صا - عالی

نہایت آرد و اقوام سے گزارش ہے کہ روبینہ LHW
حسکی ڈیوٹی وائرہ مدت ہے، ڈیوٹی کرنے سے قاصر ہے
2 بار ویزٹ کرے کہ باوجود بھی وہ گھر پر موجود نہیں ہوتی
اور اس علاقہ کا کہنا ہے کہ وہ زیادہ تر وارہ wana
اجنبی ہوتی ہے اور وہاں ڈیوٹی کیس کرتی ہے
فری آد صاحبان سے گزارش ہے کہ اسکی

Investigation کی 40 -
Date 13-6-18
DHO
LHS: Nadi's Hanif
Paniala Centre.
Please stop her
as she is violating
the rules of program

Signature
LHS:
[Signature]

Office of the District Health Officer
Dera Ismail Khan

Ph: 0966-9280199

Date: 13/03/2018

No. 3218-21/AP

To-

Mrs. Rubina Bibi LHW
BHU Wanda Madat

Subject: - EXPLANATION

As reported UPEC Incharge BHU Wanda Madat .you are hereby directed to explain the following.

1. Refused to perform polio duty
2. Poor performance in polio
3. Misconduct

You are hereby directed to explain your position .your reply much reach to undersigned along with comments of UPEC Incharge BHU Wanda madat with in two days failing which strict disciplinary action will be initiated against you under E&D Rules 2011.

Moreover your pay has been stopped till further order.

District Health Officer
Dera Ismail Khan

Cc:-

1. Coordinator LHW Programme DIKhan
2. Coordinator EPI DIKhan
3. Account Clerk of this Office to stop her Pay


District Health Officer
Dera Ismail Khan

office copy

(8)

Ann: 

Office of the District Health Officer
Dera Ismail Khan.

No: 1056-58 / LHM

Dated: 23 / 07 / 2018

To

Mr. Rubina Bibi
BHU Wanda Madat

Subject: **CHARGE SHEET**

A copy of Charge Sheet enclosed with the direction to submit your reply and appear before the Enquiry Officer with in 03-Days positively for further proceeding otherwise ex parte action will be initiated against you under E&D Rules 2011.


District Health Officer
Dera Ismail Khan

Cc: -

1. Dr. Qamar Iqbal DDHO Enquiry Officer for necessary action pleases.
2. Incharge BHU Wanda Madat.


District Health Officer
Dera Ismail Khan

9

Ann: 6

**OFFICE OF THE DISTRICT HEALTH OFFICER
DERA ISMAIL KHAN.**

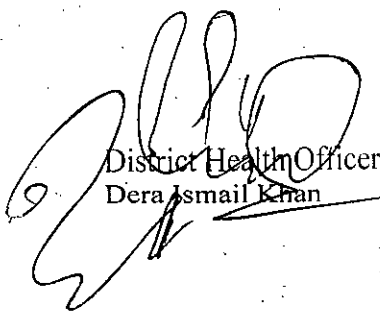
No: 2002-04 /PF/L.A.W Dated: 28/03/2019

To

Mrs. Robina Bibi LHW
BHU Wanda Madat

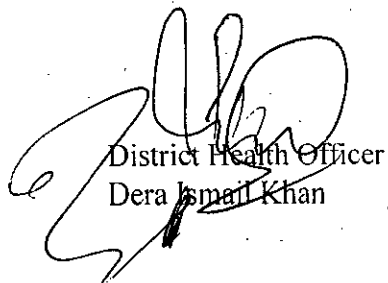
Subject: **DISCIPLINARY ACTION/CHARGE SHEET**

A copy of Charge Sheet enclosed with the direction to submit your reply and appear before the Enquiry Officer with in 03-Days positively for further proceeding otherwise ex parte action will be initiated against you under E&D Rules 2011.


District Health Officer
Dera Ismail Khan

Cc: -

1. Enquiry Officer for necessary action please.
2. Incharge BHU Wanda Madat.


District Health Officer
Dera Ismail Khan

خدمت حساب ڈسٹرک پیمنٹ آفیسر ضلع ڈیو اسماعیل خان

Amir

حساب عالی

صوبہ ہریانہ گزارش ہے کہ روہتہ جی (LHU) کوڈ نمبر (003)

(BHU) وائڈ عدت) کام میں نے 3 بار وزٹ کیا ہے لیکن وہ گھر پر نہیں ہوئی

وہ ڈیڑھ مہینے سے اپنے علاقے میں نہیں ہے۔

اُسکی بنیادی پرو آسائیڈ ماڑہ میں ہوئی ہے اور وہ اب وہ میرے علاقے میں (NR) ہے۔

میں نے بھی روہتہ جی کی رپورٹ آفس میں کروائی ہے اور اب ہر اسی کی

رپورٹ کروائی ہوئی

العارضی

7/5/19

موصوف =
/Amir Empirment
- Amir - Amir

7/5/2019

فدویہ = سدرہ جی
LHS (BHU) وائڈ عدت



**OFFICE OF THE DISTRICT HEALTH OFFICER
DERA ISMAIL KHAN.**

No: 10869-73 /PF

Dated: 25 /10/2019

To

Mrs. Robina Bibi LHW
BHU Wanda Madat

Subject: **DISCIPLINARY ACTION/CHARGE SHEET**

A copy of Charge Sheet enclosed with the direction to submit your reply and appear before the Enquiry Officer with in 03-Days positively for further proceeding otherwise ex parte action will be initiated against you under E&D Rules 2011.


District Health Officer
Dera Ismail Khan

Cc: -

- Benical Credits Law Programs etc*
1. Enquiry Officer for necessary action please.
2. Incharge BHU Wanda Madat.
3. Accounts Clerk of this Office to stop the pay of above LHW.


District Health Officer
Dera Ismail Khan

Annex 1/2

Phone No. (0966-2280199) Fax No. (0966-2280200)
GOVERNMENT OF PUNJAB, DEPARTMENT OF HEALTH AND FAMILY WELFARE
DERA ISMAIL KHAN, DISTRICT HEADQUARTERS

No. 12-23/14/17 Dated DIKhan the 22/11/2019

OFFICE ORDER:-

WHEREAS, disciplinary Proceedings were initiated against Mrs. Robina Bibi LHW attached to BHU Wanda Madat on account of absence from duty, nonresident status, very poor performance as LHW and misconduct.

AND WHEREAS, Charge Sheet was issued to her, vide DHO DIKhan letter No. 10869-73/PF dated 25-10-2019.

AND WHEREAS, on submission of formal enquiry report conducted by Dr. Qamar Iqbal Deputy District Health Officer DIKhan, she was held responsible for absence from duty, nonresident status, very poor performance as LHW, misconduct and recommended for major penalty.

NOW THEREFORE, The undersigned after having examined the charges and evidence on record, is pleased to impose major penalty of "Removal from Service" under Rule-4 (b) E&D Rules 2011 upon Mrs. Robina Bibi Lady Health Worker attached to BHU Wanda Madat with immediate effect.

District Health Officer
Dera Ismail Khan.

CC:-

1. Provincial Coordinator LHW Program Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer DIKhan.
3. Coordinator LHW Program DIKhan.
4. Incharge BHU Wanda Madat.
5. Accounts Clerk of this office.
6. LHW Concerned.


District Health Officer
Dera Ismail Khan

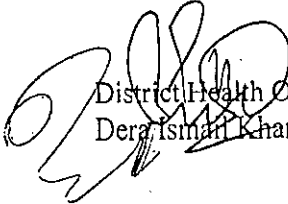
**OFFICE OF THE DISTRICT HEALTH OFFICER
DERA ISMAIL KHAN.**

No: 12538 - 43 /PF

Dated: 29/11/2019

Office Order: -

With reference to Project Director Integrated Health Project Khyber Pakhtunkhawa office order No: 5152-56/DHS/IHP/2018-19 dated: 28/11/2019 and telephonic discussion with him on 29/11/2019, the office order regarding removal from service vide No: 12309-14/PF dated: 27/11/2019 in respect of Mrs. Robina Bibi LHW BHU Wanda Madat is hereby withdrawn with the direction to appear before the committee constituted by Project Director.


District Health Officer
Dera Ismail Khan

Cc: -

1. Provincial Coordinator LHW Programme Khyber Pakhtunkhawa Peshawar.
2. District Accounts Officer DIKhan.
3. Coordinator LHW Programme DIKhan.
4. Incharge BHU Wanda Madat.
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District Health Officer
Dera Ismail Khan

**BEFORE HONOURABLE SERVICE TRIBUNAL KHYBER
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*Dist: Health Officer
Dera Ismail Khan*

Your Humble Respondent No.3

(7)

**BEFORE HONOURABLE SERVICE TRIBUNAL KHYBER
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Therefore, it is requested that service appeal may kindly be dismissed.

Respondent No.3

*Distt: Health Officer
Dera Ismail Khan*


District Coordinator
LHW Dera Ismail Khan

Amex. (A)

(W)

Date: 30/12/19

INQUIRY REPORT

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BACKGROUND OF THE CASE:

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Ho
M. J. Durrani
M. J. Durrani
8/12/2019

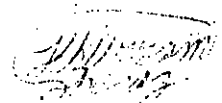
5


Therefore LHW Rubina on account of her poor performance and non resident status was terminated vide office order No 12309-14/PF dated 27-11-2019 (Annex-VI), however upon the appeal submitted by LHW Rubina to the provincial Office of Provincial Coordinator, enquiry constituted under office order No 5152-56/DHS/IHP/2018-19 dated 28-11-2019, therefore, District Health Officer withdrawn the termination order of LHW Rubina vide office order No 12538-43/PF dated 29-11-2019 (Annex-VII), till the decision/recommendation by the enquiry officers under office order No office order No. 5152-56/DHS/IHP/2018-19 dated 28-11-2019.

RECOMMENDATIONS:

It has been found that LHW Rubina has always found a constant and deliberate poor performer as well as non resident for her allocated catchment area where she was and is supposed to deliver her services, currently her status is still Non Resident due to her marriage and she has left her area from March 2019 till date, therefore, her termination on account of Poor Performance and Non Resident Status that has been followed by all the codal formalities must be retained, therefore, office order No 12538-43/PF dated 29-11-2019 (Annex-VII above) that pertains to cancellation of her termination may be withdrawn and Office order No 12309-14/PF dated 27-11-2019 (Annex-VI above) regarding her termination may be implemented.


Chairman
Dr. Majid Salim Ustrana
District Coordinator
LHWs Program D.I Khan


Member
Khurram Sheraz
Field Monitoring Officer
Integrated Health Project


Member
Syed Musanif Shah
Administrative Officer
Integrated Health Project

خدمت صا - LHW گوارڈینسٹری ڈی آئی خان ۲۰۱۸

Anni (B)

Subject: complaint about Robina
wanda madat (Paniala circle)

صا - عالی

نایت آرہ واپرام گے گزارش ہے روبینہ LHW
جسکی ڈیوٹی وائڈ مدت ہے۔ ڈیوٹی کرنے سے قاصر ہے
2 بار ویزٹ کرنے کے باوجود بھی وہ گھر در فرعون میں رہے گی
اور اس علاقہ کا کہنا ہے کہ وہ زیادہ تر وارہ wana
اچھی سوتی ہے اور وہاں ڈیوٹی کیس کرتی ہے
فریڈ آ - مہمان سے گزارش ہے کہ اسکی

Date
13-6-18

STOP
DHO
N.R.

Investigation
is also
forwarded to DHO
please stop her
as she is violating
the rules of program

LHS: Nadiq Hanif
Paniala Centre.

Signature
LHS:
[Signature]

Office of the District Health Officer
Dera Ismail Khan

7

Anx (C)

Anx (C)

No. 3218-21/AD

Ph: 0966-9280199
Date: 13/03/2018

To

Mrs. Rubina Bibi LHW
BHU Wanda Madat

Subject: - EXPLANATION

As reported UPEC Incharge BHU Wanda Madat .you are hereby directed to explain the following.

1. Refused to perform polio duty
2. Poor performance in polio
3. Misconduct

You are hereby directed to explain your position .your reply much reach to undersigned along with comments of UPEC Incharge BHU Wanda madat with in two days failing which strict disciplinary action will be initiated against you under E&D Rules 2011.

Moreover your pay has been stopped till further order.

District Health Officer
Dera Ismail Khan

Cc:-

1. Coordinator LHW Programme DIKhan
2. Coordinator EPI DIKhan
3. Account Clerk of this Office to stop her Pay


District Health Officer
Dera Ismail Khan

Office copy

8

Ann:

**Office of the District Health Officer
Dera Ismail Khan.**

No: 10156-58 / LHMW

Dated: 23 /07/2018

To

Mr. Rubina Bibi
BHU Wanda Madat

Subject: **CHARGE SHEET**

A copy of Charge Sheet enclosed with the direction to submit your reply and appear before the Enquiry Officer with in 03-Days positively for further proceeding otherwise ex parte action will be initiated against you under E&D Rules 2011.

District Health Officer
Dera Ismail Khan

Cc: -

1. Dr. Qamar Iqbal DDHO Enquiry Officer for necessary action please.
2. Incharge BHU Wanda Madat.

District Health Officer
Dera Ismail Khan

(9)

Ann: C

**OFFICE OF THE DISTRICT HEALTH OFFICER
DERA ISMAIL KHAN.**

No: 2002-04/PF/AW Dated: 28/03/2019

To

Mrs. Robina Bibi LHW
BHU Wanda Madat

Subject: **DISCIPLINARY ACTION/CHARGE SHEET**

A copy of Charge Sheet enclosed with the direction to submit your reply and appear before the Enquiry Officer with in 03-Days positively for further proceeding otherwise ex parte action will be initiated against you under E&D Rules 2011.


District Health Officer
Dera Ismail Khan

Cc: -

1. Enquiry Officer for necessary action please.
2. Incharge BHU Wanda Madat.


District Health Officer
Dera Ismail Khan

خدمت حساب ڈسٹرکٹ ہسپتال آفیسر ضلع ڈیہو اسماعیل خان

Amr. C

حساب عالی!

صوبہ ہائے تفریحی سے تھرو پیٹھ بی جی (LHU) کوڈ کسر (003)

(BHU) وائڈھ مدت) کام میں نے 3 بار وزٹ کیا ہے لیکن وہ گھر پر ہیں سوئی
وہ ڈیٹھرو پیٹھ سے اپنے علاقے میں ہیں ہے۔

اُسی کی شادی پرو آسائڈ ماڑھ میں سوئی ہے اور وہاں وہ میرے علاقے میں
(NR) ہے۔

میں پیٹھ بھی تھرو پیٹھ بی جی کی رپورٹ آفس میں کروائی ہے اور اب پھر اسی کی
رپورٹ تھروائی سوئی

العارض

7/5/19

مورف =
The explanation
- since to find out

7/5/2019

فدویہ = کدرہ بی جی
LHS (BHU) وائڈھ مدت



**OFFICE OF THE DISTRICT HEALTH OFFICER
DERA ISMAIL KHAN.**

No: 10869-73 /PF

Dated: 25 /10/2019

To

Mrs. Robina Bibi LHW
BHU Wanda Madat

Subject: **DISCIPLINARY ACTION/CHARGE SHEET**

A copy of Charge Sheet enclosed with the direction to submit your reply and appear before the Enquiry Officer with in 03-Days positively for further proceeding otherwise ex parte action will be initiated against you under E&D Rules 2011.


District Health Officer
Dera Ismail Khan

Cc: -

- 1. Binical coordinator LHW Programs etc*
1. Enquiry Officer for necessary action please.
2. Incharge BHU Wanda Madat.
3. Accounts Clerk of this Office to stop the pay of above LHW.


District Health Officer
Dera Ismail Khan

Annex 42

No. 12/28/19/117

Dated DIKhan the 22/11/2019

OFFICE ORDER:-

WHEREAS, disciplinary Proceedings were initiated against Mrs. Robina Bibi LHW attached to BHU Wanda Madat on account of absence from duty, nonresident status, very poor performance as LHW and misconduct.

AND WHEREAS, Charge Sheet was issued to her, vide DHU DIKhan letter No. 10869-73/PF dated 25-10-2019.

AND WHEREAS, on submission of formal enquiry report conducted by Dr. Qamar Iqbal Deputy District Health Officer DIKhan, she was held responsible for absence from duty, nonresident status, very poor performance as LHW, misconduct and recommended for major penalty.

NOW THEREFORE, The undersigned after having examined the charges and evidence on record, is pleased to impose major penalty of "Removal from Service" under Rule-4 (b) E&D Rules 2011 upon Mrs. Robina Bibi Lady Health Worker attached to BHU Wanda Madat with immediate effect.

**District Health Officer
Dera Ismail Khan.**

Cc:-

1. Provincial Coordinator LHW Program Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer DIKhan.
3. Coordinator LHW Program DIKhan.
4. Incharge BHU Wanda Madat.
5. Accounts Clerk of this office.
6. LHW Concerned.


**District Health Officer
Dera Ismail Khan**

**OFFICE OF THE DISTRICT HEALTH OFFICER
DERA ISMAIL KHAN.**

No: 12538 - 43 /PF

Dated: 29/11/2019

Office Order: -

With reference to Project Director Integrated Health Project Khyber Pakhtunkhawa office order No: 5152-56/DHS/IHP/2018-19 dated: 28/11/2019 and telephonic discussion with him on 29/11/2019, the office order regarding removal from service vide No: 12309-14/PF dated: 27/11/2019 in respect of Mrs. Robina Bibi LHW BHU Wanda Madat is hereby withdrawn with the direction to appear before the committee constituted by Project Director.


District Health Officer
Dera Ismail Khan

Cc: -

1. Provincial Coordinator LHW Programme Khyber Pakhtunkhawa Peshawar.
2. District Accounts Officer DIKhan.
3. Coordinator LHW Programme DIKhan.
4. Incharge BHU Wanda Madat.
5. Accounts Clerk of this Office.
6. LHW Concerned.


District Health Officer
Dera Ismail Khan

RIZWAN ULLAH KHAN
Advocate High Court
BC-12-3500
Date of Issue: 08-04-2018



ADVOCATE HIGH COURT

کوریٹ
فیس

Secretary
KP Bar Council

حساب سروس ٹریبیونل ج صاحب کلبی کوریٹ ڈیڑہ اگلا سہان

اجدالت

مناظر
روبین کلبی
فلسفہ

دعوی یا جرم

(سروس ایبل)

تفصیل دعوی یا جرم

باعث تحریر آنکہ

Di. Khan

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے پر پیش و جواب دہی برائے پیش یا تصفیہ مقدمہ نام

رضوان اللہ خان ایڈووکیٹ

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا بڑا بندر یا برو عدالت حاضر ہوتا رہوں گا اور ہر وقت چارٹ جانے مقدمہ دیکھ صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور نیرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر کچہری کے علاوہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل حیدری کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر کچہری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے یا پیچھے پیش ہونے پر مظہر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا محنت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے جو کوکل ساختہ پر واخذ صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرش ڈوٹی یا جواب دہی یا درخواست اجراء اسمائے ذمیری نظر ثانی ایبل عمرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر ثانی یا راشنی نامہ و فیصلہ برحلاف کرنے اقبال ڈوٹی کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مزکور بیرون از کچہری صدر حیدری مقدمہ مزکور نظر ثانی ایبل و عمرانی و برآمدگی مقدمہ یا منسوفی ڈگری یک طرفہ یا درخواست حکم اقسائی یا قرضی یا گرفتاری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادائیگی طے کردہ محتاج بیرون کا اختیار ہو گا اور تمام ساختہ پرواخذ صاحب موصوف مثل کردہ از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو گا مقدمہ مزکورہ یا اس کے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی ایبل عمرانی یا دیگر معاملہ و مقدمہ مذکورہ کسی دوسرے وکیل یا بیر مٹر کو اپنے بجائے یا اسپنٹ ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں ذہنی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جائزہ اتواء پرست کا وہ صاحب موصوف کا حق ہو گا مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ۱۰۰۰ روپے کا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی لہری نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے

2022 08 14 مورخہ

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Accepted by
[Signature]

روبین کلبی
[Signature]

NOTICE

15-A

TO


1. Government of Khyber Pakhtunkhwa, through Secretary Health, Peshawar.
2. Director Health Khyber Pakhtunkhwa, Peshawar.
3. District Health Officer, D.I.Khan.

Subject: Service Appeal Titled "Robina Bibi Vs. The Government of Khyber Pakhtunkhwa & others".

Please take the notice that the undersigned is going to file the above titled Service Appeal before Honorable Service Tribunal, Khyber Pakhtunkhwa, Peshawar, Camp Court Dera Ismail Khan.

You are also impleaded as respondent in above titled Service Appeal. (Copy of the appeal is enclosed herewith).

Dated: 18/05/2022



**Rizwan Ullah Khan
Advocate High Court,
Dera Ismail Khan**

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

Resd
No.

TB Dikhan

APPEAL No. *870* of 20 *22*

Robina Bibi

Appellant/Petitioner

Versus

Through Sery: Health Pesh


RESPONDENT(S)

Notice to Appellant/Petitioner *Counsel Rizwan Ullah (Advocate)*
High Court
Dikhan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *28-6-22* at *8:00 AM*

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at camp court
Dikhan


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

Recd
No.

TB DIK

APPEAL No.....870..... of 20 22

Robina Bibi

Appellant/Petitioner

Versus

Through Spys Health Peshawar

RESPONDENT(S)

Notice to Appellant/Petitioner

Robina Bibi D/O Abdul Karim
R/o Wanda Jemi Teh Pahalpur
DIKhan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 28/6/22 at 2.00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

At camp court
DIKhan

Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.