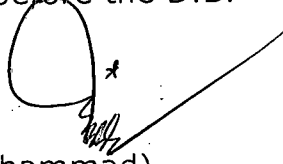


21.09.2022

Petitioner alongwith his counsel present. Mr. Nabi Gul, Superintendent alongwith Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Record of Service Appeal No. 7609/2021 be requisitioned and to come up for further proceedings on 30.11.2022 before the D.B.



(Mian Muhammad)
Member (Executive)



(Salah-Ud-Din)
Member (Judicial)

30/11/22


Deleted from list to come
up on 24-2-23

On
Reds

14.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 09.03.2022 for the same as before.

9-3-22


Reader

Due to Retirement of the Hon.ble Chairman the case is adjourned to come up for the same as before on 15-4-22


Reader

9-3-22


Due to retirement of the Hon.ble Chairman the case is adjourned to come up for the same as before on 15-4-22


Reader

15th April, 2022

Appellant alongwith counsel present. Mr. Kabirullah Khattak, Addl. AG alongwith Nabi Gul, Superintendent for the respondents present.

To come up for further proceedings before the D.B on 11.05.2022 alongwith SA No. 7609/2021.



(Rozina Rehman)
Member(J)



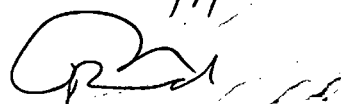
Chairman

11-5-22

Proper DB not available the case is adjourned on 26-7-22

26/7

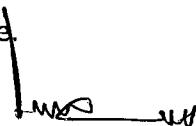


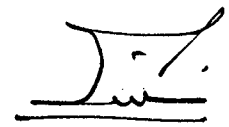
Proper DB not available to come up for the same as before 21/9/22



FORM OF ORDER SHEET

Court of _____

C.O.C No. 04/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	04/01/2021	<p>The C.O.C application of Mr. Irfan Ahmad submitted today by Mr. Qaiser Hussain Advocate, may be entered in the relevant Register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2	25.01.2022	<p>This C.O.C application be put up before D Bench at Peshawar on <u>25/01/2021</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Clerk of the learned counsel for the petitioner present and stated that learned counsel for petitioner is unable to attend the Tribunal today due to strike of lawyers. Adjourned. To come up for further proceedings before the D.B on 14.02.2022.</p> <div style="display: flex; justify-content: space-around; margin-top: 20px;"> <div style="text-align: center;">  (Rozina Rehman) Member (J) </div> <div style="text-align: center;">  (Salah-Ud-Din) Member (J) </div> </div>

BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR.

Misc. Application No. _____/2022

For contempt of court
In S.A.No.7609/2021

Irfan Ahmad, Mali (BPS-03)
Directorate of Special Welfare, Peshawar.....Petitioner

VERSUS

Habib Khan & others..... Respondents

INDEX

S.No.	Description of documents.	Annexure	Pages.
1	Application for contempt of court.		1-3
2	Affidavit.		4
3	Copy of appeal		5- 6
4	Copy of order dated 04.11.2021		6
5	Copy of letter dt.26.11.2021.		7-9

Petitioner
Irfan Ahmad
Through
Qaiser Hussain

&

Wajid Hussain
Advocates High Court
Peshawar.

Dated: 04.01.2022

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Misc. Application No. _____/2022

For contempt of court
In S.A.No.7609/2021

Irfan Ahmad, Mali (BPS-03)

Directorate of Special Welfare, Peshawar.....Petitioner

VERSUS

- 1) Habib Khan, Director Social Welfare, opp: Islamia College, Peshawar.
- 2) Muhammad Younas Afridi, District Officer, Social Welfare, Pajaggi Road, Bashir Abad, Peshawar.
- 3) Muhammad Arif, Principal Govt. Institute for Blinds (Girls), Nanakpura, G.T. Road, Peshawar.
- 4) Rehab Khattak, Manager MR&PHC, Pajaggi Road, Peshawar.

.....Respondents

APPLICATION FOR INITIATING
CONTEMPT OF COURT PROCEEDING
AGAINST THE RESPONDENTS U/S 3/4 OF
THE CONTEMPT OF COURT ORDINANCE
2003 R/W ARTICLE 204 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC
OF PAKISTAN FOR DISOBEYING THE
ORDER OF THIS HON'BLE TRIBUNAL
DATED 04.11.2021.

2

Respectfully Sheweth;

- 1) That the petitioner filed service appeal No.7609/2021 before this Hon'ble Tribunal in which interim relief/ suspension order was issued vide order dated 04.11.2021 and notice was also issued to the respondents in this respect in which this hon'ble Tribunal passed the following order:

“The appeal is also accompanied by an application seeking the suspension of the impugned order dated 30.09.2021 till final decision of the appeal. Notice of said application be also given to the respondents for the date fixed. The operation of impugned order is suspended till date fixed.

(Copy of order is Annexure “A”

- 2) That the petitioner approached the respondents time and again for compliance of the order as directed by this Hon'ble Tribunal, which was accordingly received by the respondents, but till date the respondents are reluctant to comply with the order of this Hon'ble Tribunal and similarly attendance of the petitioners are not marking intentionally and deliberately and salary of the petitioners has also been stopped with no good reason.
- 3) That the aforesaid act of respondents is totally illegal, is in total disregard to the order dated 04.11.2021.
- 4) That the respondents have intentionally and deliberately disobeyed the worthy order of this hon'ble tribunal, therefore, the contempt of court proceedings may kindly be initiated against them.
- 5) That omission of respondents to act upon the order of this Hon'ble Court speaks of the fact that respondents have undermined the authority of this Hon'ble Tribunal and has not moved even an inch for implementation of the same.

3

- 6) That this omission/ act of respondents squarely falls within the ambit of contempt of court as respondents have conveniently ignored the directions given by this Hon'ble Tribunal.
- 7) That in the circumstances the respondents have committed gross violation of the order passed by this Hon'ble Tribunal and has exposed themselves for contempt of court proceedings.

It is, therefore, humbly prayed that on acceptance of this application, contempt proceedings may graciously be initiated against the respondents according to law and they may also be directed to implement the worthy order of this Hon'ble Tribunal in letter and spirit.

Petitioner
Irfan Ahmad
Through

Qaiser Hussain

&

Wajid Hussain
Advocates High Court
Peshawar.

BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR.

4

Misc. Application No. _____/2022

For contempt of court
In S.A.No.7609/2021

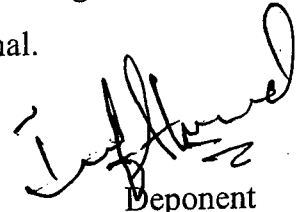
Irfan Ahmad, Mali (BPS-03)
Directorate of Special Welfare, Peshawar.....Petitioner

VERSUS

Habib Khan & others..... Respondents

AFFIDAVIT

I, Irfan Ahmad, Mali (BPS-03) Directorate of Special Welfare, Peshawar (petitioner/ appellant), do hereby affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



Deponent

CNIC No.17301-3357859-5

5

1

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

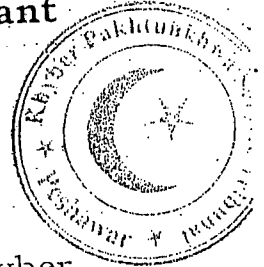
Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7747

Dated 18/10/20

Service Appeal No. 7609 /2021

Irfan Ahmad, Mali (BPS-03) Director of Social
Welfare, Peshawar **Appellant**



VERSUS

1. Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat Peshawar.
2. Secretary Social Welfare, Special Education and Women Empowerment, Jamrud Road, Peshawar
3. Director Social Welfare, Special Education and Women Empowerment, Jamrud Road, Peshawar
4. Superintendent GIB Girls Peshawar

..... **Respondents**

Filed to-day

Registrar

18/10/21

Recd.

(Signature)

11-11-21

Director of Social Welfare

6645

11-11-21

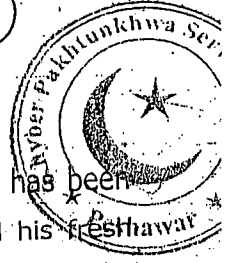
**APPEAL UNDER SECTION 4 OF KP
SERVICES TRIBUNAL ACT 1974
AGAINST THE TRANSFER ORDER
NO. DSW/1863-80 DATED
30/09/2021 TO THE EXTENT OF
SERIAL No. 5, BY WHICH THE
APPELLANT WAS TRANSFERRED
AND HIS SERVICE WAS PLACED
AT MR & PHC, PESHAWAR WITH
IMMEDIATE EFFECT**

Certified to be true copy

(Signature)
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Appeal No. 7609/2021
Irfan Ahmad vs Govt

6



04.11.2021

Mr. Wajid Hussain, Advocate present and stated that he has been engaged in the service appeal afresh, he therefore, submitted his fresh Wakalat Nama in the instant appeal. Memorandum of appeal and the copies of record annexed there with perused and preliminary arguments heard.

Learned counsel for the appellant argued that the appellant is serving as Mali (BS-03) who has been subjected to frequent posting/transfer before completion of his normal tenure, in utter violation of the Posting/Transfer Policy. First he was transferred from Government Institute for Blind (Girls) Peshawar to shelter Home Pajagay road Peshawar vide order dated 09.10.2020. The said order (dated 09.10.2020) was withdrawn and he was detailed to GHS for Deaf Children Yaqatoot Peshawar vide order dated 04.06.2021. Yet again he was transferred from Government Institute for Blind (Girls) to MR&PHC Peshawar vide order dated 30.09.2021. The appellant preferred departmental appeal to respondent No.2 on 01.10.2021 who recorded directions to respondent No.3 that "kindly withdraw to this extent as per attached application". However, directions of the appellate authority have not been honored till date, hence, the instant service appeal filed on 18.10.2021. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 03.12.2021 before the D.B.

The appeal is also accompanied by an application seeking the suspension of the impugned order dated 30.09.2021 till final decision of the appeal. Notice of said application be also given to the respondents for the date fixed. The operation of impugned order is suspended till date fixed.

Date of Presentation of Application 08/11/21
Number of Words 833
Copying Fee 10.00
Urgent 4.00
Total 14.00
Name of Copyist _____
Date of Completion of Copy 08/11/21

Confirmed to be true copy
(Mian Muhammad)
Member(E)
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

7

بخدمت جناب انچارج صاحبہ MR&PHC سکول پنجگی روڈ پشاور

عنوان: جواب طلبی کا جواب لیٹر نمبر 10-109-10 بمورخہ 07/12/2021

جناب عالیہ!

مودبانہ التماس ہے کہ سروس ٹریبونل اپیل نمبر 7609/2021 ڈائری نمبر 7747 بمورخہ 18/10/2021 یہ سروس ٹریبونل کا آرڈر کی کاپی بمورخہ 12/11/2021 کو آپ نے وصول کی تھی جو کہ میرا ٹرانسفر آرڈر نمبر 1863-80 بمورخہ 30-09-2021 کو ٹرانسفر ہوا تھا جو کہ سروس ٹریبونل نے میرا ٹرانسفر آرڈر سسپینڈ کیا ہے۔ لہذا میں سروس ٹریبونل کے آرڈر کے مطابق گورنمنٹ نابینا خواتین سکول میں ڈیوٹی سرانجام دے رہا ہوں۔ سروس ٹریبونل کا آرڈر اس درخواست کے ساتھ منسلک ہے۔

شکریہ

To J.C

Reference letter No: DO(SW)P/04-128/
G159-63 Dated 26-11-2021
As per DO instruction the salary
of official mandy Irfan Ahmad
(Nialibsp:03) Should be stop
Under information to this office.
Letter is hereby attached.

کاپی نو: (1) رجسٹر سروس ٹریبونل خیبر پختونخواہ پشاور

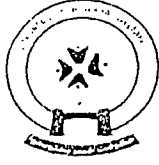
P.S(2) ٹو ڈپٹی کمشنر پشاور

P.S(3) ٹو سیکرٹری ٹو گورنمنٹ آف خیبر پختونخواہ زکوٰۃ عشر، سوشل ویلفیئر سوشل ایجوکیشن اینڈ ویمن امپاورمنٹ

ڈیپارٹمنٹ پشاور

العاض
عرفان احمد

(مالی) گورنمنٹ نابینا سکول پنجگی روڈ پشاور



OFFICE OF THE DISTRICT OFFICER,
SOCIAL WELFARE, SPECIAL EDUCATION &
WOMEN EMPOWERMENT DEPARTMENT;
PAJAGGI ROAD, NEAR BACHA KHAN MARKAZ,
DISTRICT PESHAWAR.

PH # 9331700. EMAIL ADD: swpeshawar@gmail.com



No. DO (SW)/PI/04-128/6159-63

DATED PESHAWAR THE 26 NOVEMBER, 2021

To,

The Director,
Social Welfare, Special Education &
Women Empowerment, Khyber Pakhtunkhwa,
Peshawar

Subject: SUSPENSION OF ORDER OF IRFAN AHMAD (MALI BPS-03)

Dear Sir,

Kindly refer to the Manager Social Welfare Services for Mentally Retarded & Physically Handicapped Children Peshawar letter no. MR&PHC/SW/10095 dated 18.11.2021 on the subject noted above and to state that the reported employee named Irfan Ahmad (BPS-03) is an unwilling worker who after failing in exerting illegal political bureaucratic pressure is now hiding himself behind the Court orders. Since the said fact is quite sensitive dealing with mentally retarded and physically handicapped children therefore, staff availability is mandatory for its smooth functioning. Moreover, Manager has time and again requested this office for provision of staff particularly for however, this office is unable to entertain her request due to shortage of staff.

2. In view of the forgoing, it is, therefore, proposed that disciplinary proceedings may immediately be initiated against the willful absentee official named Irfan Ahmad (BPS-03), MR&PHC under the Khyber Pakhtunkhwa, Civil Servants (Efficiency & Discipline) Rules, 2011.

(Encls. As Above)

YOURS FAITHFULLY,

o/c
DISTRICT OFFICER,
SOCIAL WELFARE, PESHAWAR

Endst. of Even No. & Date:

Copy for information to the:-

1. Registrar Services Tribunal Khyber Pakhtunkhwa, Peshawar.
2. PS to Deputy Commissioner, Peshawar.
3. PS to Secretary to Government of Khyber Pakhtunkhwa, Zakat, Ushr, Social Welfare, Special Education & Women Empowerment Department, Peshawar.
4. Manager, MR&PHC w/r to her letter quoted above. She is directed to explanation stop salary and deduction shall also be made for the absence of the official concerned, under intimation to this office.

Position ID => (80288899)

DATE

Page No.

OF THE ³ Manager, Social Services for Mentally Retarded & Physically Handicapped Children Peshawar.

THE MONTH OF December 2021

Center) P W 6 1 4 7 Description MRB PHC

0 0 8 9 5 1 2 1

Employee Name JREAN AHMAD

National ID Card Number 17351-3157

Day (Sup) 03 MAL

Salary Status Start Stop

9

New Contents ¹⁶	Wage Type ¹⁸	CHANGE IN PAYMENT / DEDUCTIONS ¹⁷			Effective Date ²¹	Remarks ²²
		Rupees	Amount	Paisa		
						Salary Stop due to
						Absent from duty with
						AS per letter no date
						24-12-2021
						2-11-2021
						Salary Stop i.e.
						21-12-2021
						All Relevant Documents
						are attached

[Signature]

MANAGER
Social Services for Mentally Retarded
& Physically Handicapped
Children Peshawar
Entered / Verified By

Audited By/Checked By ²⁴

[Signature]

بعدالت کروں ٹریبونل CP کسٹ

COC — 1/2022
S.A no — 7609/21

2022 پنجاب سائیل
سرکان الہ بنام حبیب کان

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آئیکہ

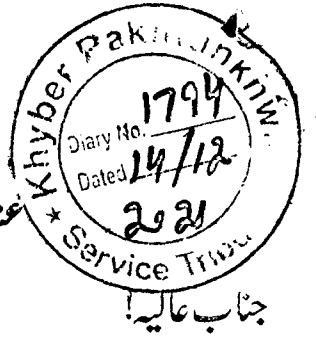
مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دی وکل کاروائی متعلقہ آن مقام کیلئے وارنٹ میں اس کے لئے
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
دیکل صاحب کو راضی نامہ کرنے و تقرر ثالثتہ فیصلہ بر حلف دیئے جواب دی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک دروپیا عرضی 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 منسوخ
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 یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
پرداختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو فرچہ ہر جات التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکورہ کریں۔ لہذا وکالت نامہ لکھدیا کہ سند ہے۔

Altaf
جنوری 2022
ماہ 4
الرقوم 4
واہ العب
بمقام کے لئے منظور ہے۔

Handwritten signatures and marks at the bottom of the page.

Handwritten notes and signatures on the right side of the page.

بخدمت جناب انچارج صاحبہ MR&PHC سکول ہجلی روڈ پشاور
عنوان: جواب طلبی کا جواب لیٹر نمبر 10-10109-10 بمورخہ 07/12/2021



مودبانہ التماس ہے کہ سروس ٹریبونل اپیل نمبر 7609/2021 ڈائری نمبر 7747 بمورخہ 18/10/2021 یہ سروس ٹریبونل کا آرڈر کی کاپی بمورخہ 12/11/2021 کو آپ نے وصول کی تھی جو کہ میرا ٹرانسفر آرڈر نمبر 1863-80 بمورخہ 30-09-2021 کو ٹرانسفر ہوا تھا جو کہ سروس ٹریبونل نے میرا ٹرانسفر آرڈر سسپینڈ کیا ہے۔ لہذا میں سروس ٹریبونل کے آرڈر کے مطابق گورنمنٹ نابینا خواتین سکول میں ڈیوٹی سرانجام دے رہا ہوں۔ سروس ٹریبونل کا آرڈر اس درخواست کے ساتھ منسلک ہے۔

شکریہ

العارض
عرفان احمد

(مالی) گورنمنٹ نابینا سکول جی ٹی روڈ پشاور

کاپی ٹو: (1) رجسٹرار سروس ٹریبونل خیبر پختونخواہ پشاور

(2) P.S ٹو ڈپٹی کمشنر پشاور

(3) P.S ٹو سیکرٹری ٹو گورنمنٹ آف خیبر پختونخواہ زکواۃ عشر، سوشل ویلفیئر سیشنل ایجوکیشن اینڈ وومن امپاورمنٹ

ڈیپارٹمنٹ پشاور

Placed on file

14/12/21

(1)

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

Khyber Pakhtunkhwa
Services Tribunal

Service Appeal No. 7609 /2021

Diary No. 7747

Date 18/10/20

Irfan Ahmad, Mali (BPS-03) Director of Social
Welfare, Peshawar **Appellant**

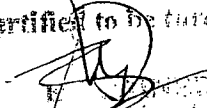
VERSUS

1. Chief Secretary, Government of Khyber
Pakhtunkhwa, Civil Secretariat Peshawar.
2. Secretary Social Welfare, Special Education and
Women Empowerment, Jamrud Road; Peshawar
3. Director Social Welfare, Special Education and
Women Empowerment, Jamrud Road, Peshawar
4. Superintendent GIB Girls Peshawar

..... **Respondents**

**APPEAL UNDER SECTION 4 OF KP
SERVICES TRIBUNAL ACT 1974
AGAINST THE TRANSFER ORDER
NO. DSW/1863-80 DATED
30/09/2021 TO THE EXTENT OF
SERIAL No. 5, BY WHICH THE
APPELLANT WAS TRANSFERRED
AND HIS SERVICE WAS PLACED
AT MR & PHC, PESHAWAR WITH
IMMEDIATE EFFECT**

Certified to be true copy


Khyber Pakhtunkhwa
Services Tribunal
Peshawar

Filed to-day

Registrar

18/10/21

Appeal No. 7609/2021
Irfan Ahmad vs Govt



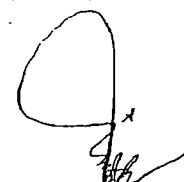
04.11.2021

Mr. Wajid Hussain, Advocate present and stated that he has been engaged in the service appeal afresh, he therefore, submitted his Wakalat Nama in the instant appeal. Memorandum of appeal and the copies of record annexed there with perused and preliminary arguments heard.

Learned counsel for the appellant argued that the appellant is serving as Mali (BS-03) who has been subjected to frequent posting/transfer before completion of his normal tenure, in utter violation of the Posting/Transfer Policy. First he was transferred from Government Institute for Blind (Girls) Peshawar to shelter Home Pajagay road Peshawar vide order dated 09.10.2020. The said order (dated 09.10.2020) was withdrawn and he was detailed to GHS for Deaf Children Yaqatoot Peshawar vide order dated 04.06.2021. Yet again he was transferred from Government Institute for Blind (Girls) to MR&PHC Peshawar vide order dated 30.09.2021. The appellant preferred departmental appeal to respondent No.2 on 01.10.2021 who recorded directions to respondent No.3 that "kindly withdraw to this extent as per attached application". However, directions of the appellate authority have not been honored till date, hence, the instant service appeal filed on 18.10.2021. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 03.12.2021 before the D.B.

The appeal is also accompanied by an application seeking the suspension of the impugned order dated 30.09.2021 till final decision of the appeal. Notice of said application be also given to the respondents for the date fixed. The operation of impugned order is suspended till date fixed.

Date of Presentation of Application 08/11/21
Number of Words 830
Copying Fee 10.00
Stamp 4.00
Total 14.00
Name of Copyist _____
Date of Completion _____
08/11/21


(Mian Muhammad)
Member(E)
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

بخدمت جناب پرنسپل صاحب گورنمنٹ نابینا سکول برائے (خواتین) جی ٹی روڈ پشاور

جناب عالی!

گزارش ہے کہ میرا ٹرانسفر آرڈر نمبر 80-1863 بمورخہ 30-09-2021 کو MR&PHC کو ہوا تھا جو کہ سروس ٹریبونل نے اپیل نمبر 7609/2021 بمورخہ 18/10/2021 میرا ٹرانسفر آرڈر سسپینڈ کیا ہے جو کہ دو مرتبہ آپ کو جمع (1) بمورخہ 13-11-2021 اور (2) بمورخہ 20-11-2021 کو آپ کو موصول ہو چکا ہے۔ یہ کہ اب تک میرا حاضری رجسٹر میں حاضری نہیں لگا رہے۔

لہذا مہربانی فرما کر سروس ٹریبونل کے فیصلے کے مطابق میری حاضری لگا دی جائے۔ سروس ٹریبونل کا فیصلہ آرڈر اس درخواست کیساتھ منسلک ہے۔

العارض
عرفان احمد

(مالی) گورنمنٹ نابینا سکول جی ٹی روڈ پشاور

کاپی ٹو: (1) رجسٹرار سروس ٹریبونل خیبر پختونخواہ پشاور

P.S(2) ٹوڈ پی کمشنر پشاور

P.S(3) ٹو سیکرٹری ٹو گورنمنٹ آف خیبر پختونخواہ زکواۃ عشر، سوشل ویلفیئر سپیشل ایجوکیشن اینڈ وومن امپاورمنٹ

ڈیپارٹمنٹ پشاور

1

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

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 7609 /2021

Diary No. 7747

Dated 18/10/20

Irfan Ahmad, Mali (BPS-03) Director of Social
Welfare, Peshawar **Appellant**



VERSUS

1. Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat Peshawar.
2. Secretary Social Welfare, Special Education and Women Empowerment, Jamrud Road; Peshawar
3. Director Social Welfare, Special Education and Women Empowerment, Jamrud Road, Peshawar
4. Superintendent, GIB Girls Peshawar

..... **Respondents**

Filed to-day

Registrar

18/10/21

**APPEAL UNDER SECTION 4 OF KP
SERVICES TRIBUNAL ACT 1974
AGAINST THE TRANSFER ORDER
NO. DSW/1863-80 DATED
30/09/2021 TO THE EXTENT OF
SERIAL No. 5, BY WHICH THE
APPELLANT WAS TRANSFERRED
AND HIS SERVICE WAS PLACED
AT MR & PHC, PESHAWAR WITH
IMMEDIATE EFFECT**

Certified to be true copy

Registrar
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Appeal No. 7609/2021
Irfan Ahmad vs Govt



04.11.2021

Mr. Wajid Hussain, Advocate present and stated that he has been engaged in the service appeal afresh, he therefore, submitted his Wakalat Nama in the instant appeal. Memorandum of appeal and the copies of record annexed there with perused and preliminary arguments heard.

Learned counsel for the appellant argued that the appellant is serving as Mali (BS-03) who has been subjected to frequent posting/transfer before completion of his normal tenure, in utter violation of the Posting/Transfer Policy. First he was transferred from Government Institute for Blind (Girls) Peshawar to shelter Home Pajagay road Peshawar vide order dated 09.10.2020. The said order (dated 09.10.2020) was withdrawn and he was detailed to GHS for Deaf Children Yaqatoot Peshawar vide order dated 04.06.2021. Yet again he was transferred from Government Institute for Blind (Girls) to MR&PHC Peshawar vide order dated 30.09.2021. The appellant preferred departmental appeal to respondent No.2 on 01.10.2021 who recorded directions to respondent No.3 that "kindly withdraw to this extent as per attached application". However, directions of the appellate authority have not been honored till date, hence, the instant service appeal filed on 18.10.2021. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 03.12.2021 before the D.B.

The appeal is also accompanied by an application seeking the suspension of the impugned order dated 30.09.2021 till final decision of the appeal. Notice of said application be also given to the respondents for the date fixed. The operation of impugned order is suspended till date fixed.

Date of Presentation of Appeal 08/11/21
Number of Words 850
Copying Fee 10.00
Litigation 4.00
Total 14.00
Name of Copyist _____
Date of Completion of Appeal 08/11/21

(Mian Muhammad)
Member(E)
Kyber Pakhtunkhwa
Service Tribunal,
Peshawar

Appeal No. 7609/2021
Irfan Ahmad vs Govt



04.11.2021

Mr. Wajid Hussain, Advocate present and stated that he has been engaged in the service appeal afresh, he therefore, submitted his Wakalat Nama in the instant appeal. Memorandum of appeal and the copies of record annexed there with perused and preliminary arguments heard.

Learned counsel for the appellant argued that the appellant is serving as Mali (BS-03) who has been subjected to frequent posting/transfer before completion of his normal tenure, in utter violation of the Posting/Transfer Policy. First he was transferred from Government Institute for Blind (Girls) Peshawar to shelter Home Pajagay road Peshawar vide order dated 09.10.2020. The said order (dated 09.10.2020) was withdrawn and he was detailed to GHS for Deaf Children Yaqatoot Peshawar vide order dated 04.06.2021. Yet again he was transferred from Government Institute for Blind (Girls) to MR&PHC Peshawar vide order dated 30.09.2021. The appellant preferred departmental appeal to respondent No.2 on 01.10.2021 who recorded directions to respondent No.3 that "kindly withdraw to this extent as per attached application". However, directions of the appellate authority have not been honored till date, hence, the instant service appeal filed on 18.10.2021. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 03.12.2021 before the D.B.

The appeal is also accompanied by an application seeking the suspension of the impugned order dated 30.09.2021 till final decision of the appeal. Notice of said application be also given to the respondents for the date fixed. The operation of impugned order is suspended till date fixed.

Date of Presentation of Application: 08/11/21
Number of Words: 800
Copying Fee: 10.00
Urgent: 4.00
Total: 14.00
Name of Copyist: _____
Date of Completion of Copy: 08/11/21

(Mian Muhammad)
Member(E)
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

~~13/11/91~~
~~M. J. [Signature]~~

Govt. Board School
Glasgow

Received on 12-11-2021
(P)

Mrs P.H.C.

Appeal No. 7609/2021
Irfan Ahmad vs Govt



04.11.2021

Mr. Wajid Hussain, Advocate present and stated that he has been engaged in the service appeal afresh, he therefore, submitted his fresh Wakalat Nama in the instant appeal. Memorandum of appeal and the copies of record annexed there with perused and preliminary arguments heard.

Learned counsel for the appellant argued that the appellant is serving as Mail (BS-03) who has been subjected to frequent posting/transfer before completion of his normal tenure, in utter violation of the Posting/Transfer Policy. First he was transferred from Government Institute for Blind (Girls) Peshawar to shelter Home Pajagay road Peshawar vide order dated 09.10.2020. The said order (dated 09.10.2020) was withdrawn and he was detailed to GHS for Deaf Children Yaqatoot Peshawar vide order dated 04.06.2021. Yet again he was transferred from Government Institute for Blind (Girls) to MR&PHC Peshawar vide order dated 30.09.2021. The appellant preferred departmental appeal to respondent No.2 on 01.10.2021 who recorded directions to respondent No.3 that "kindly withdraw to this extent as per attached application". However, directions of the appellate authority have not been honored till date, hence, the instant service appeal filed on 18.10.2021. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 03.12.2021 before the D.B.

The appeal is also accompanied by an application seeking the suspension of the impugned order dated 30.09.2021 till final decision of the appeal. Notice of said application be also given to the respondents for the date fixed. The operation of impugned order is suspended till date fixed.

Date of Presentation of Appeal: 08/11/21
Number of Pages: 8
Copying Fee: 10.00
Charges: 4.00
Total: 14.00
Name of Copies: _____
Date of Completion of Copy: 08/11/21

(Mian Muhammad)
Member(E)
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

1

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

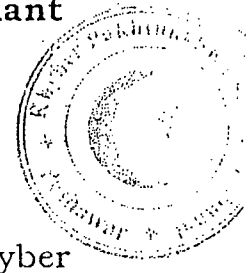
Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7747

Dated 18/10/20

Service Appeal No. 7609 /2021

Irfan Ahmad, Mali (BPS-03) Director of Social
Welfare, PeshawarAppellant



V E R S U S

1. Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat Peshawar.
2. Secretary Social Welfare, Special Education and Women Empowerment, Jamrud Road, Peshawar
3. Director Social Welfare, Special Education and Women Empowerment, Jamrud Road, Peshawar
4. Superintendent GIB Girls Peshawar

.....Respondents

Filed to-day
Registrar
18/10/21

**APPEAL UNDER SECTION 4 OF KP
SERVICES TRIBUNAL ACT 1974
AGAINST THE TRANSFER ORDER
NO. DSW/1863-80 DATED
30/09/2021 TO THE EXTENT OF
SERIAL No. 5, BY WHICH THE
APPELLANT WAS TRANSFERRED
AND HIS SERVICE WAS PLACED
AT MR & PHC, PESHAWAR WITH
IMMEDIATE EFFECT**

Certified to be true copy

Registrar
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

گڈ مٹ جناب پرنسپل صاحب گورنمنٹ نابینا (خواتین) سکول (نیشنل) آباد
سیٹیاہ

جناب عالی!

گزارش ہے کہ میرا ٹرانسفر آرڈر MR & PHC کو مورخہ 20-9-2021
کو سوا تھا کہ سرورس ٹریبونل ٹیپرینٹو جوائنٹ 11/11/2021 کو منظور
کیا ہے۔ آمد ایف ڈی حاضری رجسٹر میں میری حاضری نہیں لگی
جبکہ آپ کو سرورس ٹریبونل کا فیصلہ آپ کو دیا ہے۔

لہذا میری اپنی فرمائش میری حاضری رجسٹر میں حاضری لگائی
جائے جس تاریخ سے میرا ٹرانسفر سوا تھا

رضوان احمد
عرفان احمد
(مالی)

شکریہ

اللہ اعلم

گورنمنٹ نابینا (خواتین) سکول

نوٹ: اس درخواست، سہ ماہی سرورس ٹریبونل کا فیصلہ منسک ہے (نیشنل) آباد سیٹیاہ

No. 1461

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered letter addressed to... Date-Stamp... Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary. Insured for Rs. (in figures)... Insurance fee Rs. Ps. (in words) Weight Kilo Grams Name and address of sender

No. 1458

For RGL74239235 Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered letter addressed to... Date-Stamp... Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary. Insured for Rs. (in figures)... Insurance fee Rs. Ps. (in words) Weight Kilo Grams Name and address of sender

No. 1459

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered letter addressed to... Date-Stamp... Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary. Insured for Rs. (in figures)... Insurance fee Rs. Ps. (in words) Weight Kilo Grams Name and address of sender

No. 1460

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered letter addressed to... Date-Stamp... Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary. Insured for Rs. (in figures)... Insurance fee Rs. Ps. (in words) Weight Kilo Grams Name and address of sender

بخدمت جناب انچارج صاحبہ MR&PHC سکول منجلی روڈ پشاور

عنوان: جواب طلبی کا جواب لیٹر نمبر 10-10109-10 بمورخہ 07/12/2021

جناب عالیہ!

موربانہ التماس ہے کہ سروس ٹریبونل اپیل نمبر 7609/2021 ڈائری نمبر 7747 بمورخہ 18/10/2021 یہ سروس ٹریبونل کا آرڈر کی کاپی بمورخہ 12/11/2021 کو آپ نے وصول کی تھی جو کہ میرا ٹرانسفر آرڈر نمبر 1863-80 بمورخہ 30-09-2021 کو ٹرانسفر ہوا تھا جو کہ سروس ٹریبونل نے میرا ٹرانسفر آرڈر سپینڈ کیا ہے۔ لہذا میں سروس ٹریبونل کے آرڈر کے مطابق گورنمنٹ نابینا خواتین سکول میں ڈیوٹی سرانجام دے رہا ہوں۔ سروس ٹریبونل کا آرڈر اس درخواست کے ساتھ منسلک ہے۔

شکریہ

العارض

عرفان احمد

(مالی) گورنمنٹ نابینا سکول، جی ٹی روڈ پشاور

کاپی ٹو: (1) رجسٹرار سروس ٹریبونل خیبر پختونخواہ پشاور

(2) P.S ٹو ڈپٹی کمشنر پشاور

(3) P.S ٹو سیکرٹری ٹو گورنمنٹ آف خیبر پختونخواہ زکواۃ عشر، سوشل ویلفیئر سپیشل ایجوکیشن اینڈ وومن امپاورمنٹ

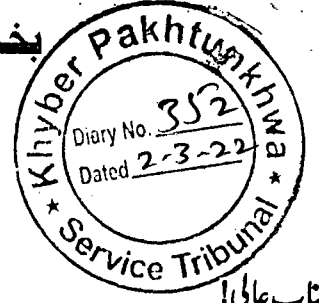
ڈیپارٹمنٹ پشاور

Received
MR&PHC
10/12/21

بخدمت جناب ڈائریکٹر صاحب محکمہ سماجی فلاح

و

بہبود و خصوصی تعلیم خیبر پختونخوا



جناب عالی!

گزارش ہے کہ میں نہایت غریب اور نادار ہوں آپ کے زیر سایہ گورنمنٹ نابینا خواتین سکول میں مالی کی ڈیوٹی سرانجام دے رہا تھا جو کہ مجھے 30-09-2021 کو مجھے MR&PHC چنگی روڈ ٹرانسفر کر دیا جو کہ سروس ٹریبونل خیبر پختونخوا پشاور نے کیس نمبر 7609/2021 جو کہ میرے ٹرانسفر آ رڈر کو Suspended کر دیا جس کی کاپی ڈائریکٹریٹ میں ڈائری نمبر 6645 بمورخہ 11-11-2021 کو جمع کیا تھا اور ایک کاپی انچارج MR&PHC کو بمورخہ 12-11-2021 اور گورنمنٹ نابینا سکول کے سپرنٹنڈنٹ کو بمورخہ 13-11-2021 کو جمع کیا تھا پھر دوبارہ سپرنٹنڈنٹ گورنمنٹ نابینا سکول خواتین کو بمورخہ 20-11-2021 کو جمع کیا مگر گورنمنٹ نابینا سکول خواتین کے پرنسپل صاحب نے اب تک نہ تو میری حاضری لگا رہے ہیں اور نہ میری تنخواہ شروع کر رہے ہیں، میں سروس ٹریبونل کے فیصلے کے مطابق گورنمنٹ نابینا خواتین سکول میں ڈیوٹی سرانجام دے رہا ہوں اور میں نے بار بار درخواستیں دی ہیں اب تک میری درخواست اور سروس ٹریبونل کے فیصلے پر کوئی عمل درآمد نہیں ہوئی۔

لہذا مہربانی فرما کر میری حاضری اور دسمبر 2021 سے میری تنخواہ جاری کرنے کے احکامات صادر فرما کر مشکور و ممنون فرمائے۔ اس درخواست کے ساتھ سروس ٹریبونل کا فیصلہ اور درخواستیں لف ہیں۔

شکریہ

العارض

عرفان احمد (مالی)
گورنمنٹ نابینا سکول خواتین جی ٹی روڈ نشتر آباد پشاور

کاپی برائے اطلاع:

(1) سیکٹری صاحبہ سوشل ویلفیئر خیبر پختونخوا

(2) ڈپٹی کمشنر صاحب پشاور

(3) رجسٹرار صاحب سروس ٹریبونل خیبر پختونخوا پشاور

(4) ڈپٹی رجسٹرار صاحب ٹریبونل خیبر پختونخوا پشاور ✓

Place as file

R.K
~~Signature~~

21/3/2022

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

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 7609 /2021

Diary No. 7747
Dated 18/10/20

Ifan Ahmad, Mali (BPS-03) Director of Social
Welfare, PeshawarAppellant



VERSUS

1. Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat Peshawar.
2. Secretary Social Welfare, Special Education and Women Empowerment, Jamrud Road, Peshawar
3. Director Social Welfare, Special Education and Women Empowerment, Jamrud Road, Peshawar
4. Superintendent GIB Girls Peshawar

..... Respondents

**APPEAL UNDER SECTION 4 OF KP
SERVICES TRIBUNAL ACT 1974
AGAINST THE TRANSFER ORDER
NO. DSW/1863-80 DATED
30/09/2021 TO THE EXTENT OF
SERIAL No. 5, BY WHICH THE
APPELLANT WAS TRANSFERRED
AND HIS SERVICE WAS PLACED
AT MR & PHC, PESHAWAR WITH
IMMEDIATE EFFECT**

Filed to-day

Registrar
18/10/21

Recd.

(Signature)

11-11-21

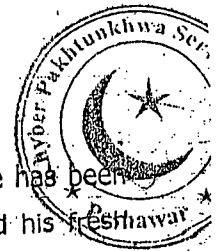
Director of Social
Welfare, Peshawar

6645

11-11-21

(Signature)
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Appeal No. 7609/2021
Irfan Ahmad vs Govt



04.11.2021

Mr. Wajid Hussain, Advocate present and stated that he has been engaged in the service appeal afresh, he therefore, submitted his Wakalat Nama in the instant appeal. Memorandum of appeal and the copies of record annexed there with perused and preliminary arguments heard.

Learned counsel for the appellant argued that the appellant is serving as Mali (BS-03) who has been subjected to frequent posting/transfer before completion of his normal tenure, in utter violation of the Posting/Transfer Policy. First he was transferred from Government Institute for Blind (Girls) Peshawar to shelter Home Pajagay road Peshawar vide order dated 09.10.2020. The said order (dated 09.10.2020) was withdrawn and he was detailed to GHS for Deaf Children. Yaqatoot Peshawar vide order dated 04.06.2021. Yet again he was transferred from Government Institute for Blind (Girls) to MR&PHC Peshawar vide order dated 30.09.2021. The appellant preferred departmental appeal to respondent No.2 on 01.10.2021 who recorded directions to respondent No.3 that "kindly withdraw to this extent as per attached application". However, directions of the appellate authority have not been honored till date, hence, the instant service appeal filed on 18.10.2021. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 03.12.2021 before the D.B.

The appeal is also accompanied by an application seeking the suspension of the impugned order dated 30.09.2021 till final decision of the appeal. Notice of said application be also given to the respondents for the date fixed. The operation of impugned order is suspended till date fixed.

Date of Presentation of Application: 08/11/21
Number of Words: 800
Copying Fee: 10.00
Urgent: 4.00
Total: 14.00
Name of Copyist: _____
Date of Completion of Copy: 08/11/21

(Mian Muhammad)
Member(E)
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

گذرتہ جناب پرنسپل صاحب گورنمنٹ نابینا (خواتین) سکول (نیشنل) آباد
سیٹیاہ

جناب عالی!

گزارش ہے کہ میرا ٹرانسفر آرڈر MR & PHC کو مورخہ 30-9-2021
کو سوا تھا جو کہ سرورس ٹریبونل ٹیبلریشن خواہ نے 11/10/2021 کو منسوخ
کیا ہے۔ آمد ایسی تہ حاضرہ رجسٹر میں میری حاضرہ نہیں ہے
جبکہ آپ کو سرورس ٹریبونل کا ضمیمہ آپ کو دیا ہے۔

لہذا، میری پانی فرحانہ میری حاضرہ رجسٹر میں حاضرہ لگائی
جائے جس تاریخ سے میرا ٹرانسفر سوا تھا

عرفان احمد
(مالی)
Received
11/10/21

شکریہ

گورنمنٹ نابینا (خواتین) سکول

الکھاری

نوٹ: اس درخواست کے ساتھ سرورس ٹریبونل کا ضمیمہ منسلک ہے (نیشنل) آباد سیٹیاہ

No. 1461

For Insurance Notices see reverse. Rs. Ps.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgment is due.

Received a registered
addressed to _____ Date-Stamp _____
*Write here "letter", "postcard", "packet" or "parcel"
Initials of Receiving Officer with the word "insured" before it when necessary.
Insured for Rs. (in figures) _____ (in words) _____
Insurance fee Rs. _____ Ps. _____ Weight _____ Kilo _____
(in words) Grams _____
Name and address _____
of sender _____

1458

For RGL74239235 Rs. Ps.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgment is due.

Received a registered
addressed to _____ Date-Stamp _____
*Write here "letter", "postcard", "packet" or "parcel"
Initials of Receiving Officer with the word "insured" before it when necessary.
Insured for Rs. (in figures) _____ (in words) _____
Insurance fee Rs. _____ Ps. _____ Weight _____ Kilo _____
(in words) Grams _____
Name and address _____
of sender _____

No. 1459

For Insurance Notices see reverse. Rs. Ps.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgment is due.

Received a registered
addressed to _____ Date-Stamp _____
*Write here "letter", "postcard", "packet" or "parcel"
Initials of Receiving Officer with the word "insured" before it when necessary.
Insured for Rs. (in figures) _____ (in words) _____
If insured. Insurance fee Rs. _____ Ps. _____ Weight _____ Kilo _____
(in words) Grams _____
Name and address _____
of sender _____

No. 1460

For Insurance Notices see reverse. Rs. Ps.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgment is due.

Received a registered
addressed to _____ Date-Stamp _____
*Write here "letter", "postcard", "packet" or "parcel"
Initials of Receiving Officer with the word "insured" before it when necessary.
Insured for Rs. (in figures) _____ (in words) _____
If insured. Insurance fee Rs. _____ Ps. _____ Weight _____ Kilo _____
(in words) Grams _____
Name and address _____
of sender _____

بخدمت جناب انچارج صاحبہ MR&PHC سکول پنجگی روڈ پشاور

عنوان: جواب طلبی کا جواب لیٹر نمبر 10-10109-10 بمورخہ 07/12/2021

جناب عالیہ!

موربانہ التماس ہے کہ سروس ٹریبونل اپیل نمبر 7609/2021 ڈائری نمبر 7747 بمورخہ 18/10/2021 یہ سروس ٹریبونل کا آرڈر کی کاپی بمورخہ 12/11/2021 کو آپ نے وصول کی تھی جو کہ میرا ٹرانسفر آرڈر نمبر 1863-80 بمورخہ 30-09-2021 کو ٹرانسفر ہوا تھا جو کہ سروس ٹریبونل نے میرا ٹرانسفر آرڈر سسپینڈ کیا ہے۔ لہذا میں سروس ٹریبونل کے آرڈر کے مطابق گورنمنٹ نابینا خواتین سکول میں ڈیوٹی سرانجام دے رہا ہوں۔ سروس ٹریبونل کا آرڈر اس درخواست کے ساتھ منسلک ہے۔

شکریہ

العارض

عرفان احمد

(مالی) گورنمنٹ نابینا سکول جی ٹی روڈ پشاور

کاپی ٹو: (1) رجسٹرار سروس ٹریبونل خیبر پختونخواہ پشاور

P.S(2) ٹو ڈپٹی کمشنر پشاور

P.S(3) ٹو سیکرٹری ٹو گورنمنٹ آف خیبر پختونخواہ زکواۃ عشر، سوشل ویلفیئر سپیشل ایجوکیشن اینڈ وومن امپاورمنٹ

ڈیپارٹمنٹ پشاور

Received
MR&PHC
10/12/21

1

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

Khyber Pakhtunkhwa
Service Tribunal

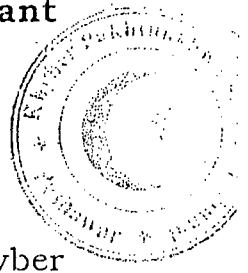
Service Appeal No. 7609 /2021

Diary No. 7747

Dated 18/10/20

Irfan Ahmad, Mali (BPS-03) Director of Social
Welfare, PeshawarAppellant

V E R S U S



1. Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat Peshawar.
2. Secretary Social Welfare, Special Education and Women Empowerment, Jamrud Road, Peshawar
3. Director Social Welfare, Special Education and Women Empowerment, Jamrud Road, Peshawar
4. Superintendent GIB Girls Peshawar

.....Respondents

Filed to-day
Registrar
18/10/21

**APPEAL UNDER SECTION 4 OF KP
SERVICES TRIBUNAL ACT 1974
AGAINST THE TRANSFER ORDER
NO. DSW/1863-80 DATED
30/09/2021 TO THE EXTENT OF
SERIAL No. 5, BY WHICH THE
APPELLANT WAS TRANSFERRED
AND HIS SERVICE WAS PLACED
AT MR & PHC, PESHAWAR WITH
IMMEDIATE EFFECT**

Certified to be true copy

Registrar
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Appeal No. 7609/2021
Irfan Ahmad vs Govt



04.11.2021

Mr. Wajid Hussain, Advocate present and stated that he has been engaged in the service appeal afresh, he therefore, submitted his fresh Wakalat Nama in the instant appeal. Memorandum of appeal and the copies of record annexed there with perused and preliminary arguments heard.

Learned counsel for the appellant argued that the appellant is serving as Mail (BS-03) who has been subjected to frequent posting/transfer before completion of his normal tenure, in utter violation of the Posting/Transfer Policy. First he was transferred from Government Institute for Blind (Girls) Peshawar to shelter Home Pajagay road Peshawar vide order dated 09.10.2020. The said order (dated 09.10.2020) was withdrawn and he was detailed to GHS for Deaf Children Yaqatoot Peshawar vide order dated 04.06.2021. Yet again he was transferred from Government Institute for Blind (Girls) to MR&PHC Peshawar vide order dated 30.09.2021. The appellant preferred departmental appeal to respondent No.2 on 01.10.2021 who recorded directions to respondent No.3 that "kindly withdraw to this extent as per attached application". However, directions of the appellate authority have not been honored till date, hence, the instant service appeal filed on 18.10.2021. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 03.12.2021 before the D.B.

The appeal is also accompanied by an application seeking the suspension of the impugned order dated 30.09.2021 till final decision of the appeal. Notice of said application be also given to the respondents for the date fixed. The operation of impugned order is suspended till date fixed.

Date of Presentation of Appeal 08/11/21
Number of Words 800
Copying Fee 10.00
Urgent 4.00
Total 14.00
Number of Copies 1
Date of Completion of Copy 08/11/21

Approved to be true copy
(Mian Muhammad)
Member(E)
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

MRE PHC

Received
on 12-11-2021

Ⓟ

Govt Blind Girls
School

M. ~~off~~

~~13/11/21~~

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No. 1710/2019

Irfan Ali Shah Appellant

Versus

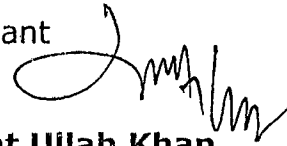
Secretary Health, Govt. Khyber Pakhtunkhwa,
Peshawar and others..... Respondents

I N D E X

S.No.	Description of documents.	Annexure	Pages.
1	Grounds of appeal.		1-9
2	Affidavit.		10
3	Addresses of the parties.		11-12
4	Copy of Provisional Seniority list of Clinical Technician (Dental) (BS-12) dated 07.12.2017 alongwith letter dated 07.12.2017	A & B	13-17
5	Copies of appellant's degrees of B.S.c and B.S (Honors) in Dental Technology	C & C/1	18-19
6	Copy of Recruitment Rules dated 10.05.2016	D	20-23
7	Copy of promotion order dated 01.02.2018 of respondent No.4	E	24-25
8	Copy of Seniority List dated 15.04.2019 alongwith letter dated 08.06.2019	F & F/1	26-40
9	Copy of Seniority List alongwith letter dated 27.06.2019	G	41-44
10	Copy of objection petition	H	45-46
11	Copy of impugned seniority list dated 02.11.2017	I	47-52
12	Copy of Writ Petition alongwith its order	J & J/1	53-60
13	Copy of personal hearing letter dated 19.07.2019	K	61
14	Copy of departmental appeal dated 20.08.2019	L	62-63
15	Wakalatnama.		64

Dated: 29.11.2019

Appellant
through



Inayat Ullah Khan

Advocate, Peshawar, High
Court
LLM (UK).

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No. 1770 /2019

Irfan Ali Shah S/o Abdul Ali Shah
R/o Kotka Abdul Qadeer Shah (Bangash Khel) Mandan,
Tehsil & District Bannu
Presently Serving as Clinical Technician BPS-12 (Dental) in the
office of erstwhile Agency Surgeon Tribal (District North
Waziristan),Appellant

Versus

- 1) Secretary Health, Govt. Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 2) Director General Health, Govt of Khyber Pakhtunkhwa Peshawar.
- 3) The Agency Surgeon Tribal District North Waziristan.
- 4) Fazle Ala S/o Fazle Maula, Serving as Clinical Technologist (Dental in BPS-17 MTI Lady Reading Hospital, Peshawar.
- 5) Ajab Khan S/o Bashir Khan (BS-14), Senior Clinical Technician Dental present posting Civil Hospital Matta Swat.
- 6) Akbar Khan S/o Khoja Omar (BS-12), clinical technician dental, present posting, DHO Chitral.
- 7) Shakeel Raziq S/o Fazal Raziq (BS-14) Senior Clinical Technician Dental, Present posting, LRH Peshawar.
- 8) Sher Muhammad Khan S/o Noor Muhammad (BS-12), clinical technician dental, Present posting, Saidu Group Teaching Hospital, Swat.
- 9) Sohni Bibi d/o Sadar Jehan Mian (BS-12), clinical technician dental, Present posting, Civil Hospital Khuwaza Khela, Swat.
- 10) Murad Khan S/o Ghandal Khan (BS-12), clinical technician dental, Present posting, LRH Peshawar.
- 11) Hayat Muhammad Khan S/o Muhammad Sharif Khan (BS-12), Clinical Technician Dental, Present posting, rhc Koza Bandi, Batagram.

- 12) Tariq Saleem S/o Gul Payao (BS-12), Clinical Technician Dental Present posting, DHQH Karak.
- 13) Ismail Khan S/o Zar Gul (BS-12), Clinical Technician Dental, Present posting, Services Hospital, Peshawar.
- 14) Saifullah S/o Shakirullah (BS-12), Clinical Technician Dental Present posting, Bacha Khan Medical College, Mardan.
- 15) Hidayatul Rehman S/o Tooti Rehman (BS-12), Clinical Technician Dental Present posting, DHQ Hospital Dir Upper.
- 16) Faizul Karim S/o Gul Khan (BS-14), Senior Clinical Technician Dental Present posting, Civil Hospital Makken Swat..... Respondents

APPEAL U/S 4 OF THE N.W.F.P SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED JOINT SENIORITY LIST OF TECHNOLOGIST (BS-17) IN VARIOUS CADRES IN HEALTH DEPARTMENT KHYBER PAKHTUNKHWA AS STOOD ON 15.04.2019, FINAL SENIORITY LIST OF DEGREE HOLDERS, CLINICAL TECHNICIANS, DENTAL/ SENIOR CLINICAL TECHNICIANS/ CHIEF CLINICAL TECHNICIANS AS STOOD ON 27.06.2019 AND IMPUGNED PROMOTION NOTIFICATION OF RESPONDENT NO.4 DATED 01.02.2018. And provisional list of seniority ~~is~~ annexed at page. 13.

THE APPELLANT FILED HIS DEPARTMENTAL APPEAL DATED 20.08.2019 TO RESPONDENT NO.1 AGAINST THE SENIORITY LISTS AS REFERRED TO, IN THE HEADING OF THIS APPEAL BUT THE SAME HAS NOT BEEN RESPONDED DESPITE LAPSE OF STATUTORY PERIOD OF 90 DAYS HENCE

PRESENTS THIS SERVICE APPEAL
BEFORE THIS HONORABLE TRIBUNAL
WELL WITHIN 30 DAYS TIME PERIOD.

Prayer:

On acceptance of this appeal, the appellant may kindly be declared as Senior to private respondents No.4 to 16 and thereby promoted to the post of Technologist (BS-17) with effect from his passing/ acquiring the B.S.c Degree in Dental Technology in terms of the Recruitment Rules dated 10.05.2016 notified by Provincial government with all consequential back benefits.

Any other consequential relief which this Hon'ble Tribunal deems appropriate in the circumstances of the case and not specifically asked-for may also be granted.

Respectfully Sheweth;

Brief facts giving rise to the instant appeal are as under:-

- 1) That the appellant was appointed as Dental Technician (BS-9), later-on the post of Dental Technician was re-designated as Junior Clinical Technologist (JCT) (Dental) (BS-9), on 10.05.2006. The appellant was promoted to the post of clinical technician (Dental) (BS-12) issued by respondent No.2.

It is pertinent to mention that the appellant is appearing at Sr.No.22 at the Provisional Seniority List of Clinical Technician (Dental) (BS-12).

(Copy of Provisional Seniority list of Clinical Technician (Dental) (BS-12) dated 07.12.2017 alongwith letter dated 07.12.2017 are attached as Annexure "A" & "B").

- 2) That the respondents in order to enhance the skills of paramedical staff, introduced Paramedics Degree Courses in various technologies including Dental Technology, therefore, the appellant also appeared to undergo two years B.S.c degree course in Postgraduate Paramedical institute at Lady Reading Hospital Peshawar in its 1st Batch/ Session 2004-2005.

On successful completion of the course the appellant got degree of B.S.c (Dental Tech) from KP Medical Faculty Peshawar.

It is pertinent to mention that the appellant later on also acquired the qualifications of four years degree course of B.S (Honors) in Dental Technology from University of Peshawar during Annual Session-2014.

(Copies of appellant's degrees of B.S.c and B.S (Honors) in Dental Technology are attached as Annexure "C" & "C/1").

- 3) That the Provincial Government introduced four stages promotion opportunities to the Paramedical Staff upto (BS-20) on the posts of Clinical Technologists (BS-17), Senior Clinical Technologist (BS-18), Chief Clinical Technologist (BS-19) and Principal Clinical Technologist (BS-20) and for that purpose promulgated recruitment rules vide gazette notification dated: 10.05.2016.

(Copy of Recruitment Rules dated 10.05.2016 are attached as Annexure "D").

- 4) That respondent No.4 vide Promotion Order dated 01.02.2018 passed by respondent No.1 & 2, whereby

respondent No.4 has been promoted to the post of Clinical Technologist (Dental) (BS-17) by superceding the appellant otherwise, then in accordance with the relevant recruitment rules as attached in Para No.3 above.

(Copy of promotion order dated 01.02.2018 of respondent No.4 is attached as Annexure "E").

- 5) That respondent No.4 has been placed at serial No.93 as Technologist (BS-17) vide impugned Seniority list dated 15.04.2019.

(Copy of Seniority List dated 15.04.2019 alongwith letter dated 08.06.2019 are attached as annexure "F and F/1").

- 6) That the appellant has been placed at Serial No. 13 of the Final Seniority List of Degree holders of paramedics Dental 2009, in which he was shown junior to private respondents No.5 to 16.

(Copy of Seniority List alongwith letter dated 27.06.2019 is attached as Annexure "G").

- 7) That the appellant also preferred his objection to the respondent No.2 through proper channel against the seniority lists and impugned promotion notification which was received in office vide daily diary No.7443 dated 21.02.2019 but no positive response was provided to him.

(Copy of objection petition is attached as Annexure "H").

- 8) That according to Clause -(b) in Column No.5 against item No.4 of appendix to the ibid Recruitment Rules, 20% quota has been reserved for promotion on the basis of Seniority-cum-fitness from amongst the incumbents of the posts of Chief Technicians (BS-16), Senior Clinical Technician (BS-14) and Technicians (Bs-12), having acquired the qualifications prescribed for initial recruitment (i.e. B.Sc in

Dental Technology) with 03 years service in the relevant technology and according to the NOTE below the said Clause (b) in column No.5 Joint Seniority List of the said posts is to be maintained with reference to dates of acquiring the qualifications of B.Sc Degree. Keeping in view the ibid provision; the appellant having acquired the qualification of B.Sc (Dental Technology) during December 2005 in the first batch/ session of 2004-05, when none else of his colleagues/ seniors has acquired the said qualification; therefore, the appellant had to be shown on the top of the seniority list for the purpose of his promotion to the post of Clinical Technologist (Dental) (BS-17) against the 20% quota reserved for promotion of the qualified departmental candidates and deserved to have been promoted to the said post instead of the Respondent No.4 on 01.02.2018. However, the respondent No.2 has with a view to favour the respondent No.4 illegally and clandestinely prepared final seniority list of the qualified departmental candidates; vide letter No.17798-847/AE-VII dated 02.11.2017; without previous circulation of the same and even without preparation of Provisional Seniority List and calling for objections thereto from the affected employees; and showed therein the respondent No.4 at the top of the seniority list, while the appellant has been shown at S.No.14 with reference to date of his acquiring the qualifications of B.S (Hons) from the University of Peshawar during Annual-2014 instead of with reference to the date of his acquiring the qualification of B.Sc from the KPK Medical Faculty Peshawar, during December 2005.

It is pertinent to submit that the Degree of B.S(Hons) is equivalent to M.Sc, while the qualifications prescribed for promotion to the post of Clinical Technologist (Dental) in (BS-17) is the Degree of B.Sc. Hence, the impugned seniority list dated 02.11.2017 as

well the resultant promotion order dated 01.02.2018 is illegal and ineffective upon service rights of the petitioner.

(Copy of impugned seniority list dated 02.11.2017 is filed as Annexure "I").

- 9) That the appellant earlier approached to Honourable Peshawar High Court Bannu Bench vide Writ Petition No.337-B/2018 which was disposed off on 06.03.2019 with the direction to respondents to treat the writ petition as representation and thereafter decide the same in accordance with law within a period of one month from the date of receipt of the order.

(Copy of Writ Petition alongwith its order are attached as Annexure "J"& "J/1").

- 10) That the appellant was called for personal hearing on 29.07.2019 by the office of respondent No.2 in terms of the order passed by Honourable Peshawar High Court Bannu Bench but no decision was made vis-à-vis the objections raised by the appellant.

(Copy of personal hearing letter dated 19.07.2019 is attached as Annexure "K").

- 11) That the appellant preferred his departmental appeal dated 20.08.2019 to the respondent No.1 for redressal of his grievance but the same has not been responded despite lapse of statutory period of 90 days, hence this appeal is presented within 30 days which is well within time.

- 12) That the appellant feeling aggrieved and dissatisfied by not responding the departmental appeal, presents this service appeal on the following amongst other grounds.

(Copy of departmental Appeal dated 20.08.2019 is attested as annexure "L").

Grounds of appeal:

- a. That the appellant has not been treated in terms of Article-4 of the Constitution of Islamic Republic of Pakistan vis-à-vis his seniority and accrued promotion rights.
- b. That the appellant case is fully covered by notification dated 10.05.2016 whereby promotion to the post of Technologist (BS-17) has made subject to acquiring the qualification of Bachelors Degree in 2nd Class in the relevant technology from a recognized University/ Institution with having 3 years experience in the relevant technology.

It is pertinent to refer to the note of the Rules for ready reference of this Honorable Tribunal;

" NOTE For the purpose of promotion, there shall be maintained a joint seniority list of Chief Technicians, Senior Technicians and Technicians with reference to the dates of their acquiring qualification prescribed for initial recruitment as in column No.3.

Provided that if two or more officials acquired the qualification prescribed for initial recruitment in the same sessions, then the official who obtains the highest marks or grade in the examination shall be deemed to be senior to the other officials."

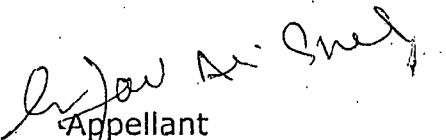
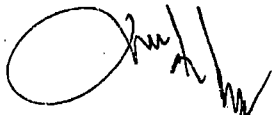
- c. That the appellant is legally entitled to be promoted to the post of Technologist (Bs-17) ahead of private respondents No.4 to 16 in terms of the Rules as referred to in ground B.
- d. That Article 25 and 27 of the Constitution of Pakistan confer fundamental right upon the appellant to be treated equally in accordance with law but the official respondents 1 to 4 failed to grant him promotion to which the appellant

is entitled under the ibid recruitment rules circulated vide notification dated 10.05.2016.

- e. That no meaningful opportunity of defence has been provided to the appellant so far, hence the provision of Article 10-A has not been complied-with which in essence speaks about the due process of law.
- f. Additional grounds will be raised at the time of arguments with the kind permission of this Honorable Tribunal.

Keeping in view the aforesaid submissions, it is, therefore, humbly prayed that On acceptance of this appeal, the appellant may kindly be declared as Senior to private respondents No.4 to 16 and thereby promoted to the post of Technologist (BS-17) with effect from his passing/ acquiring the B.S.c Degree in Dental Technology in terms of the Recruitment Rules dated 10.05.2016 notified by Provincial government with all consequential back benefits.

Any other consequential relief which this Hon'ble Tribunal deems appropriate in the circumstances of the case and not specifically asked-for may also be granted:


Appellant
through 

Inayat Ullah Khan
Advocate, Peshawar, High
Court
LLM (UK).

Dated: 29.11.2019

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No.____/2019

Irfan Ali Shah Appellant

Versus

Secretary Health, Govt. Khyber Pakhtunkhwa,
Peshawar and others..... Respondents

AFFIDAVIT

I, Irfan Ali Shah S/o Abdul Ali Shah R/o Kotka Abdul Qadeer Shah (Bangash Khel) Mandan, Tehsil & District Bannu do hereby affirm and declare on oath that the contents of the application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Irfan Ali Shah
Deponent

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No._____/2019

Irfan Ali Shah Appellant

Versus

Secretary Health, Govt. Khyber Pakhtunkhwa,
Peshawar and others..... Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

Irfan Ali Shah S/o Abdul Ali Shah
R/o Kotka Abdul Qadeer Shah (Bangash Khel) Mandan,
Tehsil & District Bannu
Presently Serving as Clinical Technician BPS-12 (Dental) in the
office of erstwhile Agency Surgeon Tribal (District North
Waziristan)

RESPONDENTS:

- 1) Secretary Health, Govt. Khyber Pakhtunkhwa, Peshawar.
- 2) Director General Health, Govt of Khyber Pakhtunkhwa
Peshawar.
- 3) The Agency Surgeon Tribal District North Waziristan.
- 4) Fazle Ala S/o Fazle Maula, Serving as Clinical Technologist
(Dental in BPS-17 MTI Lady Reading Hospital, Peshawar.
- 5) Ajab Khan S/o Bashar Khan (BS-14), present posting DHO
Swat.
- 6) Akbar Khan S/o Khoja Omar (BS-12), present posting,
DHO Chitral.
- 7) Shakeel Raziq S/o Fazal Raziq (BS-14) Present posting,
LRH Peshawar.
- 8) Sher Muhammad Khan S/o Noor Muhammad (BS-12),
Present posting, SHT Hospital Swat.
- 9) Sohni Bibi D/o Sadar Jehan Mian (BS-12), Present posting,
DHO Swat.

- 10) Murad Khan S/o Ghandal Khan (BS-12), Present posting, LRH Peshawar.
- 11) Hayat Muhamamd Khan S/o Muhammad Sharif Khan (BS-12), Present posting, Batagram.
- 12) Tariq Saleem S/o Gul Payao (BS-12), Present posting, DHQH Karak.
- 13) Ismail Khan S/o Zar Gul (BS-12), Present posting, Services Hospital, Peshawar.
- 14) Saifullah S/o Shakirullah (BS-12), Present posting, BKMC Mardan.
- 15) Hidayatul Rehman S/o Tooti Rehman (BS-12), Present posting, DHQ Hosp Dir Upper.
- 16) Faizul Karim S/o Gul Khan (BS-14), Present posting, DHO Swat.

Inayat Ullah Khan
Appellant
through *Inayat Ullah Khan*

Inayat Ullah Khan
Advocate, Peshawar, High
Court
LLM (UK).

Dated: 29.11.2019

Annexure 2
"A"
13

**PROVISIONAL SENIORITY LIST OF CLINICAL TECHNICIAN (DENTAL) BS-12
HEALTH DEPARTMENT KHYBER PAKHTUNKHWA 2017.**

S.No	Name / Father Name	a)Old Nomenclature With BPS. b)New Nomenclature after restructuring with BPS.	Date of Joining Govt. Service/ promotion/ up-graduation	Place Of Present Posting	Date of Birth / Domicile	Date Of Retirement
1.	Ahmad Ali S/O Aurang Sher	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	12.08.1986 10.05.2006 11.08.2015	DHO Mardan	02.05.1965 Mardan	01.05.2025 Forgone his promotion to BS-12 vide letter No. 33649-53 dated 23.10.2012
2.	Rehmani Gul S/O Mabjawar	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	01.04.1987 10.05.2006 11.08.2015	DHO Swat	20.04.1963 Swat	19.04.2023 Forgone his promotion BS-12 vide letter No. 36280-85 dated 18.12.2012
3.	Umar Zada S/O Muhammad Younis	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	09.05.1988 10.05.2006 11.08.2015	DHO Swat	01.03.1970 Swat	28.02.2030 Forgone his promotion BS-12 vide letter No. 2559-63/E-1 dated 28.01.2013
4.	Abdul Ghafoor S/O Abdul Qudoos	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	11.10.1988 11.08.2015	DHO DI Khan	15.09.1969 DI Khan	14.09.2029
5.	Muhammad Yousaf Zeb Khan S/O Aurangzeb	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	29.10.1988 10.05.2006 11.08.2015	DHQ Hosp; DI Khan	14.09.1966 / DI Khan	13.09.2026
6.	Muhammad Zahid S/O Muhammad Zaman	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	20.10.1988 10.05.2006 11.08.2015	DHO Swat	10.04.1964 Swat	09.04.2024 Forgone his promotion BS-12 vide letter No. 2031-35 /EV/DT dated 16.01.2013 11.08.2015
7.	Muhammad Hamayun Khan S/O Gul Ayub Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	23.07.1989 10.05.2006 11.08.2015	DHO Bannu	02.07.1965 Bannu	01.07.2025
8.	Muhammad Jan S/O Faqr Muhammad	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	21.08.1989 10.05.2006 11.08.2015	DHO Abbottabad	12.10.1966 / Abbottabad	11.10.2026
9.	Said Mian Khawaidad S/O Said Mian Shad	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	02.09.1989 10.05.2006 11.08.2015	DHQ Hosp; Dagger Buner	09.03.1969 Buner	08.03.2029
10.	Fazal Hakim S/O Muhammad Azim Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	03.09.1989 10.05.2006 11.08.2015	DHO Swat	29.07.1969 / Swat	26.07.2029
11.	Muhammad Javed S/O Muhammad Yaqoob	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	10.10.1989 10-05-2006 11.08.2015	DHO Haripur	15.01.1965 Mardan	14.01.2025
12.	Hamid Gul S/O Muhammad Saeed	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	10.10.1989 10.05.2006 11.08.2015	DHO Mansehra	04.07.1971 Mansehra	03.07.2031
13.	Muhammad Iqbal Khan S/O Ghulam Nasiruddin	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	16.10.1989 10.05.2006 11.08.2015	DHO Lakkhi Marwat	14.04.1962 Bannu	13.04.2022
14.	Muhammad Saeed S/O Abdur Rehman	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	11.11.1989 10.05.2006 11.08.2015	DHO Mansehra	12.01.1966 Mansehra	11.10.2026
15.	Ali Raza S/O Gohar Rehman	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	11.11.1989 10.05.2006 11.08.2015	DHO Mansehra	26.04.1966 Mansehra	25.04.2026
16.	Mushtaq Ahmed S/O Siraj Muhammad	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	16.11.1989 10.05.2006 11.08.2015	DHO Peshawar	24.09.1971 Peshawar	23.09.2031
17.	Syed Taruf Hussain S/O Syed Abdul Jabber	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	18.11.1989 10.05.2006 11.08.2015	DHO Charsadda	14.11.1972 Charsadda	13.11.2032

Sl No: 22

18.	Muhammad Arshad S/O Muhammad Saeed	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	19.11.1989 10.05.2006 11.08.2015	LRH, Peshawar	24.10.1969 Peshawar	23.10.2029
19.	Muhammad Sajjad S/O Kala Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	22.11.1989 10.05.2006 11.08.2015	DHO Mansehra	30.03.1967 Mansehra	29.03.2027
20.	Farhatullah S/O Wreham Dad	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	16.12.1989 10.05.2006 11.08.2015	KGNT Hosp; Bannu	11.11.1970 Bannu	10.11.2030
21.	S. Zahir Shah S/O S. Nasrab Shah	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	20.01.1990 10.05.2006 11.08.2015	DHO Kohat	23.03.1970 Kohat	22.03.2030
22.	Irfan Ali Shah S/O Abdul Ali Shah	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	17.06.1990 10.05.2006 11.08.2015	AS NWA	01.06.1971 Bannu	31.05.2031
23.	Tahir Naesem S/O Zaffar Ali Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	02.07.1990 10.05.2006 11.08.2015	DHQT Hosp; Bannu	12.06.1972 Bannu	01.06.2032
24.	Mukhtiar Ali S/O Abdullah Shah	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	09.07.1990 10.05.2006 11.08.2015	DHO Mardan	05.01.1969 Mardan	04.01.2029
25.	Nek Daraz Khan S/O Muhammad Daraz Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	18.07.1990 10.05.2006 11.08.2015	DHO Bannu	16.03.1972 Bannu	15.03.2032
26.	Aurangzeb S/O Atlas Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	19.07.1990 10.05.2006 11.08.2015	AS NWA	25.06.1972 Bannu	19.06.2032
27.	Shafi ur Rehman S/O Shah Baraz Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	28.07.1990 10.05.2006 11.08.2015	DHO Lakki Marwat	12.01.1971 Bannu	11.01.2031
28.	Muhammad Ayub- ur-Rehman S/O Aziz-ur-Rehman	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	31.07.1990 10.05.2006 11.08.2015	DHO Peshawar	01.11.1968 Bannu	31.10.2028
29.	Baitullah Shah S/O Ghaffar Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	06.08.1990 10.05.2006 11.08.2015	KGNT Hosp; Bannu	13.05.1971 Bannu	12.05.2031
30.	Shahid Jamil S/O Abdul Latif	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	08.08.1990 10.05.2006 11.08.2015	Abbottabad	01.04.1970 Abbottabad	31.03.2030
31.	Siraj ud Daula S/O Abdul Manan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	15.08.1990 10.05.2006 11.08.2015	DHO Mansehra	15.11.1965 Mansehra	14.11.2025
32.	Ihsanullah S/O Misrab Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	19.08.1990 10.05.2006 11.08.2015	AS FR Kohat	05.04.1969 Kohat	04.04.2029
33.	Kishwar Ali Khan S/O Muhammad Kamil	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	12.09.1990 10.05.2006 11.08.2015	DHO Shangla	15.03.1970 Shangla	14.03.2030
34.	Rehmatullah S/O Khalil ullah	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	30.09.1990 10.05.2006 11.08.2015	DHO Chitral	15.03.1971 Chitral	14.03.2031
35.	Gul Muhammad S/O Nek Amal Din	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	02.10.1990 10.05.2006 11.08.2015	DHO Bannu	02.06.1965 Bannu	01.06.2025
36.	Akbar Khan S/O Khawaja Umar	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	15.10.1990 10.05.2006 11.08.2015	DHO Chitral	09.03.1964 Chitral	08.03.2024
37.	Fazal Banat S/O Fazal Rahim	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	17.10.1990 10.05.2006 11.08.2015	DHO Nowshera	06.03.1971 Peshawar	05.03.2031
38.	Muhammad Siraj S/O Said Rehman	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	20.10.1990 10.05.2006 11.08.2015	DHO Nowshera	10.03.1968 Charsadda	09.03.2028
39.	Burhan Ud Din S/O Kamal Ud Din	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	22.10.1990 10.05.2006 11.08.2015	DHO Mardan	31.03.1968 Mardan	28.02.2028
40.	Tamiullah Shah S/O Sakhi Shah	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	23.10.1990 10.05.2006 11.08.2015	DHO Lakki Marwat	08.01.1964 Bannu	07.07.2024
41.	Ihsan S/O Adam Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	23.10.1990 10.05.2006 11.08.2015	DHO Mardan	14.02.1971 Mardan	13.02.2031
42.	Muhammad Hamayun Khan S/O Gul Ayub Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech:Dental Tech: B-12	23.07.1990 01.12.1990 11.08.2015	DHO Bannu	02.07.1965 Bannu	01.07.2025

14

43.	Shaukat Ali S/O Fazli Ali	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	17.03.1991 10-05-2006 11.08.2015	DHO Swat	17.01.1971 Swat	16.01.2031
44.	Gohar Ali S/O Umer Din	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	01.04.1991 10.05.2006 11.08.2015	DHO Nowshera	11.02.1966 Charsadda	10.02.2026
45.	Fida Muhamad S/O Abdul Majeed	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	28.04.1991 10.05.2006 11.08.2015	DHO Charsadda	27.03.1971 Charsadda	26.03.2031
46.	Niaz Muhammad S/O Kulal	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	13.05.1991 10.05.2006 11.08.2015	DHO Charsadda	24.02.1969 Charsadda	23.02.2029
47.	Tariq Mehmood S/O Sufi Waris Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	11.08.1991 10.05.2006 11.08.2015	DHO Haripur	11.10.1968 Haripur	10.10.2028
48.	Amjad Wali S/O Wali Muhammad	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	18.08.1991 10.05.2006 11.08.2015	DHQ Hosp; Battagram	01.04.1971 Mansehra	31.03.2030
49.	Inayat ur Rehman S/O Muhammad Yousaf	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	20.08.1991 10.05.2006 11.08.2015	DHQ Hosp; Haripur	01.03.1970 Haripur	28.02.2030
50.	Muhammad Fateh Ali S/O Mursalin	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	28.08.1991 10.05.2006 11.08.2015	DHQ Hosp; Swabi	15.04.1969 Buner	14.02.2029
51.	Bashir Ahmed S/O Muhammad Ghazal Baig	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	01.09.1991 10.05.2006 11.08.2015	DHO Chitral	20.02.1967 Chitral	19.02.2027
52.	Afsar Zaman S/O Khan Zaman	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	19.01.1992 10.05.2006 11.08.2015	KGNT Hosp; Bannu	08.11.1971 Bannu	07.01.2031
53.	Abdul Wahab S/O Abdul Malik	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	22.01.1992 10.05.2006 11.08.2015	FR Tank	20.05.1972 FR D.I. Khan	19.05.2032
54.	Rehmat ullah S/O Fazal Khafiq	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	31.01.1992 10.05.2006 11.08.2015	DHQ Hosp; Hangu	13.04.1970 Orakzai	12.04.2030
55.	Rehmat Khan S/O Asmat Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	01.02.1992 10.05.2006 11.08.2015	DHO Tank	15.03.1971 D.I. Khan	14.03.2031
56.	Khalil ur Rehman S/O Ghulam Habib	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	01.02.1992 10.05.2006 11.08.2015	M & C Hosp; Kohat	06.05.1977 Kohat	05.05.2037
57.	Sher Ghulam S/O Ghulam Rasool	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	11.02.1992 10.05.2006 11.08.2015	DHO DI Khan	28.10.1969 Tank	27.10.2029
58.	Sohail Akram S/O Muhammad Akram	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	11.02.1992 10.05.2006 11.08.2015	Ayub TH Abbottabad	01.03.1969 Abbottabad	28.02.2029
59.	Tariq Saleem S/O Gul Peyo	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	18.02.1992 10.05.2006 11.08.2015	DHO Karak	03.09.1972 Karak	02.09.2030
60.	Almar Hussain S/O Muhammad Nazir	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	18.02.1992 10.05.2006 11.08.2015	AHQ Hosp; Parachinar	25.03.1973 Kurram Ag;	24.03.2033
61.	Abdul Ghaffar S/O Gul Shaip Kahn	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	19.02.1992 10.05.2006 11.08.2015	DHO Karak	10.03.1971 Karak	09.03.2031
62.	Jawad Hussain S/O Rehmat Ali	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	19.02.1992 10.05.2006 11.08.2015	AS Kurram	14.03.1971 Kurram	13.03.2031
63.	Inayat Khan S/O Dilbar Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	19.02.1992 10.05.2006 11.08.2015	DHO Kohat	04.05.1972 Kohat	03.05.2032
64.	Ahmad Nasir S/O Sakhi Muhammad	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	20.02.1992 10.05.2006 11.08.2015	DHO Karak	20.03.1971 Karak	19.03.2031
65.	Muhammad Naeem S/O Ahmed Nawaz	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	22.02.1992 10.05.2006 11.08.2015	DHO Karak	05.01.1960 Karak	04.01.2020
66.	Arif Ali S/O Yaquen Ali	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	22.02.1992 10.05.2006 11.08.2015	DHO Kohat	13.03.1971 Kohat	12.03.2031
67.	Muhammad Nawaz S/O Saee Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	25.02.1992 10.05.2006 11.08.2015	DHO Kohat	01.08.1971 Kohat	31.07.2031
68.	Shaukat Islam S/O Shafiqur Rahman	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	12.03.1992 10.05.2006 11.08.2015	DHO Manshehra	20.01.1972 Manshehra	19.01.2037

15

Annexure B

16



DIRECTORATE GENERAL
HEALTH SERVICES, KHYBER
PAKHTUNKHWA, PESHAWAR

No. 19494-93/AE-VIII
Dated: 07/12/2017

- To:
1. The Principal, KMC/KCD Peshawar
 2. The Principal, AIG, Abbottabad
 3. The Principal, Hachai Khan Hospital, Chitral, Mardan
 4. The Director Health Services, IATA Peshawar
 5. The Hospital Director,
Govt. MPT/NTK/DHHC Peshawar
 6. The Medical Superintendent,
Sadr Group of Teaching Hospital Swat
 7. The Hospital Director,
MTH Ayaz Teaching Hospital Abbottabad
 8. The Hospital Director,
Khaifia Gul Nawaz MTH Hospital Bannu
 9. The Hospital Director,
Mulla Memorial Memorial MTH Hospital Dera
 10. The Medical Superintendent,
ID Children Hospital Peshawar
 11. The Medical Superintendent,
Women's Children Hospital, Dera Ismail Khan
 12. The Medical Superintendent,
Govt. Ch. Hospital Kohat
 13. The Medical Superintendent,
Services Hospital Peshawar
 14. The Medical Superintendent,
Mardan Medical Complex, Mardan
 15. The Medical Superintendent, Services Hospital for Psychiatric Diseases, Peshawar
 16. The Medical Superintendent, Services Hospital Dadar, Manshera
 17. The Medical Superintendent, Dera AIG Hospital in KP/KFATA
 18. The Medical Superintendent, Dera AIG Hospital in KP/KFATA
 19. The Additional Director, Health Services, Khyber Pakhtunkhwa Province

Subject: PROVISIONAL SENIORITY LIST OF CLINICAL TECHNICIANS
(DENTAL) BS-12 OF HEALTH DEPARTMENT KHYBER
PAKHTUNKHWA.

Memo
Enclosed please find Provisional Seniority List of Clinical Technicians
(Dental) BS-12 of Health Department Khyber Pakhtunkhwa for information and
circulation amongst the officials working under your control

The same may please be brought to the notice of all concerned and
objections regarding correction in Name, Father Name, date of appointment, Place of
posting, date of birth and date of retirement, may kindly be sent to this Directorate within
one month of the receipt of this letter after which no representation will be accepted and
the Final Seniority List will be issued

Note. The provisional seniority list can be downloaded from the
website www.dhiskp.gov.pk

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

No. 19494/AE-VII

Copy forwarded to the:-
PS to Secretary to Govt. of Khyber Pakhtunkhwa, Health Department Peshawar.

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

LEGIBLE COPY

DIRECTORATE GENERAL

HEALTH SERVICES KHYBER
PAKHTUNKHWA PESHAWAR.

No. 19414-93/AE-VII

Dated. 07 /12/ 2017

17

To

1. The principals KMC/KCD Peshawar
2. The principal AMC Abbottabad
3. The principal Bacha Khan Medical College Mardan
4. The Director Health Services FATA Peshawar
5. The hospital Director
Govt MTI/LRH.KTH.HMC Peshawar
6. The medical superintend.
Saidu group of teaching hospital swat.
7. The hospital director.
MTI/Ayub Teaching Hospital Abbottabad.
8. The hospital director.
Khalifa Gul Nawaz MTI/Hospital, Bannu.
9. The hospital director.
Mufti Mehmood Memorial MTI/ Hospital D.I Khan
10. The Medical Superintendent.
ID Children Hospital .Peshawar
11. The Medical Superintendent.
Women & Children Hospital GT Road Peshawar
12. The Medical Superintendent.
Govt City Hospital Kohat Road Peshawar
13. The Medical Superintendent.
Services Hospital Peshawar
14. The Medical Superintendent.
Mardan Medical Complex Mardan.
15. The Medical Superintendent .Sarhad Hospital For Psychiatric Diseases . Peshawar
16. The Medical Superintendent. General & Mental Hospital Dara Mansehra
17. The All Medical Superintendents. DHQ/ AHQ Hospital in KPK/FATA
18. The All Agency Surgeons in FATA /FRs.
19. The all district Health Officers in Khyber Pakhtunkhwa Province.

Subject: PROVISINAL SENIORITY LIST CLINICAL TECHNICANS (DENTAL) BS-12 OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA

Memo

Enclosed please find provisional seniority list of clinical technicians (Dental) BS-12 of health department Khyber pakhtunkhwa of information and circulation amongst the officials working under your control.

The same may please be brought into the notice of all concerned and objection regarding correction in name, father name, date of appointment, place of posting, date of birth and date of retirement, May kindly be sent to this Directorate within one month of the receipt of this letter after which no representation will be accepted and the final seniority list will be issued.

**Note . The Provisional Seniority list can be downloaded from the website :
www.dhiskp.gov.pk**

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

No. _____/AE-VII

Copy Forwarded to the:-

1 PS to secretary to Govt of Khyber Pakhtunkhwa, health Department Peshawar.

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

S. No. 217

Reg. No. MF/15/PIMT/DIK

Annexure "C"
بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ (18)

Roll No. 102 1st Batch

Result Declared on 3/2006

N.W.F.P. Medical Faculty Peshawar (Pakistan)


This is to Certify that

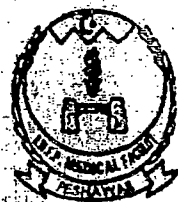
MR. IRFAN ALI SHAH Son/ Daughter of MR. ABDUL ALI SHAH and a student of
PGPI-LRH having passed the prescribed examination held in December, 2005


is this day admitted by the N.W.F.P. Medical Faculty Peshawar To the Degree of

Bachelor of Science in DENTAL **Technology**

in the 2nd Division


SECRETARY
NWFP MEDICAL FACULTY
Peshawar (Pakistan)




CHAIRMAN
NWFP MEDICAL FACULTY
/SECRETARY to Govt. of
NWFP Health Department Peshawar

Dated: 17-7-2008

Note: This Two Years Degree is issued under N.W.F.P. Medical & Dental Degree Ordinance XXVI of 1982
Valid for Appointment/Promotion in Health Department NWFP



Annexure "C" 1

University of Peshawar (19) Pakistan

This certifies that

Irfan Ali Shah son of **Abdul Ali Shah**

having fulfilled all the requirements is hereby admitted to the degree of

Bachelor of Science (Honours) in Paramedical Sciences

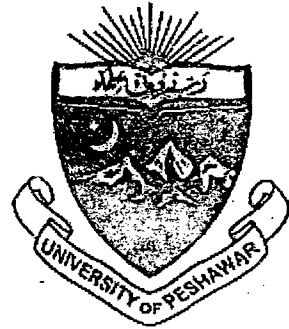
and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 2nd day of August, 2017.

Roll No: 1057

Session: Annual 2014

Reg. No: 2005-PGPI-52



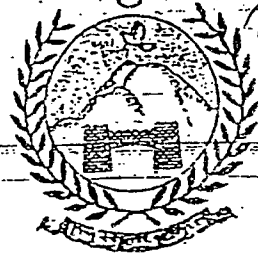
134885


Registrar


Vice Chancellor

EXTRAORDINARY
GOVERNMENT

Annexure



REGISTERED NO. P.III
GAZETTE

21

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, TUESDAY, 10TH MAY, 2016

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

NOTIFICATION

Peshawar dated the 10th May 2016.

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

APPENDIX

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

<ul style="list-style-type: none"> (v) Principal Clinical Technologist Anesthesia; (vi) Principal Clinical Technologist Cardiology; (vii) Principal Clinical Technologist Surgical; (viii) Principal Clinical Technologist Dialysis; (ix) Principal Clinical Technologist Physiotherapy; 	<p style="font-size: 2em;">21</p>		
<ul style="list-style-type: none"> (x) Principal Clinical Technologist Pulmonology; (xi) Principal Clinical Technologist Gastroenterology; and (xii) Principal Clinical Technologist Ophthalmology / otorhinolaryngology; and <p><u>Principle PHC Technologist</u></p> <ul style="list-style-type: none"> (i) Principal PHC Technologist (Multi Purpose); and (ii) Principal PHC Technologist (MCH). 			
<p>2. <u>Chief Technologist</u> CBS-1P5</p> <ul style="list-style-type: none"> (i) Chief Clinical Technologist Dental; (ii) Chief Clinical Technologist Pharmacy; (iii) Chief Clinical Technologist Radiology; (iv) Chief Clinical Technologist Pathology; (v) Chief Clinical Technologist Anesthesia; (vi) Chief Clinical Technologist Cardiology; (vii) Chief Clinical Technologist Surgical; (viii) Chief Clinical Technologist Dialysis; (ix) Chief Clinical Technologist Physiotherapy; (x) Chief Clinical Technologist Pulmonology; (xi) Chief Clinical Technologist Gastroenterology; and (xii) Chief Clinical Technologist Ophthalmology/ Otorhinolaryngology; and 			<p>By promotion, on the basis of seniority-cum-fitness, from amongst Senior Technologists and Senior PHC Technologists with seven years service in BPS-18 or twelve years service in BPS-17 and above as such in the relevant technology.</p>

<p>Chief PHC Technologist</p> <p>(i) Chief PHC Technologist (Multi-Purpose); and (ii) Chief PHC Technologist (MCH).</p>	<p>22</p>		
<p>3 Senior Technologist (BS-18)</p> <p>(i) Senior Clinical Technologist Dental; (ii) Senior Clinical Technologist Pharmacy; (iii) Senior Clinical Technologist Radiology; (iv) Senior Clinical Technologist Pathology; (v) Senior Clinical Technologist Anesthesia; (vi) SCT Senior Clinical Technologist Cardiology; (vii) Senior Clinical Technologist Surgical; (viii) Senior Clinical Technologist Dialysis; (ix) Senior Clinical Technologist Physiotherapy; (x) Senior Clinical Technologist Pulmonology; (xi) Senior Clinical Technologist Gastroenterology; and (xii) Senior Clinical Technologist Ophthalmology/Otorhinolaryngology; and</p> <p>Senior PHC Technologist</p> <p>(i) Senior PHC Technologist (Multi-Purpose); and (ii) Senior PHC Technologist (MCH).</p>	<p>At least Second Class Master's Degree or B.SC Honours/ BS (04-years) in the relevant technology or equivalent qualification from a recognized University/Institution.</p>	<p>20-35 years</p>	<p>(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Technologists and PHC Technologists with five years service as such in the relevant technology; and (b) fifty percent by initial recruitment.</p>
<p>4 Technologist (BS-12)</p> <p>(i) Clinical Technologist Dental; (ii) Clinical Technologist Pharmacy; (iii) Clinical Technologist Radiology; (iv) Clinical Technologist Pathology; (v) Clinical Technologist Anesthesia;</p>	<p>At least Second Class Bachelor's Degree in the relevant Technology from a recognized University/Institution</p>	<p>18-32 years</p>	<p>(a) Forty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technicians and Chief PHC Technicians with three years service as such in the relevant technology;</p>

23

- (vi) Clinical Technologist Cardiology;
- (vii) Clinical Technologist Surgical;
- (viii) Clinical Technologist Dialysis;
- (ix) Clinical Technologist Physiotherapy;
- (x) Clinical Technologist Pulmonology;
- (xi) Clinical Technologist Gastroenterology; and
- (xii) Clinical Technologist Ophthalmology / Otorhinolaryngology); and

PHC Technologist

- (i) PHC Technologist (Multi-Purpose); and
- (ii) PHC Technologist (MCH).

(b) twenty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technicians, Senior Technicians and Technicians having qualification prescribed for initial recruitment with three years service as such in the relevant technology.

Note: For the purpose of promotion, there shall be maintained a joint seniority list of Chief Technicians, Senior Technicians and Technicians with reference to the dates of their acquiring qualification prescribed for initial recruitment as in column No. 3:

Provided that if two or more officials acquired the qualification prescribed for initial recruitment in the same session, then the official who obtains the highest marks or grade in the examination shall be deemed to be senior to the other officials; and

(c) forty percent by initial recruitment.

By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Technicians and Senior PHC Technicians with at least two years service as such in the relevant technology.

Chief Technician (BS-16)

- (i) Chief Clinical Technician Dental;
- (ii) Chief Clinical Technician Pharmacy;
- (iii) Chief Clinical Technician Radiology;
- (iv) Chief Clinical Technician Pathology;
- (v) Chief Clinical Technician Anesthesia;
- (vi) Chief Clinical Technician Cardiology;
- (vii) Chief Clinical Technician Surgical;
- (viii) Chief Clinical Technician Dialysis;
- (ix) Chief Clinical Technician Physiotherapy;
- (x) Chief Clinical Technician Pulmonology;
- (xi) Chief Clinical Technician Gastroenterology; and



GOVT OF KHYBER
HEALTH DEPARTMENT

Dated the Peshawar 1st February, 2018

Annexure

"E"

24

1016

1/2/18

NOTIFICATION

No. SOH-III/8-60/2018. Upon recommendations of the Departmental Promotion Committee, the following Paramedics (Relevant Degree Holders) are hereby promoted to the post of Technologists (BS-17) in different categories/specialties in Health Department with immediate effect in the public interest.

1. Chief Technician (Anesthesia) BS-16, Senior Technicians (Anesthesia) BS-14 & Technicians (Anesthesia) BS-12 to Clinical Technologist (Anesthesia) BS-17

S.NO	Name	Place of Present posting.	Remarks.
1.	Arbab Sikandar S/O Mr Ahmad Khan	MTI, KTH Peshawar.	Promoted.

2. Chief Technician (Dental) BS-16, Senior Technicians (Dental) BS-14 & Technicians (Dental) BS-12 to Clinical Technologist (Dental) BS-17

S.NO	Name	Place of Present posting.	Remarks.
1.	Fazle Aala S/O Fazlo Maula	MTI, LRH Peshawar.	Promoted.

3. Chief PHC Technician (MCH) BS-16, Senior PHC Technicians (MCH) BS-14 & PHC Technicians (MCH) BS-12 to PHC Technologist (MCH) BS-17

S.NO	Name	Place of Present posting.	Remarks.
1.	Ulfat Begum D/O Fazal Ahmad	DHO Charsadda	Promoted
2.	Areeza Kumari D/O Mr Chand	Services Hospital Peshawar.	Promoted
3.	Bibi Benazir D/O Mubarak Khan	DHO Chitral/BHU Shughora Chitral	Promoted

4. Chief Clinical Technician (Ophthalmology) BS-16, Senior Clinical Technician (Ophthalmology) BS-14 Technicians (Ophthalmology) BS-12 to Clinical Technologist (Ophthalmology) BS-17

S.NO	Name	Place of Present posting.	Remarks.
1.	Wahed Ullah Khan S/O Muhammad Karim	KGN Hospital/MTI Bannu	Promoted
2.	Maharaj Gulab Khan S/O Malik Aziz Khan	DHO Jhelum/KDA Kotli	Promoted
3.	Abdul Wahid S/O Gul Muhammad Khan	NBMH Kohat Road Peshawar	Promoted

5. Chief Technician (MIP) BS-16, Senior PHC Technicians (MIP) BS-14 & PHC Technicians (MIP) BS-12 to PHC Technologist (MIP) BS-17

S.NO	Name	Place of Present posting.	Remarks.
1.	Mahid Khan S/O Muhammad Khan	DHO Peshawar	Promoted
2.	S/S Wajid Ali	DHO Shaidu	Promoted

25

3.	Abdul Razzaq S/O Muhammad Yousaf	DHO Haripur.	Promoted
4.	Fazal Hadi S/O Lajbar	PMIT Swat.	Promoted
5.	Muhammad Iqbal S/O Karim Gul	DHO Peshawar.	Promoted
6.	Syed Maqsood Anwar S/O Syed Muhammad Shah	DHO Abbottabad RHC Kund.	Promoted
7.	Zainul Abidin S/O Izat Khan	DHO Charsadda	Promoted
8.	Jan Muhammad S/O Nowshad Khan.	DHO Dir Lower	Promoted
9.	I Amir Khan S/O Khan Baz	DHO Peshawar	Promoted
10.	Bashir ul Haq S/O Habibul Haq	DHO Charsadda	Promoted
11.	Muhammad Hashim S/O Gul Zarin	Agency Surgeon Bajaur	Promoted
12.	Muhammad Usman S/O Muhammad Haroon	DHO Mardan	Promoted
13.	Janas Khan S/O Amin Khan	DHO Kohat	Promoted
14.	Qaisar Khan S/O Muhammad Hanif	DHO Kohat	Promoted
15.	Aziz ur Rehman S/O Bahadar Khan	DHO Lower Dir.	Promoted

- 6. They will be on probation for a period of one year.
- 7. Posting/transfer Notification in favor of above mentioned officers will be issued later on.

**SECRETARY HEALTH
GOVT. OF KHYBER PAKHTUNKHWA**

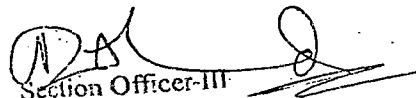
Encl: Even No and Date.

Copy forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director General Health Services, Khyber Pakhtunkhwa.
3. The Director General Provincial Health Services Academy, Peshawar.
4. The Director Health Services, FATA.
5. Hospital Directors, MTs, Khyber Pakhtunkhwa concerned.
6. Medical Superintendents, DHO, Teaching Hospital, Khyber Pakhtunkhwa concerned.
7. Principals/Deans, KMC/KCD/MGT, Peshawar.
8. District Health Officers, Khyber Pakhtunkhwa concerned.
9. District Accounts Officers, Khyber Pakhtunkhwa concerned.
10. The Deputy Director Health Department.
11. PS to Senior Minister Health, Khyber Pakhtunkhwa.
12. PS Secretary Health, Khyber Pakhtunkhwa.
13. PA to Additional Secretary (Establishment) Health, Khyber Pakhtunkhwa.
14. PA to Deputy Secretary (Admin) Health, Khyber Pakhtunkhwa.
15. Officers concerned.

34

70.	Muhammad Ishaq S/O Khan Bahadar	Diploma/M.A	12.11.1959	24.05.1979 26.08.1987 19.09.1993 20.04.2010 02.08.2012 21-07-2017	a. Dispenser b. Kdny Mach:Tech c. Dialysis Tech d. Sr. Cl. Tech: c. Chief Tech: e. Clinical Technologist (Dialysis)	BS-06 BS-11 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	LRH/MTI Peshawar
71.	Muslim Jan S/O Muhammad Sharif	Matric/Diploma	1/12/1967	02/09/1987 08.04.2010 02.08.2012 21-07-2017	a. BBT b. Clinical Tech: c. Chief Tech: d. Clinical Technologist (Pathology)	BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion	DHQ Mardan.
72.	Khushdil Khan S/O Abdur Rahman	Matric/Certificate	24/05/1965	10/02/1981 20/10/1987 08.04.2010 02.08.2012 21-07-2017	a. Lab Asst: - b. BBT c. Clinical Tech: . d. Chief Tech; e. Clinical Technologist (Pathology)	BS-05 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	LRH/MTI Peshawar.
73.	Habib Akbar	Matric/Diploma	16.12.1964	01.02.1983 16.09.1984 5.04.2010 02.08.2012 21-07-2017	a. O.T Asst: b. O.T Tech: c. CT (Surgical) d. Ch; CT (Surgical) e. Clinical Technologist (Surgical)	BS-06 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	HMC/MTI Peshawar
74.	Malik Tahir Awan S/O Malik Akhtar Awan	D.com/ Certificate	23.03.1965 Peshawar	29/10/1988 20.04.2010 02.08.2012 21-07-2017	a. FluorescienAngioTech. b. Clinical Tech: c. Chief Ophth: Tech: d. Clinical Technologist (Ophthalmology)	BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion	LRH/MTI Peshawar 0312912770
75.	Wisal Muhammad S/O Siraj Muhammad	Certificate/B.A	11/8/1960	12/01/1982 20.05.2010 02.08.2012 21-07-2017	a. ECG Tech b. C/Tech: c. Chief Tech: d. Clinical Technologist (Cardiology)	BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion	HMC/MTI Peshawar 0315-9831549
76.	Iftikhar Ahmad S/O Abdul Ghafar	M.A	15.04.1964	10/11/1994 02.08.2012 21-07-2017	a. Ophthalmic Tech. b. Chief Ophth: Tech: c. Clinical Technologist (Ophthalmology)	BS-09 BS-16 BS-17	By initial By promotion By promotion	KTH/MTI Peshawar
77.	Muhammad Saleem S/O Ali Muhammad	B.A/Diploma	10.03.1960	02/12/1979 01/06/1995 02.08.2012 21-07-2017	a. Dispenser b. Ophth: Tech. c. Chief Ophth: Tech: d. Clinical Technologist (Ophthalmology)	BS-06 BS-09 BS-16 BS-17	By initial By promotion By promotion By promotion	DHQ/MTI Hosp: DI Khan


Section Officer-III
Health Department
Khyber Pakhtunkhwa.

Department of Civil Services
Government of Khyber Pakhtunkhwa
The appointment of an officer to a post shall be construed to be an appointment to that post unless the contrary is shown.

35

78.	Tariq Saeed S/O Ghulam Rahmani	BS Ophthalmic	01.01.1972	02/04/1996 02.08.2012 21-07-2017	a.Ophth: Tech. b.Chief Ophth: Tech: c.Clinical Technologist (Ophthalmology)	BS-09 BS-16 BS-17	By initial By promotion By promotion	LRH/MTI Peshawar
79.	Nisar Ahmad S/O Muhammad Ashraf	Matric/ Certificate	01.03.1962	18.12.1989 15.04.2010 02.08.2012 21-07-2017	a.CSSD Tech b.CT (Surgical) c.Ch; CT (Surgical) d.Clinical Technologist (Surgical)	BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion	KGN/MTI Techning Hospital Bannu.
80.	Ajmal Khan S/O Sarfaraz	Matric/Certificate	2.1.1961	05.01.1981 01.03.1991 15.04.2010 02.08.2012 21-07-2017	a.O.T Asst: b.O.T Tech: c.CT (Surgical) d.Ch; CT (Surgical) e. Clinical Technologist (Surgical)	BS-06 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	KTH/MTI Peshawar
81.	Rukhtaj D/O Muhammad Azeem	Matric /Certificate	04-12-1959	16.03.1980 29.04.2010 24.07.2013 21-07-2017	a.LHV b.PHC Tech: c.Chief PHC Tech: d.PHC Technologist (MCH)	BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion	DHO Mansehra
82.	Sakina Bibi D/O Abdul Ghaffar	Matric /Certificate	5/9/1960	13.03.1980 24.07.2013 21-07-2017	a.LHV b.Chief PHC Tech: c.PHC Technologist (MCH)	BS-09 BS-16 BS-17	By initial By promotion By promotion	DHO D.I Khan
83.	Shafi ur Rehman S/O Shad Ali Khan	B.A /Certificate	07.11.1962	01.12.1983 27.01.2011 02.08.2012 11-08-2015 21-07-2017	a.Disp: b.C/Tech: c.Sr. Tech: d.Chief Tech: e.Clinical Technologist (Pharmacy)	BS-06 BS-12 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Hosp:Karak 03449002142
84.	Farkhanda Jabeen S/O Muhammad Shafiq	Matric/Certificate	31.03.1963	08.03.1981 29.04.2010 24.07.2013 11-08-2015 21-07-2017	a.LHV b.PHC Tech: c.Sr. PHC Tech: d.Chief PHC Tech: e.PHC Technologist (MCH)	BS-09 BS-12 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Peshawar
85.	Syed Maqsood Anwar S/O Muhammad Shah	BS (H) (Health Technology)	02.08.1960 Peshawar	19.06.1983 24.08.1983 21.02.2011 11.05.2012 23-02-2018	Med: Tech: BPS-07 Med Tech: BPS 09 PHC Tech: BS-12 Chief PHCT BS-16 PHC Technologist (MP) BS-17	BS-07 BS-9 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	PGPI Haripur

(Signature)
Section Officer-III
Health Department
Khyber Pakhtunkhwa.

... shall be construed as the date of ...
... (post) as the ...
... of subsection ...
... of office

36

86.	Khalid Khan S/O Durrani Khan	BS (H) (Health Technology)	01.03.1961	21.06.1983 24.08.1983 21.02.2011 11.05.2012 23-02-2018	As Disp: BS-06 Med: Tech: BPS-07 Health Tech: BPS 09 PHC Tech: BS-12 Chief PHCT BS-16 PHC Technologist (MP) BS-17	BS-06 BS-07 BS-9 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion By promotion	PGPI Peshawar
87.	Fazal Hadi S/O Lajbar	BS (H) (Health Technology)	24.05.1959 Swat	27.06.1983 24.08.1983 21.02.2011 11.05.2012 23-02-2018	Med: Tech: BPS-07 Med Tech: BPS 09 PHC Tech: BS-12 Chief PHCT BS-16 PHC Technologist (MP) BS-17	BS-07 BS-9 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	PMIT Swat
88.	Jan Muhammad S/O Nowshad Khan	BS (H) (Health Technology)	17.11.1961	25.06.1983 24.08.1983 21.02.2011 11.05.2012 23-02-2018	Med: Tech: BPS-07 Med Tech: BPS 09 PHC Tech: BS-12 Chief PHCT BS-16 PHC Technologist (MP) BS-17	BS-07 BS-9 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Dir Lower
89.	Kamal Zada S/O Muhammad Nawab	MA/MPH Diploma	02.04.1981	14.06.2004 10.05.2006 11.05.2012 23-02-2018	CDC Sup: BPS-11 PHC Tech: BPS-12 Chief PHCT BS-16 PHC Technologist (MP) BS-17	BS-11 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion	DHO Shangla
90.	Naik Zamin S/O Zarif Khan	FA/Certificate	16.04.1960	24.02.1979 11.05.2006 02.03.2010 02.08.2012 23-02-2018	Dispenser BPS 06 Tech BS-12 Sr. Tech: BS-14 Chief CT (Pharmacy) BS-16 C.T Pharmacy BS-17	BS-07 BS-9 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Malakand
91.	Meher Shah S/O Akbar Khan	Matric/certificate	04.04.1960	18.09.1978 11.05.2006 02.03.2010 02.08.2012 23-02-2018	Dispenser BPS 06 JCT (Pharmacy) BS-09 CT (Pharmacy) BS-12 Chief CT (Pharmacy) BS-16 C.T Pharmacy BS-17	BS-06 BS-12 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHS FATA 0341-9389308
92.	Inam Jan S/O Rafiullah	MA/Certificate	20/05/1960	20/05/1979 20/10/1987 08.04.2010 02.08.2012 23-02-2018	Lab Asst: BS 05 BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16 Clinical Technologist (Pathology) BS-17	BS-06 BS-12 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHQ Hosp: Mardan 03018939665
93.	Fazle Aala S/O Fazle Moula	BS (H) Dental Technology	15.10.1965	24.03.1983 20.04.2010 30.08.2012 23-02-2018	Dental Tech B-9 Clinical Tech: BS-12 Chief Tech: BS-16 C.T Dental BS-17	BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion	LRH Peshawar

Section Officer-III
Health Department
Khyber Pakhtunkhwa.

... take effect from the date of ...
... service, with effect from the date of ...
... contained in the ...
... provisions of ...
... other ...
... department

37

94.	Malik Irfanullah S/O Malik Afzal Khan	BS (H) (Health Technology)	01.01.1973 Kohat	17/09/1996 02.08.2012 23-02-2018	Ophth: Tech. BPS-09 Chief Ophth: Tech: BS-16 Clinical Technologist (Ophth) BS-17	BS-09 BS-16 BS-17	By initial By promotion By promotion	DHQ Hosp: KDA Kohat 31.12.2032
95.	Waheedullah Khan S/O Muhammad Karim	BS (H) (Ophthalmology)	20.02.1978 Bannu	08/12/2005 02.08.2012 23-02-2018	Refractionist BPS-09 Chief Ophth: Tech: BS-16 Clinical Technologist (Ophth) BS-17	BS-09 BS-16 BS-17	By initial By promotion By promotion	KGN Teaching Hospital Bannu.
96.	Zainul Abidin S/O Izzat Khan	BS (H) (Health Technology)	02.11.1959 Peshawar	15.10.1985 21.02.2011 11.05.2012 11-08-2015 23-02-2018	Health Tech: BPS 09 PHC Tech: BS-12 Sr. PHC Tech: B-14 Chief PHC Tech: B-16 PHC Technologist (MCH) BS-17	BS-09 BS-12 BS-16 BS-14 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Charsadda
97.	Hamida Begum S/O Umar Gul	Matric/ Certificate	06.07.1959 Mardan	19.03.1981 29.04.2010 24.07.2013 11.08.2015 23-02-2018	LHV BPS 09 PHC Tech: B 12 Sr. PHC Tech: BS-14 Chf PHC The (MCH BS-16 PHC Technologist (MCH) BS-17	BS-09 BS-12 BS-16 BS-14 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Charsadda
98.	Shaheen Miraj S/O Yousaf Muhammad	Matric/ Certificate	15.04.1962 Swabi	24.03.1981 29.04.2010 24.07.2013 11-08-2015 23-02-2018	LHV BPS 09 PHC Tech: B 12 Sr. PHC Tech: BS-14 Chf PHC The (MCH BS-16 PHC Technologist (MCH) BS-17	BS-09 BS-12 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Swabi
99.	Muhammad Iqbal S/O Karim Gul	BS (H) (Health Technology)	01.05.1963 Peshawar	09.02.1984 21.02.2011 11.05.2012 11-08-2015 23-02-2018	Med: Tech: BPS-07 Med Tech: BPS 09 PHC Tech: BS-12 Chief PHCT BS-16 PHC Technologist (MP) BS-17	BS-07 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	PGPI Peshawar
100.	Aziz ur Rehman S/O Bahadar Khan	BS (H) (Health Technology)	16.05.1959 Dir Lower	17.02.1984 11.05.2012 11-05-2012 11-08-2015 23-02-2018	Health Tech: BPS 09 PHC Tech: (MP) B-12 Sr. PHC Tech: (MP) BS-14 Chief PHCT BS-16 PHC Technologist (MP) BS-17	BS-09 BS-12 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHS FATA
101.	Ulfat Begum S/O Fazal Ahmad	BS (H)	20.10.1962 Mardan	20.03.1982 02.08.2012 11.08.2015 25-10-217 23-02-2018	Lady Health Visitor BS-09 PHC Tech; (MCH) BS-12 SPHC Tech; (MCH) BS-14 Chf PHC The (MCH BS-16 PHC Technologist (MCH) BS-17	BS-09 BS-12 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Peshawar
102.	Qaisar Khan S/O Muhammad Hanif	BS (H) (Health Technology)	05.10.1963	12.02.1986 02.08.2012 11.08.2015 25-10-2017 23-02-2018	Health Tech: BPS 09 PHC Tech: (MP) B-12 SPHC Tech: (MP) B-14 Chief PHCT BS-16 PHC Technologist (MP) BS-17	BS-09 BS-12 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Kohat

NDA
Section Officer-III
Health Department
Khyber Pakhtunkhwa.

Provisions of sub-section 10 of the Civil Servants (Promotions) Act, 1973 shall be deemed to apply to the posts mentioned above from the date of effect from the date of the order of the Government.

103.	Abdul Razaq S/O Muhammad Yousaf	BSc (H) (Health Technology)/ (MSPH)	15/05/1965 Haripur	08.03.1988 11.05.2012 11.08.2015 23-02-2018	JR. PHC Tech: (MP) BS 09 PHC Tech: (MP) B-12 Sr. PHC Tech: (MP) BS-14 PHC Technologist (MP) BS-17	BS-9 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion	DHO Haripur
104.	Bashir ul Haq S/O Habib ul Haq	BS (H) (Health Technology)	14.04.1966 Charsadda	13.05.1986 11.05.2012 23-02-2018	Health Tech: BPS 09 PHC Tech: (MP) B-12 PHC Technologist (MP) BS-17	BS-09 BS-12 BS-17	By initial By promotion By promotion By promotion	DHS FATA
105.	Bibi Benazir D/O Mubarik Khan	BS (H) (Health Technology)	06.06.1968 Chitral	14.03.1992 11-08-2015 23-02-2018	LHV EPS-09 PHC Tech: (MCH) BS-12 PHC Technologist (MP) BS-17	BS-09 BS-12 BS-17	By initial By promotion By promotion By promotion	DHO Chitral
106.	Amir Khan S/O Khan Baz	BS (H) (Health Technology)	04.04.1962	11.04.1995 11-08-2015 23-02-2018	JPHC Tech: (MP) BS-9 PHC Tech: (MMP) BS-12 PHC Technologist (MP) BS-17	BS-09 BS-12 BS-17	By initial By promotion By promotion	DHS FATA
107.	Arbab Sikandar S/O Mir Ahmad Khan	BS (H) Anesthesia	02.02.1972	06.02.1995 10.05.2006 11.08.2015 23-02-2018	a) Anaesthesia: Asst: B-6 b) JCT Anaesthesia: B-9 c) C.T. Anaesthesia: B-12 Clinical Technologist (Anesthesia) BS-17	BS-06 BS-09 BS-12 BS-17	By initial By promotion By promotion By promotion	KDA Kohat
108.	Muhammad Usmani S/O Muhammad Haroon	BS (H) (Health Technology)	02.04.1984 Mardan	07.12.2006 11.08.2015 23-02-2018	JPHC Tech (MP) B-9 PHC Tech: (MP) B-12 PHC Technologist (MP) BS-17	BS-09 BS-12 BS-17	By initial By promotion By promotion By promotion	PMIT Swat
109.	Muhammad Hashim S/O Gul Zarin	BS (H) (Health Technology)	04.01.1981 Bajaur	26.12.2006 11.08.2015 23-02-2018	JPHC Tech (MP) B-9 PHC Tech: (MP) B-12 PHC Technologist (MP) BS-17	BS-09 BS-12 BS-17	By initial By promotion By promotion By promotion	DHS FATA
110.	Janas Khan S/O Amin Khan	BS (H) (Health Technology)	11.11.1968 Kohat	02.08.2007 11.08.2015 23-02-2018	JPHC Tech (MP) B-9 PHC Tech: (MP) B-12 PHC Technologist (MP) BS-17	BS-09 BS-12 BS-17	By initial By promotion By promotion By promotion	DHO Hangu
111.	Abdul Wahid S/O Gul Muhammad	BS (H) (Ophthalmology)	03.08.1983 Karak	16.11.2009 11.08.2015 23-02-2018	JCT Ophth: BS-09 CT Ophth: BS-12 C Technologist (Ophthalmology) BS-17	BS-09 BS-12 BS-17	By initial By promotion By promotion By promotion	NBM Hosp; Peshawar

DA
Section Officer-III
Health Department
Khyber Pakhtunkhwa.

... for the time being
... shall be
... from the
... effect from the
... from the
... of sub-
... civil se-
... department or

39

112.	Khair-ur-Rehman S/O Anwar-ul-Haq	BS (H) (Health Technology)	20.08.1966 Shangla	11.10.2012 11.08.2015 23-02-2018	JPHC Tech(MP)B-9 PHC Tech;(MP)B-12 PHC Technologist (MP) BS-17	BS-9 BS-12 BS-17	By initial By promotion By promotion	DHO Swat
113.	Areeta Kumari D/O Mir Chand	BS (H)	12.10.1986 Buner	02.01.2014 11.08.2015 23-02-2018	JPHC Tech; (MCH) BS-9 PHC Tech; (MCH) BS-12 PHC Technologist (MCH) BS-17	BS-9 BS-12 BS-17	By initial By promotion By promotion By promotion	DHO Peshawar
114.	Muhammad Khalid S/O Muhammad sharif Khan	BSc MLT /MSc Hematology	08-09-1975 Tank.	26-02-2018	Clinical Technologist, Pathology BS-17	BS-17	By initial Reg through Act 26-02-18	RBC Hayatbad Peshawar
115.	Iqbal Muhammad S/O Mumtaz Hussain	BSc MLT /MSc Micro/ M Phil Micro	15-04-1980 Shangla	26-02-2018	Clinical Technologist, Pathology BS-17	BS-17	By initial Reg through Act 26-02-18	RBC Hayatbad Peshawar
116.	Muhammad Tariq S/O Fateh Mul Khan	BS (H) MLT	12-01-1989 Dir Lower	26-02-2018	Clinical Technologist, Pathology BS-17	BS-17	By initial Reg through Act 26-02-18	RBC Hayatbad Peshawar

Note:- It is certified that the seniority list is final and undisputed and has been prepared after circulation of tentative Seniority list & during stipulated period of tentative no objections have been received from any officer concern.

Verified

[Signature]
Section Officer-III
Health Department
Khyber Pakhtunkhwa

[Signature]
Director General Health Services,
Khyber Pakhtunkhwa Peshawar.

shall take effect from the date of appointment or from the date of joining the service, whichever is later.

Annexure F-2

(40)



**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

1353

8.8.19

Dated the Peshawar 08th August, 2019

NOTIFICATION.


No. SOH-III/10-4/2019. In terms of sub-section (5) of Section 8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Establishment Department's circular letter No. SOR-I(E&AD)3-15/88(Vol-I), dated: 09-05-2002, the Competent Authority has been pleased to notify the final joint seniority list of Technologists (BS-17), in various cadres in the Health Department Khyber Pakhtunkhwa as stood on 15-04-2019 for information of all concerned.

**Secretary to Govt. of Khyber Pakhtunkhwa,
Health Department**

Endst No. of even No and Date.

Copy forwarded to:-

1. The Director General Health Services, Khyber Pakhtunkhwa, Peshawar **with the direction to circulate the final joint seniority list of Technologists (BS-17) in various cadres in Health Department to all concerned.**
2. Deputy Director (I.T) Health, Khyber Pakhtunkhwa with the request to upload it on the website of Health Department.
3. PS to Secretary Establishment Department, Khyber Pakhtunkhwa, Peshawar.
4. PS to Secretary Health, Khyber Pakhtunkhwa.
5. PA to Additional Secretary (Estab:) Health, Khyber Pakhtunkhwa.
6. Officers concerned.

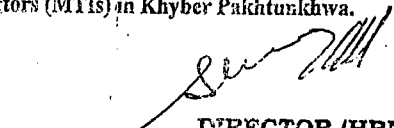

(NISAR AHMAD)
SECTION OFFICER (E-III) 878719

**OFFICE OF THE DIRECTOR GENERAL HEALTH SERVICES,
KHYBER PAKHTUNKHWA PESHAWAR.**

No. 17288-350/E-V Dated Peshawar the 08/08/2019.

Copy of the above is forwarded to the mention below for information with request to circulate amongst All officers concern under your control.

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


DIRECTOR (HRM)
DIRECTORATE GENERAL HEALTH
HYBER PAKHTUNKHWA, PESHAWAR.

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

All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.
Exchange Ph. 091-9210187 - 196 Fax. 091-9210130 Web. www.healthkp.gov.pk

Anheuser G.



(41)

To:

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

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

Memo:

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

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

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

No. 103/3 ⁴⁰³ /AE-VII Dated 27/6/2019

Copy forwarded to the:-

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

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

Final Seniority list of Degree Holder Paramedics Dental 2019.

S. No.	Name & Father Name	BPS	Date of 1st appointment	Date of Passing Degree	Total / Obtained Marks & Division.	%age	University	Present Posting	Domicile	Date of Birth	Date of Retirement
1.	Ajab Khan S/O Bashir Khan	BS-14	07 05 1988	Feb 2012 BS (H)	3213/5000	64.26	University of Peshawar	DHO Swat	Swat	01 03 1968	28 02 2028
2.	Akbar Khan S/O Khoja Omar	BS-12	15 10 1990	Feb 2012 BS (H)	3151 / 5000	63 02	University of Peshawar	DHQH Chitral	Chitral	09 03 1964	8/2/2024
3.	Shakiel Raziq S/O Fazal Raziq	BS-14	03 08 1987	Feb 2012 BS (H)	3115/5000	62.3	University of Peshawar	LRH Peshawar	peshawar	14 11 1968	13-11-2028
4.	Sher Muhammad Khan S/O Noor Muhammad	BS-12	22 09 1994	Feb-12 BS (H)	2744 / 5000	54.88	University of Peshawar	SGT Hosp Swat	swat	30 03 1964	29-03-2064
5.	Sohni Bibi D/O Sada Jahan Mian	BS-12	19 11 2013	Feb-12 BS (H)	2722 / 5000	54 44	University of Peshawar	DHO Swat	Swat	20 09 1988	19 09 2048
6.	Murad Khan S/O Ghandal Khan	BS-12	12 10 1993	12/2/2015 BS (H)	3684 / 5000	71 68	University of Peshawar	LRH Peshawar	Charsadda	27.03 1974	28.03 2034
7.	Hayat Muhammad Khan S/O Muhammad Sharif Khan	BS-12	21-12-2003	12/2/2015 BS (H)	3314/5000	66 28	University of Peshawar	DHO Batagram	Batagram	17 04 1979	16-04-2039
8.	Tariq Saleem S/O Gul Payao	BS-12	18 02 1992	12/2/2015 BS (H)	3131 / 5000	62 62	University of Peshawar	DHQH Karak	Karak	03 09 1972	02 09 2032
9.	Ismail Khan S/O Zar Gul	BS-12	15.07 2015	17/03/2017 BS (H)	3.63	76 3	KMU UNI	Services Hosp Peshawar	Peshawar	01 03 1991 Peshawar	28.02 2051
10.	Saif Ullah S/O Shakirullah	BS-12	09 01 2013	17/03/2017 BS (H)	3.62	75.2	KMU UNI	BKMC Mardan	Nowshera	02 10 1985	01 10 2045

43

11.	Hidayatulrehman S/O Tooti Rehman	BS-12	24.04.2009	17/03/2017 BS (H)	2.88	68.8	KMU UNI	DHQ Hosp; Dir Upper	Dir Upper	01.03.1984	28-02-2044
12.	Faizul Karim S/O Gul Khan	BS-14	02.05.1988	2/8/2017 BS (H)	5000/3151	63.02	University of Peshawar	DHO Swat	Swat	01.01.1968	31.12.2027
13.	Irfan Ali Shah S/O Abdul Ali Shah	BS-12	17.06.1990	2/8/2017 BS (H)	2947/5000	58.94	University of Peshawar	AS NWA	Bannu	01.06.1971	31.05.2031
14.	Farhatullah S/O Wresham Dad	BS-12	16.12.1989	2/8/2017 BS (H)	2908/5000	58.16	University of Peshawar	KGNT Hosp; Bannu	Bannu	11.11.1970	10.11.2030
15.	Nawab Khan S/O Akbar Khan	BS-12	24.12.1997	2/8/2017 BS (H)	2731/5000	54.62	University of Peshawar	DHQ Hosp; Mardan	Mardan	16.12.1968	15-12-2028
16.	Noor Habib S/O Tawas Khan	BS-12	14.09.1994	2/8/2017 BS (H)	2711/5000 DMC Req.	54.22	University of Peshawar	DHQ Hosp; Dir Upper	Dir Upper	02.09.1971	1/9/2031
17.	Hidayatullah S/O Hidayatur ehman	BS-12	21.02.2001	2/8/2017 BS (H)	2898/5000	57.96	University of Peshawar	KCD Peshawar	Swat	05.04.1964 / Swat	4/4/2024
18.	Seema Azim D/O Fazal Azim	BS-12	31.01.2009	2/8/2017 BS (H)	2882/5000	57.64	University of Peshawar	DHQ Hosp; Shangla	Shangla	01.06.1985	31.05.2045
19.	Fida Muhamad S/O Abdul Majeed	BS-12	28.04.1991	30/08/2017 BS (H)	2637/5000	52.74	University of Peshawar	DHO Charsadda	Charsadda	27.03.1971 Charsadda	26-03-2031
20.	Shahid Khan S/O Zarad Ali Khan	BS-12	20.09.2013	12/1/2018 BS (H)	4800/3584	74.67	Bacha Khan UNI	DHO Mardan	Mardan	03.04.1989	02.04.2049
21.	Arshad Ahamad S/O Bakhat Jamal	BS-12	16.01.2013	20-02-2018 BS (H)	3.92	3.92	KMU UNI	BKMC Swabi	Swabi	06.04.1978	5/4/2038
22.	Fazal Jamal S/O Muhammad Johar	BS-12	07.11.2006	19-11-2018 BS (H)	3.2	3.2	Bacha Khan UNI	DHO Shangla	Shangla	01.02.1972	31-01-2032
23.	Syed Adil Hussain Shah S/O Syed arif Hussain Shah	BS-12	01-03-2008	21-05-2018 BS (H)	2.80	2.80	Bacha Khan UNI	DHO Mansehra	Mansehra	03-03-1980	02-03-2040

44

24.	Zia Ullah S/O Abdul Rauf	BS-12	14.03.2007	30-08-2018 BS (H)	3.62	3.62	KMU Peshawar	DHQ Hosp. Battagram	Battagram	20.04.1988	19.04.2013
-----	--------------------------	-------	------------	----------------------	------	------	--------------	---------------------	-----------	------------	------------

pared by Syed Amd Ak Shah Office Assistant, Syed Farman Ak Shah Sr. Clerk, Syed Mehmood Ak Shah J/C cum C.O Rosh Ullah C O Muhammad Anwar J/C & Checked by Sheeraz Khan Deputy Director Paramedics

Director General Health Services,
Khyber Pakhtunkhwa, Peshawar

MA

Annexure

H
45

To:-

The Director General
Health Services (Govt of KPK, Peshawar)

Through Proper Channel

Subj:- OBJECTION OVER PROVISIONAL SENIORITY LIST OF QUALIFIED (DEGREE HOLDER) DENTAL TECHNICIANS/ SENIOR TECHNICIANS/CHIEF TECHNICIANS

Respected Sir;

It is respectfully submitted; with reference to Your Office letter No. 701-790/AE-VII dated 25-1-2019; floated on Facebook page with ID name "Syed Mehmood Bukhari"; that according to item No. 4 in APPENDIX to the Health Department (Govt of KPK) Notification No. SOH-III/HD/3-5/2014 dated 10-5-2016 (Published in Extraordinary Gazette of the Govt of KPK dated 10-5-2016), the basic qualification required for promotion to the post of Dental Technologist (BPS-17) against 20% quota is Bachelor's Degree in the relevant Technology, which I have acquired in December 2005 in 2nd Division from NWFP now KPK Medical Faculty Peshawar, valid for appointment/promotion in Health Department (Govt of KPK) in terms of NWFP Medical and Dental Degree Ordinance-1982. Copy of the Verified copy of B.Sc Degree (Dental Technology) is submitted herewith as Annex "A".

2. It is further submitted that I have also acquired the qualification of Degree of B.S.(Hons) during Annual Session-2014 from the University of Peshawar but the Degree has been issued to me on 02-8-2017. Hence the delay in issue of the Degree is at the Part of the University for which I cannot be penalized. Copy of the said Degree of B.S.(Hons) in Paramedical Sciences is submitted herewith as Annex "B".

3. It is further submitted that none else (employed in my cadre of Dental Technology in Health Department, Govt of KPK) has

Handwritten notes and signatures:
No. 7443 / EM
21/8/19
J.G.H.S
Applicant
officer

(46)

acquired the required qualification of B.Sc (Dental Technology) prior to me, therefore, it was obligatory for Your worthy Office (in terms of the provisions of Para-(b) in Column No; 5 against item No. 4 of the APPENDIX to the Health Department's ibid Notification dated 10-5-2016) to have listed me at S.No. 1 of the Joint Seniority List of Qualified Paramedics (Dental) instead of S.No. 10 of the said list circulated vide your ibid letter dated 25-1-2019.

4. It is pertinent to submit that in the Provisional Seniority List, the date of my qualification has been shown to be 02-8-2017, which is the date of issue of B.S.(Hons) Degree to me by the University of Peshawar notwithstanding the fact that the said Degree (Annex "B") clearly speak that I had passed the prescribed examination in Annual Session-2014. Even otherwise, the qualification required for promotion to the post of Dental Technologist (BPS-17) against 20% quota is B.Sc. Degree, which I have passed in December 2005. Since Mr. Ajab Khan listed at S.No. 1 has acquired the Degree of BS(Hons) on 02-1-2012 i.e. seven years later than my passing the prescribed qualification, therefore, my name was required to have been shown at S.No. 1.

5. In view of the above humble submissions it is earnestly prayed that my name may kindly be listed at S.No. 1 of the impugned Provisional Seniority List dated 25-1-2019 instead of S.No. 10.

APPLICANT

Miranshah
Dated:- 14-2-2019
Encls:- (Annex "A" & "B")

Irfan Ali Shah
IRFAN ALI SHAH
Dental Technician (BPS-12)
Office of the Agency Surgeon,
Distt/Agency;NWA, Miranshah



Annexure

"I" (47)

**DIRECTORATE GENERAL
HEALTH SERVICES KHYBER**

PAKHTUNKHWA PESHAWAR.

No. 17798-847/AE-VII

Dated. 2 / 11 / 2017

To

1. All Principals, of Medical Colleges in KPK.
2. The Principal PGPI, Buddha Road Douran Pur, PIMTs DI Khan, Abbottabad, Swat.
3. All Hospital Directors, of Medical Teaching Institutions in KPK.
4. Director General Provincial Health Services, Academy KPK Peshawar.
5. The Director Health Services, FATA Peshawar.
6. The Medical Superintendent, Saidu Group of Teaching Hospital Swat.
7. The Medical Superintendent, Molvi Ameer Shah Memorial Hospital, GT Road Peshawar.
8. The Medical Superintendent, Govt. NKB, Memorial Hospital, Kohat Road Peshawar.
9. The Medical Superintendent, Services Hospital, Peshawar.
10. The Medical Superintendent, SGS Memorial Hospital, Peshawar.
11. The Medical Superintendent, Sarhad Hospital for Psychiatric Diseases, Peshawar.
12. The Medical Superintendent, General & Mental Hospital Dadar, Mansehra.
13. All Medical Superintendents, DHO/ AHQ Hospitals in KPK/FATA.
14. All Agency Surgeons in FATA/FRs.
15. All District Health Officers in Khyber Pakhtunkhwa.

Subject: FINAL SENIORITY LIST OF DEGREE HOLDERS (CLINICAL TECHNICIANS) (DENTAL) BS-12 (SR. CLINICAL TECHNICIANS) (DENTAL) BS-14 (CHIEF CLINICAL TECHNICIANS) (DENTAL) BS-16 OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.

Memo.

Enclosed please find Final Seniority List of Degree Holders Clinical Technicians (Dental) BS-12 (Sr. Clinical Technicians) (Dental) BS-14 (Chief Clinical Technicians) (Dental) BS-16 of Health Department Khyber Pakhtunkhwa for information and circulation amongst all the concerned officials working under your control.

Note: The Final seniority list has also been downloaded from the website www.dhiskp.gov.pk

AP Mastad
Adhik
DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

Cc.

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

LEGIBLE COPY

DIRECTORATE GENERAL

HEALTH SERVICES KHYBER
PAKHTUNKHWA PESHAWAR.
No. 17798-847/AE-VII

Dated. 21 / 11 / 2017

48

To

1. All principal, of medical colleges in KPK.
2. The Principal PGPI, Buddhni Road Douran Pur, PMITs DI Khan Abbottabad, Swat
3. All Hospital Directors, Of Medical Teaching Institutions in KPK.
4. Director General Provincial Health Services, Academy KPK Peshawar
5. The Director Health Services , FATA Peshawar
6. The Medical Superintendent, Saidu Group Of Teaching Hospital Swat.
7. The Medical superintendent, Molvi Ameer Shah Memorial Hospital ,GT Road Peshawar
8. The medical superintendent , Govt NKB, Memorial Hospital, Kohat Road Peshawar
9. The medical superintendent , Services Hospital Peshawar
10. The medical Superintendent ,SGS Memorial Hospital Peshawar.
11. The Medical Superintendent .Sarhad Hospital For Psychiatric Diseases , Peshawar.
12. The Medical Superintendent .General & Mental Hospital Dadar, Mansehra.
13. All Medical Superintendent , DHQ/AHQ Hospitals in KPK/FATA.
14. All Agency Surgeons in FATA /FRs.
15. All District Health Officers In Khyber Pakhtunkhwa.

Subject: Final Seniority List Of Degree Holders (Clinical) Technicians) (Dental) BS-12 (SR. Clinical Technicians) (Dental) BS-14 (Chief Clinical Technicians) (Dental) BS-16 Of Health Department Khyber Pakhtunkhwa.

Memo

Enclosed please find final seniority list of degree holders clinical Technician (Dental)BS-12 (Sr. clinical technicians) (Dental) BS-14 (Chief Clinical Technician) Dental BS-16 of health Department Khyber Pakhtunkhwa for information and circulation amongst all the concerned officials working under your control.

Note: The final Seniority List has also been downloaded from the website www.dhiskp.gov.pk

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PUKHTUNKHWA, PESHAWAR

Cc.

PS to secretary to Govt: of Khyber Pakhtunkhwa. Health Department Peshawar

49

Final Seniority list of Qualified Paramedics Degree Holders Dental V.I.C.S.P.

S.No	Name	Father's Name	Date of Birth	Date of Passing Degree	Total Obtained Marks & Division	%age	Board/ University/ Institution	Present Posting	Domicile	Date of Birth	Date of Retirement
1			10	6	7	10	10	10	10	11	13
2			2003	2011 Annual	3342/5000	66.84	University of Peshawar	LRA Peshawar	Peshawar	15.10.1965	14.10.2025
3			07.03.1968	2011 Annual	3213/5000	64.26	University of Peshawar	DHO Swat	Swat	01.03.1968	28.02.2028
4			19.03.1968	2011 Annual	3131/5000	62.62	University of Peshawar	DHO Chitral	Chitral	09.03.1968	30.12.2024
5			03.08.1969	2011 Annual	3115/5000	62.3	University of Peshawar	LRA Peshawar	Peshawar	14.11.1966	13.11.2028
6			20.06.1969	2011 Annual	2777/5000	55.54	University of Peshawar	PAF Swat	Swat	10.03.1969	29.03.2064
7			17.07.1970	2011 Annual	2222/5000	44.44	University of Peshawar	DHO Swat	Swat	20.09.1968	19.09.2048
8			17.07.1970	2013	3069	61.38	KNU	DHO Hosp. Nowshera	Peshawar	01.09.1991 Peshawar	28.02.2061
9			09.07.2013	Spring 2013	312	48	KNU	BKMC Mardan	Nowshera	02.10.1999	01.10.2045
10			14.03.1974	Spring 2013	288	72	KNU	DHO Hosp. Upper Dir	Upper Dir	01.03.1961	28.02.2044
11			22.10.1968	2013 Annual	3584/5000	71.68	University of Peshawar	LRA Peshawar	Chatsadda	27.03.1974	26.03.2034
12			15.11.1968	2014 Annual	3374/5000	67.48	University of Peshawar	DHO Bahagram	Bahagram	17.04.1979	16.04.2031
13			15.11.1968	2014 Annual	3151	63.02	University of Peshawar	DHO Swat	Swat	06.01.1961	31.12.2024

(50)

Final Seniority list of Qualified Paramedics Degree Holders Dental.v

S. No.	Name	Father Name	Date of 1st appointment	Date of Passing Degree	Total Obataned Marks & Division.	%age	Board/ University/ Institution	Present Posting	Domicile	Date of Birth	Date of Retirement
1	2	3	4	5	6	7	8	9	10	11	12
1	Fazle Aala	Fazle Maula	24.03.1983	2011-Annual	3342/5000	66.84	University of Peshawar	LRH Peshawar	Peshawar	15.10.1965	14-10.2025
2	Ajab Khan	Bashar Khan	07.05.1988	2011-Annual	3213/5000	64.26	University of Peshawar	DHO Swat	Swat	01.03.1968	26-02-2028
3	Akbar Khan	Khoja Omar	15.10.1990	2011-Annual	3151 / 5000	63.02	University of Peshawar	DHQH Chitral	Chitral	09.03.1964 /	8/3/2024
4	Shakeel Raziq	Fazal Raziq	03.08.1987	2011-Annual	3115/5000	62.3	University of Peshawar	LRH Peshawar	peshawar	14.11.1968	13-11-2028
5	Sher Muhammad Khan	Noor Muhammad	22.09.1994	2011-Annual	2744 / 5000	54.88	University of Peshawar	PMT swat	swat	30.03.1964	29-03-2064
6	Sohni Bibi	Sadar Jehan Mian	11.11.2013	2011-Annual	2722 / 5000	54.44	University of Peshawar	DHO Swat	Swat	20.09.1983	19.09.2048
7	Ismail Khan	Zar Gul	15.07.2015	2013	3.63	90.75	KMU	DHQ Hosp; Nowshera	Peshawar	01.03.1991 Peshawar	28.02.2051
8	Saif Ullah	Shakirullah	09.01.2013	Spring-2013	3.52	88	KMU	EIKMC Mardān	Nowshera	02.10.1985	01.10.2045
9	Hidayat Ur Rahman S/O	Tooli Khan	24.04.2009	Spring-2013	2.88	72	KMU	DHQ Hosp; Upper Dir	Upper Dir	01.03.1984	28-02-2044
10	Murad Khan	Ghanda Khan	12.10.1993	2014-Annual	3584 / 5000	71.68	University of Peshawar	LRH Peshawar	Charsadda	27.03.1974	26.03.2034
11	Hayat Muhammad Khan	Muhammad Sharif Khan	23.12.2003	2014-Annual	3314/5000	66.28	University of Peshawar	DHO Balagram	Balagram	17.04.1979	16-04-2039
12	Faizul Karim	Gul Khan	02.05.1988	2014-Annual	3151	63.02	University of Peshawar	DHO Swat	Swat	01.01.1968	31.12.2027

S-NO: 14

LEGIBLE COPY

51

13	Tariq Saleem	Gul Payao	02.1992	2014-Annual	3131 / 5000	62.63	University of Peshawar	DHO Peshawar	Karak	03.09.1972	02.09.2032
14	Imam Ali Shah	Abdul Ali Shah	17.06.1990	2014-Annual	3947/5000	58.91	University of Peshawar	ASABA	Ebano	01.11.1973	11.09.2031
15	Fathullah	Waham Dad	16.12.1989	2014-Annual	2528/5000	38.16	University of Peshawar	KCNF Hosp. Peshawar	Ebano	11.01.1970	10.11.2031
16	Ridayatullah	Hidayat Chinnori	21.02.2001	2014-Annual	3895/5000	57.89	University of Peshawar	KCD Peshawar	Srial	05.04.1984 Srial	11/11/2021
17	Muhammad Khan	Abdul Khan	24.12.1991	2014-Annual	2731/5000	54.63	University of Peshawar	DHO Hosp. Peshawar	Ebano	15.12.1988	15.12.2028
18	Muhammad Habib	Muhammad Khan	14.09.1994	2014-Annual	2711/5000	54.22	University of Peshawar	DHO Hosp. Dir Usuz	Dir Usuz	02.09.1971	19/09/2031
19	Muhammad Ali	Abdul Kader	25.01.1991	2015-Annual	2637/5000	51.74	University of Peshawar	DHO Hosp. Peshawar	Chapra	03.11.1976 Peshawar	03.11.2026

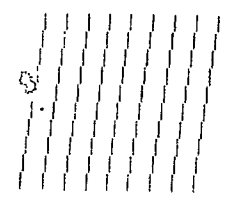
DIRECTOR GENERAL SERVICES
PESHAWAR UNIVERSITY PESHAWAR

52

Handwritten notes and signatures in the top right corner.

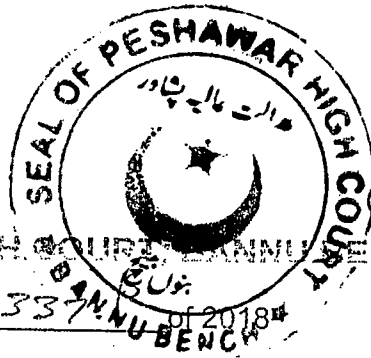
LEGIBLE COPY

13	Tariq Saleem	Gul Payao	02.1992	2014-Annual	3131/5000	62.62	University of Peshawar	DHQ kark	Kark	03.09.1972	02.09.2023
14	Irfan Ali Shah	Abdul Ali Shah	17.06.1990	2014-Annual	2947/5000	58.94	University of Peshawar	AS NWA	Bannu	01.06.1971	31.05.2031
15	Farhatullah	Waresham Dad	16.12.1989	2014-Annual	2908/5000	58.16	University of Peshawar	KGNT Hosp Bannu	Bannu	11.11.1970	10.11.2010
16	Hidayat ullah	Hidayatur ehman	21.02.2001	2014-Annual	2898/5000	57.96	University of Peshawar	KCD Peshawar	Swat	05.04.1964 Swat	04.04.2024
17	Nawab khan	Akbar Khan	24.12.1997	2014-Annual	2731/5000	54.62	University of Peshawar	DHQ Hosp Mardan	Mardan	16.12.1968	15.12.2028
18	Noor Habib	Twas Khan	14.09.1994	2014-Annual	2711/5000	54.22	University of Peshawar	DHQ Hosp Dir Upper	Dir Upper	02.09.1971	01.09.2031
19	Fida Muhammad	Abdul Majeed	28-04-1991	2015-Annual	2637/5000	52.74	University of Peshawar	DHQ Charsadda	Charsadda	27.03.1971	26.03.2031



QP100653

DIRECTOR GENEBAZ HEALTH SERVICE
KHYBER PUKHTUNKHWA, PESHAWAR



J
Annexure
(S3)

IN THE PESHAWAR HIGH COURT, BANNU BENCH

Writ Petition No. 33 BANNU BENCH of 2018

Irfan Ali Shah s/o Abdul Ali Shah
R/O: Kotka Abdul Qadeer Shah (Bangash Khel) Mandan,
Tehsil & District: Bannu
Serving as Clinical Technician (Dental) in the office of
Agency Surgeon (NWA), Miranshah-----PETITIONER

VERSUS

The Govt of Khyber Pakhtunkhwa, through:-

1. The Secretary (Health Department) Govt of KPK, Peshawar
2. The Director General Health (Govt of KPK), Peshawar
3. The Agency Surgeon (NWA), Miranshah
4. Fazle Aala s/o Fazle Maula, Serving as Clinical Technologist(Dental) in BPS-17 MTI Lady Reading Hospital, Peshawar

-----RESPONDENTS

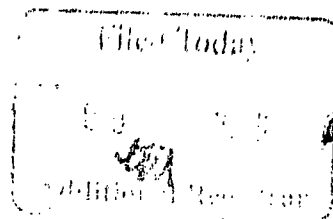
WRIT PETITION UNDER ARTICLE: 199(1)(a)&(c)
OF THE CONSTITUTION OF PAKISTAN-1973

Being aggrieved by and dissatisfied with the promotion order dated 01-2-2018, passed by the Respondent No. 1&2 vide S.No. 2 of the Notification No. SOH-III/8-60/2018 dated 01-2-2018, whereby the Respondent No. 4 has been promoted to the post of Clinical Technologist (Dental) in BPS-17 while superseding the Petitioner otherwise than in accordance with the relevant Recruitment Rules, therefore, the Petitioner is compelled to prefer this writ petition for the enforcement of his inalienable constitutional and fundamental rights, inter alia, on the following facts and grounds:-

Copy of the impugned Notification dated 01-2-2018 is filed as Annex "A"

FACTS

Contd. P/R
Adv for Pts



TESTED
EXAMINER
Peshawar High Court
Bannu Bench

54

1. That the Petitioner has joined service as Dental Technician (BPS-9) under the Respondents No. 1&2 on 17-6-1990, which was re-designated as JCT(Dental) (BPS-9) on 10-5-2006 and was promoted to the post of Clinical Technician (Dental) (BPS-12) wef 11-8-2015, as reflected at S.No. 22 of the Provisional Seniority List of Clinical Technicians (Dental) (BPS-12) issued by the Respondent No. 2 vide his letter No. 19414-93/AE-VII dated 02-11-2017.

Copy of the Respondent No. 2's letter dated 02-11-2017 alongwith its enclosed Seniority List is filed herewith and marked as Annex "B".

2. That with a view to enhance the skills of Paramedical Staff, the Respondents No. 1&2 had introduced the Paramedics Degree Courses in various technologies including Dental Technology and the Petitioner was detailed to undergo two (02) years B.Sc. Degree course in the Postgraduate Paramedical Institute at Lady Reading Hospital Peshawar in its FIRST Batch/Session; 2004-05. On successful completion of the course the trainees were subjected to exhaustive examination by the NWFP (now KPK) Medical Faculty Peshawar during December 2005 and the Petitioner was granted the Degree of B.Sc(Dental Tech) by the KPK Medical Faculty Peshawar. It is pertinent to mention that the Petitioner has later on acquired the qualifications of 4 years' Degree course of B.S. (Hons) in Dental Technology from the University of Peshawar during Annual 2014.

Copies of the Petitioner's Degrees of B.Sc & B.S.(Hons) in Dental Technology are filed herewith and marked as Annex "C/1&2".

3. That after imparting graduate and postgraduate training to the paramedical staff of Health Department, the provincial Govt introduced four (04) stages promotion opportunities to the paramedical staff upto BPS-20 in the posts of Clinical Technologist (BPS-17), Senior Clinical Technologist (BPS-18), Chief Clinical Technologist (BPS-19) and Principal Clinical Technologist (BPS-20) and for that purpose promulgated Recruitment Rules vide Gazette Notification dated 10-5-2016.

Control — P/2

Filed Today
Additional Registrar

ATTESTED
EXAMINER
Peshawar High Court
Rana Bench

55

(13)

Copy of the Recruitment Rules dated 10-5-2016 is filed as Annex "D".

4. That according to Clause-(b) in Column No. 5 against item No. 4 of Appendix to the ibid Recruitment Rules, 20% quota has been reserved for promotion on the basis of seniority-cum-fitness from amongst the incumbents of the posts of Chief Technicians(BPS-16), Senior Clinical Technician (BPS-14) and Technicians(BPS-12), having acquired the qualifications prescribed for initial recruitment (i.e. B.Sc in Dental Technology) with 03 years service in the relevant technology and according to the NOTE below the said Clause-(b) in Column No. 5 Joint Seniority List of the said posts is to be maintained with reference to dates of acquiring the qualifications of B.Sc Degree. Keeping in view the ibid provision; the Petitioner having acquired the qualification of B.Sc (Dental Technology) during December 2005 in the first batch/session of 2004-05, when none-else of his colleagues/seniors had acquired the said qualification; therefore, the Petitioner had to be shown on the top of the seniority list for the purpose of his promotion to the post of Clinical Technologist (Dental) in BPS-17 against the 20% quota reserved for promotion of the qualified departmental candidates and deserved to have been promoted to the said post instead of the Respondent No. 4 on 01-2-2018. However, the Respondent No. 2 has; with a view to favour the Respondent No. 4 illegally and clandestinely prepared final seniority list of the qualified departmental candidates; vide letter No. 17798-847/AE-VII dated 02-11-2017; without previous circulation of the same and even without preparation of Provisional Seniority List and calling for objections thereto from the affected employees; and showed therein the Respondent No. 4 at the top of the Seniority List, while the Petitioner has been shown at S.No. 14 with reference to date of his acquiring the qualifications of B.Sc(Hons) from the University of Peshawar during Annual-2014 instead of with reference to the date of his acquiring the qualification of B.Sc from the KPK Medical

Control — P/4 @
17/11/2017 for P/4

Filed Today
Additional Registrar

ATTESTED
EXAMINER
Peshawar High Court

56

Faculty Peshawar, during December 2005. It is further pertinent to submit that the Degree of B.S(Hons) is equivalent to M.Sc., while the qualifications prescribed for promotion to the post of Clinical Technologist (Dental) in BPS-17 is the Degree of B.Sc. Hence, the impugned seniority list dated 02-11-2017 as well the resultant promotion order dated 01-2-2018 is illegal and ineffective upon service rights of the Petitioner.

Copy of the impugned Seniority list dated 02-11-2017 is filed as Annex "E".

5. That in the above circumstances the Petitioner sees no remedy except to beseech before this Hon'ble High Court for the enforcement of his inalienable constitutional and fundamental rights; inter alia; on the following grounds:-

GROUNDS

(A) That, the Petitioner has no other alternate and efficacious remedy against the illegal atrocities of the Respondents, except through institution of this Petition, because neither PROVISIO to Section: 22 of the KPK Civil Servants Act-1973 allows any departmental appeal or representation against matters relating to the determination or fitness of a person to hold a particular post or to be promoted to a higher post or grade nor Section; 4(b) of the KPK Service Tribunal Act-1974 allows appeal to the KPK Service Tribunal against an order or decision of a departmental authority determining the fitness or otherwise of a person to be appointed to or a particular post or to be promoted to a higher post or grade. Hence the only remedy available to the Petitioner is to beseech before this Hon'ble Court for judicial review of the impugned promotion order of the Respondent No. 4, passed by the Respondents No. 1&2, under Article: 199 of the Constitution of Pakistan-1973.

(B). That Article; 4 of the constitution of Pakistan-1973 confers upon the Petitioner his inalienable constitutional right of his

Contd. — P/5 D
Filed today
Additional Registrar
ATTESTE
EXAMINED
Peshawar High Co

(57)

(5)

treatment in accordance with law but despite the fact that despite the fact that the Petitioner is lawfully entitled for promotion in preference to the Respondent No. 4 by virtue of having acquired the prescribed qualification during December 2005 while the Respondent No. 4 has no doubt acquired higher qualifications of B.S(Hons) but five (05) year later than the Petitioner. Therefore, the Petitioner is lawfully entitled to have been promoted to the post of Clinical Technologist (Dental) in BPS-17 in preference to the Respondent No. 4. Hence the impugned promotion order of the Respondent No. 4 is null and void ab-inito and ineffective upon the service rights of the Petitioner.

(C). That Articles: 25&27 of the Constitution of Pakistan-19073 confer upon the Petitioner his fundamental right to equal treatment/protection under the law but the Respondents No. 1&2 have discriminated against the Petitioner in the matter of his promotion to the post of Clinical Technologist (Dental) in BPS-17 otherwise than in accordance with the relevant Recruitment Rules. Hence the instant writ petition is lawfully maintainable for the enforcement of fundamental right of the Petitioner.

(D). That Advocate for the Petitioner craves leave of this Hon'ble High Court to urge more grounds at the time of hearing of this Petition.

PRAYERS

6. In view of the above humble submissions, it is earnestly prayed that this Hon'ble High Court may graciously be pleased to:-

(a). Declare that the Petitioner has been treated in the matter of his promotion to the post of Clinical Technologist (Dental) in BPS-17 otherwise than in accordance with the relevant law/rules: and

Contd. — P/6
Adv for Pet

ATTESTED

EXAMINER
Peshawar High Court
Banno Bench

SW

58

(b). Issue an appropriate writ to the Respondents No. 1&2 review/revise the impugned promotion order dated 01-2-2018 and substitute the name of the Petitioner instead of the Respondent No. 4 with all consequential benefits.

(c). That as an INTERIM RELIEF this Hon'ble Court may graciously be pleased to suspend operation of the impugned Notification dated 01-2-2018 to the extent of promotion of the Respondent No. 4 only till final disposal of the instant writ petition.

(d). Any other relief(s) which this Hon'ble High Court may deem fit and necessary in circumstances of the case.

Prayed accordingly in the interest of justice.

Sher Muhammad Khan
PETITIONER

Through:-

Bannu
Dated:- 23-2-2018

Sher Muhammad Khan
(Sher Muhammad Khan)
Advocate High Court, at Bannu
I. D. No. BC-09-2433

LIST OF BOOKS

1. The Constitution of Pakistan-1973.
2. The KPK Civil Servants Act-1973
3. The West Pakistan Civil Servants (A,P&T) Rules-1989
4. KPK Health Department's Recruitment Rules of the post of Clinical Technologist (Dental) issued vide Notification dated 10-5-2016.,

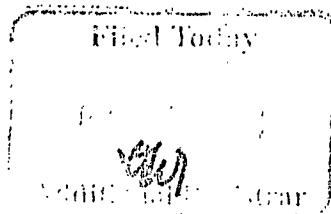
CERTIFICATE

It is certified that no such like Writ Petition has earlier been filed in this Hon'ble Court as per information furnished to me by the Petitioner.

Sher Muhammad Khan
Advocate for the Petitioner

ATTESTED

EXAMINER
Peshawar High Court
Bannu Bench



Annexure

J-2

59

PESHAWAR HIGH COURT
BANNU BENCH

FORM 'A'

FORM OF ORDER SHEET

Date of order or proceedings	Order or other proceedings with signature of Judge (s).
(1)	(2)
06-03-2019	<p><u>IV.P No.337-B of 2018.</u></p> <p>Present:</p> <p>Sher Muhammad Khan advocate for petitioner..</p> <p>Mr. Shahid Hameed Qureshi AAG for official respondents</p> <p>Fazle Ala (respondent No.4)</p> <p>***</p> <p><u>MUHAMMAD NASIR MAHFOOZ, J---</u></p> <p>Through the instant Writ petition, the petitioner has challenged the vires of seniority list dated 02-11-2017 and subsequent Notification No.SOH-III/6-60/2018 dated 01-02-2018, whereby the respondent No.4 has been promoted to the post of Clinical Technologist (Dental) in BPS-17 while superseding the petitioner, hence prayed for declaring the impugned seniority list dated 02-11-2017 as well as the promotion order/notification dated 01-02-2018 as</p>

2.24

ATTESTED

EXAMINER

Peshawar High Court

illegal and ineffective upon right of the petitioner

2- After arguing the case at some length, learned counsel for the petitioner stated at the Bar that he would not press the instant petition, provided the same be treated as representation and sent to the competent authority for decision in accordance with law.

3- Learned Additional AG present in the court, in some other case, accepts the notice and has got no objection

4- In view of the above, the petition is treated as Representation and send to the competent authority for decision in accordance with law within a period of one month from the ate of receipt of this order.

SD/-Mr. Justice Muhammad Nasir Hashmi
SD/-Mr. Justice Saad Ahmad J

Announced.
06-03-2019

VERIFIED TO BE TRUE COPY
Examiner
Peshawar High Court Bench
Authorised under Article 87 of
the Qanun-e-Shahadat Order 1988

Handwritten signature and date: 17/03/2019



Annexure "k" (61)
**DIRECTORATE GENERAL
HEALTH SERVICES KHYBER
PAKHTUNKHWA PESHAWAR**

No. _____ / AE-VII

Dated: _____ / 07 / 2019

Registered

To

Mr. Irfan Ali Shah S/O Abdul Ali Shah
R/O: Kotka Abdul Qadeer Shah (Bangash Khel) Mandan
Tehsil & District Bannu.

Subject: **WF NO. 337-R/2018 - IRFAN ALI SHAH VERSUS GOVT. OF
KHYBER PAKHTUNKHWA AND OTHERS**

I am directed to refer to the subject noted above and to direct to attend office of the Director General Health Services Khyber Pakhtunkhwa, Peshawar on 29.07.2019 at 10:00 AM positively for personal hearing.

Deputy Director (Paramedics)
Directorate General Health Services
Khyber Pakhtunkhwa, Peshawar

No. 12800 / AE-VII

Dated 19/07/2019

Through Fax

Copy forwarded to the:-

- > District Health Officer Tribal District Miransha (NWA).
- > He is requested to direct the above official to appear before the GHS, KP on the above date and time positively.

*Fax to asad
DHC Merged Dist*

Deputy Director (Paramedics)
Directorate General Health Services
Khyber Pakhtunkhwa, Peshawar

Annexure

"L"

62

To:-

The Secretary
Health Department (Govt of KPK, Peshawar)

Through Proper Channel

**Appeal Under Rule: 3 of the KPK Civil Servants (Appeal)
Rules-1986**

Respected Sir;

It is respectfully submitted that I had submitted; my objections dated 14-2-2019 (copy enclosed as **Annex "A"**); to the Director General Health Services (KPK), over the Provisional Seniority List of qualified (Degree Holders) Dental Technicians/Senior Tech (Dental)/Chief Tech (Dental); issued under DGHS (KPK) letter No. 701-790/ AE-VII dated 25-1-2019 and floated on Facebook page with ID name of "Syed **Mehmood Bukhari**" for the purpose of promotion to the post of Dental Technologist (BPS-17).

2. It is pertinent to submit that I had submitted the said objections through proper channel and were forwarded by the office of Agency Surgeon (Tribal District North Waziristan) to the DGHS (KPK) Peshawar under his covering letter No. 497/D-2 dated 14-2-2019 and delivered by hand to the office DGHS (KPK) Peshawar under Inward Dak Diary No. 7444 dated 21-2-2019 (copy enclosed as **Annex "B"**).

3. It is further submitted that without disposal of my elaborated objections dated 14-2-2019 over the provisional seniority list dated 25-1-2019; wherein I had claimed my seniority position at top of the impugned provisional seniority list dated 25-1-2019 instead of assigning my Seniority at S.No.10 of the impugned provisional seniority list dated 25-1-2019; office of the worthy DGHS (KPK) Peshawar has issued Final Seniority List of the Degree Holder Paramedics (Dental) vide their letter No. 10313-403/AE-VII dated 27-6-2019 (copy enclosed as **Annex "C"**) and listed me at S.No. 13 of the Final Seniority List instead of my due seniority position at the top of the Seniority List and even instead of the assigned seniority at S.No. 10 of the Provisional Seniority List.

2019-02-21

2019-02-21

63

4. It is further submitted that the office of DGHS (KPK) had previously on 02-11-2017 clandestinely issued Final Seniority List of the the Qualified Paramedics (Dental) without first issue of Provisional Seniority List and arranged to promote illegally my junior Fazle Aala, Dental Tech at LRH Peshawar to the post of Dental Technologist (BPS-17), vide your office Notification No. SOH-III/8-60/ 2018 dated 01-2-2018, therefore, I had to challenge the said promotion in the Hon'ble Peshawar High Court Bannu Bench through Writ Petition No. 337-B/2018, which has been disposed off vide judgement/order dated 06-3-2019 (copy enclosed as **Annex "D"**) and remitted to your Office as representation for the departmental redress of my grievances but no response has so far been received from your office despite my personal hearing by the DGHS (KPK) on 29-7-2019 duly called for the same vide his office letters (1) NO. 12799/AE-VII dated 19-7-2019 and (2) No. 12800/AE-VII dated 19-7-2019 (copy enclosed as Annex **"D/1&2"**).

5. In view of the above humble submissions it is earnestly prayed that the office of DGHS (KPK) Peshawar may kindly be directed to reconcile and assign me my due seniority position on the top of the Seniority List of qualified Degree Holders Paramedics (Dental) for the purpose of my promotion to the post of Dental Technologist (BPS-17) and may also be pleased to grant me proforma promotion to the ibid post with effect from 01-2-2018 i.e. the date of promotion of my junior namely Fazle Aala.

Miranshah

Dated:- 20-8-2019
Encls:- (Annex "A" to "D/2")

(19 Pages)

APPLICANT

Irfan Ali Shah

IRFAN ALI SHAH

Dental Technician (BPS-12)
Office of the Agency Surgeon,
Tribal District; North Waziristan
Miranshah

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

SERVICE APPEAL NO. 1770 OF 2019

Irfan Ali Shah.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa and others.....Respondents

Respectfully Sheweth:

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

Preliminary Objections:-

1. That the Appellant has got neither cause of action nor locus standi to file the instant Appeal.
2. That the Appellant has filed the instant appeal just to pressurize the respondents.
3. That the instant Appeal is against the prevailing Law and Rules.
4. That the Appeal is not maintainable in its present form and also in the present circumstances of the issue.
5. That the Appellant has filed the instant Appeal with mala-fide intention hence liable to be dismissed.
6. That the Appellant has not come to the Tribunal with clean hands.
7. That the Appeal is time barred.
8. That the Honorable Tribunal has no Jurisdiction to adjudicate upon the matter.
9. That the instant Appeal is bad for mis-joinder and non-joinder of the necessary parties.

ON FACTS:

1. Para No. 1 is incorrect. The Appellant was appointed as Dental Technician in BPS-09 and the post of Dental Technician BPS-09 was re-nomenclatured as Jr. Clinical Technician (Dental) BPS-09 on 25/08/2006 (after approval of Service Structure of Paramedics). However the posts of Clinical Technician (Dental) BPS-09 was upgraded in BPS-12 and renomenclatured as Clinical Technician (Dental) on 11/08/2015 and not on 10/05/2006. At present the Appellant is at S. No. 21 of the Seniority list.

2. Para No. 2 pertains to record, hence no comments.
3. Para No. 3 is correct, but 20% quota (posts) reserved for 4 years degree holders in the relevant field. The Appellant had acquired the BS (Honors) 4 years degree from Peshawar University during session 2014 and has been placed in the seniority list of degree holders in proper place.
4. Para No. 4 is correct. The Respondent No. 4 has been promoted to BPS-17 as Clinical Technologist (Dental) on Seniority cum fitness basis after approval of the Departmental Promotion Committee, as he was on top of the seniority list of degree holders.
5. Para No. 5 is incorrect. The Respondent No. 4 has been placed in the Seniority list of Clinical Technologist/PHC Technologist (BPS-17) in proper place while the Appellant is in BPS-12.
6. Para No. 6 is incorrect. The Appellant has been placed in the seniority list of degree holders (Dental) in proper place as per approved Service Rules notified by Govt. on 10/05/2016.
7. Para No. 7 is incorrect. Appeal of the Appellant was not considered being not covered under the rules.
8. Para No. 8 is incorrect. The Appellant acquired 02 years degree from Medical Faculty Khyber Pakhtunkhwa during the year 2005. As the Medical Faculty Khyber Pakhtunkhwa is not a degree awarding body/institute being not registered with any Chartered University/Institution recognized by Higher Education Commission (HEC). Therefore the Degree 02 years awarded by Medical Faculty Khyber Pakhtunkhwa cannot be considered. However, the Appellant has been included in the seniority list of degree holders (Dental) from the date of acquiring degree from Peshawar University i.e. 2014 as per approved Service Rules notified by the Govt. of Khyber Pakhtunkhwa Health Department on 10/05/2016 and he will be promoted on his turn.
9. Para No. 09 is correct, hence need no comments.
10. Para No. 10 is incorrect. The Appellant was called for personnel hearing on 29/07/2019 in light of orders of the Honorable Khyber Pakhtunkhwa Service Tribunal, Peshawar and the Appeal has been regretted by the Competent Authority i.e. DGHS Khyber Pakhtunkhwa vide letter No. 17227/AE-VII dated 02/10/2019 (Annex-A).

11. Para No. 11 is incorrect. The same has already been furnished in preceding para.

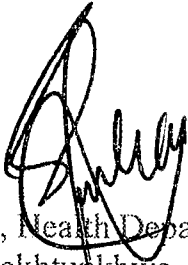
12. Para No. 12 is incorrect. Reply has already been furnished in Para No. 10 above.

ON GROUNDS:

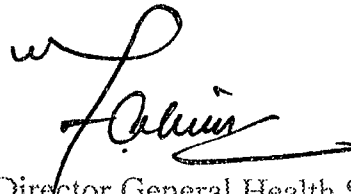
- a. Para-a is incorrect. Reply has already been furnished in Para No. 8 of Facts above.
- b. Para-b is incorrect, as in preceding para.
- c. Para-c is incorrect. Reply has already been given in Para-a above.
- d. Para-d is incorrect. Reply has already been furnished in preceding paras.
- e. Para-e is incorrect. Reply has already been furnished in Para No. 8 of Facts.
- f. Para-f needs no comments being formal.

PRAYER:

It is therefore most humbly prayed that on acceptance of comments, the instant Appeal may very graciously be dismissed with cost.



Secretary, Health Department,
Khyber Pakhtunkhwa, Peshawar.
Respondent No. 01



Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.
Respondent No. 02



321
**DIRECTORATE GENERAL
HEALTH SERVICES KHYBER
PAKHTUNKHWA PESHAWAR**

No. 17727 /AE-VII

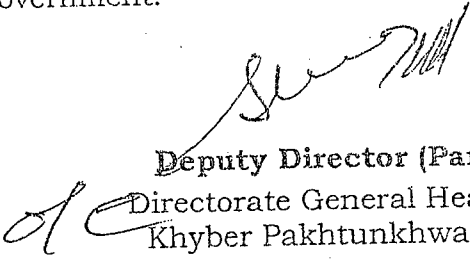
Dated: 2 / 10 / 2019

To

The District Health Officer,
Tribal District Miranshah.

Subject: APPEAL UNDER RULE-3 OF THE KP CIVIL SERVANTS
APPEAL RULES 1986.

I am directed to refer to your letter No. 2905/Miranshah, dated 20.08.2019 on the subject noted above and to state that the subject case has been discussed and decided in the presence of the applicant (Mr. Irfan Ali Shah) and the appeal has been regretted by the competent authority in the light of instructions of the Government.


Deputy Director (Paramedics)

Directorate General Health Services
Khyber Pakhtunkhwa, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR.

Irfan Ali Shah

V E R S U S

Secretary Health, & Others

INDEX SHEET

S/No	Description Of Documents	Annexure	Page No
1	Comments		1-2
2	Affidavit		3

RESPONDENTS NO. 5, 6, 7 & 9

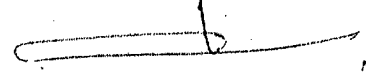
Ajab Khan S/O Bashar Khan

Akbar Khan S/O Khoja Omar

Shakeel Raziq S/O Fazal Raziq

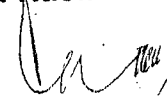
Sohni Bibi D/O Safdar Jehan

Through Counsel



Muhammad Nasir Ghilzai

Aziz Khan



Muhammad Ayub



Advocate High Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR.

Irfan Ali Shah

V E R S U S

Secretary Health, & Others

COMMENTS ON BEHALF OF RESPONDENTS NO. 5, 6, 7 & 9

Respectfully Sheweth.

Para wise comments on behalf of Respondents No.5, 6, 7 & 9 are as under: -

PRELIMINARY OBJECTION

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has no locus standi to file the instant appeal.
3. That the appellant has filed the instant appeal just to pressurize the respondents.
4. That the instant appeal is against the prevailing law and rules.
5. That the appeal is not maintainable in its present form and circumstances of issues.
6. That the appellant has filed instant appeal with malafide intention, hence liable to be dismissed.
7. That the appellant has not come to this Hon'ble Tribunal with clean hands.
8. That the appellant wants to be promoted by depriving the respondents of their right.

ON FACTS

1. Para no. 1 pertains to departmental record, hence no comments.
2. Para 2 relates to academic qualification of the appellant and pertains to records, hence no comments.
3. Para no. 3 is correct.
4. Para no 4 pertains to respondent no 4, hence no comments.
5. Para no. 5 pertains to respondent no 4, hence no comments.
6. Para no. 6 is correct to the extent that the appellant being junior was placed at serial no. 13 of the Final Seniority of Degree holders of Paramedics Dental 2009.
7. Para no. 7 pertains to respondent no. 2, hence no comments.
8. Para no. 8 is incorrect. The appellant acquired 2 years degree from Medical Faculty Khyber Pakhtunkhwa during the year 2005. As the medical faculty Khyber Pakhtunkhwa is not a degree awarding body / institute being not recognized with any Chartered University / institution recognized by Higher Education Commission. Therefore the degree of 2 years awarded by Medical Faculty of Khyber Pakhtunkhwa cannot be considered. However, the appellant has been included in the seniority list of degree holders (Dental) from the date of acquiring of degree from Peshawar University i.e 2004 as per approved service rules notified by the Government of Khyber Pakhtunkhwa, Health Department on 10/05/2016 and he will be promoted on his turn.
9. Para no. 9 pertains to institution of writ petition by the appellant, hence no comments.
10. Para no. 10 pertains to respondent no 2, hence no comments.

11. Para no. 11 pertains to respondent no. 1, hence no comments.
 12. Para no. 12 pertains to grounds which are replied as under against each: -

GROUND

- A. Para no. A already replied in para no. 8 of the facts.
 B. Para no. B is incorrect, hence denied.
 C. Para no C is incorrect, hence denied.
 D. Para no D pertains to respondent no 1 to 4, hence no comments.
 E. Para no E does not pertains to respondents no-5, 6, 7 & 9, hence no comments.
 F. No comments on para no F.

It is therefore humbly prayed that on acceptance of instant comments, the appeals of the appellant may kindly be dismissed with cost.

RESPONDENTS NO. 5, 6, 7 & 9

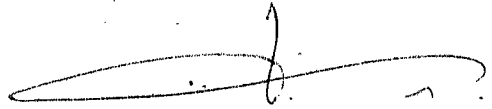
Ajab Khan S/O Bashar Khan

Akbar Khan S/O Khoja Omar

Shakeel Raziq S/O Fazal Raziq

Sohni Bibi D/O Safdar Jehan

Through Counsel



Muhammad Nasir Ghilzai

Aziz Khan

Muhammad Ayub

Advocate High Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR.

Irfan Ali Shah

V E R S U S

Secretary Health, & Others

AFFIDAVIT

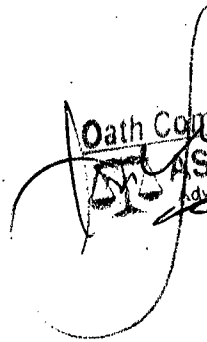
I, Shakil Raziq S/O Fazal Raziq (**Respondent No 4**), do hereby solemnly affirm and states on oath that the contents of accompanying comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Deponent Shakil Raziq

IDENTIFIED BY



Muhammad Nasir Ghilzai
Advocate High Court



Oath Commissioner
MASAD KHAN
Advocate High Court

07-04-21