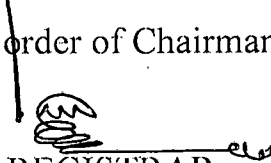


FORM OF ORDER SHEET

Court of _____

Case No.- 1682/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/11/2022	<p>The appeal of Mr. Razi Muhammad resubmitted today by Mr. Mafkhar Haleem Kakakhel Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Razi Muhammad son of Ali Ahmad Chief Clinical Technician Pharmacy MMC Mardan received today i.e. on 22.11.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1 ✓ Copy of impugned order dated 02.08.2022 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
- 2 ✓ Copy of departmental appeal against the impugned order is not attached with the appeal which may be placed on it.
- 3- (3) Annexures-P&Q of the appeal are illegible which may be replaced by legible/better one.
- 4- (4) Annexures of the appeal may be attested.

No. 3301 /S.T,

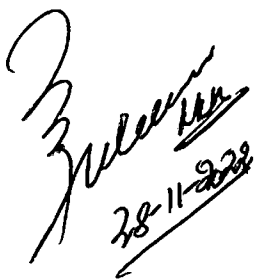
DL. 22.11. /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Mafikhar Haleem Kakakhel Adv. Pesh.

R/Six

Objections no 1 & 2 removed
and filed again. File re-submitted
on 28-11-2022. by objection no 3
also removed and re-submitted
accordingly


28-11-2022

- Objection no 2 is attached on page no 26 as annexure
"K" and annexure "L" whereby the appellant did appear
before the competent authority for the inclusion of
"DHPM" degree in MPT Seniority list of Pharmacy
Technology for promotion purposes. In this regard a
review application was already filed in that very
appeal copy of which is available on 53 page accordingly

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

CHECK LIST

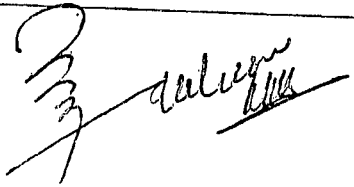
Case title

Razi Muhammad	Vs	The Govt. of Khyber Pakhtunkhwa & others
---------------	----	--

S #	CONTENTS	YES	NO
•	This petition has been presented by Mafkhar Haleem Kakakhel <i>Advocate</i>	✓	
•	Whether Counsel / Petitioner / Respondent / Deponent have signed the requisite documents?	✓	
•	Whether the enactment under which the case/petition is filed mentioned?	✓	
•	Whether the enactment under which the case/petition is filed is correct?	✓	
•	Whether affidavit is appended?	✓	
•	Whether affidavit is duly attested by competent oath commissioner?	✓	
•	Whether petition/annexure are properly paged?	✓	
•	Whether annexures are certified?	✓	
•	Whether certificate regarding filing any earlier appeal/petition on the subject, furnished?	✓	
•	Whether annexures are legible?	✓	
•	Whether annexures are attested?	✓	
•	Whether Special Power of Attorney filed?		
•	Whether Special Power of Attorney attested?		
•	Whether copy of application is delivered to A.G/D.A.G?		
•	Whether Appeal, Revision application is within time?		
•	Whether value for the purpose of Court fee and jurisdiction given in the relevant column of the opening sheet is correct?		
•	Whether Power of Attorney of the Counsel engaged is attested and signed by all petitioners/appellants/respondents?	✓	
•	Whether complete spare copy is filed in separate file cover?	✓	
•	Whether numbers of referred cases given/ are correct?		
•	Whether petition being sent by post?		
•	Whether appeal/petition contains cuttings/overwriting?		✓
•	Whether appeal/revision/ writ petition is competent?	✓	
•	Whether list of books has been provided at the end of the petition?	✓	
•	Whether case relate to this Court?	✓	
•	Whether case relate to this Bench?	✓	
•	Whether petition drafted by a competent person?	✓	

•	Whether name of Jail in which appellant/petitioner/respondent is given?		
•	Whether copies of annexures are readable/clear?	√	
•	Whether Court Fee stamps affixed?	√	
•	Whether Court Fee stamps annexed are sufficient?	√	
•	Whether certified copies of impugned order/decrees sheets before District Judge have been filed?		
•	Whether in view of Order 43 Rule 3 CPC/Rule 2(3) Chapter 4-J, Vol: V of High Court Rules & Orders, notice along with copy of appeal/petition and annexures has been sent to respondents?	√	
•	Whether Judicial Officer whose orders are challenged mentioned at the bottom of the panel of respondents?		
•	Whether index filed?	√	
•	Whether index is correct?	√	
•	Whether copies of comments/reply/rejoinder provided to opposite party?		
•	Whether addresses of parties given are complete?	√	
•	Whether addresses of parties are complete?	√	
•	Whether list of L.Rs of petitioner filed?		
•	Whether copy of list of L.Rs of respondents as filed before Courts below or if not, a certificate to this effect attached?		
•	Whether opening sheet filed?	√	
•	Whether opening sheet is correct / complete?	√	
•	Whether approved file cover used?	√	
•	Whether separate application filed for each prayer?		
•	Whether separate request has been made for interim relief in writ petition?		√
•	Whether security of Rs. 10,000/- deposited with review petition?		√
•	Whether review petition filed and certified by the Advocate who had argued the case resulting into order review of which is sought?		√
•	Whether purpose of the document filed explained?	√	
•	Whether respondents sued by name in the CoC?		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:	Mafkhar Haleem Kakakhel Advocate
Signature:	
Dated:	23.10.2022

Mian Mafkhar Haleem Kakakhel
LLB (University of London)
Advocate High Court Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR HIGH

SERVICE APPEAL No. 1689 /2022

Razi Muhammad.....Appellant

V E R S U S

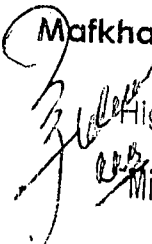
Government of Khyber Pakhtunkhwa
Through Secretary Health & others.....Respondents

I N D E X

S#	Description of Documents	Annex	Pages
•			
•	<i>Memno of Service Appeal</i>		1-13
•	Affidavit		14
•	Addresses of parties		15
•	Copy of CNIC of the petitioner	A	16
•	Copy of the Testimonials in the above three categories	B to D	17-19
•	Copy of the PGDHPM and DMC (Details marks sheet)	E & F	20-21
•	Copy of Degree and DMC	G & H	22-23
•	Copy of Diploma and DMC in the relevant field	I & J	24-25
•	Copy of the Departmental Appeal	K	26-27
•	Copy of the Appeal	L	28
•	Copy of Notification	M	29-34
•	Copy of the minutes of the meeting dated 18.01.2022	N	35-37
•	Copy of the Health Management Service Rules	O	38-40
•	Copy of service rules of paramedics	P	41-48
•	Copy of amended paramedic's service rules	Q	49-52
•	copies of review applications submitted to the respondents departments are attached as annexure "R" and "S"	R & S	53-60
•	copy of the high court order dated 06-10-2022 is attached as annexure "T"	T	61-62
•	copy of the office order is attached as annexure "U"	U	63-65
•	Wakalatnama		


Appellant
Through

Dated 23-10-2022


Mafkhar Haleem Kakakhel
Advocate
High Court, Peshawar
Mian Mafkhar Haleem Kakakhel
LLB (University of London)
Advocate High Court Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL No. 1682 /2022

Razi Muhammad Son of Mr. Ali Ahmad,
Chief Clinical Technician Pharmacy BS-16
MMC (MTI), Mardan.....**APPELLANT**

V E R S U S

- Government of Khyber Pakhtunkhwa
Through Secretary Health,
At Khyber Road, Peshawar
- Government of Khyber Pakhtunkhwa
Through Director General Health Service, Peshawar
.....**Respondents**

SERVICE APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT 1974, AGAINST THE IMPUGNED NOTIFICATION/ORDER NO .SOH-III/8-60/2021 DATED 11-01-2022 OF THE HEALTH DEPARTMENT AND SUBSEQUENTLY THE NOTIFICATION /ORDER NO. SOH-III/8-60/2021 DATED 02-08-2022 ISSUED BY THE HEALTH DEPARTMENT WHEREBY ALL THE COLLEAGUES OF THE APPELLANT WERE PROMOTED ACCORDINGLY AND POSTED/TRANSFERRED INTO THE CATEGORY OF CLINICAL TECHNOLOGIST BS-17 BUT THE ACTUALIZATION OF PROMOTION OF THE PRESENT APPELLANT WAS TOTALLY IGNORED AND HARSHLY DISCRIMINATED.

Respectfully Sheweth:

1. That the appellant is a law abiding and bonafide citizen of Pakistan having a domicile of Khyber Pakhtunkhwa Mardan. **(Copy of CNIC of the petitioner is attached as annexure "A")**.
2. That the appellant has completed SSC examination from Government High School Rustam, in Session 1982. Furthermore the petitioner cleared his intermediate examination in Session 1989 and passed his Bachelor in Arts from University of Peshawar in Session 1996. **(Copy of the Testimonials in the above three categories are attached as annexure "B, C, & D" respectively)**.
3. That the appellant has the honour for serving and performing his duties as a "Senior Clinical Technician" Pharmacy BPS-16 in Health Department upto the satisfaction of high-up's since 01.10.1988.
4. That the appellant has completed and got his Post Graduate Diploma in Health Planning & Management (PGDHPM) from the Institute of Management Studies University of Peshawar after graduation in Session 2002. **(Copy of the PGDHPM and DMC (Details marks sheet) are attached as annexure "E" & "F" respectively)**.

12. That in the service rules of paramedics issued under the notification No.SOH-IIIHD/3-5/2014 dated 10th May 2016 wherein it has been clearly stated and declare that at least 2nd class bachelor degree in the relevant technology recognized university will be considered for promotion. **(Copy of service rules of paramedics is attached as annexure "P").**

13. That later on in the above preceding para and the service rules of paramedics were amended under the notification No.SOH-III/8-60/2020/paramedics/SSRC/1440-82 dated 04th November 2020, wherein it was declared that for the purpose of promotion part from the enhanced qualification, BSc 2 years degree recognized university shall be applicable for the 7 years form the issuance of this amending notification.

Furthermore under this notification it was also clearly held that the MPH (Master in Public Health Degree) from recognized University shall also be considered for promotion purposes only where the relevant degree/degrees in the relevant technology does not exist. **(Copy of amended paramedic's service rules is attached as annexure Q).**

14. That later on the present appellant also filed and submitted a review application in appeal already submitted before both the respondents 1&2 respectively, whereby the appellant prayed for the inclusion and enlisting the post graduate diploma in health planning and management (PGDHPM) In the master of public health seniority list of pharmacy technology for the promotion purposes under diary no 2194 dated 21-3-22 and 14103 dated 29-3-22 respectively but this was time and again unheard and not responded by the respondents. (**copies of review applications submitted to the respondents departments are attached as annexure "R" and "S" respectively**).

15. That feeling aggrieved from the discrimination of respondents and unjustifiable approach the appellant having no other adequate remedy to approach this Hon'ble Court in its appeal jurisdiction on the following grounds inter alia:

GROUNDS:-

- A. That the other colleagues of the petitioner were adjusted and promoted in their desired stations /hospitals with a promoted pay scales.
- B. That the present petitioner has already filed a departmental appeal both the competent authorities i.e. DG Health and Secretary Health but which are still unheard and not considered for the petitioner promotion.
- C. That the petitioner have got good prima facie case and the balance of convenience also lies in favour of petitioner, hence, direction may very kindly be issued respondents considered the petitioner for promotion purposes ,keeping in view the aforesaid details and very notifications issued.
- D. That the acts of the Respondents of not following the relevant rules, regulations, and well known the facts of regarding the petitioners being performed their duty with full devotion are entitled of the treatment which are provided by law and rules, as guaranteed by the fundamental rights, however the respondents are having been refused to treat the petitioners as per rules and criteria, is illegal, unlawful, unnatural, ab-initio, null

and void in the eye of law, hence liable to be declared so.

- E.** That as the petitioners are being the senior most incumbent of the respondent department and are eligible for the post of Senior Clinical Technologist BPS-17, inspite of these facts the respondents have totally ignore this very factual scenario and badly discriminated the present appellant.
- F.** That according to the constitution every incumbent of the department should be treated fairly and the competent authority is under the obligation to determine eligibility of employees for grant of higher grade and it is the obligation of the functionaries to redress if arose any grievance of their subordinates and efforts should be made to bring out egalitarian to Islamic concept of fair play and social justice and authorities should never be a reason to create unnecessary hardships to employees.
- G.** That it is well settled law and principal of promotion has been prescribed on the manner that whenever there is a malafide or leading to violation of constitutional guarantees, the

constitutional courts have ample power to interfere for redressal of law in any case has to be geared properly and injustice in the form of supersession has to be curbed, so that people must sense of deprivation or discomfort otherwise there has to be a chaos in the society and people lose confidence in all institutions of modern constitutions, the constitution of Pakistan emphasizes upon fundamental rights and such rights in any case have the courts as guardians of citizens, provision of Art 199 of the Constitution empowers the court to exercise jurisdiction in to being ignored, in any case merit cum seniority has to be recognized, but in the instant case the rights of promotion of petitioners being violated by the respondents as the junior most of the Petitioners have been promoted time and again and the Petitioners being seniors and completed their length of services which is required for promotion as per prevailing rules and policies which could be gathered from the above mentioned record.

- H. That the acts of the Respondents of not following the same criteria which has been safeguarded by the law and rules and guidelines provided by the

apex courts that every person are equal before law and the constitution of Republic of Pakistan has safeguarded the fundamental rights of the citizens and further it has been provided to treat the incumbents as per law not otherwise if found so the Hon,ble court has the power to declared null in void the illegal acts of the authority, the respondents in the present case violated the legal lawful and constitutional right of promotion of the petitioner which is illegal, unlawful, unnatural, ab-initio, null and void in the eye of law, hence liable to be declared so.

- I. That the petitioner has been treated against the law and he has also been deprived of equal protection of law.
- J. That the present appellant before filling this appeal approached to the honorable Peshawar high court Peshawar under the writ petition No 3176-p/2022 which was decided by the honorable court with the directions to the appellant to file his case before the honorable Service Tribunal Khyber Pakhtunkhwa being the civil servant as a senior clinical technician to

effectively defend his case (copy of the court order dated 06-10-2022 is attached as annexure "T")

- k. That the present appellant has also promoted from clinical technicians BS-14 to BS -16 into the chief clinical technician pharmacy on **06-09-2022** through an office order by the respondent NO 2(**copy of the office order is attached as annexure "U"**).
- L. That any other ground not taken specifically may be raised at the time of arguments with the prior permission of this Honorable Court..

PRAYER IN APPEAL

It is, therefore, most humbly prayed that on acceptance this service Appeal the respondent No.1/Secretary Health may very graoucsly be directed to considered the notification No.SOH-III-8-60/2021 issued on dated 11.01.2022 and notification NO SOH-III/8-60/2021 issued on dated 02-08-2022 for the actualization of the appellant promotion at BPS-17 at nearby station in Mardan being the District Domicile holder along with all back benefits being

the most experienced and senior among his colleagues.

OR

Grant any other relief, not specifically asked for, deems fit and appropriate in the circumstances of the case, may also be granted by this Hon'ble Court

INTERIM RELIEF;

Keeping in view the above factual and actual scenario of the present case this honorable court has got ample jurisdiction to entertain the service appeal of the present appellant by issuing directions to the above respondents not to issue further promotion orders till the actualization of the promotion of the present appellant in BS-17 in the best interest of Justice.

Appellant
Through

Mafkhar Haleem Kakakhel
Advocate
High Court, Peshawar

Dated 23.10.2022

CERTIFICATE:

It is certified that no such like Writ Petition has earlier been filed before this Hon'ble Court regarding the present subject matter

LIST OF BOOKS:

- Constitution of Islamic Republic of Pakistan, 1973
- Civil servants promotion Rules.
- Khyber pakhtunkhwa services Tribunal Act, 1974.
- Any other law books according to need

ADVOCATE
Mian Mafkhar Haleem Kakakhel
LLB (University of London)
Advocate High Court Peshawar

ADVOCATE
Mian Mafkhar Haleem Kakakhel
LLB (University of London)
Advocate High Court Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____/2022

Razi Muhammad.....Appellant

V E R S U S

Government of Khyber Pakhtunkhwa

Through Secretary Health & others.....Respondents

A F F I D A V I T

I, Razi Muhammad Son of Mr. Ali Ahmad, ~~Chief~~ Clinical Pharmacy BS-16 MMC (MTI), Mardan) R/o Phandu Kotay Rustam, Tehsil & District Mardan, do hereby solemnly affirm and declare on oath that the contents of the accompanying **service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Mian Maikhar Haleem Kakakhel
LLB (University of London)
Advocate High Court Peshawar

Identified by

Maikhar Haleem Kakakhel
Advocate Peshawar High Court

Razi

DEPONENT

CNIC#: 16101-3420002-9

Cell #: 0346-9309510



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____/2022

Razi Muhammad.....Appellant

V E R S U S

Government of Khyber Pakhtunkhwa
 Through Secretary Health & others.....**Respondents**

ADDRESSES OF PARTIES

APPELLANT:

Razi Muhammad Son of Mr. Ali Ahmad,
 Senior Clinical Technician (BPS – 16) Pharmacy
 MMC (MTI), Mardan.

R E S P O N D E N T S:

- Government of Khyber Pakhtunkhwa
 Through Secretary Health,
 At Khyber Road, Peshawar
- Government of Khyber Pakhtunkhwa
 Through Director General Health Service, Peshawar

Razi Muhammad
Appellant
 Through

Mafkhar Haleem Kakakhel
Mafkhar Haleem Kakakhel
 Advocate

High Court, Peshawar

Dated 23.-10-.2022

Mafkhar Haleem Kakakhel
Mafkhar Haleem Kakakhel
 LLB (University of London)
 Advocate High Court Peshawar

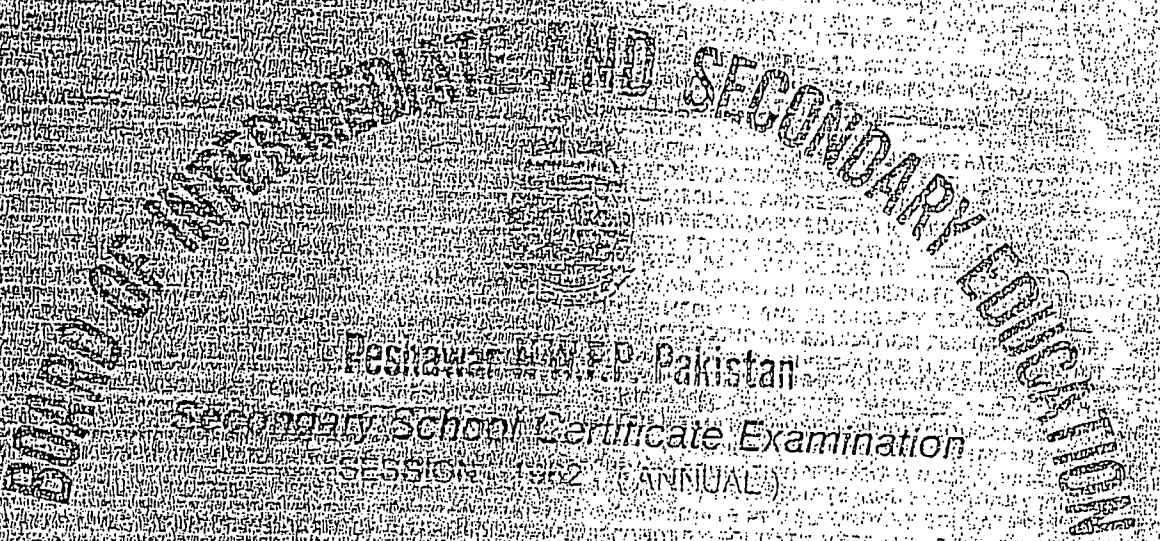
P 16

جمہوریہ پاکستان
 16101-3420002-9
 عثمان پروفیشنل
 0170474667

T188Y0 16101-3420002-9
 23/03/2025
 23/03/2016

Annexure - 'B'

Roll No. 35886



Peshawar, W.P. Pakistan

Secondary School Certificate Examination
SESSION 1982 (ANNUAL)

THIS CERTIFICATE THAT Bani Muhammad
Son/Daughter of Ali Ahmad
and a student of Govt. High School, Rustam (Mardan)

has passed in Secondary School Certificate Examination
of the Board of Intermediate and Secondary Education, Peshawar held in April 1982
as a Regular candidate. He/She obtained 575 Marks out of 850
and has been placed in Grade 1st Representing Very Good

The Candidate passed in the following subjects:

- 1. English 3. Islamiat 5. Pak. Studies 7. Mathematics
- 2. Urdu 4. Physics 6. Chemistry 8. Biology

He/She has been awarded Grade 1st on the basis of internal
assessment by the Institution concerned.

Date of birth according to admission form is First April
one thousand nine hundred and Sixty Seven (1-1-1967)

Asstt. Secretary

11th August, 1982

Secretary

This Certificate is issued without alteration or disguise.

15862

785

S.B.

/PC

Roll No.

2247

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION

Peshawar N.W.F.P. Pakistan
 PROVISIONAL CERTIFICATE
 INTERMEDIATE EXAMINATION



Session 1984 Annual/Supplementary

Part Group

THIS IS TO CERTIFY THAT

Engr. Muhammad

Son/daughter of

A. I. Ahmad

and a candidate of

Mardan Distt

Registered No. 7 has passed the INTERMEDIATE EXAMINATION of the

Board of Intermediate & Secondary Education, Peshawar held in 1984 19 84

as a Regular/Private candidate. He/She obtained 54.9 Marks out of 100 and

has been placed in Grade (1) Representing Punjab

The Examination was taken as a whole/in parts

Prepared by [Signature]

[Signature]

Checked by [Signature]

Asst. Secretary (Certificates)

Date of Preparation [Blank]

19

Annexure - D

University of Peshawar



Serial No. 025055 ✓

Provisional Certificate

SESSION: 1996

Certified that FAZI MUHAMMAD ✓
 son / daughter of ALI AHMAD
 candidate/student of DISTRICT HADDON
 has passed BACHELOR OF ARTS
 Examination of the University of Peshawar held in AUGUST 1996
 securing 283 marks out of 550 and is placed in SECOND division.

The examination was taken as a whole / in parts.

Registration No. 91-FC-3409

Roll No. 85064 ✓

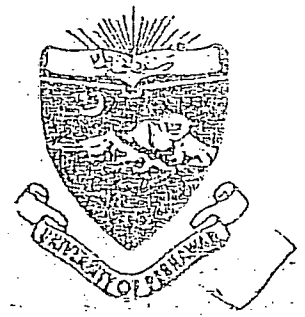
Result declared on 21.2.97

[Signature]
 Assistant Controller of Examinations
 University of Peshawar

P-20

University of Peshawar (PAKISTAN)

Annexure - E



Verified and Found Correct *176*

7/17/2
Controller of Examinations
University of Peshawar
KB
Registrar

Session 2002

Certified that RAZI MUHAMMAD SON OF ALI AHMAD

a student of the Institute of Management Studies having met all the requirements under the Semester System is admitted for the award of Postgraduate Diploma in

Health Planning & Management.

Serial No. 000130

Registered No. 91-PP-3409

Enrolment No. 12

Result declared on December 01, 2004

[Signature]
Registrar

[Signature]

21

Annexure - F

Serial No. _____



Institute of Management Studies University of Peshawar, Pakistan

Ref. No. UPM/IMS

DETAIL MARKS CERTIFICATE

Date: _____

Post-Graduate Diploma in Health Planning and Management

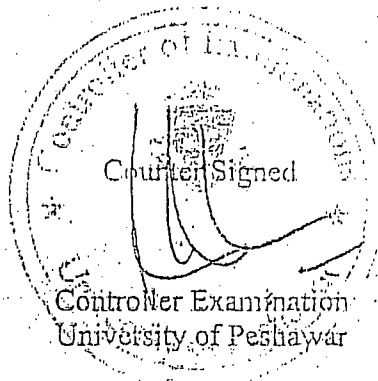
Name: Razi Muhammad	Semester	GPA	CGPA	Grade	Cr. Hrs.
F/Name: Ali Ahmad	I	2.75		C	12
Session: 2001-2002	II	2.40	2.6	C	15
Reg. No: 91-PC-7409	Total Marks			640	
Enrol. No: 12	Percentage			73.11	

Course Code	Title of Course	Marks	Grade	Value	Cr. Hrs.	Grade Point
1st Semester						
501	Intro to Health Care Services in Pakistan	72	B	3	3	9
503	Health Care Planning	80	B	3	3	9
505	Health & Health Care Policy	79	B	3	3	9
507	Mgt. & Planning of Hospital-Level Health Services	67	C	3	3	6
2nd Semester						
504	Health Education & Health Promotion	63	C	2	3	6
505	Human Resource Management & Planning	66	C	2	3	6
506	Mgt. & Planning of Primary-Level Health Services	69	C	2	3	6
508	Health Systems Research	77	B	3	3	9
509	Research Dissertation	76	B	3	3	9

Note: Errors and omissions, if any, are subject to subsequent rectification

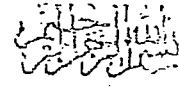
Program: _____

Institute of Management Studies
University of Peshawar



Director: _____

Institute of Management Studies
University of Peshawar



University of Peshawar
Pakistan

22

Armaul-e-G

This certifies that

Razi Muhammad son of Ali Ahmad

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

Master of Arts in Islamiyat

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

Given this 28th day of February, 2005.


Roll No: 24958


Session: Annual 2004

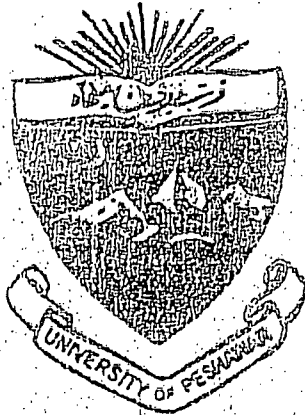
Reg. No: 91-PC-3409



172779


Registrar


Vice Chancellor



UNIVERSITY OF PESHAWAR
(Pakistan)

Detailed Marks Certificate
Master of Arts in Islamiyat (FINAL)
Annual Examination 2004

Private Candidate from **Mardan**

Required Pass Percentage - 40, Aggregate Pass Percentage - 48

Name: *Razi Muhammad*

Gender: *Male* Roll No. *24958*

Father's Name: *Ali Ahmad*

Registration No. *91-PC-3409*

Papers/Subjects

Marks Obtained

Papers/Subjects	Maximum Marks	In Figures		in Words
Al Qura'an Translation "2nd Half" and Commentary Alongwith Grammar (VI)	100	54		Fifty Four
Principles of Islamic Jurisprudence (VII)	100	56		Fifty Six
Islam and Other World Religions (VIII)	100	40		Forty only
Kalam and Philosophy of Islam / Islam and Contemporary Muslim World (IX)	100	40		Forty only
Islamic Economics OR Islamic Politics OR Islam and Science (X)	100	40		Forty only
Viva Voce	100	50		Fifty only
M.A Previous Marks	500	268		Two Hundred and Sixty Eight
Total:	1100	548		Five Hundred and Forty Eight

Errors and omissions are subject to subsequent rectification.

The examination was passed *as a Whole in Second division.*

Examination held on Friday, 11th Feb, 2005. Result Declared on February 12, 2005.

Controller of Examinations
University of Peshawar

DMC issued on: 01/03/05 at 17:31:17

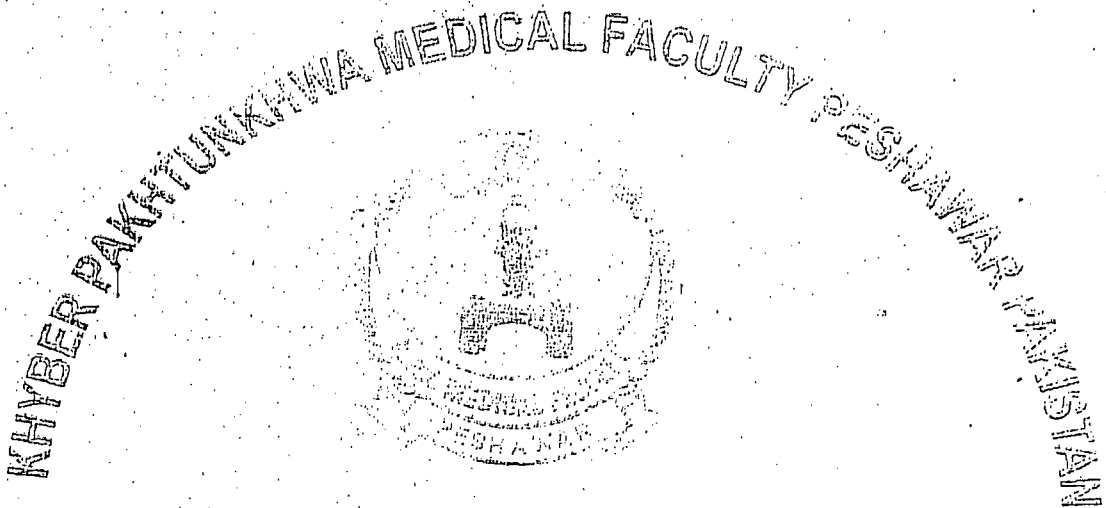
UoP's Engineering, Very First Step in History of Peshawar University

NO: 029311

Annexure - I

Serial No 5003

Roll No 3116



Diploma In HEALTH Technology

SESSION 02-2011

This is to certify that Mr. Miss. Mrs. RAZI MUHAMMAD Son / Daughter of

Mr. ALI AHMAD Of Batch No. _____ Bearing

Registration No MF/657/HT/PGPI/LRH/PEW Has passed the examination of Two years diploma

In the year 02-2011 He / She obtained 743 Marks out of 2400

He / She has been Placed in C Grade.

Prepared by: _____

Checked by: [Signature]

Verified by: [Signature]

[Signature]
 Secretary,
 Khyber Pakhtunkhwa Medical Faculty
 Peshawar Pakistan

Amekusa - J

S.No. 5839

CHAMBER PAKHTUNKHWA MEDICAL FACULTY
 PESHAWAR - PAKISTAN



DETAILED MARKS CERTIFICATE
 1st, 2nd, 3rd and 4th Semester Diploma Course examination of
 (Govt Post Graduate Paramedical Institute, Peshawar)

Name: Razi Muhammad Father Name: All Ahmad

Health Technology

1st Semester Session: 02/2011 (ROLL NO 3116)

Subject/paper	Total Marks	Obtained Marks	Passing Marks	Result
Anatomy	100	50	50	Passed
Pathology	100	50	50	Passed
Pharmacology	100	50	50	Passed
Physiology/ Biochemistry	100	50	50	Passed
Result	400	200		

2nd Semester Session: 12/2006 (ROLL NO 3116)

Subject/paper	Total Marks	Obtained Marks	Passing Marks	Result
Paper A	100	50	50	Passed
Paper B	100	50	50	Passed
English	100	50	50	Passed
Islamiat	50	25	25	Passed
Result	350	175		

3rd Semester Session: 02/2011 (ROLL NO 3116)

Subject/paper	Total marks	Obtained Marks	Passing Marks	Result
Paper A	100	50	50	Passed
Paper B	100	50	50	Passed
Public Health	100	50	50	Passed
Result	300	150		

4th Semester Session: 02/2007 (ROLL NO 3116)

Subject/paper	Total marks	Obtained Marks	Passing Marks	Result
Paper A	100	67	50	Passed
Paper B	100	61	50	Passed
English	100	57	50	Passed
Pak-Study	50	26	25	Passed
Result	350	211		
Grand Total	1400	748		

Error(s) & Omission(s) accepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate

Date: 24/09/2019
 Prepared by: [Signature]
 Checked by: [Signature]
 Verified by: [Signature]

[Signature]
 Secretary
 Chamber Pakhtunkhwa Medical Faculty
 Peshawar

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Annexure - K

The Director General Health Services
Khyber Pakhtunkhwa Peshawar.

Through Proper Channel

Subject: SUBMISSION OF DEGREE FOR ONWARD PROCESS FOR QUALIFIED
SENIORITY LIST.

Respected Sir,

Most respectfully it is stated that I have the honour that I am serving as Pharmacy Technician in health department since 01/10/1988.

Now the MPH/DHPN degree included and amendment in the new service rule for further up gradation/promotion of paramedics I got the degree of DHPM (MPH) from IMS University of Peshawar in session 2002 and also diploma in health technology from medical faculty Peshawar.


It is therefore requested in your honour that I may kindly include to entry the said degree in qualified seniority list of MPH degree holder.

Relevant documents and Peshawar High Court papers are attached.

I am looking for your kind response.

Thank You.

Yours Sincerely


Razi Muhammad
CT Pharmacy
MMC Mardan.

Date: 25/09/2020

As for nca





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Medical Teaching Institution
Mardan Medical Complex

Mardan

No 6439/MTI/MMC

Dated 21/10/2020

To

The Director General Health Services,
Khyber Pakhtunkhwa, Peshawar

Subject: SUBMISSION OF DEGREE FOR ONWARD PROCESS FOR QUALIFIED
SENIORITY LIST.

Enclosed please find herewith a self explanatory application on the subject cited above in r/o Mr. Razi Muhammad CT Pharmacy MTI MMC Mardan for submission of attached degree in inclusion of qualified seniority list.


Hospital Director
MTI-MMC Mardan

Amexuse - L

To,

The Honourable Secretary Health
Khyber Pakhtunkhwa Peshawar.

DAIRY NO: 19507 ✓
DATE 28.10.21 ✓
HEALTH DEPARTMENT ✓

Subject: APPEAL FOR INCLUDING DHPM DEGREE IN MPH SENIORITY LIST OF PHARMACY TECHNOLOGY FOR PROMOTION.

Respected Sir,

Most respectfully it is stated, that I have the honour that I am serving as Senior Clinical Technician Pharmacy BPS-14 in health department since 01-10-1988.

Now the MPH/DHPN degree including and amendment in the new service rule for further up gradation/promotion of paramedics. I got the degree of DHPM (MPH) from Institute of Management Study University of Peshawar In session 2002, M.A from Peshawar University in session 2005, BHMS from KMU in session 2014 and also Diploma in Health Technology from medical faculty Peshawar.

It is therefore requested in your honour that I may kindly include to entry the said degree in qualified seniority list of MPH degree holder.

I am looking for your kind response.

Thank You.

SSH (E&A) *[Signature]* Yours Sincerely
AS - ESTT
AS - MTI *50-10*
DS - Admin Razi Muhammad
DS - Legal SCT Pharmacy
DS - ESTT MMC MTI Mardan
Cell No 0346-9309510

Dated: 28-10-2021

Copy to:
Director General Health Services Peshawar.

Urgent
Support
Send to DGHS for views/counts to be furnished by tomorrow as meeting of DPC will be held at 2:30 Pm on 04/11/2021
[Signature]



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar, the 11th January, 2022

Annexure - M

NOTIFICATION

SOH-III/8-60/2021 (Different Categories of Paramedics BS-17): The Competent Authority, on the recommendations of Departmental Promotion Committee (DPC), in its meeting held on 11-11-2021, is pleased to promote the following PHC/Clinical Technicians BS-12, Sr. PHC/Clinical Technicians BS-14 & Chief PHC/Clinical Technicians (BS-16) to the posts of PHC/Clinical Technologists (BS-17) on regular basis, with immediate effect.

Item No. 1. Chief PHC Technician (M.P) BS-16 to the post of PHC Technologist (M.P) BS-17.

S.NO	Name/F, Name of Officials	Current Place of posting.
1.	Riaz Hussain Shah S/O Ghulam Shabir	DHO Tank
2.	Muhammad Daud S/O Shah Nawaz	DHO Tank
3.	Afsar Khan S/O Yardil Khan	DHO Charsadda
4.	Qamar Zaman S/O Fazal Rehman	DHO Karak
5.	Muhammad Irfan S/O Gul Sherin	DHO Karak
6.	Jehanzeb S/O Kala Khan	DHO Mansehra
7.	Manzoor Ahmad S/O Khan Zaman	DHO Abbottabad
8.	Yasmin Begum S/O Abdur Rehman	DHO Mansehra
9.	Abdullah Khan S/O Mehr Dil	DHO D.I.Khan
10.	Muhammad Rafiq S/O Ghulam M.	DHO D.I.Khan
11.	Fida Muhammad S/O Qazi Sahibullah	DHO Peshawar
12.	Khalid Usman S/O Muhammad Saeed	DHO Karak
13.	Tasleem Khan S/O Fazal Rehman	DHO Charsadda
14.	Saadullah S/O Ali Halder	DHO Mardan
15.	Muhammad Najjullah S/O Saltanat Shahi	DHO Chitral
16.	Ibad UR Rehman S/O Muhammad Jamil	DHO Charsadda
17.	Raj Muhammad S/O Abdul Wahab	DHO Battagram
18.	Faridoon Khan S/O Behri Karam	DHO Malakand
19.	Roohul Islam S/O Saeed ur Rehman	DHO Battagram
20.	Samiullah S/O Iqbal Wazir	DHO Kohat

(Signature)
Secretary
Health Department
Khyber Pakhtunkhwa

21.	Zainul Islam S/O Hafiz Muhammad Halim	DHO Bannu
22.	Muhammad Ayaz S/O Mir Azam Khan	DHO Charsadda
23.	Khalid Iqbal S/O Nadir Khan	DHO Peshawar
24.	Mohammad S/O Rahmani Gul	DHO Malakand
25.	Tariq Hussain Shah S/O Ghazi Hussain Shah	DHO Abbottabad
26.	Rifaqat Hussain S/O Hazarat Shah	DHO Mansehra
27.	Muhammad Arif S/O Mir Afzal Khan	DHO Nowshera
28.	Attar Rehman S/O Inayat Rehman	DHO Buner
29.	Muhammad Rehman S/O Inayat Rehman	DHO Buner
30.	Muhammad Saeed S/O Masher Khan	DHO Peshawar
31.	Khalid Mahmood S/O Muhammad Younas	DHO Haripur
32.	Ghulam Said S/O Pir Said	DHO Malakand
33.	Muhammad Arshad S/O Muhammad Rafique	DHO Mansehra
34.	Feroz din S/O Rahman-ud-Din	DHO Mardan
35.	Muhammad Amin S/O Saida Gul	DHO Mardan
36.	Fazal Qayum S/O Fazli Hakeem	DHO Mardan
37.	Shagufa Gul S/O Arshad Hussain	DHO Mansehra
38.	Behzad Khan S/O Aziz Khan	DHO Swat
39.	Hamidullah S/O Rehmatullah	DHO Nowshera
40.	Durri Menhaj Afridi S/O Fazal Haq	DHO Peshawar
41.	Gul Sadhar S/O Yaqoot	DHO Buner
42.	Muhammad Aman S/O Khalid Aman	DHO Swat
43.	Ahmad Zeb S/O Jehanzeb	DHO Swat
44.	Siraj Khan S/O Rahim Khan	DHO Buner
45.	Muhammad Ayaz S/O Gul Zaman	DHO Haripur
46.	Khaista Irshad S/O Amran Said	DHO Lower Dir
47.	Nargis Begum S/O Ghulam Habib	DHO Nowshera
48.	Akhir Jan S/O Ahmad Jan	LRII Peshawar
49.	Habibur Rehman S/O Oudratullah	DHO Battagram
50.	Shaheen Akhtar S/O Haji Muhammad Gul	DHO Mansehra
51.	Hidayatullah S/O Abdullah Jan	LRII Peshawar

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52.	Nayyar Batool S/O Fazal Haq	DHO Peshawar
53.	Muhammad Fayyaz S/O Wali Ahmad	DHO Haripur
54.	Nazirullah S/O Muhammad Ghaus	DHO Nowshera
55.	Sardar Nawaz S/O Haq Nawaz	DHO Chitral
56.	Gul Faraz Khan S/O Paqroshi	DHO Chitral
57.	Muhammad Nazir S/O Fazli Rashid	DHO Dir Lower
58.	Nasreen Begum S/O Noor Alam Khan	DHO Malakand
59.	Robina Shaheen S/O Abdul Wadood	DHO Peshawar
60.	Jamil Ahmad S/O Muhammad Saeed	DHO Dir Lower
61.	Abdul Samad S/O Saeed ur Rehman	DHO Peshawar
62.	Shahi Bostan S/O Sher Zada	DHO Shangla
63.	Shaukat Ali S/O Mushraq Ali	DHO Malakand
64.	Abdul Jamil S/O Fazal Rahim	PHMT Swat
65.	Iqbal Ahmad S/O Baharul Melk	DHO Swat
66.	Muhammad Ayaz S/O Mumtaz	DHO Swat
67.	Samullah S/O Shah Hussain	DHO Swat
68.	Abdul Jabbar S/O Ishaq Gul	DHO Buner
69.	Said Muhammad Khan S/O Sahosh	DHO Swat
70.	Anwar Adil S/O Mutabar Khan	DHO Bajaur
71.	Fazal Bakhsh S/O Bakhshish	DHO Bajaur
72.	Azhar Ahmad S/O Muhammad Zahir Shah	DHO Charsadda

Item No. 2 Chief Clinical Technicians (Anesthesia) BS-16 to the post of Clinical Technologist (Anesthesia) (BS-17).

S.NO	Name/F, Name of Officials	Place of posting.
1.	Abdur Rahman S/O Fazal Rahman	LRH Peshawar
2.	Abidullah S/O Rafi Ullah	LRH Peshawar
3.	Sar Zamin Khan S/O Salsalat Khan	BBS Hosp: Abbottabad
4.	Attaullah Khan S/O Hamzala Khan	LRH Peshawar
5.	Zahoor Jan S/O Muhammad Anwar	MMC Mardan
6.	Ihtishamullah S/O Fatehullah Khan Siddique	DHQ Hosp: DI Khan
7.	Muhammad Ranq S/O Abdus Subhan	KTM Peshawar

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8.	Wazir Zada S/O Mir Abdullah Shah	KGNT Hosp; Bannu
9.	Muhammad Payyaz S/O Muhammad Akram	KTH/MTI Hosp; Peshawar
10.	Jehangir Khan S/O Abdullah Jan	NKB Memorial Hosp; Peshawar
11.	Mishad Ali S/O Gul Sahib	KTH Peshawar
12.	Zamarud Gul S/O Sarfraz Gul	LRH Peshawar
13.	Gul Wali S/O Sargand Khan	MMC Mardan
14.	Sahib Gul S/O Ashraf Gul	KTH Peshawar
15.	Fazl Amin S/O Fazliakbar	DHQ Hosp; KDA Kohat
16.	Akhtar Gul S/O Rehman-ud-Din	DHQ Hosp; Nowshera
17.	Anwar Zeb S/O Muhammad Hassan Khan	Services Hospital Peshawar

Item No. 3 Chief Clinical Technicians (Surgical) (BS-16) to the post of Clinical Technologists (Surgical) (BS-17).

S.NO	Name/F, Name of Officials	Place of posting.
1.	Asghar Khan S/O Fazle Mahmood	KTH Peshawar.
2.	Muhammad Zaman S/O Bakht Jan	MMC Mardan
3.	Fazle Subhan S/O Sobat Khan	LRH Peshawar
4.	Nawaz Khan S/O Ali Akbar	KTH Peshawar
5.	Riaz Muhammad S/O Khadi Gul	KTH Peshawar
6.	Rashidullah S/O Muhammad Sharif	DHQ Hosp; Karak
7.	Amir Nawaz Khan S/O Askar Khan	LRH Peshawar.
8.	Firdous Khan S/O Abbas Khan	SIIPD Peshawar
9.	Muhammad Saleem S/O Gul Nowshad	SGT Hosp; Swat
10.	Nasir Ali Khan S/O Amir Sardar	DHO Swat
11.	Abdur Rauf S/O Gul Rahman	KTH Peshawar

Item No. 4 Qualified Chief Clinical Technicians (Dental) BS-16, Sr. Clinical Technicians (Dental) BS-14 & Clinical Technicians (Dental) BS-12 to the post of Clinical Technologists (Dental) BS-17.

S.NO	Name/F, Name of Officials	Place of posting.
1.	Ajab Khan S/O Beshar Khan	DHO Swat
2.	Akbar Khan S/O Khoja Omar	DHQ Hosp; Chitral

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3.	Shakeel Raziq S/O Fazal Raziq	LRH Peshawar
4.	Sher Muhammad Khan S/O Noor Muhammad	SGT Hosp: Swat.
5.	Sohail Bibi D/O Sadar Jehan Khan	DHO Swat
6.	Murad Khan S/O Ghazal Khan	LRH Peshawar

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Item No. 5 Qualified Chief Clinical Technicians (Radiology) BS-16, Sr. Clinical Technicians (Radiology) BS-14 & Clinical Technicians (Radiology) BS-12 to the post of Clinical Technologists (Radiology) BS-17.

S.NO	Name/F, Name of Officials	Place of posting.
1.	Naveed Ahmad S/O Amir Badshah	RGFT Hosp: Hangu
2.	Anwar Shah S/O Burqum Shah	DHO Buner
3.	Nadar Khan S/O Majeed Gul	DHQH Barkhela
4.	Wajid Khan S/O Musall Khan	W&C Hosp: Kohat
5.	Rahmatullah S/O Pir Shah Jehan	KDA Hosp: Karak.
6.	Johar Ali S/O Ghulam Rahmani	Services Hosp: Peshawar
7.	Tariq Gul S/O Gul Raqib	RGVTH Bannu
8.	Nehar Ali S/O Muhammad Nasar	DHQ Hosp: Swabi
9.	Mir Azam Shah S/O S. Muzameen Shah	LRH Peshawar
10.	Barkat Ali S/O Raj Dil Din	SGT Hosp: Swat

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Item No. 6 Qualified (BSc H/Pharmacy) Chief Clinical Technicians (Pharmacy) BS-16, Sr. Clinical Technicians (Pharmacy) BS-14 & Clinical Technicians (Pharmacy) BS-12 to the post of Clinical Technologists (Pharmacy) BS-17.

S.NO	Name/F, Name of Officials	Place of posting.
1.	Shahbaz S/O Zarah Gul	DHQ Hosp: Hangu
2.	Mushiq Ahmad S/O Khurshid	DHO Buner

Item No. 7 Qualified (MPH) Chief Clinical Technicians (Pharmacy) BS-16, Sr. Clinical Technicians (Pharmacy) BS-14 & Clinical Technicians (Pharmacy) BS-12 to the post of Clinical Technologists (Pharmacy) BS-17.

S.NO	Name/F, Name of Officials	Place of posting.
1.	Munir Ahmad S/O Shah Ahmad	DHO D.I Khan
2.	Alli Rahman S/O M. Zareen	DHO Swat
3.	Naeem Jan S/O Haji Abdul Jabar	DHO Peshawar
4.	Aurang Zeb S/O Fazli Subhan	DHQ Hosp: Mardan
5.	Amin Jan S/O Muhammad Jan	DHO Peshawar
6.	Noor Hallim Jan S/O Noor All Jan	DHQ Hosp: Bajaur
7.	Javed Akbar S/O Muhammad akbar	DHO Peshawar

8.	Aftab S/O Zulqadar	DHO Peshawar
9.	Yasir Ali S/O Khan Mallik	DHO Mardan
10.	Zafar Iqbal S/O Shah Rasul Shamim	KTH Peshawar
11.	Shakeel Ahmad S/O Wadood Ur Rahman	DHO Peshawar
12.	Anwar Khan S/O Shereen Zada	DHO Peshawar
13.	Muhammad Younas S/O Shamshad	DHQ Hosp: Batkhela
14.	Abdul Qadir S/O Noor Ahmad	LRH Peshawar

2. The officers on promotion will remain on probation for a period of one year in terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

3. Posting/Transfer Notifications in respect of above mentioned officers will be issued later on.

Secretary to Govt. of Khyber Pakhtunkhwa
Health Department

Enlist of even No and Date.

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar with the request to furnish proposal regarding posting of the above mentioned officers to this Department, at the earliest, to proceed further in the matter.
3. Director General, Provincial Health Services Academy, Khyber Pakhtunkhwa.
4. District Health Officer, concerned.
5. Hospital Director, MTI concerned.
6. Medical Superintendent, DHQ Hospital, concerned.
7. District Accounts Officer, concerned.
8. The Deputy Director (LT) Health Department.
9. PS to Secretary Health, Khyber Pakhtunkhwa.
10. PS to Special Secretary (E&A) Health, Khyber Pakhtunkhwa.
11. PA to Additional Secretary (Estab) Health, Khyber Pakhtunkhwa.
12. PA to Deputy Secretary (Admn) Health Department.
13. Officers concerned.

(Dr. Natasha Sumbal)
SECTION OFFICER-III

MOST IMMEDIATE



**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

No. SOH-III/8-60/2021(Razi Muhammad/CT)
Dated Peshawar the 02nd November, 2021

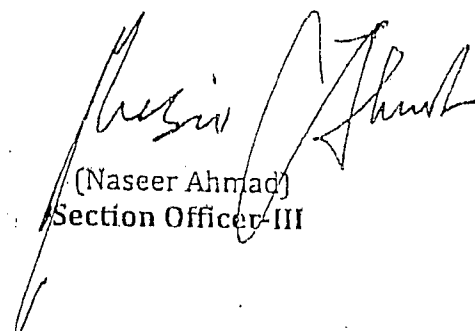
To

✓
The Director General,
Health Services, Khyber Pakhtunkhwa,
Peshawar.

SUBJECT: APPEAL FOR INCLUDING DHPM DEGREE IN MPH SENIORITY LIST OF PHARMACY TECHNOLOGY FOR PROMOTION.

I am directed to refer to the subject noted above and to enclose herewith copy of an appeal & other relevant enclosures received from Mr. Razi Muhammad, SCT (Pharmacy) BS-14, MMC, MTI, Mardan for views/comments to be furnished by tomorrow as meeting of DPC will be held on 04-11-2021 at 02:30 P.M.

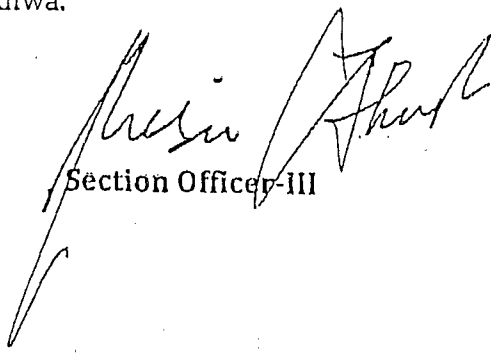
Encl: As above.


(Naseer Ahmad)
Section Officer-III

Endst: even no & date.

Copy forwarded to the:

PS to Secretary Health, Khyber Pakhtunkhwa.


Section Officer-III



P-24 35
Annexure - N

GOVT. OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT
No. SOH-III/8-60/2021 (Razi Muhammad/CT)
Dated the Peshawar 18th February, 2022

To

The Director General,
Health Services Khyber Pakhtunkhwa,
Peshawar.

Subject: APPEAL FOR INCLUDING DHPM DEGREE IN MPH SENIORITY LIST OF PHARMACY TECHNOLOGY FOR PROMOTION.

I am directed to refer to your letter No. 8920/AE.VI, dated 18-11-2021 on the subject noted above and to forward herewith a copy of approved minutes of meeting held under the Chairmanship of Additional Secretary (E&A) Health on 18-01-2022 for Information/necessary action, please.

Encl: As above.

Endst: even no & date.

(Naseer Ahmad)
Section Officer (III)

Copy forwarded to the:-

1. PS to Secretary Health, Khyber Pakhtunkhwa.
2. PA to Additional Secretary (E&A) Health Department.
3. PA to Deputy Secretary (Admn) Health Department.

Section Officer-III

MINUTES OF THE MEETING INCLUDING DHPM DEGREE IN MPH DEGREE
SENIORITY LIST OF PHARMACY TECHNOLOGY FOR PROMOTION HELD ON
18-01-2022 AT 12.00 PM.

A meeting regarding the consideration of Diploma in Health Planning & Management (DHPM) equivalent to MPH degree for the promotion was held on 18th January, 2022 at 12.00 PM under the Chairmanship of Additional Secretary (E&A) Health Department, Khyber Pakhtunkhwa in his office.

The following officers attended the meeting:-

- | | |
|--|----------|
| 1. Additional Secretary (E&A) Health Department | Chairman |
| 2. Mr. Zia Ullah DS (Lit) Health Department | Member |
| 3. Mr. Abdul Ahad, SO (R-II),
Establishment Department. | Member |
| 4. Muhammad Tufail, SO (Lit-II) Health Department. | Member |
| 5. Mr. Nadir Nazar, SO (H. Court-II) Health Department. | Member |
| 6. Dr. Fazal Rahman, DD (Paramedics) DGHS, KP. | Member |
| 7. Dr. Natasha Sumbal, SO-III, Health Deptt: | Member |

The meeting commenced with the recitation of the Holy Quran.

The Deputy Director (Paramedics) at Directorate General Health Services Peshawar explained that there are fourteen (14) different CATEGORIES of Paramedics available as per service structure. According to the Service Rules the following criteria is followed:

- i) 40% shall be 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.
- ii) 20% 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.
- iii) 40% by initial recruitment.

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

Section Officer-III added that amongst the 14 categories, only three categories do not have relevant degrees which include:-

- i) Pharmacy
- ii) MCH
- iii) MP

Regarding these categories it is mentioned in the rules that they can get promotion on the basis of MPH degree:-

~~36~~ 37

The Deputy Secretary (Litigation) stated that there is no mention of equivalent qualifications in the rules as rules are crystal clear in mentioning only MPH as the alternative degree therefore, the pray can clearly be regretted.

The representative from the Establishment Department added a few points:-

- i) A one year diploma course cannot be made equivalent to a MPH degree which is itself equivalent to M.Phil.
- ii) Equivalence has not been given by HEC.
- iii) The supporting documents attached with the pray where doctors got inducted into management cadre for general cadre on the basis of DHPM degree was explained that it was only for the purposes of induction and not PROMOTION purposes.
- iv) The other supporting document attached with the pray (a document from Khyber Pakhtunkhwa, Public Service Commission where it has tentatively established equivalence of various degrees for induction of candidates via Public Service Commission) was also explained and rejected on similar grounds. This document also explicitly mentioned that the final equivalence shall be established by the requisitioning authority.

Later the applicant was also heard and his queries were clarified. After deliberate discussion it was decided in the light of existing service rules that the pray may not be entertained.

Meeting ended with vote of thanks from the Chair.

Regarding these categories it is mentioned in the rules that they can get promotion on the basis of MPH degree:-

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GOVERNMENT OF [Khyber Pakhtunkhwa] HEALTH DEPARTMENT

NOTIFICATION

Amenduse - 0

Peshawar, dated the 11th DECEMBER, 2008

No. SOH(EV)4-20/08 : In exercise of the powers conferred by section 26 of the ²[Khyber Pakhtunkhwa] Civil Servants Act, 1973 (³[Khyber Pakhtunkhwa] Act XVIII of 1973), the Governor of the (⁴[Khyber Pakhtunkhwa] is pleased to make the following rules, namely:

THE ⁵[Khyber Pakhtunkhwa] HEALTH (MANAGEMENT) SERVICE RULES, 2008.

PART - I
GENERAL

1. Short title and commencement. — (1) These rules may be called the ⁶[Khyber Pakhtunkhwa] Health (Management) Service Rules, 2008.

(2) They shall come into force at once.

2. Definitions.— In these rules, unless the context otherwise requires, the following expressions shall have the meanings hereby respectively assigned to them, that is to say :

- (a) "appointing authority" in relation to a post, means the respective authority specified in para 4 of the ⁷[Khyber Pakhtunkhwa] Civil Servants (Appointment, Promotion and Transfer) Rules, 1989;
- (b) "Commission" means the ⁸[Khyber Pakhtunkhwa] Public Service Commission;
- (c) "Cadre" means Health Management Cadre;
- (d) "Government" means the Government of the ⁹[Khyber Pakhtunkhwa];
- (e) "Governor" means the Governor of the ¹⁰[Khyber Pakhtunkhwa];
- (f) "Initial recruitment" means appointment made otherwise than by promotion or transfer;
- (g) "Member of Service" means officer belonging to health management cadre as reflected in schedule I, II & III;
- (h) "PHSA" means Provincial Health Services Academy;

¹ Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.
² Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.
³ Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.
⁴ Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.
⁵ Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.
⁶ Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.
⁷ Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.
⁸ Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.
⁹ Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.
¹⁰ Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.

- (i) "Post" means a post specified in the Schedule-I of the rule and such other posts as may, from time to time, be determined by the Government;
- (j) "Schedule" means the schedule appended to these rules; and
- (k) "Service" means the "[Khyber Pakhtunkhwa] Health (Management) Service."

38 39

PART-II RECRUITMENTS

3. Number and nature of posts.—The Service shall comprise the posts specified in the Schedule-I and such other posts as may be determined by Government from time to time.
4. Method of Appointment.—Method of appointment, qualifications and other conditions to be applicable to a post in the Service shall be such as laid down in the column 3 to 5 of the Schedule - II.
5. Syllabus and examination for appointment by initial recruitment.—Syllabus and standard for competitive examination for appointment by initial recruitment to the post in BS-17 shall be, as laid down in Schedule-III.

PART-III CONDITIONS OF SERVICE

6. Pre-Service Training & Departmental Examinations.— (1) On appointment to a post borne on the service in BS-17, every officer so appointed shall complete six months mandatory training including attachment as specified in schedule -IV.

(2) The training shall be followed by departmental examination to be conducted by Provincial Health Services Academy, which will be part of probation period.

7. In-Service Training.—Selection for in-service trainings which are linked with promotion shall be done on seniority basis and those at verge of promotion shall be given priority.

8. Private Practice.— (1) No Member of Service shall be allowed private practice, in lieu he shall be entitled to non-practicing allowance, at such rate as may be prescribed by Government.

(2) In case of default, the Member shall be liable to disciplinary action under the law.

9. General rule.— In all matters not expressly provided for in these rules, Members of Service shall be governed by such rules as have been or may hereafter be prescribed by Government from time to time.

Provided that in case of a dispute the Government shall have the final authority to decide the matter in any manner it deems fit.

10. One time exercise.— (1) Notwithstanding anything contained in the provision of these rules, Government shall, as one-time exercise, fill in posts in the Service described in Schedule-I by way of permanent transfer from amongst the Officers of General Cadre in equivalent basic pay scale who have the qualification of Master of Public Health or Postgraduate Diploma in Hospital Administration or Health Planning & Management or equivalent Master's Degree / Diploma in Health management or allied disciplines and opt for absorption.

¹¹ Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.

Provided that the option once exercised shall be final.

39 40

(2) Where the number of officers opting for absorption in Management Cadre is more than the available positions in respective grade, the selection under one time exercise shall be done on the basis of seniority-cum-merit only in the respective grade;

Provided that for determining the suitability of the officers, additional relevant qualifications, trainings/courses in the relevant field and managerial experience, as such, shall be taken into consideration.

11. Deletion of posts.—Posts reflected in the schedule-I shall stand deleted from any other service rules for the time being in force and such rules shall be deemed to have been amended to the above extent:

SECRETARY TO GOVERNMENT OF ¹²[KHYBER
PAKHTUNKHWA] HEALTH
DEPARTMENT

Indst. of even No & Date.

Copy to:

1. The Chairman, Public Service Commission, ¹³[Khyber Pakhtunkhwa], Peshawar
2. PS to Minister for Health, ¹⁴[Khyber Pakhtunkhwa].
3. PS to Chief Secretary, ¹⁵[Khyber Pakhtunkhwa].
4. PS to Additional Chief Secretary, ¹⁶[Khyber Pakhtunkhwa].
5. PS to Secretary E&A Department.
6. PS to Secretary Law Department.
7. PS to Secretary Finance Department.
8. PS to Secretary Health.
9. PA to DGHS ¹⁷[Khyber Pakhtunkhwa].
10. Computer Programmer, Health Department.

(ADIL SAËED SAFI)
SECTION OFFICER - V

¹² Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.

¹³ Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.

¹⁴ Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.

¹⁵ Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.

¹⁶ Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.

¹⁷ Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.

EXTRAORDINARY
GOVERNMENT



REGISTERED NO. PHIL

G A Z E T T E

P-40 6/11

Amended P

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. 5011-III/AD/1-5/2014 - In pursuance of the provision contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all Notifications issued in this behalf by the Health Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualification and other conditions specified in column 3 to 5 of the Appendix to the posts of Paramedical Staff in the Health Department specified in column 2 of the said Appendix.

APPENDIX

S. No.	Nomenclature of the post.	Qualification for appointment by initial recruitment.	Age limits.	Method of recruitment.
1	2	3	4	5
1	Principal Technologist (BS-19) (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 equivalent years service in BS-17 and above as such in the relevant technology.

6/1 42

<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; 			
<ul style="list-style-type: none"> (x) Principal Clinical Technologist Pulmonology; (xi) Principal Clinical Technologist Gastroenterology; and (xii) Principal Clinical Technologist Ophthalmology / otorhinolaryngology; and 			
<u>Principal PHC Technologist</u>			
<ul style="list-style-type: none"> (i) Principal PHC Technologist (Multi Purpose); and 			
<ul style="list-style-type: none"> (ii) Principal PHC Technologist (MCH) 			
<p>Chief Technologist <i>CS-18</i></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 UPS-15 or twelve years service in UPS-17 and above as such in the relevant technology.</p>

42 43

<p>Chief PHC Technologist</p>			
<p>(i) Chief PHC Technologist (Multi-Purpose); and (ii) Chief PHC Technologist (MCH).</p>			
<p>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>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>20-25 years</p>	<p>(a) Fifty percent by promotion, on the basis of seniority/experience, 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>Senior PHC Technologist</p> <p>(i) Senior PHC Technologist (Multi-Purpose); and (ii) Senior PHC Technologist (MCH).</p>			
<p>Technologist (BS-17)</p> <p>(i) Clinical Technologist Dental; (ii) Clinical Technologist Pharmacy; (iii) Clinical Technologist Pathology;</p>	<p>At least Second Class Bachelor's Degree in the relevant Technology from a recognized University/ Institution</p>	<p>16-22 years</p>	<p>(a) Forty percent by promotion, on the basis of seniority/experience, from amongst the Chief Technicians and Chief PHC Technicians with three years service as such in the relevant technology;</p>

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<p>(b) vacancy percent by promotion, on the basis of seniority-rank fitness, from amongst the Chief Technicians, Senior Technicians and Technicians having qualifications prescribed for such recruitment with three years service each in the relevant technology.</p> <p>(c) forty percent by initial recruitment.</p>	<p>(i) Chief Technologist (Adult-Purpose); and (ii) PIC Technologist (MCI).</p>	<p>Chief Technologist (MCI) - 16</p> <p>(i) Chief Clinical Technician Dermatology; (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 Technologist Physiology; (x) Chief Clinical Technician Physiotherapy; (xi) Chief Clinical Technician Immunology; (xii) Chief Clinical Technician Hematology; (xiii) Chief Clinical Technician Gastroenterology; and (xiv) Chief Clinical Technologist Ophthalmology / Otorhinolaryngology; and</p>
<p>(b) vacancy percent by promotion, on the basis of seniority-rank fitness, from amongst the Chief Technicians, Senior Technicians and Technicians having qualifications prescribed for such recruitment with three years service each in the relevant technology.</p> <p>(c) forty percent by initial recruitment.</p> <p>Note: For the purpose of promotion, there shall be maintained a joint centrally list of Chief Technicians, Senior Technicians and Technicians with reference to the dates of their acquiring qualification prescribed for initial recruitment as in column (b).</p> <p>Provided that if two or more officers acquired the qualification prescribed for initial recruitment in the same session, then the official who obtained the highest marks in grade in the examination shall be deemed to be senior to the other officials; and</p>	<p>(i) Chief Clinical Technologist Dermatology; (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 Physiology; (x) Chief Clinical Technologist Immunology; (xi) Chief Clinical Technologist Hematology; (xii) Chief Clinical Technologist Gastroenterology; and (xiii) Chief Clinical Technologist Ophthalmology / Otorhinolaryngology; and</p>	<p>Chief Technologist (MCI) - 16</p> <p>(i) Chief Clinical Technician Dermatology; (ii) Chief Clinical Technician 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 Physiology; (x) Chief Clinical Technologist Immunology; (xi) Chief Clinical Technologist Hematology; (xii) Chief Clinical Technologist Gastroenterology; and (xiii) Chief Clinical Technologist Ophthalmology / Otorhinolaryngology; and</p>

Handwritten signature/initials.

<p>(xii) Chief Clinical Technicians (Ophthalmology); and Chief PHTC Technician</p>	<p>(i) Chief PHTC Technicians (with Purpose); and (ii) Chief PHTC Technician (PCH)</p>	<p>Senior PHTC Technicians (with Purpose); and Senior PHTC Technicians (PCH)</p> <p>(i) Senior Clinical Technicians Dental; (ii) Senior Clinical Technicians Pharmacy; (iii) Senior Clinical Technicians Radiology; (iv) Senior Clinical Technicians Histology; (v) Senior Clinical Technicians Anaesthesia; (vi) Senior Clinical Technicians Cardiology; (vii) Senior Clinical Technicians Surgical; (viii) Senior Clinical Technicians Dialysis; (ix) Senior Clinical Technicians Physiotherapy; (x) Senior Clinical Technicians Pathology; (xi) Senior Clinical Technicians Gastroenterology; and (xii) Senior Clinical Technicians Ophthalmology;</p>	<p>Technician (85-12)</p> <p>(i) Clinical Technician Dental; (ii) Clinical Technician Pharmacy; (iii) Clinical Technician Radiology; (iv) Clinical Technician Histology; (v) Clinical Technician Anaesthesia; (vi) Clinical Technician Cardiology; (vii) Clinical Technician Surgical; (viii) Clinical Technician Dialysis; (ix) Clinical Technician Physiotherapy; (x) Clinical Technician Pathology; (xi) Clinical Technician Ophthalmology; (xii) Clinical Technician Pulmonology;</p>
			<p>(i) Technician (PHTC) Technician: At least Second Division Secondary School Certificate with Diploma in a recognized Board with Diploma in the relevant Paramedical Technology from Kyber Pakhtunkhwa Medical Faculty or Diploma in the relevant Paramedical technology provided that the same is registered with the Medical Faculty Kyber Pakhtunkhwa Peshawar and</p>
	<p>By promotion, on the basis of seniority-cum-fitness, from amongst the Technicians and PHTC Technicians with at least five years service as such in the relevant technology.</p>		<p>18-20 years By initial recruitment</p>

AS 46

952. KHIDER PAKHI UNIQWA GOVERNMENT GAZETTE, EXTRAORDINARY, 10th MAY, 2016

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

GOVERNMENT OF THE KHIDER PAKHI UNIQWA,
HEALTH DEPARTMENT.

Printed and published by the Manager,
State, at the Khider Pakhi Uniqwa, Tachanor

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<p>PHC Technician</p> <p>(i) PHC Technician (Multi-Purpose); and (ii) PHC Technician (MCH).</p>	<p>(ii) PHC Technician (MCH): Secondary School Certificate with at least Second Division in Science from a recognized board and Diplomas of LHV and Midwifery from recognized Nursing Examination Board.</p>		
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SECRETARY TO
GOVERNMENT OF THE KHYBER PAKHTUNKHWA,
HEALTH DEPARTMENT.

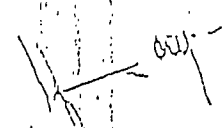
Order No. & Date even

Order No: SOH-111/3-60/2016 (Paramedics/Nurses/Service Rules)

Dated Peshawar, 11-05-2016

Copy forwarded for information and necessary action to:-

1. The Director General Health Services Khyber Pakhtunkhwa.
2. The Director, Provincial Health Services Academy, Khyber Pakhtunkhwa.
3. All District Health Officers, Khyber Pakhtunkhwa.
4. The Registrar, Khyber Medical University, Peshawar.
5. The Director Health Services FATA.
6. All Hospital Directors/Medical Directors of Autonomous Institutions in Khyber Pakhtunkhwa.
7. All Medical Superintendents DHC/THQ Hospitals, of Khyber Pakhtunkhwa.
8. All the Principals of Medical Colleges in Khyber Pakhtunkhwa.
9. The Deans RGMir Peshawar.
10. The Chief HSRU Health Department Khyber Pakhtunkhwa.
11. The Director Information, Khyber Pakhtunkhwa.
12. The Deputy Director (I.T) Health, Khyber Pakhtunkhwa.
13. The Secretary, Medical Faculty, Khyber Pakhtunkhwa, Peshawar.
14. The Principal, Post Graduate Paramedical Institute, Peshawar.
15. The Principal, Post Graduate College of Nursing, Hayatabad Peshawar.
16. The Controller, Nursing Examination Board, Peshawar.
17. PSO to Chief Secretary Khyber Pakhtunkhwa.
18. PS to Additional Chief Secretary (FATA) Peshawar.
19. PS to Secretary to Governor Khyber Pakhtunkhwa.
20. PS to Secretary to Chief Minister Khyber Pakhtunkhwa.
21. PS to Secretary to Government of Establishment Department.
22. PS to Secretary to Government of Finance Department.
23. PS to Secretary to Government of Law Department.
24. PS to Secretary, Public Service Commission, Khyber Pakhtunkhwa.
25. PS to Senior Minister for Health Department.
26. The Manager, Government Printing Press, Peshawar.


(Asfandyar Khattal
Deputy Secretary)

EXTRAORDINARY

GOVERNMENT



REGISTERED NO. P111

GAZETTE

Annexure - 2

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, FRIDAY, 6TH NOVEMBER, 2020.

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

NOTIFICATION

Peshawar dated the 01st November, 2020.

No. SO11-III/8-60/2020/Paramedical/SSRC/1440-821: In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Health Department, in consultation with the Establishment Department and the Finance Department, hereby directs that in this Department's Notification No. SO11-III/110/3-5/2014, dated: 10-05-2016, the following amendments shall be made, namely:-

AMENDMENTS

In the Appendix,

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

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

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

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

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

2	3	4	5
Senior Technologist / Senior PHC Technologist.	At least MS/ M.phil in the relevant technologies from a recognized University.	23-40 Years	
i) Senior Clinical Technologist <u>Dental</u>			
ii) Senior Clinical Technologist <u>Pharmacy</u>			
iii) Senior Clinical Technologist <u>Radiology</u>			
iv) Senior Clinical Technologist <u>Pathology</u>			
v) Senior Clinical Technologist <u>Anaesthesia</u>			
vi) Senior Clinical Technologist <u>Cardiology</u>			
vii) Senior Clinical Technologist <u>Surgical</u>			
viii) Senior Clinical Technologist <u>Dialysis</u>			
ix) Senior Clinical Technologist <u>Physiotherapy</u>			
x) Senior Clinical Technologist <u>Pulmonology</u>			
xi) Senior Clinical Technologist			

(a) Seventy percent (70%) by promotion on the basis of seniority-cum-fitness from amongst the Clinical Technologists and PHC Technologists with five years service in the relevant technologies as such. In case the required length of service is less than five years then half of the service in BS-16 and one fourth in service below BPS-16 shall be counted as service in BPS-17 in the relevant technology.

Note: A joint seniority list of Clinical Technologists and PHC Technologists shall be maintained for the purpose of promotion; and

(b) thirty percent (30%) by initial recruitment.

			(xii) Senior Medical Technologist Ophthalmology/Otorhinology (xiii) Senior PIC Technologist (Multi Purpose) (xiv) Senior PIC Technologist (MCH)
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51

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

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

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

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

22-35 years and

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

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

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

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

Note: (i) The counting of one fourth service in lower basic scales as service in BS-14 shall be done once exercise in order to remove the anomaly created in the immediate service structure after the up-gradation of posts in BS-12 without upgrading the incumbent to higher grades vide Finance Department Notification No. dated 15.05.2018. Upon promotion of the existing incumbent this relaxation shall be discontinued.

(A) A separate seniority list of Senior Clinical Technicians and Senior PHC Technicians of relevant technology shall be maintained for the purpose of promotion.

against Serial No. 6 in Column No. 3 for the existing entries, the following shall be substituted, namely:

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

Note: A separate seniority list of Technicians and PHC Technicians shall be maintained in the relevant technology for the purpose of promotion, and

against Serial No. 7, in Columns No. 3 and 4, for the existing entries, the following shall be substituted, namely:

(i) Technician/ PHC Technician:	4
At least Second Division Secondary School Certificate in science from a recognized Board and two years Diploma in the relevant Paramedical Technology from recognized Medical Faculty or F.Sc Medical Technology in the relevant Technology from a recognized Board.	18-32 Years.
(ii) PHC Technician (MCH):	
At least Second Division Secondary School Certificate in science from a recognized Board and Diplomas of LHV and Midwifery from recognized a Nursing Examination Board and having valid registration with Pakistan Nursing Council as LHV.	

SECRETARY TO
GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Annexure "R"

53

To,

The honouraible Secretary health govt of
Khyber Pakhtunkhwa health department

Peshawar,

Subject: Review application in appeal already submitted before the worthy secretary health khyber pakhtunkhwa Peshawar for the inclusion and enlisting post graduate diploma in health planning and management (PGDHPM) in the master of public health (MPH) seniority list of pharmacy technology for promotion purposes.

Respected sir,

Most humbly stated in your honor that I have the honor that I am serving and performing my duty as a "SCT" senior clinical technician Pharmacy in health department up to the satisfaction of the high ups since 01-10-1988. A brief history of my academic record and credentials along with the already filed departmental appeals to the concerned authority (Health Department) has been mentioned for your kind perusal and consideration in the following para.

- (1) That I have completed and got my Post Graduate Diploma in Health Planning and Management Degree (PGDHPM) from the institute of management studies, university of Peshawar after graduation in session 2002 along with MA Islamiyat from university of Peshawar, BHMS from khyber medical university Peshawar, Diploma in medical and Ophthalmic technology from medical faculty Peshawar.

(2) That later on the undersigned submitted a departmental appeal before the worthy Directors General Health services khyber Pakhtunkhwa Peshawar for the inclusion of 'PGDHPM' Post Graduate Diploma in Health Planning and Management in the MPH seniority list of Pharmacy technology for the promotion purposes in February 2020 but which was unheard and hence was not considered by the competent authority.

(3) That after filling of the departmental appeal to the concerned authority the DG office issued a list of the MPH Degree holder whereby the name of the undersigned was also mentioned and enlisted in the very preliminary list. But later on the competent authority issued a final seniority list whereby the undersigned was discriminated and hence excluded from the issued list.

(4) That onwards the applicant/undersigned on dated 28-10-2021 submitted a departmental appeal bearing a Diary no 19507 before the honourable secretary Health kpk Peshawar in which the same prayer was claimed by the undersigned from the competent authority. In light of above subject issue Health department ordered for and arranged a meeting of "DPC" Departmental promotion committee for the promotion of different categories including the above subject category mentioned by the undersigned in the appeal, moreover the "DPC" meeting was arranged and held on dated 11-11-2021, whereby the competent authority was pleased to issue promotion orders of clinical technicians (bps -12) senior clinical technician (bps-14) and chief clinical technicians (bps-16) to the post of clinical technologists in (bps 17) on regular basis with immediate effect.

(5) :-That furthermore the concerned department sent my appeal/grievances to DGHS for comments and then DGHS sent it to the worthy secretary Health for further view and comments. Later on the competent authority arranged a special meeting in this regards on dated 18-1-2022. Whereby the undersigned was again discriminated his position was time and again not considered for promotion as prayed for in the subject of the instant appeal.

(6):-That under the khyber Pakhtunkhwa Health (Management) service rules 2008. Issue through the notifications No SOH(EV) 4-20/ 08 , 11 December 2008 in connection to Management cadre, whereby under para 10 of this notification others related fields /categories like Master in public health or Postgraduate Diploma in public health or postgraduate Diploma in Hospitals Administration or postgraduate Diploma in Health Planning and Management etc were also included and absorbed .

(7):- That in the service rules of paramedic issued under the notification No SOH-111/HD/3-5/2014 dated 10 may 2016 wherein it has been clearly stated and declared that " at least second class Bachelor "Degree in the relevant technology from a recognized university/institution will be considered for promotion.

(8):-That later, on the above preceding para the service rules of paramedic were amended under the notification No SOH-111/8-60/2020/paramedic/SSRC/1440-82 Dated 04 November, 2020, wherein it has declared that for the purpose of promotion apart from the enhanced qualifications -BSc Degree from a recognized university shall be applicable for the upto 7 years from the issuance of this amending notification.

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(9) Furthermore under this notification it was also clearly held that the MPH (Master in public Health) Degree from a recognized university shall also be considered for promotion purposes only where the related Degree or Degree in the relevant technology doesn't exist.

In nutshell the above mentioned faceted and actual scenario and keeping in view the provided data and details it is most humbly prayed that being the senior clinical technologist and in the light of the above mentioned notification issued by the competent authority dated 11-1-2022, the applicant /undersigned may very graciously be considered for the promotion in Bps 17 and my obtained Degree in post graduate diploma in Health Planning and Management (PGDHPM) may very kindly be enlisted and included in the Mph seniority list of Pharmacy technology along with all back benefits.

Relevant document attached.

Thanking you and obliged.

Your sincerley


Razi Muhammad s/o Ali Ahmad

SCT Pharmacy MTI Mmc Mardan.

Date:18/03/2022

Copy to DGHS Peshawar for information and necessary action please .

To,

Amirul - "S"
57

The honourable Director Genral Health Services
Khber pakhutunkhwa health department.

Peshawar,

Subject: Review application in appeal already submitted before the worthy secretary health khyber Pakhtunkhwa Peshawar for the inclusion and enlisting post graduate diploma in health planning and management (PGDHPM) in the master of public health (MPH) seniority list of pharmacy technology for promotion purposes.

Respected sir,

Most humbly stated in your honor that I have the honor that I am serving and performing my duty as a "SCT" senior clinical technician Pharmacy in health department up to the satisfaction of the high ups since 01-10-1988. A brief history of my academic record and credentials along with the already filed departmental appeals to the concerned authority (Health Department) has been mentioned for your kind perusal and consideration in the following para.

- (1) That I have completed and got my Post Graduate Diploma in Health Planning and Management Degree (PGDHPM) from the institute of management studies, university of Peshawar after graduation in session 2002 along with MA Islamiyat from university of Peshawar, BHMS from khyber medical university Peshawar, Diploma in medical and Ophthalmic technology from medical faculty Peshawar.

(2) That later on the undersigned submitted a departmental appeal before the worthy Directors General Health services khyber Pakhtunkhwa Peshawar for the inclusion of 'PGDHPM' Post Graduate Diploma in Health Planning and Management in the MPH seniority list of Pharmacy technology for the promotion purposes in February 2020 but which was unheard and hence was not considered by the competent authority.

(3) That after filling of the departmental appeal to the concerned authority the DG office issued a list of the MPH Degree holder whereby the name of the undersigned was also mentioned and enlisted in the very preliminary list. But later on the competent authority issued a final seniority list whereby the undersigned was discriminated and hence excluded from the issued list.

(4) That onwards the applicant/undersigned on dated 28-10-2021 submitted a departmental appeal bearing a Diary no 19507 before the honourable secretary Health kpk Peshawar in which the same prayer was claimed by the undersigned from the competent authority. In light of above subject issue Health department ordered for and arranged a meeting of "DPC" Departmental promotion committee for the promotion of different categories including the above subject category mentioned by the undersigned in the appeal, moreover the "DPC" meeting was arranged and held on dated 11-11-2021, whereby the competent authority was pleased to issue promotion orders of clinical technicians (bps -12) senior clinical technician (bps-14) and chief clinical technicians (bps-16) to the post of clinical technologists in (bps 17) on regular basis with immediate effect

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(5) That furthermore the concerned department sent my appeal/grievances to DGHS for comments and then DGHS sent it to the worthy secretary Health for further view and comments. Later on the competent authority arranged a special meeting in this regards on dated 18-1-2022. Whereby the undersigned was again discriminated his position was time and again not considered for promotion as prayed for in the subject of the instant appeal.

(6):-That under the khyber Pakhtunkhwa Health (Management) service rules 2008. Issue through the notifications No SOH(EV) 4-20/ 08 , 11 December 2008 in connection to Management cader ,whereby under para 10 of this notification others related fields /categories like Master in public health or Postgraduate Diploma in public health or postgraduate Diploma in Hospitals Administration or postgraduate Diploma in Health Planning and Management etc were also included and absorbed .

(7):- That in the service rules of paramedic issued under the notification No SOH-111/HD/3-5/2014 dated 10 may 2016 wherein it has been clearly stated and declared that " at least second class Bachelor "Degree in the relevant technology from a recognized university/institution will be considered for promotion.

(8):-That later, on the above preceding para the service rules of paramedic were amended under the notification No SOH-111/8-60/2020/paramedic/SSRC/1440-82 Dated 04 November,2020, wherein it has declared that for the purpose of promotion apart from the enhanced qualifications -BSc Degree from a recognized university shall be applicable for the upto 7 years from the issuance of this amending notification.

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(9) Furthermore under this notification it was also clearly held that the MPH (Master in public Health) Degree from a recognized university shall also be considered for promotion purposes only where the related Degree or Degree in the relevant technology doesn't exist.

In nutshell the above mentioned faceted and actual scenario and keeping in view the provided data and details it is most humbly prayed that being the senior clinical technologist and in the light of the above mentioned notification issued by the competent authority dated 11-1-2022, the applicant /undersigned may very graciously be considered for the promotion in Bps 17 and my obtained Degree in post graduate diploma in Health Planning and Management (PGDHPM) may very kindly be enlisted and included in the Mph seniority list of Pharmacy technology along with all back benefits.

Relevant document attached.

Thanking you and obliged.

Your sincerley

Razi Muhammad s/o Ali Ahmad

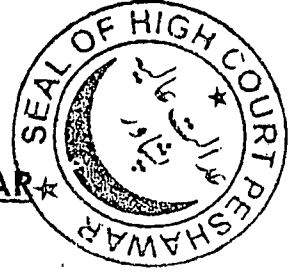
SCT Pharmcy MTI Mmc Mardan.

Date:18/03/2022

Copy to Secretary Health Peshawar for information and necessary action please

Amazuke T

61



IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. _____/2022

Razi Muhammad Son of Mr. Ali Ahmad,
Senior Clinical Technician Pharmacy
MMC (MTI), Mardan.....Petitioner

V. E R S U S

1. Government of Khyber Pakhtunkhwa
Through Secretary Health,
At Khyber Road, Peshawar
2. Government of Khyber Pakhtunkhwa
Through Director General Health Service,
Peshawar.....Respondents

**WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN, 1973**

ATTESTED
EXAMINER
Peshawar High Court

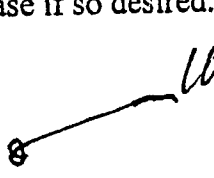
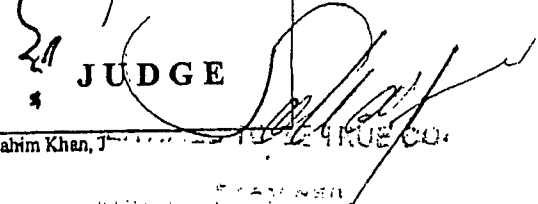
Respectfully Sheweth:

1. That the petitioner is a law abiding and bonafide citizen of Pakistan having a domicile of Khyber Pakhtunkhwa Mardan. (Copy of CNIC of the petitioner is attached as annexure "A").

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PESHAWAR HIGH COURT, PESHAWAR
FORM OF ORDER SHEET

Date of Order or Proceeding	Order or other proceedings with Signature of Judge
2	3
06.10.2022	<p><u>W.P No. 3176-P/2022</u></p> <p><u>Present:</u> - Mr. Mafkhar Haleem Kakakhel, Advocate for petitioner.</p> <p style="text-align: center;">***</p> <p><u>MOHAMMAD IBRAHIM KHAN, J.</u> The petitioner is performing his duties as Senior Clinical Technical Pharmacy MMC (MTI); Mardan and seeks actualization of his promotion to BPS-17, which relates to MTI for which a Medical Appellate Tribunal u/s 16-A of the MTI Act, 2015 has been constituted. However, a look over Para No. 3 of the petition would reveal that the petitioner is stated to be performing his duties as "Senior Clinical Technician" Pharmacy BPS-14, Health Department being a civil servant thus, it is entirely left to the petitioner to approach either of the forum where can effectively present his case if so desired.</p> <p>Announced 06.10.2022</p> <p style="text-align: right;">  JUDGE  JUDGE </p>

Muhammad Fiaz *D.B* Hon'ble Mr. Justice Mohammad Ibrahim Khan, J
Hon'ble Mr. Justice Ijaz Anwar, J

11 OCT 2022



Amended

DIRECTORATE GENERAL
HEALTH SERVICES, KHYBER
PAKHTUNKHWA, PESHAWAR

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OFFICE ORDER

Consequent upon approval accorded by the Departmental Promotion Committee the following Sr. Clinical Technicians Pharmacy (BS-14) are hereby promoted to the post of Chief Clinical Technicians Pharmacy (BS-16) with immediate effect

S.NO	Name Father Name	Place of posting
1	Shakirullah S/O Raidullah Khan	DHO Malakand
2	Naseebullah S/O Bandik	DHO Bannu
3	Saeed Zaman S/O Akhtar Zaman	DHO Hosp Bannu
4	Muhammad Arif S/O Shah Nawaz	DHO Hosp. D.I Khan
5	Muhammad Bilal S/O Abdur Rashid	DHO Hosp. D.I Khan
6	Ghulam Ali S/O Muhammad Gul	DHO D.I Khan
7	Muhammad Yousaf S/O K Mir Abdullah Shahi	KGN Hosp Bannu
8	Mujeeb Ur Rahman S/O Fazal Ur Rahman	DHO Khyber
9	Muhammad Khurshid S/O Abdur Rehman	DHO Abbottabad
10	Abdur Rashid S/O Gohar Rehman	DHO Manshera
11	Sain Muhammad S/O Rahimullah	DHO Manshera
12	Wiqar Ahmad S/O Lawar Khan	DHO Charsadda
13	Misbahullah S/O Ahmad Jan	DHO Peshawar
14	Mehboob ur Rahman S/O Muhammad Shamas	DHO Charsadda
15	Ismail Khan S/O Juma Khan	DHO Charsadda
16	Mustafaq Ahmad S/O Muhammad Nawaz	DHO D.I Khan
17	Tilawat Khan S/O Sher Afzal	DHO Dir Lower
18	Ashraf Ali S/O Ghulam Muhammad	DHO Dir Upper
19	Fazli Malik S/O Fazli Khalifa	DHO Hosp Ghaffar
20	Ahmad Khan S/O Faqir Shah	DHO Kohat
21	M. Zulfikar S/O M. Israfeel	KAT Hosp Manshera
22	Sayyar Khan S/O Muhammad Amin	DHO Peshawar
23	Jehan Alam S/O Shah Wazir	DHO Swat
24	Aqal Din S/O Khan Gul	DHO Malakand
25	Abdur Razzag S/O Syed Jahan	DHO Lower Peshawar
26	Muhammad Idrees S/O Mundir Khan	DHO Manshera
27	Sal Hussain	DHO Kunar
28	Ghulam Farid	DHO Manshera
29		

Copy of this order to be sent to the concerned authorities for their information.

255	Janab Gul S/O Paye Gul	DHO Mardan
256	Khaista Jan S/O Baghwan Gul	DHO Khyber
257	Muhammad Shajid S/O sardar Abdul Ghani	DHO Khyber
258	Khalid Yaseen S/O Muhammad Younas	DHO Manshera
259	Fazal Jamil S/O Abdul Jamil	KAT Hosp. Manshera
260	Wahed Akram S/O M. Yousaf	DHO Chitral
261	Nak Bali S/O Gul Khan	DHO Hosp. Manshera
262	Abdul Rahim S/O Abdul Sattar	AHQ Hosp. SWA
263	Muhammad Ilyas S/O Umar Hayat	KGNT Hosp. Bannu
264	Karim Ullah S/O Sawab Gul	DHO D.I Khan
265	Rahmat Shah S/O Muzaffar Khan	DHO Charsadda
266	Muhammad Raisat S/O Muhammad Din	DHO Bannu
267	Sohail Anjum S/O J.M. Jones	BBST Hosp. Abbottabad
268	Razi Muhammad S/O Ali Ahmad	BEST Hosp. Abbottabad
269	M. Irfan S/O Mirza Khan	MMC Mardan
270	Muhammad Tahir S/O Muhammad Sabir	DHO Abbottabad
271	Yousaf Khan S/O Shad Ali Khan	Ayub TH Abbottabad
272	Munir Iqbal S/O Muhammad Ghulam	DHO Hosp. Karak
273	Muhammad Iqbal S/O Umar Khan	DHO Hosp. Karak
274	Lal Shahbaz S/O Mir Shah Bal	DHO Hosp. Karak
275	Muhammad Riaz S/O Jamroz Khan	DHO Karak
276	M. Sharif S/O Murad Khan	DHO Chitral
277	Azmat Hussain S/O Farhad Hussain	DHO Karak
278	Rafiullah S/O Malal Gul	DHO Karak
279	Airshad Ali S/O Abdul Baqi	DHO Hosp. Charsadda
280	Dawood Shah S/O Rahmat Gul	SHPD Peshawar
281	Muhammad Anwar S/O Noranbaz	DHO Hangu
282	Rangeen Shah S/O Syed Noor Badshah	DHO Peshawar
283	Sulman Ali S/O Ali Zaman	DHO Kurram
284	Karimullah S/O Saadullah Khan	DHO Swabi
285	Zahidullah S/O Obaidullah	MMC Mardan
286	Muhammad Riaz S/O Sher Afzal	DHO Kohat
287	Arshad Ali S/O Mushlaq Ali	DHO Hosp. Bakhela
288	Gul Muhammad S/O Miral Khan	DHO Malakand
289	Said Anwar S/O Sadiq Khan	SGT Hosp. Swal
290	Muhammad Rafiq S/O Aslam Khan	DHO Swal
291	Fazal Qadir S/O Sadiq Khan	DHO Shangla

64

M. Irfan
 Deputy Director (Personnel)
 Federal Government Services
 Peshawar

65

Amir Zada S/O
Muzahar

DFCO Hosp.
Shangha

DFCO Hosp.
Shangha

No.

N.D. Annual Departure should be submitted to this Directorate for record.


Sd/xxxxx

Director General Health Services,
Khyber Pakhtunkhwa Peshawar

No. 1244-63 (Promotion Cell) Dated Peshawar the 26/09/2022
Copy forwarded to the:-

1. All Sub-offices of Health Services in Khyber Pakhtunkhwa
2. All Hospital Directors (MTIs) in Khyber Pakhtunkhwa
3. All Deans/Principal of Medical Colleges in Khyber Pakhtunkhwa Peshawar
4. Accountant General Khyber Pakhtunkhwa Peshawar
5. All District Account Officers in Khyber Pakhtunkhwa
6. Deputy Director (DHIS) DGHS, KPK, Peshawar
7. PA to DG Health Services Khyber Pakhtunkhwa Peshawar
8. Official Concerned
9. Suptt. Promotion Cell, DGHS, KPK, Peshawar
10. Personal Files

For information and necessary action.


 Additional Director General
 Directorate General Health Services,
 Khyber Pakhtunkhwa Peshawar

Amekule - V

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GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar, the 02nd Aug, 2022

NOTIFICATION

SOH-III/0-60/2021 (Different Categories of Paramedics BS-17): In continuation of this Department's Notification of even number dated 31-05-2022, the Competent Authority, is pleased to order posting/transfer of the following PHC/Clinical Technologists (BS-17) with immediate effect, in the public interest.

Item 1. Clinical Technologist Pharmacy BS-17					
S.NO	Name & Father Name	Domicile	from	To	Remarks.
1.	Massadiq Yasin S/O Ghulam Yasin	Karak	DHQ Hosp: Karak	DHQ Hosp: Karak	Against the vacant post.
2.	Zafar Ali S/O Mir Saleem	Bannu	KGNTH Bannu.	KGNTH Bannu	Do-
Item 2. Clinical Technologist Cardiology BS-17					
S.NO	Name & Father Name	Domicile	from	To	Remarks.
1.	Muhammad Saeed S/O Ajab Gul	Mardan	DHQ Hosp: Swabi.	DHQ Hosp: Mardan	Against the vacant post.
2.	Maqsood Ahmad Gul Zaman	Abbottabad	DHQ Hosp: Abbottabad	DHQ Hosp: Abbottabad	Do-
3.	Hukam Khan S/O Sabir Khan	Lakki Marwat	DHQ Hosp: D.I Khan	DHQ Hosp: D.I Khan	Do-
4.	Murad Ali S/O Ajmal Khan	Bannu	DHQ Hosp: Karak.	W & C Hosp: Kohat	Do-
5.	Bakht Sardar S/O Mohib Shah	Buner	DHQ Hosp: Daggar, Buner	DHQ Hosp: Daggar, Buner	Do-
6.	Nisar Muhammad S/O Pir Muhammad	Charsadda	LRH Peshawar	NKBM Hosp: Peshawar	Do-
7.	Muhammad Qasim S/O Noor Muhammad	Charsadda	LRH Peshawar	DHQ Hosp: Mardan	Do-
8.	Muhammad Asim S/O Muhammadi Gul	Charsadda	LRH Peshawar	MASM Hosp: Peshawar	Do-

8.	Dilawat Khan S/O Ajdar Khan	Dir Lower	DHO Hosp: Dir Lower	DHO Dir Lower	Do-
9.	Rahimullah S/O Lal Badshah	Dir Lower	DHO Dir Lower	DHO Dir Lower	Do-
10.	Asadullah S/O Sakht Jan	Swat	DHO Swat	DHO Swat	Do-
11.	Fida Muhammad S/O Muhammad Fayaz	Shangla	DHO Shangla	DHO Hosp: Shangla	Do-
12.	Husan ul Haq S/O Din Muhammad	Dir Lower	DHO Hosp: Dir Lower	DHO Hosp: Dir Lower	Do-
13.	Israr Ullah S/O Muhammad Qasim	Bannu.	Bannu Medical College Bannu	Bannu Medica: College Bannu	Do-
14.	Zahir-ud-din S/O Siraj-ud-Din	Lower Dir	DHO Lower Dir	DHO Talmergara	Do-

Hussain

Item 7. Clinical Technologist Pharmacy BS-17

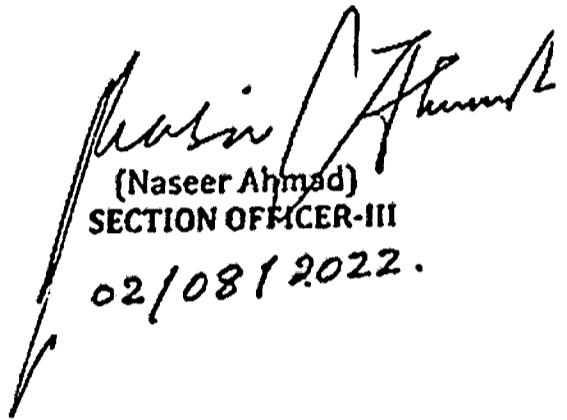
S.NO	Name & Father Name/ Designation	Domicile	From	To	Remarks.
1.	Abdullah SAO Zardad Khan Clinical Technologist Pharmacy BS-17	Buner	DHO Hosp: Dagger Buner	DHO Hosp: Dagger Buner	Against the vacant post.
2.	Muhammad Taif S/O Clinical Technologist Pharmacy BS-17	Dir Lower	DHO Dir Lower	DHO Hospital Talmergara	Do-
3.	Iqbal Hussain S/O Muhammad Ayub Clinical Technologist Pharmacy BS-17	D.I Khan	DHO D.I Khan	DHO D.I Khan	Do-
4.	Walid Ullah S/O Faraz Dad Clinical Technologist Radiology BS-17	D.I Khan	DHO Hosp: D.I Khan	DHO D.I Khan	Do-
5.	Zaitullah S/O Sher Adat Khan Clinical Technologist Radiology BS-17	Bannu	KGNT Hosp: Bannu	DHO Hosp: Haripur	Do-

Secretary to Govt: of Khyber Pakhtunkhwa
Health DepartmentEnd of even No and Date.

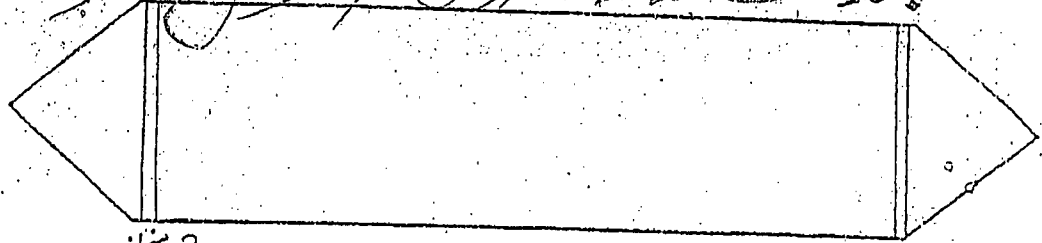
Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar
3. Director General, Provincial Health Services Academy, Khyber Pakhtunkhwa, Peshawar.

4. District Health Officer, concerned.
5. Hospital Director, MTI concerned.
6. Medical Superintendent, DIIQ Hospital, concerned.
7. District Accounts Officer, concerned.
8. The Deputy Director (I.T) Health Department.
9. PS to Secretary Health, Khyber Pakhtunkhwa.
10. PS to Special Secretary (E&A) Health, Khyber Pakhtunkhwa.
11. PA to Additional Secretary (Estab) Health, Khyber Pakhtunkhwa.
12. PA to Deputy Secretary (Admn) Health Department.
13. Officers concerned.


(Naseer Ahmad)
SECTION OFFICER-III
02/08/2022.

بعد الت جواب سروس ٹریسٹنگ مشاوری



2 مخائب

22-11-22

بنام گورنمنٹ آف پشاور

راحی محمد

Service Appeal

مورد
مقدم
دعوی
جرم

باعث تحریر آئنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی وجواب دہی دکل کاروائی متعلقہ
آن مقام سروس ٹریسٹنگ مشاوری کے لئے ~~مختار حلیہ~~ کا حلیہ لکھ کر
مقررہ کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا۔ نیز
دیکل صاحب کو راضی نامہ کرنے و تقرر ثالثتہ فیصلہ برحلف دینے جو اب دہی اور اقبال دعوی اور
یہ صورت ڈگری کرنے اجرام اور صولی چیک و روپیہ ارضی دعوی اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ
پر و اختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ 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
ڈگری کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم 22 11 2022

Revised

Call No: 3469309510

Case No: 16161-3420002-9

Mian Malkhar Haleem Kakakhel
LLB (University of London)
Advocate High Court Peshawar

Accepted
Accepted
Mian Malkhar Haleem Kakakhel

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____/2022

Razi Muhammad.....Appellant

V E R S U S

Government of Khyber Pakhtunkhwa
Through Secretary Health & others.....Respondents

A F F I D A V I T

I, Razi Muhammad Son of Mr. Ali Ahmad, ~~Chief~~ Clinical Pharmacy BS-16 MMC (MTI), Mardan) R/o Phandu Kotay Rustam, Tehsil & District Mardan, do hereby solemnly affirm and declare on oath that the contents of the accompanying **service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Mian Maikhar Haleem Kakakhel
LLB (University of London)
Advocate High Court Peshawar

Identified by

Maikhar Haleem Kakakhel
Advocate Peshawar High Court

Razi

DEPONENT

CNIC#: 16101-3420002-9

Cell #: 0346-9309510



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____/2022

Razi Muhammad.....Appellant

V E R S U S

Government of Khyber Pakhtunkhwa
 Through Secretary Health & others.....**Respondents**

ADDRESSES OF PARTIES


APPELLANT:

Razi Muhammad Son of Mr. Ali Ahmad,
 Senior Clinical Technician (BPS – 16) Pharmacy
 MMC (MTI), Mardan.

R E S P O N D E N T S:

- Government of Khyber Pakhtunkhwa
 Through Secretary Health,
 At Khyber Road, Peshawar
- Government of Khyber Pakhtunkhwa
 Through Director General Health Service, Peshawar


Appellant
 Through


Mafkhar Haleem Kakakhel
 Advocate
 High Court, Peshawar

Dated 23.-10-.2022

Mian Mafkhar Haleem Kakakhel
 LLB (University of London)
 Advocate High Court Peshawar

P-16

پاکستان
 16101-3420002-9
 عمران پوسٹ آفس
 اسلام آباد
 0170479667

T188Y0
 16101-3420002-9
 عمران پوسٹ آفس
 اسلام آباد
 0170479667
 23/03/2025
 23/03/2016

17
Annexure - 'B'

Roll No. 315836

PESHAWAR BOARD OF SECONDARY EDUCATION

Peshawar, W.P.P. Pakistan
SECONDARY SCHOOL Certificate Examination
SESSION 1982 (ANNUAL)

THIS IS TO CERTIFY THAT

Farid Muhammad

Son of

Muhammad

and residing at

Government School Peshawar (Mardan)

has passed the Secondary School Certificate Examination
of the Board of Intermediate and Secondary Education, Peshawar held in April 1982
as a Regular candidate. He/She obtained 512 Marks out of 850
and has been placed in Grade Very Good Representing Very Good

The Candidate passed in the following subjects:

1. English
2. Urdu
3. Islamiat
4. Physics
5. Par. Studies
6. Chemistry
7. Mathematics
8. Biology

He/She has been awarded Grade on the basis of internal assessment by the institution concerned.

Date of birth according to admission form is First April
one thousand nine hundred and Sixty Seven (1967)

Assist. Secretary

11th August 1982

Secretary

Annexure - C

16862

786

S.B.

/PC

Roll No

2247

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar, N.W.F.P. Pakistan
 PROVISIONAL CERTIFICATE
 INTERMEDIATE EXAMINATION

Session 1984 Annual/Supplementary

Arts Group

THIS IS TO CERTIFY THAT

Son/daughter of

and a candidate of

Registered No

Board of Intermediate & Secondary Education, Peshawar held in

as a Regular/Private candidate. He/She obtained

has been placed in Grade () Representing

The Examination was taken as a whole/in parts

Prepared by

Checked by

Date of Preparation

Asslt. Secretary (certificates)

19

Annexure - D

University of Peshawar



Serial No 025055 ✓

Provisional Certificate

SESSION: 1996

Certified that FAZI MUHAMMAD ✓
 son / daughter of ALI AHMAD
 candidate/student of DISTRICT HARDAN
 has passed BACHELOR OF ARTS
 Examination of the University of Peshawar held in AUGUST 1996
 securing 283 marks out of 550 and is placed in SECOND division.

The examination was taken ~~as a whole~~ / in parts.

Registration No. 91-FC-3409
 Roll No. 85064 ✓
 Result declared on 31.3.97

[Signature]
 Assistant Controller of Examinations
 University of Peshawar