

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 397/2019

BEFORE: MRS. ROZINA REHMAN ... MEMBER (J)
MISS FAREEHA PAUL ... MEMBER (E)

Muhammad Sajid, Junior Clerk, T.H.Q Hospital Takht Bai,
Mardan.

.... (Appellant)

Versus

1. The Director General Health Services, Khyber Pakhtunkhwa,
Peshawar.
2. Secretary to Government of Khyber Pakhtunkhwa, Health
Department, Peshawar.
3. Executive District Health Officer, Mardan.

.... (Respondents)

Ms. Roeeda Khan,
Advocate

... For appellant

Mr. Muhammad Jan,
District Attorney.

... For respondents

Date of Institution.....26.03.2019
Date of Hearing.....28.09.2022
Date of Decision..... 28.09.2022

JUDGEMENT

FAREEHA PAUL, MEMBER (E): The service appeal in hand has
been instituted under Section 4 of the Khyber Pakhtunkhwa Service
Tribunal Act, 1974, with the prayer that on acceptance of the service



appeal, name of the appellant may be included/mentioned in the seniority list of Directorate General Health Services with all back benefits.

2. Brief facts of the case, as given in the memorandum of appeal, are that father of the appellant was serving as Admin. Officer Health Department in Malaria Control Programme and died during service. As per notification dated 22.10.2005, one child of the employee who died during service had to be appointed, as per his qualification, in his place. The appellant submitted application to respondent department and when no response was received, he filed Writ Petition No. 1108/2011 which was accepted on 02.07.2013 in his favour. In the light of judgment of the Honourable Peshawar High Court, the respondent department appointed the appellant as Junior Clerk on 27.07.2015 in Directorate General Health Services, Peshawar. After appointment the appellant was posted at Gomal Medical College, D.I.Khan on 06.05.2016. He was transferred from D.I.Khan to District Health Office Swabi on 15.12.2016 and then to District Health Office Mardan on 12.10.2017. He was transferred to T.H.Q Hospital Takht Bai on 18.10.2017 where he was serving till date. The appellant submitted departmental appeal on 10.12.2018 to respondent department for including his name in the seniority list of Directorate General but no response was given by the respondent department. Feeling aggrieved, he preferred the instant service appeal.

3. Respondents were put on notice who submitted written replies/comments on the appeal. We have heard the learned counsel for the



appellant as well as the learned Assistant Advocate General and perused the case file with connected documents in detail.

4. Learned counsel for the appellant presented the case in detail and contended that the respondents were required to have processed the case of seniority of the appellant but they refused to do so and hence deprived him of his vested right. He argued that the appellant was appointed in the cadre of Director General Health Services and not mentioning his name in the seniority list was a clear violation of Section 8 (4)&(5) of Khyber Pakhtunkhwa Civil Servants Act, 1973.

5. The learned District Attorney, on the other hand, contended that on the appeal submitted by the appellant his name was considered and was included in the seniority list of Junior Clerks. He further contended that the appellant had been treated according to the Government Rules by putting his name in the seniority list of sub cadre of Health Department Khyber Pakhtunkhwa under Section 8 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989. He informed that the appellant was appointed by the Director General Health Services being controlling officer of all health institutions in Khyber Pakhtunkhwa under the deceased son quota for Gomal Medical College, D.I.Khan which came under sub cadre of Health Department. He had accepted the offer of appointment and joined duty, therefore, his name was included in the seniority list of sub cadre.



6. Perusal of record indicates that the appellant was appointed on the recommendation of Departmental Selection Committee and in the light of verdict of Honourable Peshawar High Court on the position of Junior Clerk at Gomal Medical College, D.I.Khan on specific terms and conditions. His appointment was made after the death of his father, who was Administrative Officer at LRH Peshawar and died during service. Record further indicates that he was transferred from one station to another by the Director General Health Services, Peshawar. The appellant has prayed for inclusion of his name in the seniority list of Directorate General Health Services as according to him he was appointed in the cadre of Directorate General. Certain appointment orders of Junior Clerks have been provided by the appellant in his rejoinder to the reply of respondents. Perusal of those appointment orders reveals that they were appointed as Junior Clerks by the Director General and on acceptance of the terms and conditions mentioned in their appointment orders, they were ordered to report to certain specific health facilities. Minutes of Scrutiny Committee have also been provided with the Rejoinder which indicate that they were appointed for the Directorate General Health Services and later on posted to sub offices. Perusal of appointment order of the appellant indicates that he was appointed specifically for Gomal Medical College, D.I.Khan and hence he has been treated according to government rules and his name has been placed in the seniority list of sub-cadre of Health Department Khyber Pakhtunkhwa under Section 8 of Khyber Pakhtunkhwa Civil Servants Act,



1973 read with Rule 17 of Khyber Pakhtunkhwa (Appointment, Promotion and Transfer) Rules, 1989.

7. From the above discussion, it is clear that name of the appellant has already been included in the seniority list for which it was meant under the law and rules; hence the appeal in hand is dismissed. Parties are left to bear their own costs. Consign.

8. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 28th day of September, 2022.*


(ROZINA REHMAN)
Member (J)


(FAREEHA PAUL)
Member (E)

Service Appeal No. 397/2019

1. Ms. Roeeda Khan, Advocate for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present. Arguments heard and record perused.

2. Vide our detailed judgement containing 05 pages, it is clear that name of the appellant has already been included in the seniority list for which it was meant under the law and rules; hence the appeal in hand is dismissed. Parties are left to bear their own costs. Consign.

3. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 28th day of September, 2022.*


(ROZINA REHMAN)
Member (J)


(FAREEHA PAUL)
Member (E)


18.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 21.06.2022 for the same as before.


Reader.

21.06.2022


Appellant alongwith his counsel present. Qazi Naeem, Assistant Director (Litigation) and Syed Muhammad Ali Shah, Assistant alongwith Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present and produced copy of final seniority list of Junior Clerk of DGHS Office pertaining to the year 2017, copy of appointment order dated 27.07.2015 of the appellant as Junior Clerk as well as copy of departmental appeal of the appellant dated 18.01.2017, which are placed on file. Representatives of the respondents stated that remaining record will be produced on the next date. Adjourned. To come up for remaining record as well as arguments on 12.08.2022 before the D.B.


(Fareeha Paul)
Member (E)


(Salah-ud-Din)
Member (J)

12-8-2022

Proper DB not available the case is
adjourned to 28-9-2022


Reader

22.06.2021

Miss. Roeeda Khan, Advocate, for the appellant present. Mr. Javedullah, Assistant Advocate General for the respondents present.

Learned Assistant Advocate General requested that time may be granted for provision of complete record regarding service of the appellant. Learned counsel for the appellant is also seeking adjournment. Appeal in hand is adjourned. To come up for arguments before the D.B on 18.10.2021.



(Rozina Rehman)
Member(Judicial)



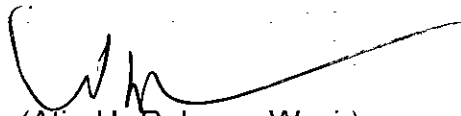
(Salah-ud-Din)
Member(Judicial)

18.10.2021

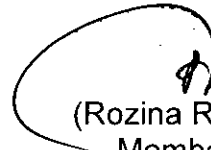
Appellant in person present.

Javid Ullah, learned Assistant Advocate General present.

Lawyers are on general strike, therefore, case is adjourned to 14.01.2022 for arguments before D.B.



(Atiq-Ur-Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

14.01.2022

Appellant alongwith his counsel present. Mr. Muhammad Rasheed, DDA for respondents present.

Due to paucity of time arguments could not be heard. Adjourned. To come up for arguments before the D.B on 18.03.2022.



(Atiq-Ur-Rehman Wazir)
Member (E)



Chairman

24.03.2021

Counsel for the appellant and Asstt. AG for the respondents present.

Learned AAG requests for time to dig out and produce before the Tribunal all the record pertaining to the status of appellant as employee of the District or of the Provincial Cadre. It is expected that the needful will be done before next date of hearing. Adjourned to 22.06.2021 for hearing before the D.B.

(Atiq-ur-Rehman Wazir)
Member(E)

Chairman


Postscript

26.05.2021

The order dated 24.03.2021 was written but could not be signed by the D.B including the then Chairman who due to unforeseen reason could not attend the office in coming days. He died in the meantime and the order sheet was left unsigned. To bring the proceedings of appeal on track, it is become expedient for ex-post facto completion of the order sheet. The unsigned order dated 24.03.2021 is reproduced below which be given effect accordingly:-

"Counsel for the appellant and Asstt. AG for the respondents present.

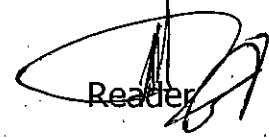
Learned AAG requests for time to dig out and produce before the Tribunal all the record pertaining to the status of appellant as employee of the District or of the Provincial Cadre. It is expected that the needful will be done before next date of hearing. Adjourned to 22.06.2021 for hearing before the D.B."


(Atiq-ur-Rehman Wazir)
Member


Chairman

24.08.2020

Due to summer vacation case to come up for the same on 28.10.2020 before D.B.


Reader

28.10.2020

Appellant in person and Zara Tajwar, DDA for the respondents present.

The Bar is observing general strike, therefore, the matter is adjourned to 05.01.2021 for hearing before the D.B.


(Atiq-ur-Rehman Wazir)
Member



Chairman

05.01.2021

Appellant alongwith counsel present.

Riaz Khan Painsdakhel Assistant Advocate General alongwith Zia Ullah Law Officer and Saleem Javed Litigation Officer for respondents present.

Former requests for adjournment; granted. To come up for arguments on 24.03.2021 before D.B.


(Atiq-Ur-Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

23.01.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

Learned AAG seeks further time to contact the respondents and furnish the requisite reply/comments. Adjourned to 02.03.2020 on which date the reply/comments shall positively be furnished.

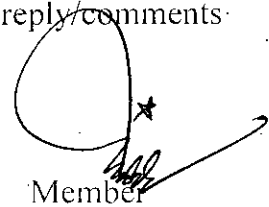
Chairman



02.03.2020

Junior to counsel for the appellant present. Nemo for the respondents. Fresh notices be issued to the respondents by way of last chance. To come up for written reply/comments on 09.04.2020 before S.B.

Member



09.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 01.07.2020 for the same. To come up for the same as before S.B.

Reader



01.07.2020

Appellant alongwith counsel present.

Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Salim Javid Litigation Officer for the respondents present.

Representative of respondents submitted written reply/comments which is placed on record. To come up for rejoinder, if any, and arguments on 24.08.2020 before D.B.

Member (J)



397/2019

16.10.2019

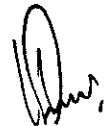
Counsel for the appellant present.

Learned counsel has provided copies of final seniority list of Junior Clerks of Director General Health Services cadre dated 19.08.2019 and promotion order dated 01.10.2019 which are placed on record.

Learned counsel contends that the appellant was appointed on 27.07.2015 by the Director General Health Services, Khyber Pakhtunkhwa Peshawar and was posted as Junior Clerk at Gomal Medical College, D.I.Khan. On 19.08.2019 a seniority list of Junior Clerks of D.G.H.S office was issued, however, the name of appellant was not included therein. Consequently, the appellant was not considered for promotion as Senior Clerk BPS-14 when his other colleagues were promoted through order dated 01.10.2019. Further contends that to find a place in the seniority list is one of the service rights of the civil servant and by denying such right by the respondents the appellant has been left stranded.

Instant appeal is admitted for regular hearing subject to all just exceptions in view of available record and arguments of learned counsel. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for submission of written reply/comments on 16.12.2019 before S.B.

Appellant Deposited
Security & Process Fee
23/10/19



Chairman

16.12.2019

Counsel for the appellant and Addl. AG alongwith Jaffar Ali, Assistant for the respondents present.

Representative of the respondents requests for time to furnish the requisite reply/comments. Adjourned to 23.01.2020 on which date reply/comments shall positively be submitted.



Chairman

29.05.2019

Counsel for the appellant present.

The appeal in hand is with the prayer for inclusion of name of appellant in the seniority list of Junior Clerks in Director General Health Services Khyber Pakhtunkhwa. The stance of appellant is that he had submitted departmental appeal to the respondents for inclusion of his name in the seniority list, however, no document showing that the needful has been done, has been appended with the memorandum of instant appeal. In the circumstances, the appellant is directed to place on record copy of seniority list from which he is aggrieved. The requisite document shall be made available positively on next date of hearing.

Adjourned to 09.07.2019 for preliminary hearing before S.B.


Chairman

09.07.2019

Appellant alongwith his counsel present.

The appellant requests for further time to produce and place on record copy of the impugned seniority list.

Adjourned to 30.08.2019 before S.B on which date the requisite document shall positively be produced.


Chairman

30.08.2019

Appellant present in person and requests for adjournment as his learned counsel is indisposed today.

Adjourned to 16.10.2019 for preliminary hearing before the S.B.





Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 397/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/03/2019	<p>The appeal of Mr. Muhammad Sajid presented today by Roeeda Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 26/3/19</p>
2-	29/03/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>17/04/2019</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	17.04.2019	<p>Appellant with counsel present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for preliminary hearing on 29.05.2019 before S.B.</p> <p style="text-align: right;"> Member</p>

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 397 /2019

Muhammad Sajid

VERSUS

Director General Health Services Khyber Pakhtunkhwa
Peshawar and Others

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10.	Wakalatnama		

Sajid
APPELLANT

Through

Roeeda Khan
Roeeda Khan
Advocate, High Court
Peshawar.

Dated: 25/03/2019

(1)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 397 /2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 391

Dated 26/3/2019

Muhammad Sajid Junior Clerk T.H.Q Hospital Takht
Bai Mardan.

Appellant

VERSUS

1. The Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. Secretary to Government Of Khyber Pakhtunkhwa Health Department Peshawar.
3. Executive District Health officer Mardan.

Respondents

APPEAL U/S-4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT
1974 THAT THE RESPONDENT DEPARTMENT
MAY KINDLY BE DIRECTED TO INCLUDE
/MENTION THE NAME OF THE APPELLANT IN
THE SENIORITY LIST OF DIRECTORATE
GENERAL HEALTH

Filed to-day
Registrar
26/3/19

Prayer:-

ON ACCEPTANCE OF THIS SERVICE
APPEAL THE NAME OF THE
APPELLANT MAY KINDLY BE
INCLUDED/MENTION INS THE
SENIORITY LIST OF THE DIRECTOR

GENERAL ^{Health Services} ALONG WITH ALL BACK BENEFITS.

Respectfully Sheweth,

1. That the father of the appellant was serving as admin Officer Health Department in Malaria control program and died during service.
2. That as per notification dated 22/10/2005 Peshawar those employees who died during service their one child as to be appointed as per his qualification.
3. That the appellant submitted application to Respondent department and on no response the appellant filed writ Petition No. 1108/2011 which has been accepted on 02/07/2013 in favour of the appellant.
4. That in the light of the decision of the said writ petition No.1108/2011 the Respondent department appointed the appellant as Junior Clerk (BPS-11) on 27/07/2015 in the cadre of Director General Health Services Peshawar. (Copy of Appointment order is annexed as annexure "A")
5. That after appointment the appellant was posted at Gomal Medical College D.I Khan

on 06/05/2016. (Copy of order is annexed as annexure "B")

6. That the appellant was transferred from Gomal Medical College D.I Khan to D.H.O Swabi on 15/12/2016. (Copy of transfer order is annexed as annexure "C")

7. That the appellant was transferred from D.H.O Swabi to D.H.O Office Mardan On 12/10/2017. (Copy of transfer order is annexed as annexure "D")

8. That the appellant was transferred from D.H.O Mardan on 18/10/2017 to T.H.Q Hospital Takht Bai to till date. (Copy of order is annexed as annexure "E")

9. That the appellant submitted departmental appeal on 10/12/2018 to Respondent department for including the name of the appellant in the seniority list of Directorate General but no response has been given by the Respondent department. (Copy of Departmental Appeal is annexed as annexure "F")

10. That feeling aggrieved the Appellant prefers the instant service appeal before

this Hon'ble Tribunal on the following grounds inter alia:-

GROUNDS:-

- A. That the appellant has not been treated in accordance with law and hence his rights secured and guaranteed under the Constitution of 1973 were badly violated.
- B. That in accordance with law the Respondents were required to have processed the case of Seniority of the appellant also, however it was refused, thus the appellant has been deprived of his vested right of consideration for seniority.
- C. That not mention the name of the appellant in the seniority list of the Directorate General Health is against the law and rules.
- D. That the appellant has been appointed in the cadre of Directorate General of Health Services.
- E. That not mentioned the name of the appellant in the Seniority list is the clear cut violation of Sec 8 (4) (5) of Civil Servant Act 1973.

F. That any other ground not raised here may graciously be allowed to be raised at the time full of arguments on the instant service appeal.

It is therefore, most humbly prayed that on acceptance of this service appeal the name of the appellant may kindly be included/mention in the seniority list of the director general ^{health services} along with all back benefits.

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

Said
APPELLANT

Through

Roeeda Khan
Roeeda Khan
Advocate, High Court
Peshawar.

Dated: 25/03/2019

NOTE:-

As per information furnished by my client, no such like appeal for the same petitioner, upon the same subject matter has earlier been filed, prior to the instant one, before this Hon'ble Tribunal.

Roeeda Khan
Advocate.

(6)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

Muhammad Sajid

VERSUS

Director General Health Services Khyber Pakhtunkhwa
Peshawar and Others

AFFIDAVIT

I, **Muhammad Sajid Junior Clerk T.H.Q Hospital Takht Bai Mardan**, do hereby solemnly affirm and declare that all the contents of the **instant appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.

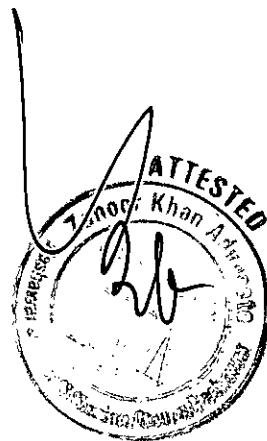
Sajid

DEPONENT

Identified by:

RK

Roeda Khan
Advocate High Court
Peshawar.



①

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

Muhammad Sajid

VERSUS

Director General Health Services Khyber Pakhtunkhwa
Peshawar and Others

ADDRESSES OF PARTIES

PETITIONER.


Muhammad Sajid Junior Clerk T.H.Q Hospital
Takht Bai Mardan.

ADDRESSES OF RESPONDENTS

1. The Director General Health Services Khyber
Pakhtunkhwa Peshawar.
2. Secretary to Government of Khyber Pakhtunkhwa
Health Department Peshawar.
3. Executive District Health officer Mardan.


APPELLANT

Through


Roeeda Khan
Advocate, High Court
Peshawar.

Dated: 25/03/2019



DIRECTORATE GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA
PESHAWAR

APPOINTMENT ORDER

On the recommendation of Departmental Selection Committee held on 23.07.2015 at 10:00 AM as well as verdict/C.O.C of Peshawar High Court Peshawar, Mr. Muhamamd Sajid S/o (Late) Abdul Ghani Ex: Admn: Officer LRH Peshawar, is hereby appointed as Junior Clerk (BPS-11) at Gomal Medical College D.I Khan plus other allowances as admissible under the policy of Govt: regarding recruitment of deceased employee's sons/daughter/widow as provided under Rules-10(4) of the Khyber Pakhtunkhwa APT Rules 1989.

His appointment in the Govt: of Khyber Pakhtunkhwa Health Department will be subject to the following terms and conditions:

1. His appointment shall be made conditionally, that in case, the post of Junior Clerk (BS-11) remains within the purview of Khyber Pakhtunkhwa public service commission, your appointment shall be treated as withdrawn and you will be offered a post from BPS-01 to BPS-10.
2. He shall be governed by the Khyber Pakhtunkhwa Civil Servants Act 1973 and all the laws applicable to the Civil Servants and the Rules made there under;
3. He shall be on probation initially for a period of one year extendable for further one year;
4. In case he wish to resign at any time, fourteen days notice shall be necessary or in lieu thereof 30-days pay shall be forfeited;
5. He shall produce a medical fitness certificate from Medical Superintendent and character certificate from two gazette officers;
6. His retention in service shall be subject to verification of his domicile testimonials and antecedents etc from the concerned authorities/ offices;
7. His appointment is liable to be terminated at any time without assigning any reason before the expiry of the period of probation/ extended period of probation, if your performance during this period is not fund satisfactory;
8. He will join duty at your own expenses, as no TA/DA shall be admissible there-for;

If the above terms and conditions are acceptable to him, he should report to Principal Gomal Medical College D.I Khan within 14 days of the receipt of this offer of appointment.

Sd/xxxxxxxxxxxxxx

DIRECTOR GENERAL HEALTH
SERVICES K.P.K. PESHAWAR.

No. 8587-94 /Personnel, Dated Peshawar the, 27 / 07 / 2015

Copy forwarded to the :-

1. Secretary to Govt: of Khyber Pakhtunkhwa Health Department Peshawar.
2. Registrar Peshawar High Court Peshawar w/r to his letter No. 13794/Judl: dated 09.08.2014.
3. Principal GMC D.I Khan.
4. DAO D.I.Khan.
5. Assistant Director (Litigation) DGHS, KPK Peshawar w/r to his endst: No. 2942/AD (Lit) dated 13.08.2014.
6. PA to DGHS Khyber Pakhtunkhwa Peshawar.
7. PA to Director (Admn) DGHS, Khyber Pakhtunkhwa Peshawar.
8. Mr. Muhammad Sajid S/o Abdul Ghani (late) village Pila Khel Lund Khawar Takht Bhai District Mardan.

For information and necessary action.

Hafz S.M Ali Shah

ATTESTED

DIRECTOR GENERAL HEALTH.
SERVICES K.P.K. PESHAWAR

24.7.2015

(2)

(B)

(9)

463

DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUN KHWA PESHAWAR



E-Mail Address: nwfdghs@yahoo.com office, Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230

OFFICE ORDER

In pursuance of the judgment of Peshawar High Court Peshawar, the appointment order in r/o Mr. Muhammad Sajid S/o Late Abdul Ghani Ex: Admn: officer LRH Peshawar issued vide this Directorate office order bearing Endst: No. 8587-94/Personnel dated 27.07.2015 stands revalidated with immediate effect:

He is hereby directed to report to Principal GMC D.I Khan within 14-days of the receipt of this order, failing which no excuse will be accepted and the appointment order shall stand withdrawn abinio.

No. 3596-3601 /Personnel

Sd/xxxxxxxxx
DIRECTOR GENERAL HEALTH
SERVICE, K.P.K PESHAWAR
Dated 06 /05/2016.

Copy forwarded to the:-

1. Registrar Peshawar High Court Peshawar.
2. Principal GMC D.I Khan.
3. AD (Lit) DGHS, Khyber Pakhtunkhwa Peshawar.
4. DAO D.I Khan.
5. Mr. Muhammad Sajid S/o Late Abdul Ghani Village Pila Khel Lund Khawar Takht Bhai Tehsil and District Mardan. **"Registered"**
6. Master File.

For information and necessary action.

[Signature]
DIRECTOR GENERAL HEALTH
SERVICE, K.P.K PESHAWAR
[Date] 04/5/2016.

[Signature]
ATTESTED

(2) 'C' (10)

DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUN KHWA PESHAWAR



E-Mail Address: nwfpdghs@yahoo.com office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230

OFFICE ORDER

As approved by the competent authority Muhammad Sajid Junior Clerk attached to GMC D.I.Khan is hereby transferred and posted at DHO Office Swabi against the vacant post of Junior Clerk in the best interest of public service with immediate effect.

Arrival/ departure report should be submitted to this Directorate for record.

Sd/xxxxxxx

DIRECTOR GENERAL HEALTH
SERVICES, K.P.K PESHAWAR.

Dated 15 /12/2016

No 8122-28 /Personnel

Copy forwarded to the:-

1. P.S to Minister for Health Khyber Pakhtunkhwa Peshawar.
2. Principal/ Chief Executive GMC/MMM Teaching Hospital D.I.Khan w/r to his NOC No.3510/PF dated 19.10.2016.
3. DHO Swabi.
4. DAO Swabi.
5. P.A to DGHS Khyber Pakhtunkhwa Peshawar.
6. Official concerned.
7. DHIS Cell.

For information and necessary action.

DIRECTOR GENERAL HEALTH
SERVICES, K.P.K PESHAWAR

(P)
ATTESTED

(D) (11) (4)

DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUN KHWA PESHAWAR



E-Mail Address: nwtndghs@yahoo.com office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230

OFFICE ORDER

As approved by the competent authority, Mr. Muhammad Sajid S/O Abdul Ghani Junior Clerk attached to DHO Office Swabi is hereby transferred and posted to DHO Office Mardan against the vacant post of Junior Clerk in the interest of public service with immediate effect.

Nb: Arrival/departure reports should be submitted to this Directorate for record.

Sd/xxxxxxx
DIRECTOR GENERAL HEALTH
SERVICES, K.P.K PESHAWAR.
Dated 12 /10/2017

No. 14797-802 /Personnel/JC/75

Copy forwarded to the:-

1. DHO Mardan w/r to his NOC No. 13274/DHO dated 06.10.2017.
2. DHO Swabi w/r to his letter No. 16355/P.F/DHO dated 02.10.2017.
3. DAO Mardan.
4. DAO Swabi.
5. P.A to DGHS Khyber Pakhtunkhwa Peshawar.
6. Official Concerned.

For information and necessary action:

ASSISTANT DIRECTOR (P-II)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P PESHAWAR. 12/10/17

(P)
ATTESTED



حکومت خیبر پختونخوا


DISTRICT HEALTH OFFICER
Mardan (Khyber Pakhtunkhwa)

Ph: # (0937) 9230030 Fax: # (0937) 9230349
Email: mardandho@gmail.com

OFFICE ORDER

Reference to Director General Health Services, Khyber Pakhtunkhwa Peshawar office order No. 14797-802/Personnel/JC/75 dated 12/10/2017, Mr. Muhammad Sajid s/o Abdul Ghani, Junior Clerk on account of his transfer to DHO Office Mardan is hereby posted against the vacant post at THQ Hospital Takht Bhai with immediate effect. He is directed to report to MS THQ Hospital Takht Bhai for duty immediately.

Note: Arrival/Departure should be submitted to this office for record.


District Health Officer
Mardan

No. 13906-12/DHO dated Mardan the 13 / 10 /2017

Copy forwarded to the:

1. Director General Health Services, Khyber Pakhtunkhwa, Peshawar for information w/ref: to office order No. quoted above.
2. District Comptroller of Accounts, Mardan.
3. MS THQ Hospital Takht Bhai, Mardan.
4. Finance Officer, DHO Office Mardan.
5. DHIS Cell, DHO Office, Mardan.
6. Accountant DHO Office Mardan.
7. Official concerned.


District Health Officer
Mardan


ATTESTED

(F)

13

To,

The Director General,
Health Services Khyber Pakhtunkhwa,
Peshawar.

Subject:

DEPARTMENTAL APPEAL/ REPRESENTATION
FOR INCLUSION OF NAME OF THE APPELLANT IN
THE SENIORITY LIST OF THE DIRECTORATE
GENERAL HEALTH SERVICES PESHAWAR.

Respected Sir,

The appellant submits as under.

1. That the Appellant was appointed on 27/07/2015 as Junior Clerk (BPS-11) in the cadre of the Directorate General Health Services Peshawar. **(Copy of order is attached)**
2. That after appointment the appellant was posted at Gomal Medical College D.I Khan on 06/05/2016. **(Copy of order is attached)**
3. That as per the appointment order of the appellant the appellant is entitled for the seniority of the Directorate General Health Services because the appellant has been appointed in the cadre of Directorate General Health Services.
4. That not mention the name of the appellant in the seniority list of the Director General Health is against the law and rules.


ATTESTED

14

It is therefore, humbly prayed that on acceptance of this departmental appeal the name of the appellant may kindly be include /mention in the seniority list of Director General Health Services Peshawar.

Sajid

Appellant

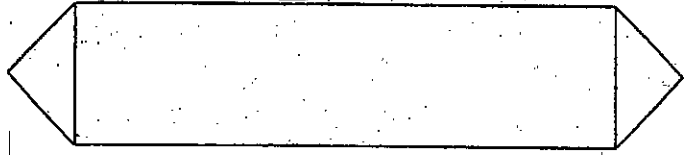
Muhammad Sajid,
Junior Clerk T.H.Q
Hospital, Takht Bai
Mardan.

Dated: 10/12/2018

P

ATTESTED

بعدالت حلف سوئے طابو



2019ء منجانب

محمد سلجہ بنام

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکد

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی

اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار 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 باختیارات حاصل ہوں گے

اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے

سبب سے وہ ہوگا۔ کوئی تارخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں

گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سندر ہے۔

2019ء

26 ماہ صادیچ

المرقوم

العبد گواہ العبد

کے لئے منظور ہے۔

مقام

سلاجہ

درد و غم و مصائب

Acceptance

BY

Child

محمد سلجہ

List Dineethah

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**



E-Mail Address: mgp@psh.gov.pk office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230
No. 9528-48 /Personnel/Promotion Dated: 19/08/2019

To,

1. Director Health Services Merged Areas Peshawar.
2. District Health Officer Peshawar.
3. District Health Officer Nowshera.
4. Principal KMC Peshawar.
5. Hospital Director MTI-HMC Peshawar.
6. Medical Superintendent Govt. Naseerullah Khan Babar Memorial Hospital Peshawar.
7. Medical Superintendent SHPD Peshawar.
8. Incharge of Branches, DGHS Office Peshawar.

Subject:
Memo:

FINAL SENIORITY LIST OF JUNIOR CLERKS OF DGHS CADRE.

A final seniority list of Junior Clerks Directorate General Health Services Cadre serving under your control is sent herewith for further necessary action.

Shadali
ADDITIONAL DG (ADMN)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P.K PESHAWAR

C.C

P.A to DGHS Office Peshawar.

19/8/19

FINAL SENIORITY LIST OF JUNIOR CLERKS OF DGHS, OFFICE

S.NO.	Name of Junior Clerk.	Date of 1st Appointment	Place of Posting	Date of Birth Domicile	Date of Retirement
1.	Mubarak Shah	18.06.1992	DGHS, office	08.08.1968/ Peshawar	08-08-2028
2.	Wajid Shah	17.09.1996	DHS, FATA	30.09.1963/ Khyber Agency	29.09.2023
3.	Nadeem ullah	17.09.1996	DHS, FATA	09.01.1972/ Peshawar	08.01.2032
4.	Khial Said	19.09.1996	DHS, FATA	15.09.1974/ Khyber Agency	14.09.2034
5.	Nasim Ahmad	19.05.1997	DGHS, office	01.06.1966/ Peshawar	31.05.2026
6.	Muhammad Imran	14.06.1997	DHS, FATA	01.08.1975/ Peshawar	31.07.2035
7.	Shaukat Ali	03.08.1994. 01.07.1997	DHO. Nowshera	01.08.1971/ Peshawar	31.07.2031
8.	Muhammad Fayyaz	29.06.1998	DHS, FATA	02.05.1974/ Peshawar	01.05.2032
9.	Ikram Ullah S/O Fazali Rabbi	25.01.2000	DGHS, Office	20-10-1974 Charsadda	19-10-2034
10.	Zulfiqar Ali	20.03.2002	DGHS, office	16.01.1966/ Peshawar	15.01.2026
11.	Irfan Ullah S/O Naimat ullah	20.03.2002	HMC Peshawar	15.03.1974/ Peshawar	14.03.2034
12.	Abid Muhammad	28.01.2004	KMC Peshawar	15.02.1972/ Khyber Agency	14.02.2032
13.	Mubashir Khan S/O Muhammad Ashraf	29.04.2006	DGHS, Office	07.01.1978/ Peshawar	06.01.2038
14.	Muhammad Nadeem	29.04.2006	DGHS, Office	01.12.1984/ Peshawar	30.11.2044
15.	Mujahid Khan S/O Firdous Khan	02.12.2006	DHS, FATA	01.06.1977/ Charsadda	31.05.2037
16.	Naveed ur Rahman	06.07.2007	DHS, FATA	10.04.1986/ Charsadda	09.04.2046
17.	Shafqat ullah Shah S/O Tilawat Shah	31.07.2007	DGHS, office	08.03.1988/ Charsadda	07.03.2048
18.	Nauman Hadi S/O Shamsul Hadi	11.05.2009	DGHS, office	05.04.1983/ Bannu	04.04.2043
19.	Jaffar Shah	03.03.2010	DGHS, office	01.01.1962/ Peshawar	31.12.2021
20.	Samin-ul-Haq	03.03.2010	MASM, Hospital	01.01.1962/ Peshawar	31.12.2021
21.	Mumfat Ali Shah	03.03.2010	DGHS, office	18.11.1968/ Charsadda	17.11.2026
22.	Fahad Khan S/O Khan Rose	22.03.2010	DGHS, office	01.02.1991/ Peshawar	31.01.2051
23.	Syed Irfan Haidar Shah S/O Syed Shabbir hussain Shah	01-11-2010	SGSM Hosp: Peshawar.	01-11-1981 Peshawar.	01-11-2041
24.	Syed Mehmood Ali Shah S/O Syed Abid Ali Shah	01-11-2010	DGHS, Office	11-01-1983 Peshawar	10-01-2043
25.	Fazal Mehmood S/O Fateh Muhammad	01-11-2010	DGHS, Office	10-06-1985 Peshawar	09-06-2045

26.	Faisal Javed S/O Javed Iqbal	01.11.2010	DGHS, office	05.11.1990/ Peshawar	04.11.2050
27.	Tahir Naqash S/O Abdul Qayum Khan	02.11.2010	DGHS, office	02.03.1982/ Peshawar	01.03.2042
28.	Asfandyar S/O Gul Afzal	02.11.2010	DHO Office, Peshawar	18.12.1990/ Peshawar	17.12.2050
29.	Waqar Ali S/O Sardar Ali	04-11-2010	DHO Peshawar	20-05-1982 Peshawar	19-05-2042
30.	Ali Raza S/O Abdul KHALIQ	04-11-2010	DGHS	04-08-1982	03-08-2042
31.	Dilawar Taj S/O Sartaj ali	04-11-2010	DHO Peshawar	01-03-1986	28-02-2046
32.	Izhar Ullah S/O Muhammad Irshad	12.04.2011	DGHS, office	15.04.1989/ Peshawar	14.04.2049
33.	Noor ud din S/O Muhammad Jehangir	14.04.2011	DGHS Office	11.09.1980/ Peshawar	10.09.2040
34.	Muhammad Shahzaib Iqbal S/O Muhammad Iqbal	14.04.2011	DGHS, office	27.11.1985/ Peshawar	26.11.2045
35.	Muhammad Adil S/O Muhammad Iqbal	14.04.2011	DGHS, office	01.04.1986/ Peshawar	31.03.2046
36.	Shehzad Gul S/O Mumtaz Ahmad Gul	29.05.2013	DGHS, office	12.02.1994/ Peshawar	11.12.2054
37.	Numan Qadir S/O Abdul Qadir	30.05.2013	DGHS, office	26.07.1991/ PESHAWAR	25.06.2051
38.	Muhammad Anwar S/O Fazli Rahim	15.07.2013	DGSH, Office	04.06.1974/ Peshawar	03.06.2034
39.	Ibrar Muhammad S/O Awal Khan	15.07.2013	DGSH Office	31.08.1974/ Peshawar	30.08.2034
40.	Abdullah Jan S/O Daulat Khan	15.07.2013	DGSH Office	26.11.1977/ Peshawar	25.11.2037
41.	Aamer Chohan S/O Sohan Lal	15.07.2013	DGSH Office	08.08.1980/ Peshawar	07.08.2040
42.	Javed Khan S/O Zain Khan	15.07.2013	DGHS Office	03.04.1979/ Peshawar	02.04.2039
43.	Aurangzeb S/O Muhammad Ashraf	15.07.2013	NBMH Peshawar	16.04.1980/ Peshawar	15.04.2040
44.	Muhammad Naveed Khan S/O Zakir Ullah	26.07.2013	DGHS Office	30.03.1992/ Peshawar	29.03.2052

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

19/8/19



D. M. Khan Peshawar

DIRECTORATE GENERAL HEALTH SERVICES GOVT. OF KHYBER PUKHTUNKHWA PESHAWAR

OFFICE ORDER

Consequent upon approval accorded by the Departmental Promotion Committee in its meeting held on 26.09.2019 under the Chairmanship of the Additional DG (Admn) DGHS Khyber Pakhtunkhwa Peshawar, the following senior most Junior Clerks (BPS-11) of DGHS cadre are hereby promoted to the post of Senior Clerk (BPS-14)

S.#	Name Of Official	S.#	Name Of Official
1.	Mr. Mubarak Shah Junior Clerk	12.	Mr. Abid Muhammad Junior Clerk
2.	Mr. Wajid Shah Junior Clerk	13.	Mr. Mubasher Khan Junior Clerk
3.	Mr. Nadeem Ullah Junior Clerk	14.	Muhammad Nadeem Junior Clerk
4.	Mr. Khial Said Junior Clerk	15.	Mr. Mujahid Khan Junior Clerk
5.	Mr. Naseem Ahmad Junior Clerk	16.	Mr. Naveed Ur Rahman Junior Clerk
6.	Muhammad Imran Junior Clerk	17.	Mr. Shafqat Ullah Shah Junior Clerk
7.	Mr. Shoukat Ali Junior Clerk	18.	Mr. Nouman Hadi Junior Clerk
8.	Muhammad Fayaz Junior Clerk	19.	Mr. Jaffar Shah Junior Clerk
9.	Mr. Ikram Ullah Junior Clerk	20.	Mr. Sami Ul Haq Junior Clerk
10.	Mr. Zulfiqar Ali Junior Clerk	21.	Mr. Mumtaz Ali Junior Clerk
11.	Mr. Irfan Ullah Junior Clerk		

Consequent upon their promotion to the post of Senior Clerk (BPS-14) they are hereby transferred and posted against the vacant posts are as under:-

S#	Name of official	From	To	Remarks
1.	Mr. Mubarak Shah Senior Clerk	DGHS Office	DGHS Office	Against the vacant post
2.	Mr. Wajid Shah Senior Clerk	DHS Merged Areas	DHS Merged Areas	-do-
3.	Mr. Nadeem Ullah Senior Clerk	Nursing College LRH Peshawar	At the disposal of DG PHSA KP Peshawar	-do-
4.	Mr. Khial Said Senior Clerk	DHS Merged Areas	DHS Merged Areas	-do-
5.	Mr. Naseem Ahmad Senior Clerk	DGHS Office	DGHS Office	-do-
6.	Muhammad Imran Senior Clerk	DHS Merged Areas	DHS Merged Areas	-do-
7.	Mr. Shoukat Ali Senior Clerk	DHO Nowshera	DHO Nowshera	-do-
8.	Muhammad Fayaz Senior Clerk	DHS Merged Areas	DHS Merged Areas	-do-
9.	Mr. Ikram Ullah Senior Clerk	DGHS Office	DGHS Office	-do-
10.	Mr. Zulfiqar Ali Senior Clerk	DGHS Office	DGHS Office	-do-
11.	Mr. Irfan Ullah Senior Clerk	MTI-HMC Peshawar	MTI-HMC Peshawar	-do-
12.	Mr. Abid Muhammad Senior Clerk	KMC Peshawar	KMC Peshawar	-do-
13.	Mr. Mubasher Khan Senior Clerk	DGHS Office	DGHS Office	-do-
14.	Muhammad Nadeem Senior Clerk	DGHS Office	DGHS Office	-do-

15	Mr. Mujahid Khan Senior Clerk	DHS Merged Areas	DHS Merged Areas	do
16	Mr. Naveed Ur Rahman Senior Clerk	DHS Merged Areas	DHS Merged Areas	do
17	Mr. Shafqat Ullah Shah Senior Clerk	DGHS Office	DGHS Office	do
18	Mr. Nouman Hadi Senior Clerk	DGHS Office	DGHS Office	do
19	Mr. Jaffar Shah Senior Clerk	DGHS Office	DGHS Office	do
20	Mr. Sami Ul Haq Senior Clerk	MASM Hosp. Peshawar	DGHS Office	do
21	Mr. Mumfat Ali Senior Clerk	DGHS Office	DGHS Office	do

Arrival/ departure report should be submitted to this Directorate for record.


Sd/xxxxxxxx
DIRECTOR GENERAL HEALTH
SERVICES, K.P.K, PESHAWAR.
Dated 01/09/2019.

No 10581-615/Personnel

Copy forwarded to the:

1. Secretary to Govt. of Khyber Pakhtunkhwa Health Department Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. Director Health Service Merged Areas Peshawar.
4. Dean KMC Peshawar.
5. Hospital Director MTI- HMC Peshawar.
6. District Health Officer Nowshera.
7. MS Moulvi Ameer Shah Memorial Hospital Peshawar.
8. Deputy Director (Accounts) DGHS Office Peshawar.
9. DAO Nowshera.
10. PA to DGHS, Khyber Pakhtunkhwa Peshawar.
11. DA Concerned.
12. Officials concerned.
13. Mr. Faisal Javed President APCA DGHS Office.

For information and necessary action.


ADDITIONAL DG (ADMN)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P.K PESHAWAR.

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

SERVICE APPEAL NO. 397 OF 2019

Muhammad Sajid.....Appellant

Versus

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

Respectfully Sheweth:

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

Preliminary Objections:-

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

ON FACTS:

1. Para No. 1 pertains to record, hence no comments.
2. Para No. 2 pertains to record, hence no comments.

3. Para No. 3 pertains to record, hence no comments.
4. Para No. 4 pertains to record, hence no comments.
5. Para No. 5 pertains to record, hence no comments.
6. Para No. 6 pertains to record, hence no comments.
7. Para No. 7 pertains to record, hence no comments.
8. Para No. 8 pertains to record, hence no comments.
9. Para No. 9 is correct to the extent that his second appeal for inclusion of his name in the seniority list was submitted on 29/01/2019 (Annex-A). Previously to the instant appeal, he also submitted a similar first appeal on 06/11/2017 (Annex-B). His appeal was considered and his name is included in the seniority list of Junior Clerk sub cadre (Annex-C), but he never approached this Honorable Court within the stipulated time of 90 days after his first appeal on 06/11/2017 hence on score of this single point, his second appeal is not maintainable.

1st appeal - 6-11-2017
2nd " 29-1-2019

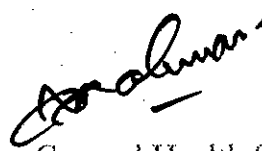
ON GROUNDS:


- A. Para-A is incorrect. He has been treated according to the Govt. Rules by putting his name in the seniority list of sub cadre Health Department Khyber Pakhtunkhwa under Section-8 of Khyber Pakhtunkhwa Civil Servant Act 1973 read with rule 17 of Khyber Pakhtunkhwa APT Rules 1989.
- B. Para-B is incorrect. His name is already included in the seniority list of sub cadre Health Department Khyber Pakhtunkhwa at Serial No. 231 already annexed at Annex-C.
- C. Para-C is incorrect. He was appointed by Director General Health Services Khyber Pakhtunkhwa being controlling officer of all health institutions in Khyber Pakhtunkhwa Health Department under the deceased son quota for Gomal Medical College D I Khan which comes under sub cadre of Health Department where he had accepted the offer of the appointment and join duty, therefore his name has been included in the seniority list of sub cadre.


- D. Para-D is incorrect. He was appointed by the Director General Health Services Khyber Pakhtunkhwa at Gomal Medical College D I Khan (sub cadre) as evident from his appointment order (Annex-D).
- E. Para-E is incorrect. His name has been included in the seniority list of sub cadre for which he deserve.
- F. Para-F no comments being formal / Legal.

PRAYER:

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


Director General Health Services,
Khyber Pakhtunkhwa.
Respondent No. 01
AD (Mm)


Secretary Health, Khyber Pakhtunkhwa.
Respondent No. 02


District Health Officer Mardan
Respondent No. 03

To,

Director General Health Services,
Khyber Pakhtunkhwa Peshawar

Amir A

405

4808
31-01-19

Reminder: - DEPARTMENTAL APPEAL/ REPRESENTATION/ FOR INCLUSION OF NAME OF THE APPLICANT IN THE SENIORITY LIST OF DIRECTORATE GENERAL HEALTH SERVICES PESHAWAR

R/sir,

The appellant submits as follow,

1. That applicant was appointed on 27.07.2015 as Junior Clerk (BPS- 11) in the cadre of Directorate General Health Services Peshawar vide order no 8587-94 personnel (copy of appointment order is attached).
2. That after appointment the applicant was posted at Gomal Medical College D I Khan on 06.05.2016 (copy of order as attached).
3. Applicant was transferred from Gomal Medical College D I Khan to D.H.O Swabi on 15-12-2016 (Copy of order is attached).
4. The applicant was transferred from D.H.O Swabi to D.H.O office Mardan on 12-10-2017 (Copy of order is attached).
5. The applicant was transferred from D.H.O Mardan on 18-10-2017 to T.H.Q Hospital Takht Bhai to till date (Copy of order is attached).
6. That prior to this departmental appeal / representation / reminder the applicant is also filled the departmental appeal on 18-10-2017 but no reply what so ever received by the applicant till now hence the instant departmental appeal/representation/reminder (Copy of departmental appeal is attached).
7. That the applicant suffers due to the above said facts circumstances while ascertaining the real seniority according to seniority list as per rules and regulation.
8. That it is very much important to place the name of the applicant in the seniority list of Directorate General Health Services KP Peshawar as per initial appointment of the applicant and rules.

It is therefore most humbly requested that instant appeal / representation of the appellant may graciously be accepted and applicant name may kindly be added in the seniority list of DG Health Services as per his seniority accordingly.

Appellant

Sajid

Muhammad Sajid Junior Clerk
T.H.Q Hospital Takht Bhai Mardan

Dated: 29-01-2019

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

667 No file

Amal-8/11/17

37412
37412
06/11/17

Through: PROPER CHANNEL

Subject: DEPARTMENTAL APPEAL FOR THE INCLUSION OF NAME IN THE SENIORITY LIST OF DIRECTORATE GENERAL HEALTH.

R/Sir,

With profound sentiment of respect I have the honour to submit the following few lines for your kind perusal and favourable consideration please.

- 1- I have been appointed as junior Clerk in the cadre of Directorate General Health Services Khyber Pukhtunkhwa Peshawar vide order bearing endorsement No 8587-94/personnel dated 27-7-2015 and revalidated with immediate effect vide order No 3596/360/Personnel dated 6-5-2016 (both photocopies of the orders are attached for ready reference).
- 2- I assumed my duty at Gomal Medical College DI Khan on 16-05-2016.
- 3- My name is included in the seniority list of sub-cadre and has been appointed in the cadre of Directorate General Health Services.
- 4- I have been transferred from DI Khan to the office of DHO Swabi and assumed my duty on 19-12-2016 (Order No. 8122-28/Personel) dated 15/12/2016.
- 5- Now I have been transferred from DHO office Swabi to DHO office Mardan and I assumed my duty in new place on 13-12-2017 (Order No. 14797-802/Personel/JC/75 dated 12/10/2017).

In view of the above factual position, it is humbly requested that my name may kindly be included in the seniority list of Directorate General Health Services KPK Peshawar, instead of the seniority list of sub cadre.

I shall be very thankful to you for your this act of kindness.

No 13936

dated 18/10-1/2017

FORWARDED TO DGHS, KPK Peshawar
FOR INFORMATION AND ACTION PLEASE

Your's Oediently
Muhammad Sajid
Junior Clerk
DHO Office Mardan

18/10/2017

(Signature)


26.	Khan Saif ur Rahman S/O Fazal Mehmood	15.02.1995	KTH Peshawar	17.03.1967 Orakzai	16.03.2027
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**FINAL SENIORITY LIST OF JUNIOR CLERKS (BS-11) OF SUB-CADRE OF HEALTH SERVICES IN
KHYBER PAKHTUNKHWA PESHAWAR**

Amir-C

S.No	Name of Official	Date of Appointment	Place of Posting	Date of Birth/Domicile	Date of Retirement
1.	Khan Muhammad	16.10.1989	AHQ Teaching H: Miran Shah	20.12.1969/ NWA	19.12.2029
2.	Iqbal-ud-Din S/O Abdul Ghani	25.01.1990	DHO Dir Lower	06.02.1965/ Dir Lower	05.02.2025
3.	Zakir Hussain S/O Khan Gul	15.03.1990	LRH Peshawar	03.01.1970/ Kohat	02.01.2030
4.	Altaf Qadir S/O Haji Gul Bahadar	28.03.1990	MAM Hosp: Pes	30.04.1970/	29.04.2030
5.	Maqsood Ur Rehman S/o Shah Zaman	01.07.1990	ATH Abbottabad	25.08.1968 Abbottabad	24.08.2028
6.	Hazrat Rahim	02.07.1990	LRH Peshawar	24.03.1962/ Charsadda	23.03.2022
7.	Amanullah	24.09.1990	Agency Surgeon Wana	11.03.1970/ NWA	10.03.2030
8.	Wisal Khan S/O Ghazanfar Ali Khan	29.08.1991	DHQ Hosp: Nowshera	15.09.1970/ Nowshera	14.09.2030
9.	Nawaz Ahmad	31.09.1991	LRH Peshawar	21.04.1971/ Peshawar	20.04.2031
10.	Ibne Amin S/o Mobeen Khan	18.01.1992	DHQ Hospital Nowshera	10.05.1972 Nowshera	09.05.2032
11.	Abdul Khalid S/O Akram Khan	05.07.1992	DHO Abbottabad	12.01.1970/ Karak	11.01.2030
12.	Nawab Khan	02.08.1992	LRH Peshawar	25.04.1972/ Peshawar	24.04.2032
13.	Muhammad Raza	29.06.1993	DHO Abbottabad	11.05.1968/ Abbottabad	10.05.2028
14.	Salim Javeed S/O Kalo Khan	04.11.1993	MMM Teaching Hospital D.I Khan	05.09.1972 D.I Khan	04.09.2032
15.	Bakht Munir	12.10.1994	SMC Swat	06.01.1969/ Swat	05.01.2029
16.	Shabir Ahmad	23.10.1994	DHO Peshawar	01.01.1967/ Kurram Agency	31.12.2026
17.	Ashiq Hussain S/O Sabir Hussain	28.12.1994	AHQ H: Parachinar	12.04.1968/ Kurram Agency	11.04.2028
18.	Javed Hussain S/O Gulab Hussain	28.12.1994	AHQ H: Parachinar	03.12.1968/ Kurram Agency	02.12.2028
19.	Said Hamid Hussain S/O Sardar Hussain	29.12.1994	AHQ H: Parachinar	19.04.1970/ Kurram Agency	18.04.2030
20.	Syed Hamid Hussain S/O Syed Ali Hussain	01-01-1995	AHQ H: Parachinar	14-03-1975 Kurram Agency	13-03-2035
21.	Bakhtiar Ahmad	26.01.1995	PGMI/ HMC Peshawar	26.09.1974/ Peshawar.	25.09.2034
22.	Gohar Ali S/o Naik Zada Bacha	01.02.1995	DHQH: Batkhela	01.02.1969 Swat	31.01.2028.
23.	Inamullah	01.02.1995	KTH Peshawar	20.11.1972/ Charsadda	19.11.2032
24.	Abdul Ali S/O Badshah Wali	11.02.1995	AHQ Hospital Miranshah	10.12.1973/ NWA	09.12.2033
25.	Dawood Khan S/O	14-02-1995	KTH Peshawar	13-08-1968 Peshawar	12-08-2028

230.	Basmina D/O Syed Miskeen Shah	16.07.2015	NMC Nowshera	09.06.1992 Nowshera	08.06.2052
231.	Muhammad Sajid S/O Abdul Ghani	27.07.2015	THO Hospital Tajki Bhai Mardan	17.01.1982 Mardan	16.01.2042
232.	Ijaz Ahmad S/O Sher Aman Khan	25.05.2016	Gajju Khan Medical College Swabi	04.02.1991 Swabi	03.02.2051
233.	Farooq Jan S/O Jan Rasool	25.05.2016	Gajju Khan Medical College Swabi	06.02.1992 Peshawar	05.02.2052
234.	Fawad Ali S/O Sher Afsar Khan	17.02.2017	Gajju Khan Medical College Swabi	27.03.1986 Swabi	26.03.2046
235.	Muhammad Tariq S/O Muhammad Tahir	29.06.2017	DHO Swat	07.03.1993	06.03.2053
236.	Muhammad Adil S/O Zahid Hussain	30.06.2017	DHIS Cell	11.04.1989	10.04.2049
237.	Zia Ullah Khan Mashwani S/O Miraj ud Din	07.03.2018	Govt: NKBM Hospital Peshawar	06.04.1974 Peshawar	05.04.2034


 DIRECTOR GENERAL HEALTH SERVICES,
 KHYBER PAKHTUNKHWA, PESHAWAR.



DIRECTORATE GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA
PESHAWAR

407
Amal-D

APPOINTMENT ORDER

On the recommendation of Departmental Selection Committee held on 23.07.2015 at 10:00 AM as well as verdict/C.O.C of Peshawar High Court Peshawar, Mr. Muhammad Sajid S/o (Late) Abdul Ghani Ex: Admn. Officer LRH Peshawar, is hereby appointed as Junior Clerk (BPS-11) at Gomal Medical College D.I. Khan plus other allowances as admissible under the policy of Govt. regarding recruitment of deceased employee's sons/daughter/widow as provided under Rules-10(4) of the Khyber Pakhtunkhwa APT Rules 1989.

His appointment in the Govt. of Khyber Pakhtunkhwa Health Department will be subject to the following terms and conditions:

1. His appointment shall be made conditionally, that in case, the post of Junior Clerk (BS-11) remains within the purview of Khyber Pakhtunkhwa public service commission, your appointment shall be treated as withdrawn and you will be offered a post from BPS-01 to BPS-10.
2. He shall be governed by the Khyber Pakhtunkhwa Civil Servants Act 1973 and all the laws applicable to the Civil Servants and the Rules made there under.
3. He shall be on probation initially for a period of one year extendable for further one year;
4. In case he wish to resign at any time, fourteen days notice shall be necessary or in lieu thereof 30-days pay shall be forfeited;
5. He shall produce a medical fitness certificate from Medical Superintendent and character certificate from two gazette officers;
6. His retention in service shall be subject to verification of his domicile testimonials and antecedents etc from the concerned authorities/ offices;
7. His appointment is liable to be terminated at any time without assigning any reason before the expiry of the period of probation/ extended period of probation, if your performance during this period is not fund satisfactory;
8. He will join duty at your own expenses, as no TA/DA shall be admissible there-for;

If the above terms and conditions are acceptable to him, he should report to Principal Gomal Medical College D.I Khan within 14 days of the receipt of this offer of appointment.

Sd/xxxxxxxxxxxxx
DIRECTOR GENERAL HEALTH
SERVICES K.P.K. PESHAWAR.

No. 8587-94 /Personnel, Dated Peshawar the, 27 / 07 /2015

Copy forwarded to the :-

1. Secretary to Govt. of Khyber Pakhtunkhwa Health Department Peshawar.
2. Registrar Peshawar High Court Peshawar w/r to his letter No. 13794/Judl: dated 09.08.2014.
3. Principal GMC D.I Khan.
4. DAO D.I. Khan.
5. Assistant Director (Litigation) DGHS, KPK Peshawar w/r to his endst: No. 2942/AD (Lit) dated 13.08.2014.
6. PA to DGHS Khyber Pakhtunkhwa Peshawar.
7. PA to Director (Admn) DGHS, Khyber Pakhtunkhwa Peshawar.
8. Mr. Muhammad Sajid S/o Abdul Ghani (late) village Pila Khel Lund Khawar Takht. Bhai Distrid Mardan.

For information and necessary action.

DIRECTOR GENERAL HEALTH.
SERVICES K.P.K. PESHAWAR

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

In S.A # 397/2019

Muhammad Sajid

Versus

Health Department

REJOINDER ON BEHALF OF
APPELLANT

Respectfully Sheweth,

All the Preliminary objection raised by the Respondents are incorrect and baseless and not in accordance with law and rules rather the Respondents are stopped due to their own conduct to raised any objection at the stage on the appeal.

Facts

All the facts of the appeal are correct while reply of the Respondent Department is incorrect wide abinitio and illegal, because the appellant is entitle for mentioning the name of the appellant in the seniority list of directorate level and not mentioning the name of the appellant in the seniority list of directorate general health service offices passed on 19.08.2019 is illegal and has not been passed according to the prevailing rules and regulations furthermore the respondent

department has been committed discrimination that is some of the other colloquies of the appellant has been given seniority on directorate level. (Copies of appointment order, minutes of the meeting and seniority list are attached).

It is, therefore, most humbly prayed that on acceptance of the instant rejoinder the appeal of the appellant may kindly be accepted as prayed for.

Dated 05/01/2021



Petitioner

Through



Roeeda Khan
Advocate, High Court
Peshawar.



DIRECTORATE GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA
PESHAWAR.

APPOINTMENT ORDER

On recommendation of Departmental Selection Committee held on 25.10.2010, Mr. Syed Irfan Haider Shah Kazmi S/o Syed Shabbir Hussain Shah is hereby appointed as Junior Clerk (BPS-07) (RS.3530-190-9230) plus other allowances as admissible under the Rules.

His appointment in the Health Department, Govt of Khyber Pakhtunkhwa will be subject to the following Terms and Conditions:-

1. He will be on probation initially for a period of one year extendable for a further period not exceeding one year.
2. His services can be dispensed with during the probation period, if his work and conduct found unsatisfactory.
3. His appointment will be subject to medical fitness verification of character/ antecedents and educational qualifications.
4. He will not be entitled to any TA/DA for medical examination and joining the first appointment.
5. He will be governed by such rules and orders as may be issued by the Government for the category of Government servant to which he belongs.
6. As laid down vide Govt. NWFP E&AD Notification No. E&A(1-3)/2005 dated 10.8.2005, he will not be entitled to pension or gratuity however in lieu thereof, will be entitled to receive such amount contributed by him towards the contributory provident fund alongwith the contributions made by the Government to his account in the said fund.
7. If he wishes to resign from service he will have to submit resignation in writing 14-days in advance or deposit 14-days salary in the government treasury. However he will continue to serve the government till his resignation is accepted by the Competent Authority.

If the above terms and conditions are acceptable to him he should report to Sarhad Hospital for Psychiatric Diseases Peshawar within 14 days of the receipt of this order.

Sd/xxxxxxxxxxxxx

DIRECTOR GENERAL HEALTH
SERVICES K.P.K. PESHAWAR.

No. 6820-23 /Personnel, Dated Peshawar the, 01/11/2010

Copy forwarded to the :-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. M.S Sarhad Hospital for Psychiatric Diseases Peshawar.
3. PA to DGHS Khyber Pakhtunkhwa Peshawar.
4. Mr. Syed Irfan Haider Shah Kazmi S/o Syed Shabbir Hussain Shah House NO. 1, Street: 6, Faisal Colony G.T Road Peshawar.

For information and necessary action.

(DR. SAJID SHAFIEN)
DIRECTOR GENERAL HEALTH
SERVICES K.P.K. PESHAWAR.

ATTESTED.

A. J. Khan
Medical Officer
Sifwat Ghayur Shahad Memorial
Hospital Peshawar.



DIRECTORATE GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA
PESHAWAR.

APPOINTMENT ORDER

On recommendation of Departmental Selection Committee held on 25.10.2010, Mr. Fazal Mehmood S/o. Fatchi Mohammad is hereby appointed as Junior Clerk (BPS-07) (Rs.3530-190-9230) plus other allowances as admissible under the Rules.

His appointment in the Health Department, Govt. of Khyber Pakhtunkhwa will be subject to the following Terms and Conditions:-

1. He will be on probation initially for a period of one year extendable for a further period not exceeding one year.
2. His services can be dispensed with during the probation period, if his work and conduct found unsatisfactory.
3. His appointment will be subject to medical fitness verification of character/ antecedents and educational qualifications.
4. He will not be entitled to any TA/DA for medical examination and joining the first appointment.
5. He will be governed by such rules and orders as may be issued by the Government for the category of Government servant to which he belongs.
6. As laid down vide Govt. NWFP E&AD Notification No. E&A(1-3)/2005 dated 10.8.2005, he will not be entitled to pension or gratuity however in lieu thereof, will be entitled to receive such amount contributed by him towards the contributory provident fund alongwith the contributions made by the Government to his account in the said fund.
7. If he wishes to resign from service he will have to submit resignation in writing 14-days in advance or deposit 14-days salary in the government treasury. However he will continue to serve the government till his resignation is accepted by the Competent Authority.

If the above terms and conditions are acceptable to him he should report to Sarhad Hospital for Psychiatric Diseases Peshawar within 14 days of the receipt of this order.

Sd/XXXXXXXXXXXX
DIRECTOR GENERAL HEALTH
SERVICES K.P.K. PESHAWAR.

No. 6828-31 /Personnel, Dated Peshawar the, 01/11/2010

Copy forwarded to the :-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Medical Superintendent Sarhad Hospital for Psychiatric Diseases Peshawar.
3. PA to DGHS Khyber Pakhtunkhwa Peshawar.
4. Mr. Fazal Mehmood S/o Fatchi Mohammad Mohallah Qazi Kheia P.O Chowk Yadgor House No. 1299 District Peshawar.

For information and necessary action.

(DR. SAJID SHAHEEN)
DIRECTOR GENERAL HEALTH
SERVICES K.P.K. PESHAWAR.

A meeting of the Scrutiny Committee was held on 25.07.2019, at 10.00 AM under the Chairmanship of Additional Director General Health Services (Admn) DGHS KP Peshawar.

The following attended the meeting:

- | | |
|---|------------|
| 1. Additional (DGHS/Admn) | (Chairman) |
| 2. Additional DGHS (HRM) | (Member) |
| 3. Mr. Muhammad Irshad (AD Ministerial) | (Member) |
| 4. Syed Amjad Ali Shah (Assistant) | (Member) |

The following issues discussed in the meeting and checked the relevant documents/Record/Papers.

1. Inclusion of the names of the following Junior Clerks in the Seniority List of Junior Clerks of (Directorate Cadre):

- | | |
|---------------------------|----------------|
| 1. Mr. Ikram ullah | (Junior Clerk) |
| 2. Mr. Shaukat Khan | (Junior Clerk) |
| 3. Syed Irfan Haider Shah | (Junior Clerk) |
| 4. Syed Mehmood Shah | (Junior Clerk) |

The appointment adjustment orders of the above Junior Clerks were checked by the Committee and decided as under.

1. Mr. Ikram ullah Junior Clerk,

The case of Mr. Ikram ullah Junior Clerk has already been discussed and decided in the previous meeting. He has already been placed in the Seniority list of Junior Clerks of (Directorate Cadre) in proper place.

2. Mr. Shaukat Khan Junior Clerk.

Mr. Shaukat Khan Junior Clerk was an employee of Sub-Cadre and during the year 1994, he became surplus and adjusted in Directorate General Health Services KP, Peshawar on 1.11.1997.

His name be included in the Seniority List of Junior Clerk (of Directorate Cadre) in proper place.

- | | |
|------------------------------|----------------|
| 3. Mr. Irfan Haider Shah. | (Junior Clerk) |
| 4. Syed Mehmood Shah Bukhari | (Junior Clerk) |

The above Junior Clerks were appointed by DGHS on 01/11/2010, for Directorate General Health Services KP and later on posted to sub offices.

Therefore the names of the above Junior Clerks be included in the Seniority List of Junior Clerks of (Directorate Cadre) in proper place.

Mr. Abdul Awal (Surplus Tracer of DIHO Nowshera)

Mr. Abdul Awal was a Tracer (BS-05) in C&W Department who had become surplus and adjusted in Health Department (DIHO Nowshera) against the vacant post of Dispenser (BS-06) in his own pay scale by the EDO (Health) Nowshera on 12.11.2003, for the purpose of drawal of pay.

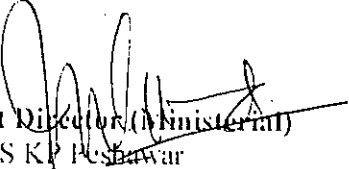
He has requested for inclusion of his name in the Seniority List of C.T. Pharmacy.

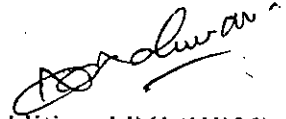
The Committee regret the request of the applicant being not covered under the rules.

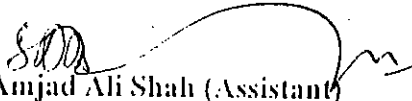
Mr. Nazir Ahmed,
(Relived) C.T Pharmacy of City Hospital Lakki Marwat.

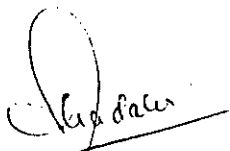
Mr. Nazir Ahmed (Relived) C.T Pharmacy has requested for his promotion to the post of Senior C.T Pharmacy BS-14&16 in light of order/decision of the Khyber Pakhtunkhwa Service Tribunal Peshawar Dated 29.11.2018.

The Committee agreed to implement the judgment/orders of the court in letter and spirit by issuance of the promotion order accordingly.


Assistant Director (Ministerial)
DGHS KP Peshawar
(Member)


Additional DG (HRM)
DGHS KP Peshawar
(Member)


Mr. Syed Amjad Ali Shah (Assistant)
DGHS KP Peshawar
(Member)


Additional DGHS (Admn)
DGHS KP Peshawar
(Chairman)

DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUN KHWA PESHAWAR



E-Mail Address: nwfdghs@yahoo.com office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230

OFFICE ORDER

In partial modification of this Directorate Office Order bearing Endst: No. 4366-69/Personnel dated 22.04.2019 the services of Mr. Muhammad Sajid Junior Clerk under transfer to PGMI Hayatabad Peshawar are hereby adjusted at this Directorate against the vacant post of Senior Clerk (in his own pay scale).

Sd/xxxxxxx
DIRECTOR GENERAL HEALTH
SERVICES, K.P.K PESHAWAR.
Dated 20 /06/2019

No 8064-68 /Personnel

Copy forwarded to the:-

1. AG Khyber Pakhtunkhwa Peshawar.
2. Dean PGMI Hayatabad Peshawar.
3. Deputy Director (Accounts) DGHS KP Peshawar.
4. P.A to DGHS Office Peshawar.
5. Official concerned.

For information and necessary action.


DIRECTOR GENERAL HEALTH
SERVICES, K.P PESHAWAR.

DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR



E-Mail Address: nwfpdghs@yahoo.com Office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230

OFFICE ORDER

On his arrival to this Directorate, Mr. Muhammad Sajid Junior Clerk is hereby directed to perform his duty in Coordination Cell DGHS office Peshawar with immediate effect.

Nb: Arrival/ departure reports should be submitted to this Office for record.

Sd/xxxxxxxxx

DIRECTOR GENERAL HEALTH
SERVICES, K.P.K, PESHAWAR.

Dated 27 /06/2019.

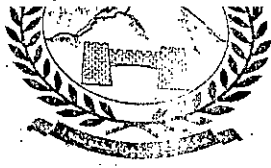
No 8304-06 /Personnel

Copy forwarded to the:-

1. Director (Coordination Cell) DGHS Office.
2. Deputy Director (Account) DGHS office Peshawar alongwith copy of arrival report.
3. Official concerned.

For information and necessary action.

ASSISTANT DIRECTOR (Ministerial)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P.K PESHAWAR.



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR
No 12153-60/Personnel (Promotion)
Dated the Peshawar: - 06/6/2017.

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To

01. The DHS (FATA), KPK, Peshawar.
02. The Hospital Director HMC Peshawar.
03. The Principal KMC Peshawar.
04. The Medical Supdt: Naseerullah Babar Memorial Hospital Peshawar.
05. The Medical Supdt: SHPD, Peshawar.
06. The Medical Supdt: Sifat Ghayur Memorial Hospital Peshawar.
07. The District Health Officer, Nowshera.
08. The Incharge of the Branches, DGHS, Office Peshawar.

SUBJECT: FINAL SENIORITY LIST OF JUNIOR CLERK OF DGHS OFFICE.
Memo:

A Final Seniority list of Junior Clerks of Directorate Cadre serving under your control is sent herewith for their information.

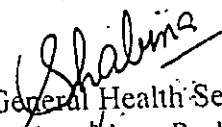
Shahina
DIRECTOR GENERAL HEALTH
SERVICES KPK, PESHAWAR.

FINAL SENIORITY LIST OF JUNIOR CLERKS OF DGHS, OFFICE DATED 25-07-2017.

Sr.	Name of Junior Clerk.	Date of 1st Appointment	Place of Posting	Date of Birth Domicile	Date of Retirement
1.	Mubarak Shah	18.06.1992	DGHS, office	08.08.1968/ Peshawar	08-08-2028
2.	Ikram Ullah S/O Fazali Rabbi	07-01-1996	DGHS, Office	20-10-1974 Charsadda	19-10-2034
3.	Abid Muhammad	01.09.1996	KMC Peshawar	15.02.1972/ Khyber Agency	14.02.2032
4.	Wajid Shah	17.09.1996	DHS, FATA	30.09.1963/ Khyber Agency	29.09.2023
5.	Nadeem ullah	17.09.1996	DHS, FATA	09.01.1972/ Peshawar	08.01.2032
6.	Khial Said	19.09.1996	DHS, FATA	15.09.1974/ Khyber Agency	14.09.2034
7.	Nasim Ahmad	19.05.1997	DGHS, office	01.06.1966/ Peshawar	31.05.2026
8.	Muhammad Imran	14.06.1997	DHS, FATA	01.08.1975/ Peshawar	31.07.2035
9.	Shaukat Ali	03.08.1994. 01.07.1997	DHO. Nowshera	01.08.1971/ Peshawar	31.07.2031
10.	Muhammad Fayyaz	29.06.1998	DHS, FATA	02.05.1974/ Peshawar	01.05.2032
11.	Zahir Shah S/O Abdul Ahad	26-01-2002	DHS, FATA	03-01-1968 Charsadda	02-01-2028
12.	Zulfiqar Ali	20.03.2002	DGHS, office	16.01.1966/ Peshawar	15.01.2026
13.	Irfan Ullah S/O Naimat ullah	20.03.2002	HMC Peshawar	15.03.1974/ Peshawar	14.03.2034
14.	Mubashir Khan S/O Muhammad Ashraf	29.04.2006	DGHS, Office	07.01.1978/ Peshawar	06.01.2038
15.	Muhammad Nadeem	29.04.2006	DGHS, Office	01.12.1984/ Peshawar	30.11.2044
16.	Mu'ahid Khan S/O Firdous Khan	02.12.2006	DHS, FATA	01.06.1977/ Charsadda	31.05.2037
17.	Naveed ur Rahman	06.07.2007	DHS, FATA	10.04.1986/ Charsadda	09.04.2040
18.	Shafqat ullah Shah S/O Tilawat Shah	31.07.2007	DGHS, office	08.03.1988/ Charsadda	07.03.2043
19.	Noman Hadi S/O Shamsul Hadi	11.05.2009	DGHS, office	05.04.1983/ Bannu	04.04.2043
20.	Jaffar Shah	03.03.2010	DGHS, office	01.01.1962/ Peshawar	31.12.2021
21.	Sami-ul-Haq	03.03.2010	NKBM, Hospital	01.01.1962/ Peshawar	31.12.2021
22.	Mumfat Ali Shah	03.03.2010	DGHS, office	18.11.1968/ Charsadda	17.11.2026
23.	Fahad Khan S/O Khan Rose	22.03.2010	DGHS, office	01.02.1991/ Peshawar	31.01.2051
24.	Syed Irfan Haidar Shah S/O Syed Shabbir hussain Shah	01-11-2010	SGSM Hosp: Peshawar.	01-11-1981 Peshawar.	01-11-2041
25.	Syed Mehmood Ali Shah S/O Syed Abid Ali Shah	01-11-2010	DGHS, Office	11-01-1983 Peshawar	10-01-2043



1	Fazal Mehmood S/O Fateh Muhammad	01-11-2010	DGHS, Office	10-06-1985 Peshawar	09-06-2045
2	Faisal Javed S/O Javed Iqbal	01.11.2010	DGHS, office	05.11.1990/ Peshawar	04.11.2050
3	Tahit Naqash S/O Abdul Qayum Khan	02.11.2010	DGHS, office	02.03.1982/ Peshawar	01.03.2042
4	Afsandiyar S/O Gul Afzal	02.11.2010	SHPD, Peshawar	18.12.1990/ Peshawar	17.12.2050
5	Ali Raza S/O Abdul KHALIQ	04-11-2010	DGHS	04-08-1982	03-08-2042
6	Izhar Ullah S/O Muhammad Irshad	12.04.2011	DGHS, office	15.04.1989/ Peshawar	14.04.2049
7	Noor ud din S/O Muhammad Jehangir	14.04.2011	Drag-Lab.	11.09.1980/ Peshawar	10.09.2040
8	Muhammad Shahzab Iqbal S/O Muhammad Iqbal	14.04.2011	DGHS, office	27.11.1985/ Peshawar	26.11.2045
9	Muhammad Adil S/O Muhammad Iqbal	14.04.2011	DGHS, office	01.04.1986/ Peshawar	31.03.2046
10	Shehzad Gul S/O Mumtaz Ahmad Gul	29.05.2013	DGHS, office	12.02.1994/ Peshawar	11.12.2054
11	Numan Qadir S/O Abdul Qadir	30.05.2013	DGHS, office	26.07.1991/ PESHAWAR	25.06.2051
12	Muhammad Anwar S/O Fazli Rahim	15.07.2013	DGSH, Office	04.06.1974/ Peshawar	03.06.2034
13	Ibrar Muhammad S/O Awal Khan	15.07.2013	DGSH Office,	31.08.1974/ Peshawar	30.08.2034
14	Yousaf Khan S/O Siraj-ud-Din	15.07.2013	DGSH Office	02.01.1959/ Peshawar	01.01.2019
15	Abdullah Jan S/O Daulat Khan	15.07.2013	DGSH Office	26.11.1977/ Peshawar	25.11.2037
16	Aamer Chohan S/O Sohan Lal	15.07.2013	DGSH Office	08.08.1980/ Peshawar	07.08.2040
17	Javed Khan S/O Zain Khan	15.07.2013	DGHS Office	03.04.1979/ Peshawar	02.04.2039
18	Aurangzeb S/O Muhammad Ashraf	15.07.2013	NBMH Peshawar	16.04.1980/ Peshawar	15.04.2040
19	Muhammad Naveed Khan S/O Zakir Ullah	26.07.2013	DGHS Office	30.03.1992/ Peshawar	29.03.2052


 Director General Health Services,
 Khyber Pakhtunkhwa Peshawar.

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2/57

DIRECTORATE GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA
PESHAWAR

APPOINTMENT ORDER

On the recommendation of Departmental Selection Committee held on 23.07.2015 at 10:00 AM as well as verdict/C.O.C of Peshawar High Court Peshawar, Mr. Muhamamd Sajid S/o (Late) Abdul Ghani Ex: Admn: Officer LRH Peshawar, is hereby appointed as Junior Clerk (BPS-11) at Gomal Medical College D.I Khan plus other allowances as admissible under the policy of Govt: regarding recruitment of deceased employee's sons/daughter/widow as provided under Rules-10(4) of the Khyber Pakhtunkhwa APT Rules 1989.

His appointment in the Govt: of Khyber Pakhtunkhwa Health Department will be subject to the following terms and conditions:

1. His appointment shall be made conditionally, that in case, the post of Junior Clerk (BS-11) remains within the purview of Khyber Pakhtunkhwa public service commission, your appointment shall be treated as withdrawn and you will be offered a post from BPS-01 to BPS-10.
2. He shall be governed by the Khyber Pakhtunkhwa Civil Servants Act 1973 and all the laws applicable to the Civil Servants and the Rules made there under;
3. He shall be on probation initially for a period of one year extendable for further one year;
4. In case he wish to resign at any time, fourteen days notice shall be necessary or in lieu thereof 30-days pay shall be forfeited;
5. He shall produce a medical fitness certificate from Medical Superintendent and character certificate from two gazette officers;
6. His retention in service shall be subject to verification of his domicile testimonials and antecedents etc from the concerned authorities/ offices;
7. His appointment is liable to be terminated at any time without assigning any reason before the expiry of the period of probation/ extended period of probation, if your performance during this period is not fund satisfactory;
8. He will join duty at your own expenses, as no TADA shall be admissible there-for;

If the above terms and conditions are acceptable to him, he should report to Principal Gomal Medical College D.I Khan within 14 days of the receipt of this offer of appointment.


Sd/xxxxxxxxxxxxxx
DIRECTOR GENERAL HEALTH
SERVICES K.P.K. PESHAWAR.

No. 858/- /Personnel, Dated Peshawar the, 27 / 07 /2015

Copy forwarded to the :-

1. Secretary to Govt: of Khyber Pakhtunkhwa Health Department Peshawar.
2. Registrar Peshawar High Court Peshawar w/r to his letter No. 13794/Judl: dated 09.08.2014.
3. Principal GMC D.I Khan.
4. DAO D.I.Khan.
5. Assistant Director (Litigation) DGHS, KPK Peshawar w/r to his endst: No. 2942/AD (Lit) dated 13.08.2014.
6. PA to DGHS Khyber Pakhtunkhwa Peshawar.
7. PA to Director (Admn) DGHS, Khyber Pakhtunkhwa Peshawar.
8. Mr. Muhammad Sajid S/o Abdul Ghani (late) village Pila Khel Lund Khawar Takht Bhai District Mardan.

For information and necessary action.


DIRECTOR GENERAL HEALTH.
SERVICES K.P.K. PESHAWAR

667
No. file

378
37612
06/11/17

To: The Director General, Health Services,
Khyber Pakhtunkhwa,
Peshawar.

Through: PROPER CHANNEL

Subject: DEPARTMENTAL APPEAL FOR THE INCLUSION OF NAME IN THE SENIORITY LIST OF DIRECTORATE GENERAL HEALTH.

R/Sir,

With profound sentiment of respect I have the honour to submit the following few lines for your kind perusal and favourable consideration please.

- 1- I have been appointed as junior Clerk in the cadre of Directorate General Health Services Khyber Pukhtunkhwa Peshawar vide order bearing endorsement No 8587-94/personnel dated 27-7-2015 and revalidated with immediate effect vide order No 3596/360/Personnel dated 6-5-2016 (both photocopies of the orders are attached for ready reference).
- 2- I assumed my duty at Gomal Medical College DI Khan on 16-05-2016.
- 3- My name is included in the seniority list of sub-cadre and has been appointed in the cadre of Directorate General Health Services.
- 4- I have been transferred from DI Khan to the office of DHO Swabi and assumed my duty on 19-12-2016 (Order No. 8122-28/Personel) dated 15/12/2016.
- 5- Now I have been transferred from DHO office Swabi to DHO office Mardan and I assumed my duty in new place on 13-12-2017 (Order No. 14797-802/Personel/JC/75 dated 12/12/2017).

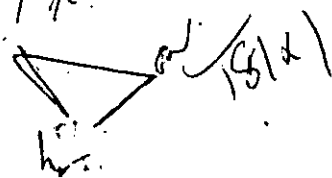
In view of the above factual position, it is humbly requested that my name may kindly be included in the seniority list of Directorate General Health Services KPK Peshawar, instead of the seniority list of sub cadre.

I shall be very thankful to you for your this act of kindness.

1936-

dated 18/10-12-2017

Kindly forward to DGHS, KPK Peshawar
for information And Action Please



Your's Oediently
Muhammad Sajid
Junior Clerk
DHO Office Mardan

18/10/2017

GOVERNMENT OF N.W.F.P.
HEALTH & SOCIAL WELFARE DEPARTMENT.

NOTIFICATION

Dated Peshawar the 22nd June, 1983.

No. SO(H)1/4-6/83. — In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1975, the Health and Social Welfare Department, in consultation with the Services & General Administration Department and Finance Department, hereby lays down the method of recruitment, qualifications and other conditions specified in column 3 to 5 of the Appendix to this Notification which shall be applicable to the posts of Ministerial Service (Sub-Cadre) in the Health Department specified in column 2 of the said Appendix.

APPENDIX

Sl. No.	Nomenclature of the post with Grade	Minimum qualifications for initial recruitment	Age limit for initial recruitment	Method of Recruitment
1.	Accountant (Grade-16)	Graduate from a recognized University with at least 5 years experience in Accounts or qualified S.A.S.	21 to 35 years	By initial recruitment or by transfer.
2.	Superintendent (Grade-16)			By promotion on the basis of seniority-cum-fitness from amongst Statistical Assistant/Assistants/Auditors/Stenographers of Health Directorates and Assistant Stenographer/Senior Store Keepers Grade-11 of subordinate offices of the Health Directorate with at least five years service as such. Note: A common seniority list of a eligible officials will be maintained for the purpose of promotion to the post of Superintendent.
3.	Assistant/Senior Store Keeper (Grade-11)			By promotion from amongst Senior Clerks/Store Keeper Grade-6 with at least three years service as such.
4.	Statistical Assistant (Grade-11)	Degree from a recognized University with mathematics or statistics as one of the subject.	20 to 25 years	By initial recruitment.
5.	Senior Clerk/Store Keeper (Grade-6)			By promotion on the basis of seniority-cum-fitness from amongst Junior Clerk/Store Keeper (Grade-5) with at least 2 years service as such.
6.	Junior Clerk/Store Keeper (Grade-5)	a) Matriculation from recognized Board, and b) A speed of 25 words per minute in typing.	18 to 25 years	By initial recruitment.

1	2	3	4	5
7.	Stenographer (Grade-12)	a) Matriculation from a recognized Board; and b) A speed of 100 words per minute in shorthand in English and 40 words per minute in typing.	18 to 25 years	By promotion on the basis of seniority-cum-fitness from amongst stenotypists with at least three years service as such, or if no suitable stenotypist is available for promotion then by initial recruitment.
8.	Stenotypist (Grade-8)	a) Matriculation from a recognized Board; and b) A speed of 80 words per minute in shorthand in English and 35 words per minute in typing.	18 to 25 years	By initial recruitment.
9.	Restorer (Grade-2)	Middle pass.	18 to 25 years	By initial recruitment.
10.	Naib Qasid (Grade-1)	Preferably literate.	18 to 45 years	By initial recruitment.

Note: In all cases of initial recruitment...

**GOVERNMENT OF N.W.F.P.
HEALTH & S. WELFARE DEPARTMENT.**

NOTIFICATION

Dated Peshawar the 29th March, 1982.

No. SO(H) IV-4-13/75.Pt.II. — In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1975, and in consultation with the Services and General Administration Department and the Finance Department, the Health Department hereby lays down the method of recruitment, qualification and other condition specified in columns 3 to 6 of the Appendix to this Notification, which shall be applicable to posts in the Health Directorate specified in column 2 of the said Appendix.

APPENDIX

Sl. No.	Nomenclature of Post	Minimum qualification for appointment by initial recruitment or by transfer	Minimum qualification prescribed for appointment by promotion.	Age limit for initial recruitment	Method of Recruitment
1	2	3	4	5	6
1.	Administrative Officer.	By selection on merit, with due regard to seniority, from amongst Superintendents.
2.	Superintendent	By promotion, on the basis of seniority-cum-fitness, from amongst: a. Statistical Assistants/Assistants/Auditors/ Stenographers of the Health Directorate, and b. Head Clerk and Stenographers of the offices Sub-ordinate to Health Directorate with at least 5 years service as such.
3.	Statistical Assistant.	Degree from a recognized University with Mathematics/Statistics as one of the subjects.	...	20 years to 25 years	Note:- A common seniority list of eligible officials shall be maintained for the purposes of Superintendents. By initial recruitment.
4.	Assistant.	<u>Degree from a recognized University.</u>	...	20 years to 25 years	i) 75% by promotion on the basis of seniority-cum-fitness from amongst Senior Clerk,

1	2	3	4	5	6
					with at least 3 years service as such; and
5.	Auditor.	ii) 25% by initial recruitment.
6.	Senior Clerks.	By selection from amongst Assistants.
7.	Junior Clerks.	a) Matriculation or equivalent qualification from a recognized Board; and b) A speed of 25 words per minute in typing.	...	18 years to 25 years	By promotion on the basis of seniority-cum-fitness, from amongst Junior Clerks, with at least 2 years service as such. By initial recruitment.
8.	Stenographers.	a) Matriculation or equivalent qualification from a recognized Board; and b) A speed of 100 words per minute in shorthand in English and 40 words per minute in typing.	...	18 years to 25 years	i) By promotion, on the basis of seniority-cum-fitness, from amongst Stenotypists with at least 3 years as such; Or ii) If no suitable Stenotypist is available for promotion, then by initial recruitment.
9.	Stenotypist.	a) Matriculation or equivalent qualification from a recognized Board; and b) A speed of 80 words per minute in shorthand in English and 35 words per minute in typing.	...	18 years to 25 years	By initial recruitment.

1	2	3	4	5	6
10.	Restorer.	Preferably literate.	...	18 years to 45 years	By initial recruitment.
11.	Machine Operator.	Preferably literate.	...	18 years to 45 years	By initial recruitment.
12.	Naib Qasid.	Preferably literate.	...	18 years to 45 years	By initial recruitment.
13.	Chowkidar.	Preferably ex-Serviceman	...	18 years to 45 years	By initial recruitment.
14.	Bhishti/Sweeper/Mali.	Preferably literate.	...	18 years to 45 years	By initial recruitment.

Amendment:- made vide S&GAD Notification No. SOR-II (S&GAD)5-2/80, DATED 27-10-1981. 10 per cent vacancies to be filled by initial recruitment is to be reserved for ex-serviceman.

GOVERNMENT OF N.W.F.P.
HEALTH & SOCIAL WELFARE DEPARTMENT.

NOTIFICATION

Dated Peshawar the 22nd June, 1983. ✓

No. SO(H)1/4-6/83. — In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1975, the Health and Social Welfare Department, in consultation with the Services & General Administration Department and Finance Department, hereby lays down the method of recruitment, qualifications and other conditions specified in column 3 to 5 of the Appendix to this Notification which shall be applicable to the posts of Ministerial Service (Sub-Cadre) in the Health Department specified in column 2 of the said Appendix.

Note:- In all cases of initial recruitment, ten per cent of the posts, where practicable, shall be reserved for ex-servicemen.

APPENDIX

Sl. No.	Nomenclature of the post with Grade	Minimum qualifications for initial recruitment	Age limit for initial recruitment.	Method of Recruitment
1	2	3	4	5
1.	Accountant (Grade-16)	Graduate from a recognized University with at least 5 years experience in Accounts or qualified S.A.S.	21 to 35 years	By initial recruitment or by transfer.
2.	Superintendent (Grade-16)	By promotion on the basis of seniority-cum-fitness from amongst Statistical Assistants/Assistants/Auditors/Stenographers of Health Directorate and Assistant Stenographer/Senior Store Keepers Grade-11 of subordinate offices of the Health Directorate with at least five years service as such. Note:- A common seniority list of a ligible officials will be maintained for the purpose of promotion to the post of Superintendent.
3.	Assistant/Senior Store Keeper (Grade-11)	By promotion from amongst Senior Clerks/Store Keeper Grade-6 with at least three years service as such.
4.	Statistical Assistant (Grade-11)	Degree from a recognized University with mathematics or statistics as one of the subject.	20 to 25 years	By initial recruitment.
5.	Senior Clerk/Store Keeper (Grade-6)	By promotion on the basis of seniority-cum-fitness from amongst Junior Clerk/Store Keeper (Grade-5) with at least 2 years service as such.
6.	Junior Clerk/Store Keeper (Grade-5)	a) Matriculation from recognized Board; and b) A speed of 25 words per minute in typing.	18 to 25 years	By initial recruitment.

1	2	3	4	5
7.	Stenographer (Grade-12)	a) Matriculation from a recognized Board; and b) A speed of 100 words per minute in shorthand in English and 40 words per minute in typing.	18 to 25 years	By promotion on the basis of seniority-cum-fitness from amongst stenotypists with at least three years service as such, or if no suitable stenotypist is available for promotion then by initial recruitment.
8.	Stenotypist (Grade-8)	a) Matriculation from a recognized Board; and b) A speed of 80 words per minute in shorthand in English and 35 words per minute in typing.	18 to 25 years	By initial recruitment.
9.	Restorer (Grade-2)	Middle pass.	18 to 25 years	By initial recruitment.
10.	Naib Qasid (Grade-1)	Preferably literate.	18 to 45 years	By initial recruitment.

Note:- In all cases of initial recruitment, ten per cent of the posts, where practicable, shall be reserved for ex-servicemen.

GOVERNMENT OF N.W.F.P.
HEALTH & S. WELFARE DEPARTMENT.

NOTIFICATION

Dated Peshawar the 29th March, 1982.

No. SO(H) IV-4-13/75.Pt.II. --- In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1975, and in consultation with the Services and General Administration Department and the Finance Department, the Health Department hereby lays down the method of recruitment, qualification and other condition specified in columns 3 to 6 of the Appendix to this Notification, which shall be applicable to posts in the Health Directorate specified in column 2 of the said Appendix.

APPENDIX

Sl. No.	Name of Post	Minimum qualification for appointment by initial recruitment or by transfer	Minimum qualification prescribed for appointment by promotion	Age limit for initial recruitment	Method of Recruitment
1	Administrative Officer				By selection on merit with due regard to seniority from amongst Superintendents.
2	Superintendent				By promotion on the basis of seniority-cum-fitness from amongst: <ul style="list-style-type: none"> a. Statistical Assistant/Assistant/Auditor/Stereographers of the Health Directorate, and b. Head Clerk and Stenographers of the offices subordinate to Health Directorate with at least 5 years service as such. Note: A common seniority list of eligible officials shall be maintained for the purposes of Superintendents.
3	Statistical Assistant	Degree from a recognized University with Mathematics/Statistics as one of the subjects.		20 years to 25 years	By initial recruitment.
4	Assistant	Degree from a recognized University.		20 years to 25 years	i) 75% by promotion on the basis of seniority-cum-fitness from amongst Senior Clerk.

with at least 3 years service as such and

ii) 25% by initial recruitment.

By selection from amongst Assistant.

By promotion on the basis of seniority-cum-fitness. From amongst Junior Clerks with at least 2 years service as such.

By initial recruitment.

By promotion on the basis of seniority-cum-fitness. From amongst Stenographers with at least 2 years of service.

ii) If no suitable Stenographer is available for promotion, then by initial recruitment.

18 years to 25 years

- a) Matriculation or equivalent qualification from a recognized Board; and
 - b) A speed of 100 words per minute in shorthand in English and 45 words per minute in typing.
- a) Matriculation or equivalent qualification from a recognized Board; and
 - b) A speed of 80 words per minute in shorthand in English and 35 words per minute in typing.

5. Auditor

6. Senior Clerks

7. Junior Clerks

8. Stenographers

9. Stenography

10. Stenography

Sl. No.	Post	Qualification	Age	Recruitment
10	Restorer	Preferably literate	18 years to 45 years	By initial recruitment
11	Machine Operator	Preferably literate	18 years to 45 years	By initial recruitment
12	Naib Qasid	Preferably literate	18 years to 45 years	By initial recruitment
13	Chowkidar	Preferably ex-Serviceman	18 years to 45 years	By initial recruitment
14	Bhishi/Sweeper/Mali	Preferably literate	18 years to 45 years	By initial recruitment

Amendment made vide S&GAD Notification No. SOR-II (S&GAD)S-2/80, DATED 27-10-1981. 10 per cent vacancies to be filled by initial recruitment is to be reserved for ex-serviceman.