

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR.

Service Appeal No. 1685/2020

Date of Institution ... 13.03.2020

Date of Decision ... 19.10.2022

Awal Badshah Khattak, Clinical Technologist (BPS-17), Health Department,
Khyber Pakhtunkhwa, Peshawar.

... (Appellant)

VERSUS

The Chief Secretary to Government of Khyber Pakhtunkhwa, Civil
Secretariat, Peshawar and 03 others.

... (Respondents)

SYED NOMAN ALI BUKHARI,
Advocate

--- For appellant.

MR. ASIF MASOOD ALI SHAH,
Deputy District Attorney

--- For respondents.

SALAH-UD-DIN
MIAN MUHAMMAD

--- MEMBER (JUDICIAL)
--- MEMBER (EXECUTIVE)

JUDGMENT:

SALAH-UD-DIN, MEMBER:- Briefly stated the
averments as raised by the appellant in his appeal are that he
was performing his duty as Clinical Technologist (BPS-17) in
the department of Pharmacology in Khyber Medical College
Peshawar; that vide order dated 26.06.2018 issued by Dean
Khyber Medical College Peshawar, the salary of the appellant
was stopped with immediate effect; that vide order dated



15.08.2018 issued by Dean Khyber Medical College Peshawar, the appellant was relieved from his duty and was directed to report to the Health Department Government of Khyber Pakhtunkhwa Peshawar for further posting; that the appellant thus submitted his arrival report to the Director General Health Services Khyber Pakhtunkhwa Peshawar on 27.08.2018; that vide letter dated 24.09.2018, communicated to the appellant on 08.10.2018, he was directed to submit arrival report to the Health Department Government of Khyber Pakhtunkhwa Peshawar, therefore, the appellant submitted his arrival report to Secretary to Government of Khyber Pakhtunkhwa Health Department on 15.10.2018; that the appellant was on the strength of the department and was performing his duty till 06.03.2019 but no salary was paid to the appellant; that vide order dated 06.03.2019, the appellant was suspended for a period of 90 days on account of misconduct, however no salary was still being paid to the appellant, therefore, he filed departmental appeal but the same was not responded within the statutory period, constraining the appellant to file the instant service appeal.

2. Notices were issued to the respondents, who submitted their comments, wherein they refuted the assertions raised by the appellant in his appeal.

3. Learned counsel for the appellant has addressed his arguments supporting the grounds agitated by the appellant in

his service appeal. On the other hand, learned Deputy District Attorney has controverted the arguments of learned counsel for the appellant and has supported the comments submitted by the respondents.

4. We have heard the arguments of learned counsel for the parties and have perused the record.

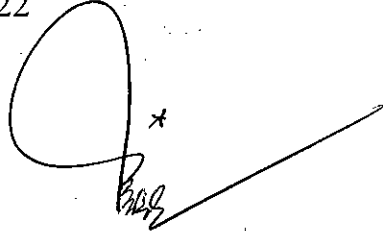
5. A perusal of the record would show that vide order dated 26.06.2018, the pay of the appellant was stopped with immediate effect on account of production of fake findings/order of the Provincial Ombudsman, whereby Dean Khyber Medical College Peshawar was advised to release salaries of the appellant. It is pertinent to mention herein that disciplinary action was taken against the appellant on the allegations of willful absence as well as production of forged findings/order of the Provincial Ombudsman, which resulted in his removal from service vide order dated 17.01.2020, however his Service Appeal No. 8817/2020 has been partially allowed by this Tribunal and the penalty of removal from service has been converted into compulsory retirement from service.

6. While passing the removal order of the appellant from service on 17.01.2020, the competent Authority did not mention anything regarding the period with effect from 26.06.2018 till 17.01.2020 i.e the period during which no pay has been paid to the appellant. Admittedly, the appellant was an employee of the

health department till his removal from service on 17.01.2020 and would be entitled to his salary for the said period.

7. Consequently, the appeal in hand is allowed and the appellant is held entitled to his salaries with effect from 01.06.2018 till 17.01.2020 i.e the date of his compulsory retirement. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
19.10.2022

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(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)

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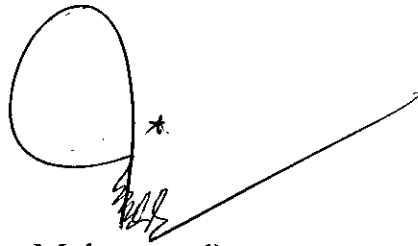
(SALAH-UD-DIN)
MEMBER (JUDICIAL)

ORDER
19.10.2022

Appellant alongwith his counsel present. Mr. Safi Ullah, Focal Person alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the appeal in hand is allowed and the appellant is held entitled to his salaries with effect from 01.06.2018 till 17.01.2020 i.e the date of his compulsory retirement. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
19.10.2022

A handwritten signature in black ink, consisting of a large, stylized 'M' followed by a long horizontal stroke extending to the right.

(Mian Muhammad)
Member (Executive)

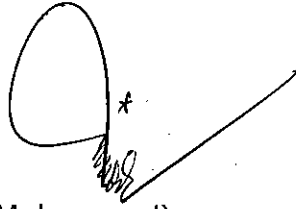
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(Salah-Ud-Din)
Member (Judicial)

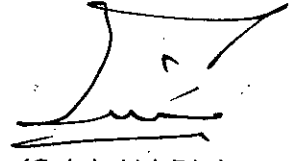
10.10.2022

Syed Noman Ali Bukhari, Advocate for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for official respondents No. 1 & 2 present. Mr. Aftab Ahmad Khattak, Legal Advisor for respondents No. 3 present.

Arguments heard. To come up for order before the D.B on 13.10.2022.



(Mian Muhammad)
Member (E)

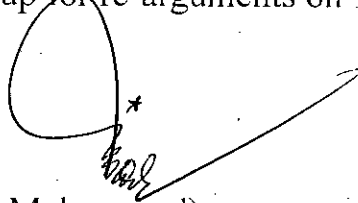


(Salah-Ud-Din)
Member (J)

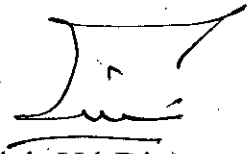
13.10.2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Further legal assistance is needed on certain points, therefore, to come up for re-arguments on 19.10.2022 before the D.B.



(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)

10.06.2022

Junior to counsel for the appellant present.

Muhammad Adeel Butt, learned Additional Advocate General alongwith Safi Ullah SO for respondents No.1 & 2 present. Nemo for respondent No.3.

File to come up alongwith connected 8817/2020 filed by the appellant, on 27.07.2022 before S.B.



(Rozina Rehman)
Member (J)

27.07.2022

Counsel for the appellant present. Mr. Kabir Ullah Khattak, Additional Advocate General for official respondents present. Mr. Aftab Ahmad Khattak, Legal Advisor for respondents No. 3.

File to come up alongwith connected service appeal No. 8817/2020 filed by the appellant, on 10.10.2022 before D.B.



(Fareeha Paul)
Member (E)

SCANNED
K
Peshawar

15.02.2022

Due to retirement of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 28.03.2022 for the same as before.


Reader

28.03.2022

Appellant in person present. Mr. Kabirullah Khattak Addl: AG for respondents No. 1 and 2 and counsel for respondent No.3 present.

Written reply/comments not submitted. Learned AAG seeks time to submit the same on the next date. Adjourned. To come up for written reply/comments on 25.04.2022 before S.B.

(MIAN MUHAMMAD)
MEMBER(E)

25.04.2022

Appellant in person present. Mr. Muhammad Adeel Butt, Addl: AG alongwith Mr. Safiullah, Focal Person for official respondents and counsel for private respondent No. 3 present.

Written reply/comments on behalf of the respondents not submitted. Representative seeks further time to submit the same on the next date. Granted but as a last chance. To come up for written reply/comments on 10.06.2022 before S.B.

(MIAN MUHAMMAD)
MEMBER(E)


1685/2020

15.07.2021

Counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration. The appeal is admitted for regular hearing, subject to all just and legal objection including that of limitation. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 13.12.2021 before the D.B.

Appellant Deposited
Security Process Fee
13


Chairman

13.12.2021

Appellant in person present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

Written reply/comments not submitted. Learned AAG seeks time to contact the respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments on 15.02.2022 before S.B.


(MIAN MUHAMMAD)
MEMBER (E)

28.10.2020

Appellant present in person.

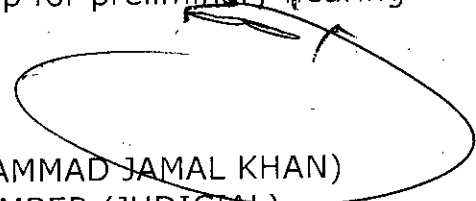
Lawyers are on general strike, therefore, case is adjourned to 12.01.2021 for preliminary hearing, before S.B.



(Rozina Rehman)
Member (J)

12.01.2021

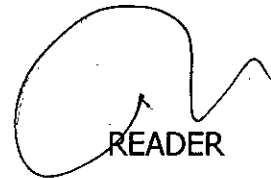
Counsel for appellant is present. He requested for adjournment. Request is allowed. The appeal is adjourned to 07.04.2021 on which date file to come up for preliminary hearing before S.B.



(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

07.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 15.07.2021 for the same as before.



READER

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____

1685 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1		3
1-	13/03/2020	<p>The appeal of Mr. Awal Badshah presented today by Syed Noman Ali Bukhari Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p>REGISTRAR 13/03/2020</p>
2-	19/03/20	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>04/05/2020</u>.</p> <p>MEMBER</p>
	04.05.2020	<p>Due to COVID-19, the case is adjourned to 05.08.2020 for the same, before S.B.</p> <p>Reader</p>
	05.08.2020	<p>Syed Noman Ali Bukhari, Advocate for appellant is present. He requested for adjournment. Adjourned to 28.10.2020. File to come up for preliminary hearing before S.B.</p> <p>(MUHAMMAD JAMAL KHAN) MEMBER</p>

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1685 /2020

SCANNED
K
Peshawar

Awal Badshah

V/S

Health Deptt: etc.

INDEX

S.NO:	Documents	Annexure	Page No.
1.	Memo of appeal	-----	01-03
2.	Copy of order dt 26.06.2018	---A---	04
3.	Copy of order dt 15.08.2018	---B---	05
4.	Copy of arrival report dt: 27.08.2018	---C---	06
5.	Copy of letter dt: 08.10.2018	---D---	07-08
6.	Copy of arrival report dt: 15.10.18	---E---	09
7.	Copy of Suspension order dt: 06.03.19	---F---	10
8.	Copy of departmental appeal	---G---	11
09.	Vakalat Nama	-----	12

APPELLANT

THROUGH:


(M. ASIF YOUSAFZAI)

ADVOCATE SUPREME COURT,


(S. NOMAN ALI BUKHARI)

ADVOCATE PESHAWAR

Room No. Fr-8, 4th Floor,
Bilour Plaza, Peshawar Cantt:
Contact No. 03339103240

①

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1685 /2020

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1862

Mr. Awal Badshah Khattak, Clinical Technologist (BPS-17),
Health Department, Khyber Pakhtunkhwa, Peshawar.

Dated 13/3/2020

(Appellant)

VERSUS

1. The Chief Secretary to Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. The Secretary Health Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 3. The Dean Khyber Medical College, Peshawar.
4. The Secretary Finance, Govt: of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.

(Respondents)

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 26.06.2018 & AGAINST NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE IMPUGNED ORDER DATED 26.06.2018 MAY BE SET-ASIDE BEING ILLEGAL AND PASSED BY INCOMPETENT AUTHORITY THE RESPONDENTS MAY FURTHER BE DIRECTED TO PAY MONTHLY SALARIES TO THE APPELLANT WITH EFFECT FROM 1/06/2018 TILL DATE BEING ON THE STRENGTH OF DEPARTMENT AND PERFORMED DUTY. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:

FACTS:

Filed to-day
Registrar.
13/03/2020

2

1. That the appellant was performing his duties as Clinical Technologist (BPS-17) in the Department of Pharmacology in Khyber Medical College Peshawar.
2. That on 26.06.2018 Dean of Khyber Medical College Peshawar issued order dated 26.06.2018 wherein the salary of appellant was stopped with immediate effect. **Copy of the order dated 26.06.2018 is attached as Annexure-A.**
3. That vide order dated 15.08.2018 the appellant was relieved of his duties from Khyber Medical College, Peshawar with effect from 15.08.2018 and directed to report to the Health Department Govt: of Khyber Pakhtunkhwa for further posting. **Copy of order dated 15.08.2018 is attached as Annexure-B.**
4. That the appellant on the basis of above mention order dated 15.08.2018 submitted his arrival report to Director General, Health Services on 27.08.2018. **Copy of arrival report is attached as Annexure-C.**
5. That letter dated 24.09.2018 which was communicated to the appellant on 08.10.2018 wherein the appellant was directed to submit his arrival report to Health Department, Govt: of Khyber Pakhtunkhwa instead of Director General, Health Services, Khyber Pakhtunkhwa. The basis of which the appellant submitted his arrival report to Secretary to Government of Khyber Pakhtunkhwa Health Department on 15.10.2018. **copy of the letter dated 24.09.2018 & arrival report are attached as Annexure-D & E.**
6. That the appellant was on the strength of the Department and performing his duty till 06.03.2019 but despite that the salaries was not paid to the appellant.
7. That thereafter vide order dated 06.03.2019 the appellant was suspended for a period of Ninety-Days on account of mis-conduct but the salaries was not paid to the appellant till date. So the appellant filed departmental appeal on 11.12.2019 for the payment of salaries with effect from 01.06.2018 till date which was not responded within statutory period of ninety days. Hence the present appeal on the following grounds amongst the others. **Copy of the Suspension order and Departmental Appeal are attached as Annexure-F & G.**


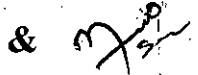
GROUND:

- A) That not paying the monthly salaries to the appellant despite that the appellant was on the strength of the Department and not taking any action on the departmental appeal of the appellant, is against the law, facts, norms of justice, therefore, not tenable.
- B) That not paying the monthly salaries to the appellant despite that the appellant was on the strength and performed his duty, actually amounts to an arbitrary act on the part of the respondents which is not tenable in the eyes of law.
- C) That the appellant has not been treated according to law and rules and has been deprived from the monthly salaries despite proper performance of duty, thus the action of the respondents is totally illegal and without lawful authority.
- D) That being a civil servant, the appellant is entitled to the salaries of the post in accordance with Section-17 of the Civil Servant Act, 1973.
- E) That according to superior court judgment the department cannot uphold the salary of the appellant for indefinite period. And in suspension period appellant is also entitled for his salaries.
- F) That the appellant has been condemned unheard and no prior chance of defenses or hearing was provided to the appellant while stopping his monthly salaries.
- G) That the stoppage of salary for such a long period without any sufficient reason is illegal against the law and natural justice.
- H) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.


APPELLANT
Awal Badshah

THROUGH:


(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT,
& 
(S. NOMAN ALI BUKHARI)
ADVOCATE PESHAWAR



A (4)

KHYBER MEDICAL COLLEGE PESHAWAR
OFFICE OF THE DEAN

091-9222162
091-9222163
principal@kmc.edu.pk
dean@kmc.edu.pk

OFFICE ORDER

In the light of office note moved by the Admin Officer, KMC dated 26/06/2018, the salary of Mr. Awal Badshah, Clinical Technologist (BPS-17), Department of Pharmacology is hereby stopped with immediate effect, on account of misuse, unauthorized, fake and fraudulent production of findings and decision of the Provincial Ombudsman Secretariat, Khyber Pakhtunkhwa advising the Dean KMC to release the salaries of the appellent.

n.u.ha
DEAN
KHYBER MEDICAL COLLEGE
PESHAWAR

No. 6840-43/Estt/KMC

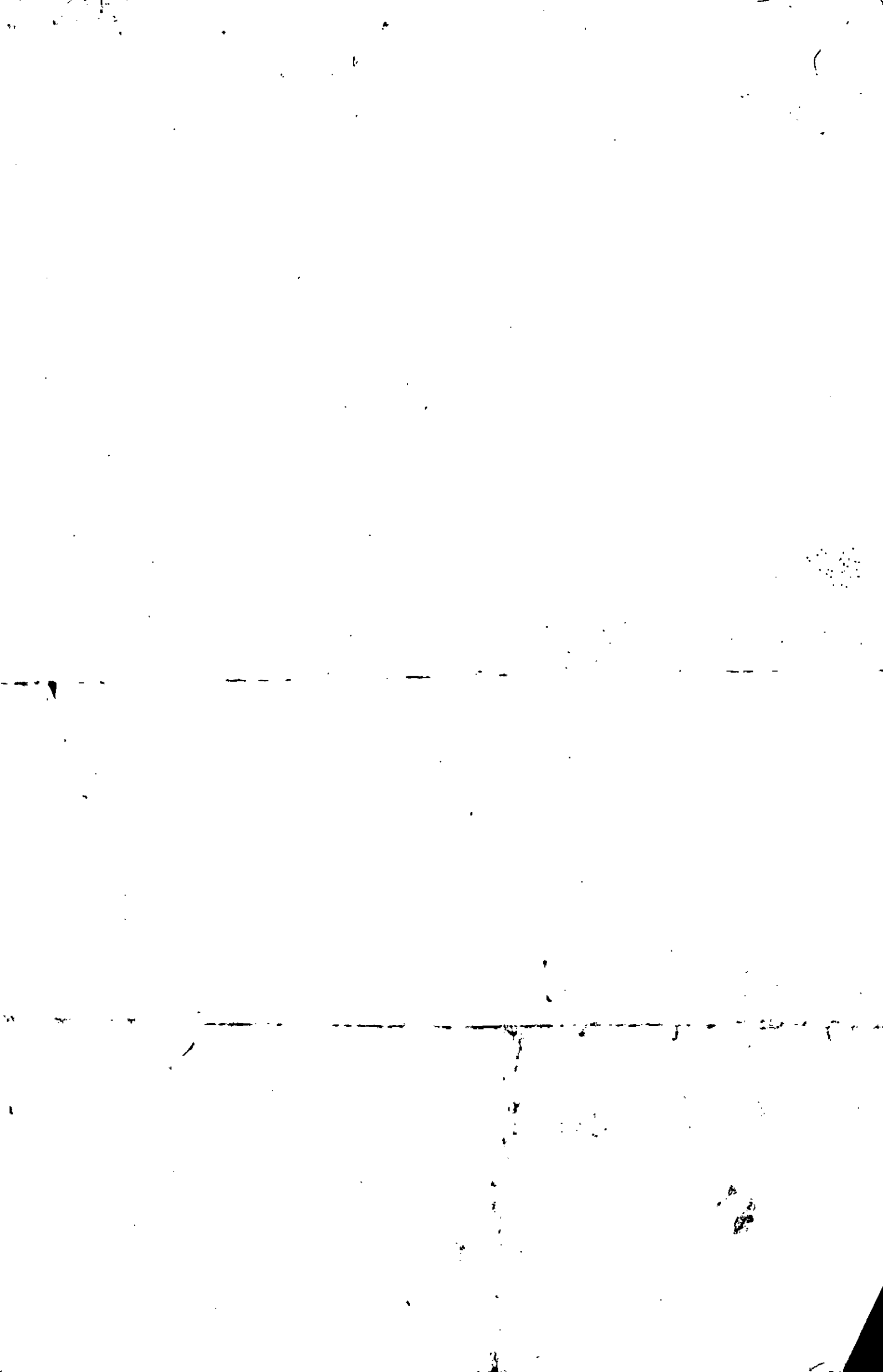
Dated:- 26/6/2018

Copy to:-

1. The Chairman, Department of Pharmacology, KMC, Peshawar.
2. The Provincial Ombudsman Secretariat, Khyber Pakhtunkhwa, Overseas Pakistani Foundation Building, Phase-V, Hayatabad, Peshawar.
3. The Accounts Officer, KMC, Peshawar for information and necessary action.
4. The official concerned.

n.u.ha
DEAN
KHYBER MEDICAL COLLEGE
PESHAWAR

n
ATTESSED





B

KHYBER MEDICAL COLLEGE PESHAWAR
OFFICE OF THE DEAN

091-9222162
091-9222163
principal@kmc.edu.pk
dean@kmc.edu.pk

OFFICE ORDER

Consequent upon the recommendations of the enquiry committee constituted by this office is received vide No. 308/Physio/KMC dated 15/08/2018 (copy attached). Mr. Awal Badshah, Clinical Technologist, Pathalogy (Civil Servant) is hereby relieved of his duties from Khyber Medical College, Peshawar with effect from 15/08/2018 (AN).

The officer concerned is directed to report to the Health Department Government of Khyber Pakhtunkhwa for further posting.

Bushra Jabeen
DEAN

Khyber Medical College
Peshawar

No. SS354/Estt/KMC
Copy to:

Dated: 15/8/2018

1. The Secretary to Government of Khyber Pakhtunkhwa Health Department Peshawar alongwith the attached enquiry report for further necessary action as per rules/recommendations of the committee.
2. The Provincial Ombudsman Secretariat, Khyber Pakhtunkhwa w/r to letter No. PO/Complaint/0656/06/2017/3912 dated 26/06/2018 alongwith the attached enquiry report.
3. The Director General Health Services, Khyber Pakhtunkhwa, Peshawar (enquiry report is attached) for further necessary action as per disciplinary rules.
4. The Chairman Enquiry Committee, KMC.
5. The Chairman, Department of Pharmacology, KMC, Peshawar
6. The Accounts Officer, KMC for information and n/a.
7. The officer concerned.

S
ATTESTED

Bushra Jabeen
DEAN

Khyber Medical College
Peshawar

78,

(78)

(6)

The Director General,
Health Services,

Subject: Approval report

R/Sir,

Humbly, reference to the order
No 8535-41/Estt/KMC, I have
submitted my approval order
for further processing.

27/8/2018

- your obedient
Awar Bad Shah
Clinical Technologist
(Path) BO-17

Received -

27/8/18

ATTESTED

REGISTERED

Sys-II



KHYBER MEDICAL COLLEGE PESHAWAR
OFFICE OF THE DEAN

091-9222162
091-9222163
principal@kmc.edu.pk
dean@kmc.edu.pk

No. 9847 /Estt/KMC

Dated: 08/10/2018

To

1. **Mr. Awal Badshah S/O Sher Bat Khan,**
Clinical Technologist (BPS-17),
Village and P/O Chokara, Tehsil Takhti Nusrati,
District Karak .
Contact No. 0334-9134332

2. **Mr. Awal Badshah S/O Sher Bat Khan,**
C/O Allied Medical Laboratory, Shinwari Medicos,
Opp: Hayatabad Medical Complex, Peshawar.
Contact No. 0334-9134332

Subject: - **ARRIVAL REPORT.**

Memo:

Reference letter No. 6765/AE-VI dated: 24/09/2018 on the subject noted above.

You are directed to submit arrival report to the Health Department Govt. of Khyber Pakhtunkhwa.

Encl (as above)


No. 9848 /Estt/KMC

Copy to:

1. The Accounts Officer KMC, Peshawar.


DEAN
KHYBER MEDICAL COLLEGE
PESHAWAR


DEAN
KHYBER MEDICAL COLLEGE
PESHAWAR


ATTESTED

DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR



Office Ph#091 – 9210269 Exchange 091-9210187 Fax # 091-9210230
All communications should be addressed to the Director General Health Services, Peshawar
And not to any official by name.

KHYBER MEDICAL COLLEGE PESHAWAR

No. 6765 /AE-VI,

Copy to 69/18

Dated. 24/8 /2018.

Date: 02/10/18

To

Mr. Awal Badshah,
Clinical Technologist (Pathology),
Dean, Khyber Medical College,
Peshawar.

Subject: - ARRIVAL REPORT.

I am directed to refer to your Arrival Report dated 27/08, 2018, regarding above captioned subject and to direct to report to the Health Department Khyber Pakhtunkhwa instead of Director General Health Services Khyber Pakhtunkhwa.

ADDITIONAL DIRECTOR GENERAL (H.R.M.)
DGHS KHYBER PAKHTUNKHWA
P E S H A W A R.

1
49/18

Bills
1287+
015/11/18

ATTESTED

To,

E

(9)

The Secretary to Govt
KPK

Subject. Reservial Report

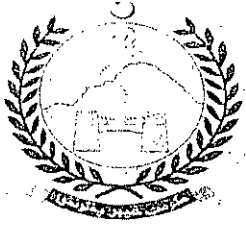
R/SW

Respectfully it is stated that I
have reported to DGHS KPK
on 27/8/2018, for duty & posting.
However, the DGHS have directed
me to report for reservial
to Health Dept. KPK. So
reservial report is submitted
for duty/posting.

15/10/2018

In your obedient
Awal Bad Shah
Medical Technologist
Health Dept KPK
BS-17

Sw
ATTESTED



F (10)
**GOVT. OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

Dated the Peshawar 06th March, 2019

NOTIFICATION.

No. SOH-III/8-60/2018. The Competent Authority (Chief Secretary, Khyber Pakhtunkhwa) is pleased to place the service of Mr. Awal Badshah, Clinical Technologist (Pathology) BS-17 attached to Khyber Medical College, Peshawar currently at the disposal of Health Department under suspension for a period of ninety days under Rule-6, of the Khyber Pakhtunkhwa, Govt. Servants (Efficiency & Discipline) Rules, 2011 on account of his misconduct with immediate effect.

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

Endst of even No and Date.

Copy forwarded to:

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
3. The Dean, Khyber Medical College, Peshawar.
4. PSO to Chief Secretary, Khyber Pakhtunkhwa.
5. PS to Secretary Health, Khyber Pakhtunkhwa.
6. PA to Additional Secretary (E) Health, Khyber Pakhtunkhwa.
7. Officer concerned.

6-3-19
o/k
SECTION OFFICER-III

S
ATTESTED

To

The Secretary to Government,
Health Department,
Khyber Pakhtunkhwa.

Subject: APPLICATION FOR THE PAYMENT OF SALARIES
(W.E.F 01/06/2018 TILL DATE)

Respected Sir,

Most humbly I have the honour to request that the chief secretary Khyber Pakhtunkhwa have placed my services (letter No. SOH-III/8-60/2018) at the disposal of Health Department Khyber Pakhtunkhwa. While since 01-06-2018, I have not been paid my salaries. I cannot be kept OSD for such long time. This situation has caused irreversible loss to me, my family and my dependants. Keeping in view it is humbly requested that kindly pay my salaries for the above mentioned period.

11/12/2018
Your Obediently,

Awal Badshah Khattak
Medical Technologist (BPS-17)
Health Department, Khyber
Pakhtunkhwa

Su
ATTESTED

VAKALAT NAMA

NO. _____/20

IN THE COURT OF KP Service Tribunal, Pesh

Awal Badsher

(Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Health Dept

(Respondent)
(Defendant)

I/We, Awal Badsher

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/20



(CLIENT)

ACCEPTED

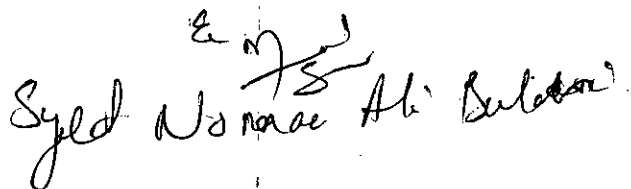


M. ASIF YOUSAFZAI
Advocate Supreme Court
Peshawar.

B.C NO# 10-7327
CNIC # 17301-5106574-3

OFFICE:

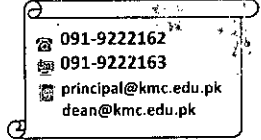
Room # FR-8, 4th Floor,
Bilour Plaza, Peshawar,
Cantt: Peshawar
Cell: (0333-9103240)



Syed Noor Ali



KHYBER MEDICAL COLLEGE PESHAWAR
OFFICE OF THE DEAN



No 5962 /Estt/KMC

Dated 15/07 /2021

WAKALATNAMA

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Mr. Awal Badshah Khattak

Appeal No. 8817/2020

Versus:

Respondent:

Dean Khyber Medical College Peshawar (Respondent No. 3)

By this, power-of-attorney Professor Awangzeb Dean^{KMC}, the said Respondent in the above case do hereby constitute and appoint **MR. AFTAB AHMAD KHATTAK, ADVOCATE** as my attorney for me/us in my/us name and on my behalf to appear, plead, give statement, verify, administer oath, file comments, written statement, reply and do all lawful acts and things in connection with the said case on my behalf or with the execution of any decree or order passed in the case in my favour/against which I/we shall be entitled or permitted to do myself, and, in particular, shall be entitled to withdraw or compromise the case or refer it to arbitration or to agree to abide by the special oath of any person and to withdraw and receive documents and money from the Court or the opposite party and to sign proper receipts and discharges for the same and to engage and appoint any other pleader or pay him as his fee irrespective of my success or failure in case, provided that if the case is heard at any place other than the usual place of sitting of the court the pleader shall not bound to attend except on my agreeing to pay him a special fee to be settled between us.

Attab m

Accepted/Attested
MR. AFTAB AHMAD KHATTAK,
ADVOCATE

h
Awangzeb
DEAN
KHYBER MEDICAL COLLEGE
PESHAWAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

In APPEAL NO. 1685/2020.

Mr. Awal Badshah Khattak

Versus

Chief Secretary, Govt of Khyber Pakhtunkhwa & Others

COMMENTS ON BEHALF OF RESPONDENT NO. 3

RESPECTFULLY SHEWETH:

The answering respondent most earnestly seek permission of this Service Tribunal to submit Comments as under:

Preliminary Objections:

- i. The appellant has got no locus standi or cause of action to file the instant appeal.
- ii. The instant appeal is not maintainable in its present form.
- iii. This instant appeal is bad for misjoinder and non-joinder of necessary parties.
- iv. That the appellant has not come to the Court with clean hands.
- v. This instant appeal is false, frivolous, misleading, and vexatious therefore the same is liable to be dismissed.

ON FACTS: -

- 1) That Para no. 1 is correct hence needs no comments.
- 2) That in replay to Para no. 2, it is humbly stated that the appellant had lodged a complaint in the Provincial Ombudsman Secretariat Khyber Pakhtunkhwa vide complaint No. PO/complaint/0656/086/2017 for releasing of his salary,

- That It is pertinent to mention that, during the pendency of the said complaint, the appellant submitted a copy of **fake** judgment of the Provincial Ombudsman Secretariat Khyber Pakhtunkhwa dated: **14.09.2017** with the decision to release the salaries of the complainant w.e.f. **16.06.2016**, upon which the Dean KMC released his salary vide letter No. 11093-94 /Estt/KMC dated: **16.10.2017**. Copies of fake judgment and salary releasing order are attached as (Annex- **A & B**).
- That later on, the Provincial Ombudsman Secretariat Khyber Pakhtunkhwa issued a **genuine** judgment/Order dated: **22.05.2018** with the recommendation to release the salary of the salary of the complainant for undisputed period which he performed his duty. Copy of the Judgment attached as (Annex- **C**).
- That in response to the said judgment of Provincial Ombudsman Secretariat, the Dean KMC endorsed a letter to the Provincial Ombudsman Secretariat Khyber Pakhtunkhwa that the salary of the complaint for undisputed period has already been released vide letter no. 11093-94 /Estt/KMC dated: 16.10.2017. Copy of letter attached as (Annex- **D**).
- The upon receiving the **fake** judgment, the Provincial Ombudsman Secretariat Khyber Pakhtunkhwa issued a letter to the Dean KMC, and Complainant to appear for hearing before Provincial Ombudsman Secretariat Khyber Pakhtunkhwa on **26.06.2018** at 11:00 AM letter dated: 13.06.2018. Copy of notice of hearing attached as (Annex- **E**).
- That in compliance the Admin Office KMC attended the hearing, during the hearing the Provincial Ombudsman Secretariat Khyber Pakhtunkhwa declared that the Judgment/finding dated: 14.09.2017 have not been issued by the Provincial Ombudsman Secretariat Khyber Pakhtunkhwa, and is fake. The Admin Office was further directed that the salary of the complainant Mr. Awal Badshah should immediately be stopped and further disciplinary action

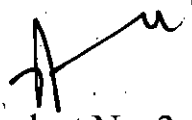
under E&D rules be initiated against him, also an F.I.R to this effect should be lodge against him. Copy of judgment dated: 26.06.2018 attached as (Annex-F).

- That with the compliance of the Judgment of the Provincial Ombudsman Secretariat Khyber Pakhtunkhwa dated **22.05.2018** the Dean KMC stopped salaries of the appellant vide office order no. 6840-43/Esst/KMC on account of misuse, unauthorized, fake and fraudulent production of fake Judgment of the Provincial Ombudsman Secretariat Khyber Pakhtunkhwa. Copy of office order is attached as (Annex-G).
- 3) That in replay to Para No. 3, it id humbly stated that, as per direction of the Provincial Ombudsman Secretariat Khyber Pakhtunkhwa, the Dean KMC constituted enquiry committee to probe into the matter, the enquiry committee recommended that, the services of the officer concerned (being a civil servant) may be placed before Health Department, Furthermore, the detailed case may be sent to the quarter concerned for further investigation/fixing responsibility. Upon which the Dean KMC issued his relieving order vide No. 8535-42/Esst/KMC dated: 15.08.2018 copies are attached as (Annex-H, I, J).
 - 4) That Para no. 4 is pertinent to record hence needs no comments.
 - 5) That Para No. 5 is not related to answering respondent hence needs no comments.
 - 6) That Para No. 6 is not related to answering respondent hence needs no comments.
 - 7) That Para No. 7 is not related to answering respondent hence needs no comments.

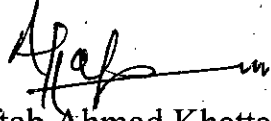
GROUND: -

- A. That with the compliance of the Judgment of the Provincial Ombudsman Secretariat Khyber Pakhtunkhwa dated **22.05.2018** the Dean KMC stopped

- i) **Dismiss** the subject appeal with costs being meritless and non-maintainable,
- ii) **Grant** any other relief to Respondent no. 3 as deemed appropriate in the facts and circumstances of the case.


Respondent No. 3

Through


Aftab Ahmad Khattak
Advocate High Court,
Peshawar.

Dated: 10/10/2022

VERIFICATION:

Verified on oath on this 10th Day of October 2022 at Peshawar that as per information provided by the department the contents of these comments, including all the objections, paragraphs and grounds are true and correct to the best of my knowledge and nothing has been concealed from this Hon'ble Court either intentionally or otherwise.

DEPONENT



IN-CHARGE LITIGATION MTI

CNC# 17301-4804223-3

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

In APPEAL NO. 1685/2020.

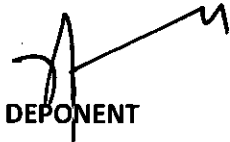
Mr. Awal Badshah Khattak

Versus

Chief Secretary, Govt of Khyber Pakhtunkhwa & Others

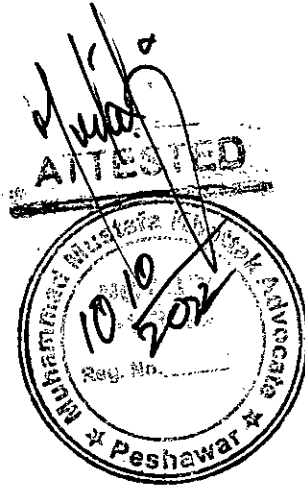
AFFIDAVIT

I, Haroon Sarfaraz S/O Sarfaraz Khan (Manager Legal MTI-KTH/KMC/KCD) do hereby solemnly affirm that the contents of above comments, as provided by the concerned department, are true and correct and nothing has been concealed from this Honorable Tribunal.


DEPONENT

17301-4804223-3.

0345-9024524



3/3

Reply of the Agency (KMC) was sent to the complainant for his feedback. In response appellant contended that he has demanded the pay for the period, which is served by him on record (since 16/6/2016). He added that the daily life of his family is badly suffered.

REJOINER

Notice was issued under regulation-7 of the KPK Provincial Ombudsman Act, 2011 to the Dean, KMC, Peshawar to meet the allegations and submit reply / comments. In response, Dean, KMC Peshawar submitted his written reply that the appellant remained absent from his duty w.e.f. 26/11/2013 to 01/7/2015 and as soon as findings of the inquiry committee are received, his salary will be released accordingly.

REPORT OF THE AGENCY

Complainant Mr. Awal Badshah Khattak has instituted a complaint that he has not been paid his salaries since 16/6/2016. He further contended that he has performed his duty regularly during this mentioned period and his family has adversely affected due to non-payment of his salaries.

THE COMPLAINT

CLOSURE FINDINGS	
1	COMPLAINT NO. NO.PO/complaint/0656/086/2017
2	NAME & ADDRESS OF THE COMPLAINANT Awal Badshah Khattak, Medical Technologist, Khyber Medical College, Peshawar
3	NAME OF THE AGENCY Dean, Khyber Medical College, Peshawar
4	NAME OF THE INVESTIGATION OFFICER Mumtaz Ahmad, Consultant-II
5	SUBJECT OF COMPLAINT Request for releasing of salaries
6	DATE OF REGISTRATION 28/8/2017
7	DATE OF FINDINGS 14/9/2017





PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA

KHYBER MEDICAL COLLEGE PESHAWAR

Diary No: 95-36
Dated: 11-10-17

HEARING

In view of the divergent stance of both sides, the case was fixed for hearing on 14/9/2017. The representative of KMC (litigation officer) appeared for hearing. The case was viewed and inquired on the basis of record. The representative of the KMC showed willingness to pay salaries to the complainant. A written statement was also obtained from the representative of KMC based on the facts that the KMC administration will release his pay as per rules.

FINDINGS

It was established that the agency (KMC) has not properly considered the request of the appellant for releasing of his salaries. The right of the complainant has been grossly infringed by ignoring his request since 16/6/2016. The proved record of his duty shows that the pay of the complainant should be released as per his duty record.

DECISION

The Dean, KMC, Peshawar is advised to release the salaries of the appellant w.e.f. 16/6/2016. The above recommendation shall be implemented within fifteen (15) days.

Handwritten notes:
ECHA
18/10/17
Pr. copy
B.M.
Pr. copy

Signature of Provincial Ombudsman
Provincial Ombudsman
Khyber Pakhtunkhwa

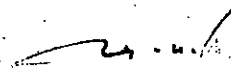
KHYBER MEDICAL COLLEGE, PESHAWAR

No. 11093-94 /Estt /KMC

Dated 16/10 /2017

Copy of Decision of Provincial Ombudsman Secretariat
Dated: 14-09-2017 is forwarded to:-

1. The Accounts officer KMC, Peshawar for information and with the remarks to release the pay w.e.f 16-06-2016.
2. Provincial Ombudsman Secretariat Khyber Pakhtunkhwa Peshawar.


DEAN
KHYBER MEDICAL COLLEGE
PESHAWAR





PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA

PO/Complaint No.0656/08/2017/353

Dated 23/05/2018

1. Dean Khyber Medical College, Peshawar.
2. Mr. Awal Badshah Khattak r/o Hayatabad Medical Complex.

UNIVERSITY COLLEGE PESHAWAR

Diary No. 4024

Date: 1-6-18

Subject: REQUEST FOR RELEASE OF SALARY.

Memo:

I am directed to enclose herewith a copy of the Findings of the Provincial Ombudsman Khyber Pakhtunkhwa on the subject noted above for information and necessary action.

Under section 31 of the Khyber Pakhtunkhwa Provincial Ombudsman Act, 2010, the aggrieved person can file representation to the Governor, Khyber Pakhtunkhwa, within thirty days of the orders, if he so desired.

Munir Ahmad
Consultant-II

Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa.

ENDST: EVEN NO & DATE:

Copy forwarded to the i/c Computer Section, Provincial Ombudsman Secretariat Khyber Pakhtunkhwa alongwith findings in duplicate, for updating record under Regulation 19 of the Khyber Pakhtunkhwa Provincial Ombudsman Office (Registration, Investigation and Disposal of Complaints) Regulations, 2011.

Consultant-II

Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa.

1287A
21/31/5/18



CLOSURE FINDINGS		
1	COMPLAINT NO.	PO/Complaint No.0656/08/2017.
2	NAME & ADDRESS OF THE COMPLAINANT	Mr. Awal Badshah Khattak r/o Hayatabad Medical Complex.
3	NAME OF THE AGENCY COMPLAINED AGAINST	Dean Khyber Medical College, Peshawar.
4	NAME OF THE INVESTIGATION OFFICER	Mumtaz Ahmad Consultant-II.
5	SUBJECT OF COMPLAINT	Request for release of salary.
6	DATE OF REGISTRATION	10/08/2016.
7	DATE OF FINDINGS	22/05/2018.

THE COMPLAINT

Mr. Awal Badshah Khattak instituted complaint that he worked as Medical Technologist (B-17) in Khyber Medical College Peshawar (KMC) and had rendered 34 years government service. Since 01/06/2016 he has not been paid salary by KMC despite attending the office regularly. He has requested to issue direction to the Agency to pay his salary as without salary his family was badly financially suffered.

REPORT OF THE AGENCY

In terms of section 10(4) of the Khyber Pakhtunkhwa Provincial Ombudsman Act, 2010 notice was issued to Dean KMC Peshawar to meet the allegations and submit reply including rebuttal, if any. In response, Dean KMC Peshawar informed that inquiry against complainant for willful absence from duty with effect from 26/11/2013 to 01/07/2015 is still pending and report is not submitted by Deputy Secretary (Drugs) Health Department who was appointed by the Competent Authority vide Notification No. SOH-III/8-60/2014 dated 05/10/2015.

REJOINDER

Reply of the Agency was shared with the complainant who in his rejoinder stated that he was not demanding of salary for the period he remained hospitalized due to road accident, which was the subject of Enquiry pending since 2013. However, he has been attending and performing duty since 16/06/2016 but salary was denied him, causing financial hardship to his family.

HEARING

Due to divergent pleadings of the parties the complaint was fixed for hearing on 14/09/2017. The representative of the Agency stated that the complainant was drawing salaries for period of absence i.e. from 26/11/2013 to 01/07/2015 and 14/07/2015 to 06/06/2016. Enquiry is pending against the complainant. Since 16/06/2016 the complainant has been regularly performing duty but salary was not paid due to pendency of Inquiry. His salary will be released under the rules.


FINDINGS



notification dated 05/10/2015 miserably failed to submit report which shows irresponsible attitude and delinquency in official duty on part of DS (Drugs). The Inquiry was regarding to determine the facts about willful absence of complain from duty. The appointment of DS (Drugs) was not under any rules/regulation as no reference about rules was mentioned in the notification.

It is therefore recommended to release the salary of the complainant for undisputed period in which he performed duty. For absence period, the DS (Drugs) may be directed to complete the Inquiry within 7 days failing which disciplinary proceedings may be initiated against him being delinquent in his official duty.

These recommendations may be implemented within 15 days from the date of communication of these Findings or reasons for non-compliance be intimated within said period.


AQAL BADSHAH
 Provincial Ombudsman.



KHYBER MEDICAL COLLEGE PESHAWAR

OFFICE OF THE DEAN

☎ 091-9222162
 ☎ 091-9222163
 ✉ principal@kmc.edu.pk
 ✉ dean@kmc.edu.pk

No. 6367 /Estt/KMC

Dated: 8/6/2018

To

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

Attention: Deputy Secretary (Drugs)/Inquiry Officer

Subject: - ENQUIRY REPORT REGARDING WILLFUL ABSENCE FROM DUTY OF MR. AWAL BADSHAH, MEDICAL TECHNOLOGIST (BPS-17).

Memo:

Reference Provincial Ombudsman Secretariat, Khyber Pakhtunkhwa, Peshawar letter No. PO/Complaint No. 0656/08/2017/3053 dated: 23-05-2018 alongwith its enclosures on the subject noted above (copy attached).

Further to the above. I would like to draw your kind attention towards your Notification No. SOII-III/8-60/2014 dated 05/10/2015 (copy attached) and this office letter No. 1696/Estt/KMC dated 01/03/2016, No. 4258/Estt/KMC dated 23/06/2016, No. 590/Estt/KMC dated 19/01/2017 and No. 6720/Estt/KMC dated: 16/06/2017 requesting to provide findings of the enquiry officer.

It is once again requested that enquiry had been conducted by Deputy Secretary (Drugs) in respect of Mr. Awal Badshah. Medical Technologist (BPS:17) attached to KMC regarding his willful absence from duty w.e.f. 26/11/2013 to 01/07/2015 wherein the enquiry officer was asked to submit report within 15 days (copy attached) but till date findings of enquiry report has not been sent to this office.

It is therefore. requested that the findings of the enquiry report in the instant case may kindly be sent to this office to proceed further as per directives of Provincial Ombudsman Secretariat, Khyber Pakhtunkhwa. Peshawar w/r to letter quoted above.

Encl: (as above)


 DEAN
 KHYBER MEDICAL COLLEGE
 PESHAWAR

No. 6368 /Estt/KMC
Copy to:-

1. Mr. Mumtaz Ahmad Consultant-II Provincial Ombudsman Secretariat, Khyber Pakhtunkhwa, Peshawar with the remarks that the salary of the complainant for undisputed period (during which period he had performed duties) has already been released vide this letter No. 11093-94/Estt/KMC dated: 16-10-2017 (copy attached).


 DEAN
 KHYBER MEDICAL COLLEGE
 PESHAWAR

PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA

KHYBER MEDICAL COLLEGE PESHAWAR

Diary No 4497

NOTICE OF HEARING
FIXED FOR: 26/06/2018 AT 11:00 AM Date: 20/06/18

No: PO/Complaint/0656/06/2017/2641

Dated: 13/06/2018

1. Dean,
Khyber Medical College Peshawar.
2. Registrar,
Khyber Medical College Peshawar.
3. Mr. Awal Badshah Khattak Hayatabad Medical Complex.

Subject: **ENQUIRY REPOT REGARDING WILLFUL ABSENCE FROM DUTY OF MR. AWAL BADSHAH MEDICAL TECHNOLOGIST (BPS-17).**

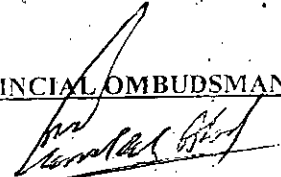
Memo:

Reference Khyber Medical College, Peshawar Endst no. 6368/Estt/KMC dated 08/06/2018 on the above mentioned subject enclosing therewith a copy of findings dated 14/09/2017 in the complaint No. 0656/08/2017 filed by Mr. Awal Badshah Khattak, Medical Technologist Khyber Medical College, Peshawar. Record of Provincial Ombudsman shows that no such findings were issued by Provincial Ombudsman Secretariat. In order to investigate the matter the following are requested to attend the office of undersigned on 26/06/2018 at 11:00AM.

1. Dean, Khyber Medical College or his representative.
2. Awal Badshah Khattak, Medical Technologist, Khyber Medical College, Peshawar.

Kindly make sure to attend the hearing on above fixed date.

THIS ISSUES WITH THE APPROVAL OF HONORABLE PROVINCIAL OMBUDSMAN.

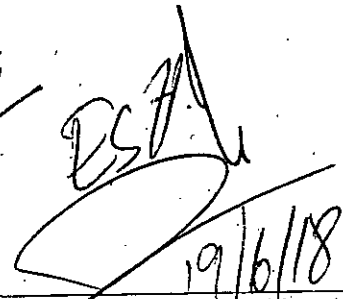


Mumtaz Ahmad
Consultant-II

Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa.

Endst: Even No & Date:

Copy forwarded for information to PS to Ombudsman Secretariat Khyber Pakhtunkhwa.

urgent

19/6/18

Consultant-II
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa.

OFFICE NOTE

Sir,

1. Please refer to Provincial Ombudsman Secretariat Khyber Pakhtunkhwa letter No. PO/Complaint/0656/06/2017/3642 dated: 13-06-2018 address to Dean KMC, Peshawar in connection with enquiry report regarding willful absence from duty of Mr. Awal Badshah, Medical Technologist (BPS-17) KMC and regarding submission of fake judgment of Provincial Ombudsman Secretariat Khyber Pakhtunkhwa by Mr. Awal Badshah, Medical Technologist (BPS-17) KMC for release of his salary.
2. In this connection the undersigned appeared before the court of Provincial Ombudsman Secretariat Khyber Pakhtunkhwa on 26-06-2018 at 11:00 am to discuss/investigate the issue.
3. The Provincial Ombudsman Secretariat Khyber Pakhtunkhwa verbally declared that the Judgment/findings dated: 14-09-2017 in the complaint No. 0656/08/2017 have not been issued by the Provincial Ombudsman Secretariat Khyber Pakhtunkhwa and are fake in toto. He further directed that the salary of Mr. Awal Badshah, Medical Technologist (BPS-17) should immediately be stopped and further disciplinary action under E&D rules be initiated against him. Also an F.I.R to this effect should be lodged against him moreover, the amount received so-for on account of fake documents should be recovered from him.
4. The undersigned requested the Honorable Provincial Ombudsman Secretariat Khyber Pakhtunkhwa that all the above directives may please be communicated to the Dean KMC in writing to proceed further.
5. Report is submitted for your kind information and further necessary action.

6. DEAN/KMC

7. Asst.

26/6/18
Admin: Officer

OFFICE NOTE

Sir,

1. Please refer to Provincial Ombudsman Secretariat Khyber Pakhtunkhwa letter No. PO/Complaint/0656/06/2017/3642 dated: 13-06-2018 address to Dean KMC, Peshawar in connection with enquiry report regarding willful absence from duty of Mr. Awal Badshah. Medical Technologist (BPS-17) KMC and regarding submission of fake judgment of Provincial Ombudsman Secretariat Khyber Pakhtunkhwa by Mr. Awal Badshah, Medical Technologist (BPS-17) KMC for release of his salary.
2. In this connection the undersigned appeared before the court of Provincial Ombudsman Secretariat Khyber Pakhtunkhwa on 26-06-2018 at 11:00 am to discuss/investigate the issue.
3. The Provincial Ombudsman Secretariat Khyber Pakhtunkhwa verbally declared that the Judgment/findings dated: 14-09-2017 in the complaint No. 0656/08/2017 have not been issued by the Provincial Ombudsman Secretariat Khyber Pakhtunkhwa and are fake in toto. He further directed that the salary of Mr. Awal Badshah, Medical Technologist (BPS-17) should immediately be stopped and further disciplinary action under E&D rules be initiated against him. Also an F.I.R to this effect should be lodged against him moreover, the amount received so-for on account of fake documents should be recovered from him.
4. The undersigned requested the Honorable Provincial Ombudsman Secretariat Khyber Pakhtunkhwa that all the above directives may please be communicated to the Dean KMC in writing to proceed further.
5. Report is submitted for your kind information and further necessary action.

6. DEAN/KMC

26/6/18
Admin: Officer

7. Estt.

If agreed, Salary of the fraudulent shall be stopped immediately and the E&D rules plus lodging an FIR shall be made when written instructions are received from the prov. ombudsman.

8. DEAN

mmakal
26/06/18

9. Estt.



KHYBER MEDICAL COLLEGE PESHAWAR
OFFICE OF THE DEAN

091-9222162
091-9222163
principal@kmc.edu.pk
dean@kmc.edu.pk

OFFICE ORDER

In the light of office note moved by the Admin Officer, KMC dated 26/06/2018, the salary of Mr. Awal Badshah, Clinical Technologist (BPS-17), Department of Pharmacology is hereby stopped with immediate effect, on account of misuse, unauthorized, fake and fraudulent production of findings and decision of the Provincial Ombudsman Secretariat, Khyber Pakhtunkhwa advising the Dean KMC to release the salaries of the appellant.

[Signature]
DEAN
KHYBER MEDICAL COLLEGE
PESHAWAR

Dated:- 26/6/2018

No. 6840-43/Estt/KMC

Copy to:-

1. The Chairman, Department of Pharmacology, KMC, Peshawar.
2. The Provincial Ombudsman Secretariat, Khyber Pakhtunkhwa, Overseas Pakistani Foundation Building, Phase-V, Hayatabad, Peshawar.
3. The Accounts Officer, KMC, Peshawar for information and necessary action.
4. The official concerned.

[Signature]
DEAN
KHYBER MEDICAL COLLEGE
PESHAWAR

OK



PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA

KHYBER MEDICAL COLLEGE PESHAWAR

No: PO/Complaint/0656/06/2017 1395

Elect No: 4755

Regd: 2/7/18

Dated: 26/06/2018

The Dean,
Khyber Medical College Peshawar.

Subject: ENQUIRY REPORT REGARDING WILLFUL ABSENCE FROM DUTY OF
MR. AWAL BADSHAH MEDICAL TECHNOLOGIST (BPS-17).

Memo: Please refer to the endorsement No. 11093-94/Estt/KMC, dated 16/10/2017 and the proceeding held on 26/06/2018. It was pointed out that the endorsed copy is not available in our record. The representative of KMC was also apprised in this regard. In order to trace out the endorsed copy kindly provide a copy of Dak Book showing the endorsed copy received in Provincial Ombudsman Office or if sent through Registered post, a copy of receipt be provided.

The name of Dispatch Rider may also be communicated and he may be enquired to whom he has delivered the endorsed copy.

THIS ISSUES WITH THE APPROVAL OF HONORABLE PROVINCIAL OMBUDSMAN.

Mumtaz Ahmad
Consultant-II

Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa.

Endst: Even No & Date:

Copy forwarded for information to PS to Ombudsman Secretariat Khyber Pakhtunkhwa.

Consultant-II
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa.

2/7/18

Dated 26/06/2018

PO/Complaint No.0656/08/2017/2912

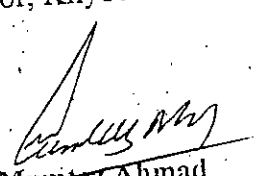
1. Dean Khyber Medical College, Peshawar.
2. Mr. Awal Badshah Khattak r/o Hayatabad Medical Complex.

Subject: REQUEST FOR RELEASE OF SALARY.

Memo:

I am directed to enclose herewith a copy of the Proceedings of the Provincial Ombudsman Khyber Pakhtunkhwa on the subject noted above for information and necessary action.

Under section 31 of the Khyber Pakhtunkhwa Provincial Ombudsman Act, 2010, the aggrieved person can file representation to the Governor, Khyber Pakhtunkhwa, within thirty days of the orders, if he so desired.


Munitaz Ahmad

Consultant-II
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa.

ENDST: EVEN NO & DATE:

Copy forwarded to the i/c Computer Section, Provincial Ombudsman Secretariat Khyber Pakhtunkhwa alongwith findings in duplicate for updating record under Regulation 19 of the Khyber Pakhtunkhwa Provincial Ombudsman Office (Registration, Investigation and Disposal of Complaints) Regulations, 2011.

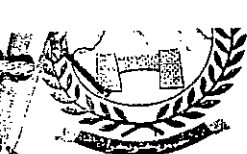
Consultant-II
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa.

Overseas Pakistanis Foundation Building, Phase -V, Hayatabad, Peshawar.

Office Phone # 091-9219531-32, Office Fax # 091-9219526

Website: www.ombudsmankp.gov.pk

Email: provincialombudsman@gmail.com



CLOSURE FINDINGS	
1	COMPLAINT NO.
2	NAME & ADDRESS OF THE COMPLAINANT
3	NAME OF THE AGENCY COMPLAINED AGAINST
4	NAME OF THE INVESTIGATION OFFICER
5	SUBJECT OF COMPLAINT
6	DATE OF FINDINGS
7	DATE OF PROCEEDINGS

PROCEEDINGS

WHEREAS, Mr. Awal Badshah Khattak, Medical Technologist Department of Pharmacology, Khyber Medical College, Peshawar had instituted a complaint on 10/08/2017 stating that his salary w.e.f 01/06/2016 has not been paid.

AND WHEREAS, Khyber Medical College, Peshawar intimated that the complainant remained wilful absent from his duties w.e.f 26/11/2013 to 01/07/2015 and Inquiry was pending in Health Department against him.

AND WHEREAS, hearing in the complaint took place on 14/09/2017. The representative of KMC Peshawar testified that the complainant remained absent from duty w.e.f 26/11/2013 to 01/07/2015, and 14/07/2015 to 06/06/2016. During his absence period, he was regularly drawing his salary. Thus, the Competent Authority appointed Enquiry Officer to proceed against him.

AND WHEREAS, the post of Khyber Pakhtunkhwa Provincial Ombudsman became vacant w.e.f 16/08/2017 upto 04/05/2018. Therefore, no findings were made and issued by the Provincial Ombudsman during the period cited above.

AND WHEREAS, the findings in the complaint was issued on 22/05/2018 which was sent to the Agency for action.

AND WHEREAS, Dean, KMC intimated that action has already been taken on the findings dated 14/09/2017 received from Provincial Ombudsman.

AND WHEREAS, after perusal of the findings dated 14/09/2017 it came to light that the findings were forged and prepared by the complainant himself with connivance of some official (if any) with fake signature in order to deceive the Agency to release his outstanding salaries without completion of Inquiry initiated against him.

AND WHEREAS, on account of Commission and Omission, Mr. Awal Badshah Khattak has been found for committing the following offences and was liable to be prosecuted in the Court of law.


1. Section 415, 417 PPC cheating and dishonestly inducing.
2. Section 463, 464, 465 PPC forgery and making false documents.
3. Section 468, 471 PPC forgery for purpose of cheating.
4. Any other relevant section.

NOW, THEREFORE, in view of the acts of omission and commission, committed by Mr. Awal Badshah Khattak, the following recommendations are made.

Overseas Pakistanis Foundation Building, Phase -V, Hayatabad, Peshawar.
Office Phone # 091-9219531-32, Office Fax # 091-9219526
Website: www.ombudsmankp.gov.pk
Email: provincialombudsman@gmail.com



- 1) forged findings drawn and signed in the name of Provincial Ombudsman by Mr. Awal Badshah Khattak has no legal sanctity, therefore, action taken on the basis of said findings may be immediately rescinded and amount recovered from him.
- 2) findings dated 22/05/2018 issued by the Ombudsman Secretariat are also rescinded and the complaint stands rejected/dismissed.
- 3) FIR may be registered against him for cheating by committing fraud with Agency and preparing forged documents of findings.
- 4) immediate disciplinary action under the KMu Servants (Efficiency & Discipline) Rules may be initiated as the said official twice committed fraud with Government and deserve no lenient view. Criminal proceedings and Disciplinary proceedings may go side by side.


AQAL BADSHAH
Provincial Ombudsman.

26/5/18



KHYBER MEDICAL COLLEGE PESHAWAR

OFFICE OF THE DEAN

091-9222162
091-9222163
principal@kmc.edu.pk
dean@kmc.edu.pk

OFFICE ORDER

The following Committee is hereby constituted with immediate effect:-

1. Prof. Dr. Shafiq ur Rehman
Associate Dean, Under Graduate KMC
Chairman
2. Dr. Asif Hussain Munir,
Assistant Professor
Department of Pathology KMC
Member
3. Mr. Sher Abdullah
Admin: Officer KMC
Member
4. Mr. Irfan Ullah,
Accounts Officer KMC
Member
5. Mr. Saqib Raza,
Legal Advisor KMC
Member

TOR of the committee:

1. To probe into the recommendations of Provincial Ombudsman Secretariat vide letter PO/Complaint/0656/06/2017/3914 Dated: 26-06-2018 in respect of Mr. Awal Badshah, Medical Technologist KMC (copy attached).
2. The Committee may submit its report within 07 days positively.

DEAN
KHYBER MEDICAL COLLEGE,
PESHAWAR

Dated: 6/7- /2018

No: 7199-30 Est/KMC
Copy to:-

1. The Provincial Ombudsman Secretariat, Khyber Pakhtunkhwa: Overseas Pakistani Foundation Building, Phase-V, Hayatabad, Peshawar.
2. All respected members for information and necessary action.

DEAN
KHYBER MEDICAL COLLEGE,
PESHAWAR



KHYBER MEDICAL COLLEGE PESHAWAR

OFFICE OF THE ASSOCIATE DEAN

(UNDERGRADUATE)

091-9222162
091-9222163
principal@kmc.edu.pk
dean@kmc.edu.pk

No. 305 /Phy/KMC

Dated: 06/08/2018

To

Mr. Awal Badshah,
Clinical Technologist,
Department of Pharmacology,
Khyber Medical College, Peshawar

Subject: - **SUBMISSION OF STATEMENT BEFORE ENQUIRY COMMITTEE**

Memo:

Reference your reply to questionnaire submitted by you on 06/08/2018 to the enquiry committee. It is to inform you that the same is not accompanied by your statement to the enquiry committee as asked for, which is essential requirement of the enquiry.

You are directed, to submit written statement to the enquiry committee by tomorrow 07/08/2018 positively.

Dr. Shafiq ur Rehman
Associate Dean (Undergraduate)
Chairman
Enquiry Committee, KMC.

Received

06/08/2018

Awal Badshah

7/8/2018



KHYBER MEDICAL COLLEGE PESHAWAR

OFFICE OF THE ASSOCIATE DEAN

(UNDERGRADUATE)

091-9222162
091-9222163
principal@kmc.edu.pk
dean@kmc.edu.pk

No. 308 /Phy/KMC

Dated: 15/8/2018

To

The Dean,
Khyber Medical College,
Peshawar.

Subject: - **ENQUIRY REPORT.**

Memo:

Please refer to your office letter No. 7129-30/Estt/KMC dated: 06-07-2018.

Enclosed please find herewith the enquiry report for further necessary action.

Dr. Shafiq ur Rehman
Associate Dean (Undergraduate)
Chairman
Enquiry Committee, KMC.

KHYBER MEDICAL COLLEGE, PESHAWAR

ENQUIRY REPORT

In pursuance of Dean, Khyber Medical College, Peshawar office order No. 7129-30/Estt/KMC dated 06/07/2018 regarding conduction of enquiry, in compliance to Provincial Ombudsman Secretariat Khyber Pakhtunkhwa letter No. PO/Complaint/0656/06/2017/3914 dated 26/06/2018. The following report is submitted.

BACKGROUNDS:

Minutes proceedings were received from the office of Provincial Ombudsman (PO) Secretariat bearing No. nil dated 14/09/2017 (later found to be factitious) regarding the release of salary in respect of Mr. Awal Badshah, Clinical Technologist. The establishment issued its endorsement to the accounts section for compliance with a copy to Provincial Ombudsman for information.

PROCEEDINGS:

1. A letter was issued by the Chairman enquiry committee vide No. 7827/Phy/KMC dated 24/07/2018 to Mr. Awal Badshah, Clinical Technologist, Department of Pharmacology to present himself before the enquiry committee in person to record statement and reply to the questionnaire of the enquiry committee.
2. Mr. Awal Badshah presented before the enquiry committee on 26/07/2018
3. Necessary verbal and written statements were obtained from him (copy attached as Annex-A)
4. Cross examination was also carried out with the help of questionnaire by the enquiry committee (copy enclosed as Annex-B).
5. The committee also heard the statement of establishment section and looked into the concerned letters (Annex-C)

FINDINGS:-

Mr. Awal Badshah has denied in his written statement the accusation leveled against him in the instant case. On the other hand while going through the direction of Provincial Ombudsman Secretariat, and written statement obtained from dispatch section given in Mr. Ayub Jan case vide this office order No. 7999-800/Estt/ KMC dated 31/07/2018 (Annex-D & E) it shows very much difference from the written statement. However, in his verbal statement Mr. Awal Badshah totally agreed during the course of discussion before the committee that he had received the letter from KMC dispatch office but with the impression that it was a personal copy meant for him.

[Handwritten signature]
ASL

07/8/2018

Awal Bad Shah
Med. Technologist

[Handwritten initials]
ASL

Furthermore, he refused to point out any helping hand at both ends i.e. Provincial Ombudsman Secretariat and KMC office.

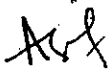
During the course of this enquiry a report of a long pending inquiry pertaining to Mr. Awal Badshah about his willful absence with effect from 26-11-2013 to 01-07-2015 at government level was also received by the committee through the office of Dean KMC but this enquiry lacks any definite conclusive remarks/recommendations.

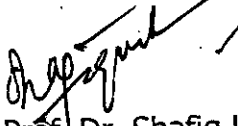
CONCLUSION:

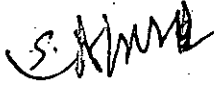
Although Mr. Awal Badshah has denied any accusation against him in his written statement and answers to the questionnaire, however, all the circumstantial evidences mentioned above in the section of findings show that he was involved in the factitious activities for release of his salary out of domestic financial compulsions.


RECOMMENDATIONS:


1. Mr. Awal Badshah, Clinical Technologist being a Civil servant is under the control of Secretary Health/DGHS, Govt. of Khyber Pakhtunkhwa. It is recommended that detailed case may be sent to the quarter concerned for further investigation /fixing responsibility.
2. The enquiry report prepared at government level as referred to above may also be sent with the case.
3. It is further recommended that his services be placed at the disposal of Health Department ^{to hence} action against him may be taken in the light of direction mentioned in the letter of Provincial Ombudsman Secretariat vide No. PO/Complaint No. 0656/08/2017/3912 dated 26/06/2018 (Annex-F).


Asstt. Prof. Dr. Asif Hussain Munir
Member
Enquiry Committee, KMC.


Prof. Dr. Shafiq Ur Rahman
Chairman
Enquiry Committee, KMC.


Sher Abdullah
Member
Enquiry Committee, KMC.


Saqib Raza, Legal Advisor
Member
Enquiry Committee, KMC


Accounts Officer
Khyber Medical College
Peshawar.

07/08/2018
Awal Bad Shah
med. Peshawar

PCSI - 26/07/18
13



KHYBER MEDICAL COLLEGE PESHAWAR

OFFICE OF THE DEAN

091-9222162
091-9222163
principal@kmc.edu.pk
0000000000000000

OFFICE ORDER

Consequent upon the recommendations of the enquiry committee constituted by this office is received vide No. 308/Physio/KMC dated 15/08/2018 (copy attached). Mr. Awal Badshah, Clinical Technologist, Pathology (Civil Servant) is hereby relieved of his duties from Khyber Medical College, Peshawar with effect from 15/08/2018 (AN).

The officer concerned is directed to report to the Health Department Government of Khyber Pakhtunkhwa for further posting.

Bushra Jaleel
DEAN

Khyber Medical College
Peshawar

Dated: 15/8/2018

No. SS35-4/Estt/KMC

Copy to:

1. The Secretary to Government of Khyber Pakhtunkhwa Health Department Peshawar alongwith the attached enquiry report for further necessary action as per rules/recommendations of the committee.
2. The Provincial Ombudsman Secretariat, Khyber Pakhtunkhwa w/r to letter No. PO/Complaint/0656/06/2017/3912 dated 26/06/2018 alongwith the attached enquiry report.
3. The Director General Health Services, Khyber Pakhtunkhwa, Peshawar (enquiry report is attached) for further necessary action as per disciplinary rules.
4. The Chairman Enquiry Committee, KMC.
5. The Chairman, Department of Pharmacology, KMC, Peshawar
6. The Accounts Officer, KMC for information and n/a.
7. The officer concerned.

Bushra Jaleel
DEAN

Khyber Medical College
Peshawar

6119
19-10-75



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated the Peshawar 05th October, 2015

NOTIFICATION.

No. SOH-III/8-60/2014. The Competent Authority is pleased to appoint the Deputy Secretary (Drugs), Health Department to conduct enquiry in respect of Mr. Awal Badshah, Medical Technologist (BS-17) attached to KMC, Peshawar regarding his willful absent from duty with effect from 26-11-2013 till 01-07-2015.

Secretary to Govt. of Khyber Pakhtunkhwa
Health Department

Endst No. of even No and Date.

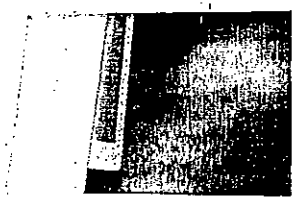
Copy forwarded to:

1. The Hospital Director, MTI, KTH/KMC/KCD, Peshawar.
2. The Principal, KMC, Peshawar.
3. PS to Secretary Health, Khyber Pakhtunkhwa.
4. PA to AS (E) Health, Khyber Pakhtunkhwa.
5. The Deputy Secretary (Drugs), Health Department concerned. He is requested to kindly conduct enquiry in the above mentioned issue and submit report to this department within **Fifteen (15)** days to proceed further in the matter. (Relevant record attached).

7512
12-10-15
OFFICE OF THE
HOSPITAL

(Muhammad Tariq)
Section Officer-III

ESTH
Principal
16076





**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

No. SOH-III/8-60/2018(Awal Badshah/Inquiry)
Dated the Peshawar 06th March, 2019

To

1. **Mr. Ahmad Kamal (PMS BS-18),**
Secretary PTA.
2. **Muhammad Khalil Akhtar (BS-18),**
Deputy Chief, HSRU Health Department.

Copy to: _____

Dated: _____

1399

11/03/19

SUBJECT: DISCIPLINARY ACTION AGAINST MR. AWAL BADSHAH, CLINICAL TECHNOLOGIST (PATHOLOGY) BS-17 ATTACHED TO KHYBER MEDICAL COLLEGE, PESHAWAR.

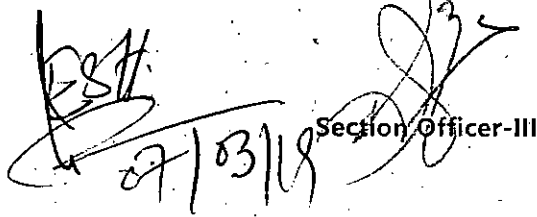
I am directed to refer to the subject noted above and to state that the Chief Secretary, Khyber Pakhtunkhwa (competent authority) is pleased to approve initiation of disciplinary proceedings against Mr. Awal Badshah, Clinical Technologist (Pathology) BS-17, Khyber Medical College, Peshawar on account of misconduct vide attached charge sheet and statement of allegations.

Consequently, the competent authority is further pleased to appoint you as an enquiry officers to enquire into the justification of absence of the aforesaid accused w.e.f 26-11-2013 to 01-07-2015 & 14-07-2015 to 06-06-2016 of his absence, while posted as Clinical Technologist (Pathology) BS-17, KMC, Peshawar viz-a-viz the attached statement of allegation/charge sheet and desires that the enquiry officers should take further necessary action and submit report of findings/recommendations within 30 days in accordance with the provision of Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011.

I am, therefore, directed to request you to conduct the enquiry and findings and recommendations of the enquiry may kindly be furnished to this department within the specified period to proceed further in the matter.

Encl: As above.

Endst: even no & date.


Section Officer-III

Copy forwarded to:-

1. The Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
2. The Dean, Khyber Medical College, Peshawar with the request that the attached charge sheet may be served upon the Clinical Technologist and also depute a well conversant officer to assist the enquiry committee.
3. PSO to Chief Secretary, Khyber Pakhtunkhwa.
4. PS to Secretary Health, Khyber Pakhtunkhwa.
5. Mr. Awal Badshah, Clinical Technologist (Pathology) BS-17, Khyber Medical College, Peshawar. He is directed to appear before the enquiry committee on the date time and venue fixed by the enquiry officers/enquiry committee.


Section Officer-III

CHARGE SHEET

31
11

I, **Muhammad Salim**, Chief Secretary, Khyber Pakhtunkhwa, as Competent Authority do hereby Charge you, **Mr. Awal Badshah, Clinical Technologist (Pathology) BS-17** as follows:

That you, while posted as Clinical Technologist (Pathology) BS-17, at Khyber Medical College, Peshawar; have committed the following act of omission/commission:

- i. You have committed fraud with government by preparing forged documents and findings as you have forged findings drawn and signed in the name of Provincial Ombudsman through deceitful means as per inquiry report & recommendations of Provincial Ombudsman.
- ii. You absented yourself from duty w.e.f. 26.11.2013 to 01.07.2015 & 14.07.2015 to 06.06.2016 as per inquiry report of Khyber Medical College, Peshawar
- iii. You have drawn salary/arrear from government exchequer on the basis of forged inquiry report/findings in the name of Provincial Ombudsman, Khyber Pakhtunkhwa.

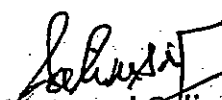
2. By reasons of the above you appear to be guilty of "**Misconduct**" under Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the Rule ibid.

3. You are, therefore, required to submit your written defence within seven days of the receipt of this Charge Sheet to the Inquiry Officer / Inquiry Committee as the case may be.

4. Your written defence, if any, should reach the Inquiry Officer/ Committee within the specified period, failing which, it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.

5. Intimate whether you desire to be heard in person.

6. A Statement of Allegation is enclosed.


(Muhammad Salim)
Chief Secretary,
Khyber Pakhtunkhwa.

Mr. Awal Badshah,
Clinical Technologist (Pathology) BS-17

DISCIPLINARY ACTION

32

(12)

I, **Muhammad Salim**, Chief Secretary, Khyber Pakhtunkhwa, as Competent Authority am of the opinion that, **Mr. Awal Badshah, Clinical Technologist (Pathology) BS-17**, Khyber Medical College, Peshawar has rendered herself liable to be proceeded against, as she committed the following act / omission within the meaning of Rule-3(b) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline Rules), 2011:-

STATEMENT OF ALLEGATIONS

- i. *He has committed fraud with government by preparing forged documents and findings as he has forged findings drawn and signed in the name of Provincial Ombudsman through deceitful means as per inquiry report & recommendations of Provincial Ombudsman.*
- ii. *He absented himself from duty w.e.f. 26.11.2013 to 01.07.2015 & 14.07.2015 to 06.06.2016 as per inquiry report of Khyber Medical College, Peshawar*
- iii. *He has drawn salary/arrears from government exchequer on the basis of forged inquiry report/findings in the name of Provincial Ombudsman, Khyber Pakhtunkhwa.*

2 For the purpose of inquiry against the said accused with reference to the above allegations, an inquiry officer / inquiry committee consisting of the following is constituted under Rule-10(i)(a) of the ibid rules.

- a. *Mr. Ahmad Rana, Secretary PTA.*
- b. *Muhammad Khalil Akhtar, Dy. Chief HSRU.*

3 The inquiry officer / committee shall, in accordance with the provisions of the rules, provide reasonable opportunity of hearing to the accused, record its findings and make within 30 days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused.

4 The accused and a well versant representative of the Department shall join the proceedings on the date, time and place fixed by the Inquiry Officer / Inquiry Committee.


(Muhammad Salim)

Dated the Peshawar 17th January, 2020**NOTIFICATION.**

No. SOH-III/8-60/2019. WHEREAS, Mr. Awal Badsha, Medical Technologist BS-17 attached to Khyber Medical College Peshawar was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges of committing fraud with government by preparing forged documents as he has forged findings drawn and signed in the name of Provincial Ombudsman through deceitful means as per inquiry report & recommendations of Provincial Ombudsman.

AND WHEREAS, he remained absent from duty w.e.f 26.11.2013 to 01.07.2015 & 14.07.2015 to 06.06.2016 as per inquiry report of Khyber Medical College, Peshawar.

AND WHEREAS, he has drawn salary/arrear from government exchequer on the basis of forged inquiry report/findings in the name of Provincial Ombudsman, Khyber Pakhtunkhwa.

AND WHEREAS, a formal enquiry was conducted under Khyber Pakhtunkhwa Govt: Servants (E&D) Rules 2011, which also concluded that the charges leveled against the above named accused stand proved.

AND WHEREAS, a show cause notice was served upon the above named accused vide Health Department letter No. SOH-3/98-60(enquiry report) dated 19-07-2019.

AND WHEREAS, the opportunity of personal hearing was also provided to the accused on 07.11.2019 in terms of Rule-15 of the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011.

NOW THEREFORE, The Competent Authority after having examined the charges and evidence on record is pleased to impose/confirm upon him major penalty of "**Removal from Service**" under Rules-4 of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.

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

Endst. even No and Date.

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa.
2. Director General Health Services, Khyber Pakhtunkhwa.
3. Dean, Khyber Medical College, Peshawar.
4. Deputy Director (IT), Health Department.
5. PSO to Chief Secretary, Khyber Pakhtunkhwa.
6. PS to Secretary Health, Khyber Pakhtunkhwa.
7. Officer concerned.

9/2/2020