

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

In Re S.A _____/2018

Mst. Dilara

VERSUS

Secretary Health Government of Khyber Pakhtunkhwa
Civil Secretariat Peshawar and Others

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Dated : 10/07/2019



Appellant

Through


JAVED IQBAL GULBELA


ISRAR AHMAD

&


SAGHIR IQBAL GULBELA

Advocate, High Court,
Peshawar.

Off Add: 9-10A Al-Nimrah Centre, Govt College Chowk Peshawar

①

BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

In S.A _____/2019

Mst. Dilara staff nurse District Head Quarters office
Charsadda.

-----(*Petitioner*)

VERSUS

1. Secretary Health Government of Khyber
Pakhtunkhwa Civil Secretariat Peshawar.
2. Director General Health Services Khyber
Pakhtunkhwa at Civil Secretariat Peshawar.
3. Medical Superintendent District Headquarters
Hospital Charsadda.

-----(*Respondents*).

AMENDED SERVICE APPEAL U/S 4 OF THE
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT 1974 AGAINST THE
IMPUGNED OFFICE ORDER NO. 3306/DHQ
HOSPITAL CHARASADDA DATED 05/06/2018
WHEREBY THE APPELLANT HAS
ILLEGALLY BEEN RELIVED/TRANSFERRED
FROM DHQ HOSPITAL CHARASADDA,
ORDER NO.6244-47 DATED 26/12/2018
WHEREBY THE APPELLANT HAS BEEN
RETRANSFERRED ON ADMINISTRATIVE
GROUND DURING PENDENCY OF THE
SERVICE APPEAL AND IMPUGNED ORDER
DATED 09/04/2019, WHEREBY THE
APPELLANT WAS AGAIN RETRANSFERRED
TO WOMEN AND CHILDREN HOSPITAL
RAJJAR, CHARASADDA, ON
ADMINISTRATIVE GROUNDS IN A
CURSORY AND WHIMSICAL MANNER.

(2)

Respectfully Sheweth,

1. That the Appellant is a naturally born bonafide citizen of the Islamic Republic of Pakistan & hails from respectable family.
2. That appellant was inducted into service after going through the mandatory required tests and interview on 02/06/2008 as charge nurse.
3. That being a pragmatic, regular, punctual, dutiful and devoted fellow the appellant got her accelerated promotions because of her whetted skills and professionalism and is now serving as charge nurse and posted at District Headquarters Hospital Charsadda.
4. That abruptly the appellant was relieved from the DHQ Hospital Charsadda vide impugned office order NO. 3306/DHQ Hospital Charsadda dated 05/06/2018 by medical superintendant DHQ Hospital Charsadda, on administrative grounds

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without any reason, prior notice, show
cause notice, inquiry or any sort of
written complaint. (Copy of the
impugned order dated 05/06/2018 is
annexed as annexure "A")

5. That feeling aggrieved the appellant
preferred departmental appeal, but
inspite of laps of statutory period
nothing came up over the same. (Copy
of departmental appeal is annexed as
annexure "B")

6. That interestingly after relieving the
appellant on administrative grounds,
which relieving order amounts to
punishment as being carried on
administrative grounds, an alleged
inquiry was ordered vide order dated
08/06/2018. (Copy of order dated
06/06/2018 is annexed as annexure
"C")

7. That feeling aggrieved, the appellant
preferred service appeal No. 1217/2018
and even interim relief was graciously
granted, but the Respondent re-
transferred the appellant vide the
impugned order No. 6244-47, dated
26/12/2018, where against the

(4)

appellant preferred a timely departmental appeal. But the story didn't end here and the appellant was again re-transferred and again on administrative grounds to women and children hospital rajjar Charsadda vide impugned order dated 09/04/2019 the appellant once again preferred departmental appeal against the same, but nothing came up of the same. (Copies of the impugned transfer orders and departmental appeal are annexed as annexure "D")

8. That feeling highly aggrieved the appellant prefers the instant departmental appeal for setting aside all the impugned office orders mentioned above upon the following grounds inter alia:-

Grounds:-

- A. That the petitioner is naturally born bona-fide citizen of the Islamic Republic of Pakistan and is fully and equally, on equality basis, entitled to all basic and fundamental rights as enshrined in the fundamental law of the land.

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B. That the impugned relieving order as well as the other two impugned transfer orders are Quorum non judice, vide illegal, unwarranted and is liable to be set aside.

C. That the appellant has been condemned unheard, throughout.

D. That the relieving and transfer orders on administrative grounds is always considered and declared as punishment by superior courts of the land.

E. That keeping in view the above principle, no penalty can be imposed without conducting any proper inquiry, issuing show cause or final show cause notice, statement of allegations or opportunity of personal hearing and if any penal action is lacking any the aforementioned essential ingredients commencing from show cause notice, then the very penal action is void and

(8)

illegal and same is the case of
appellant.

F. That neither any opportunity was ever
extended to the appellant to defend her
case against the alleged occurrence,
nor any mandatory instruments in the
form of any notice was ever issued to
the appellant, but even then was made
an escape goat.

G. That even the salary of appellant has
been illegal stopped, which even
amount to infringement of
fundamental rights.

H. That from every angle the impugned
relieving and transfer orders are
illegal, void and are liable to be
concealed and set aside.

I. That even during the pendency of the
captioned service appeal, the appellant
was transferred again and again and
that too an administrative grounds,
which also amount to flouting this
Hon'ble Tribunal.

7

J. That all three, repeated, departmental appeal went futile and without any findings upon them.

K. That any other ground not raised here may graciously be allowed to raised at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of the instant appeal, the impugned office order No.3306/DHQ Hospital Charsadda dated 05/06/2018 by medical superintendant DHQ Hospital Charsadda impugned transfer order No.6244-47, dated 26/12/2018 and dated 09/04/2019 be set aside and the appellant may kindly be allowed to serve as staff nurse at DHQ Hospital Charsadda.

Any other relief, not specifically asked for may also graciously be extended in favor of the appellant in the circumstances of the case.

Dated : 10/07/2019

Appellant

Through

JAVED IQBAL GULBELA

ISRAR AHMAD

&

SAGHIR IQBAL GULBELA

Advocate, High Court,

Peshawar

NOTE:-No such like appeal for the same appellant upon the same subject matter has earlier been filed by me before this Hon'ble Tribunal.

Advocate.

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

In S.A _____/2019

Mst. Dilara


VERSUS

Secretary Health Government of Khyber Pakhtunkhwa
Civil Secretariat Peshawar and Others

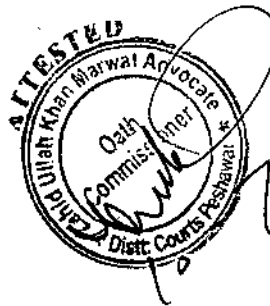
AFFIDAVIT

I, Mst. Dilara staff nurse District Head Quarters office Charsadda, do hereby solemnly affirm and declare that all the contents of the accompanied **appeal** is true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.


DEPONENT

Identified By:

Javed Iqbal Gulbela
Advocate High Court
Peshawar.

NIC # 17101-7544548-4



~~S.A~~ S.A

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

In S.A _____/2019

Mst. Dilara

VERSUS

Secretary Health Government of Khyber Pakhtunkhwa
Civil Secretariat Peshawar and Others

ADDRESSES OF PARTIES

APPELLANT.

Mst. Dilara staff nurse District Head Quarters office
Charsadda.

RESPONDENTS:

1. Secretary Health Government of Khyber
Pakhtunkhwa Civil Secretariat Peshawar.
2. Director General Health Services Khyber
Pakhtunkhwa at Civil Secretariat Peshawar.
3. Medical Superintendent District Headquarters
Hospital Charsadda.


Dated : 10/07/2019


Appellant

Through


JAVED IQBAL GULBELA


ISRAR AHMAD

& 
SAGHIR IQBAL GULBELA
Advocate, High Court,
Peshawar.

(78) (9)

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

In Re C.M No# _____ / 2018

In S.A _____ /2019

Mst. Dilara

VERSUS

Secretary Health Government of Khyber Pakhtunkhwa
Civil Secretariat Peshawar and Others

**APPLICATION FOR RELEASE OF
SALARY OF PETITIONER OF THE
INTERVENING PERIOD**

RESPECTFULLY SHEWETH,

1. That the petitioner is filing the accompanying amended appeal, the contents of which may graciously be considered as integral part and parcel of the instant petition.
2. That prima facie case exists in favour of the Petitioner.
3. That balance of convenience is also lies in favor of Petitioner and his quite sanguine of his success.

10

4. That if the instant application is not allowed the petitioner shall suffer irreparable loss.

It is, therefore, most humbly prayed that on acceptance of the instant petition the salary of the Petitioner May kindly be released till the final disposal of the accompanying appeal.

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

Dated : 10/07/2019


Appellant

Through


JAVED IQBAL GULBELA


ISRAR AHMAD

&


SAGHIR IQBAL GULBELA

Advocate, High Court,
Peshawar

(#)
(11)

A m
"A"

DISTRICT HEADQUARTER HOSPITAL CHARSADDA
KHYBER PAKHTUNKHWA

No: 3306 /DHQ Hosp. Charsadda

Dated: 05/06/2018

To

Mst. Dil Ara
Staff Nurse, Night Shift, Casualty Department
DHQ Hospital Charsadda

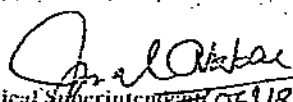
Sub: RELIEVE ON ADMINISTRATIVE GROUNDS

It has been reported by the night supervisor as well as night DMS that you are not performing your duty and categorically refused to perform your duty in casualty.

Yesterday you came to the office of the undersign along with your husband and in presence of DMS morning shift, matron and night supervisor, you were consistently arguing and screaming against both, despite of the fact MS gave you the assurance that continue with your duty and you will be facilitated next month or you may ask any of your colleague to exchange duty for your convenience. After decision you all went to matron office and after about 10/15 minutes report and complaint received by both matron and supervisor that you quarrel with them, abuse them and beat them. Your this kind of harsh, irresponsible and aggressive attitude towards your seniors is absolutely not tolerable and highly objectionable. You are therefore strictly warned to refrain from such type of behavior and attitude.

Moreover it has been reported by the DMS night shift (Dr. Jibran) that you have invited and approached media people for a press conference against the hospital administration and government institute/hospital. You being government employee should know your limitations/restrictions and service rules that no government servant can directly approach media without prior permission of the competent authority.

You are therefore relieved from DHQ Hospital Charsadda on administrative grounds and directed to report to Director General Health Services KP office.


Medical Superintendent
05/06/18
DHQ Hospital Charsadda

Copy to:

1. Director General Health Services Khyber Pakhtunkhwa Peshawar
 2. Assistant Director (Nursing) DGHS Office Khyber Pakhtunkhwa Peshawar
 3. Additional DG Health (HRM) Services Khyber Pakhtunkhwa, Peshawar
 4. PS to Secretary Health Khyber Pakhtunkhwa, Peshawar
 5. Matron DHO Hospital Charsadda
 6. DAO Charsadda
 7. Accounts Section of this hospital to stop her pay forthwith.
- For information.

(12)

12

'Auss' 'B'

8/6/18



Departmental Appeal: عنوان

جناب عالی!

بخدمت جناب ڈائریکٹر جنرل ہیلتھ سروسز خیبر پختونخوا ایشیاور
 گزارش ہے کہ میں دل آرا بیگم 2 جون 2008ء کو چارسدہ ہسپتال میں بطور چارج تیس بھرتی ہوئی اب تک مجھ سے کوئی
 Explanation طلب نہیں ہوا ہے کیونکہ میں اپنی ڈیوٹی نہایت ایمانداری سے سرانجام دیتی ہوں۔ جون 2018ء میں میری
 ٹائٹ ڈیوٹی Due تھی اس لئے میں نے ایک ہفتہ پہلے میٹرن جیلڈ فریڈ اور ایم جمان اکبر صاحب سے درخواست کی کہ میرا دو سالہ
 بیٹا اور میں خود بھی بیمار ہوں اور ٹائٹ ڈیوٹی کرنے سے قاصر ہوں اسلئے میری ٹائٹ ڈیوٹی اگلے مہینے لگائی جائے جس پر میٹرل
 نے مجھ سے رشوت طلب کی اور میری معذرت پر انتقاماً میری ڈیوٹی کچولی میں لگائی۔

4 جون 2018ء کو میں اپنے شوہر کے ہمراہ ایم ایس کے دفتر گئی اور دوبارہ اس سے ڈیوٹی تبدیل کرنے کی درخواست کی اور بتایا کہ
 جنوری میں میرے سائٹ تھ ڈیوٹی کرنے والی چار نرسوں کی ڈیوٹی آپ نے تبدیل کی ہے لہذا میری بھی تبدیل کجائے لیکن بے سود۔
 ایم ایس کے دفتر سے باہر آتے کے بعد معمولی تکرار پر ٹائٹ سپروائزر مریم بی بی نے میٹرن کے کہنے پر مجھے گالیاں دیں اور تھپڑ مارے۔
 یہ واقعہ صبح 9 بجے ایم ایس کے دفتر کے سامنے ہوا لیکن اس نے صورت حال جاننے کی زحمت گوارا نہ کی اور میرے کہنے کے باوجود بھی میٹرن
 اور ٹائٹ سپروائزر کے خلاف تادیبی کارروائی نہیں کی۔ انصاف کے حصول کیلئے مجھے مجبوراً میڈیا کا سہارا لینا پڑا لیکن ایم ایس صاحب نے
 میرے اس اقدام پر ناراضگی کا اظہار کرتے ہوئے انتقامی طور پر مجھے ہسپتال سے Relieve کیا۔

مہربانی فرما کر مجھے دوبارہ اپنی ڈیوٹی پر بحال کیا جائے
 المرقوم: 8 جون 2018ء

العارض

آپ کی وفادار

دل آرا بیگم چارج تیس

0333-9221612

This case is worth a disgraceful
 end for both. The open air
 dissemination in the part of
 the area things to be checked
 needs to be investigated
 for obvious reasons.
 1) Dr. Hemullah, Dr. Adnan
 2) Mr. Hemullah, etc.
 to acquire & report
 read of the file

(16) (B) C's
Amr



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications Should be Addressed to The Director General
Health Services Peshawar and not to any official by name

Office Ph 1 091 - 9210269 Exchange - 091 9210187, 091 9210196 Fax 1 091 9210230

OFFICE ORDER

The following officers are hereby nominated as enquiry officer to conduct enquiry against Mrs. Dilhara Begum D/O Sardar Wali, Charge Nurse (BS-16) DHQ Hospital, Charsadda being unwilling worker and categorically refused to perform her duty in Casualty Department and submit report within 15 days positively.

01. Dr. Ikramullah, Director (Admn) DGHS KP Peshawar.
02. Mr. Faridullah Shah Deputy Director (Nursing) DGHS KP Peshawar.

Sd/-
DIRECTOR GENERAL HEALTH
SERVICES, KPK, PESHAWAR.

No. 2263-67 /E.II, Dated Pesh. The 8/6 /2018.

Copy forwarded to the:-

01. Medical Supdt. DHQ Hospital, Charsadda.
02. Director (Admn) DGHS Khyber Pakhtunkhwa Peshawar.
03. Deputy Director (Nursing) DGHS Khyber Pakhtunkhwa Peshawar.
04. Deputy Director (Account) DGHS Khyber Pakhtunkhwa Peshawar.
05. PA to DGHS Khyber Pakhtunkhwa Peshawar.

For information and necessary action:

ADDL. DIRECTOR GENERAL (HRM)
DIRECTORATE GENERAL HEALTH
SERVICES, KPK, PESHAWAR

MP
08/06/18

17

14



To

The Director General Health Services,
Khyber Pakhtunkhwa, Peshawar

Subject: RELEASE OF PAY (SALARY).

R/Sir,

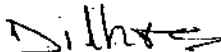
It is submitted that I have been relieved from duties on 5th June 2018. An enquiry was conducted against me on 12th June 2018, but it is still in balance, and I am waiting for resumption of any duties and released of pay. I have not received my pay for the last three months.

Therefore, I philanthropically request you to order for released of my pay and obliged.

Thanking you in anticipation.

Yours Faithfully,

Dated: 28.08.2018


Dilhara Begum D/O
Sardar Wali

15



چار سوادہ شائقین کی دل آواز
 کاٹھن کی انگریزی کا اخبار

پشاور، (پشاور پوسٹ) 20 مئی 2018ء کو شائع ہوا۔
 سید کی بیٹی کی دل آواز، انگریزی کی اخبار اور
 سے ان کی تعلیم اور ان کی بہبود کے لئے
 انگریزی کے اخبار کے لئے کام کر رہے ہیں۔
 انہوں نے ان کی تعلیم اور ان کی بہبود کے لئے
 پشاور اور دیگر شہروں میں شوقینوں کو
 پشاور اور دیگر شہروں میں شوقینوں کو



PESHAWAR HEART CENTER

Behind Khyber Medical Center Dabgari Garden Peshawar.
Mob: 0306-5997878-0314-9697745

Echocardiography Report

Name: Dil Aram Echo No: 0123 Address: Chaugadda
 Date: 24.01.2016 Age: 40 Years Referred By: Dr. Syed Sheraz Jamal

Measurements	Observed	Normal range (mm)	Parameter	Values
Aortic root dimension	28	20-40	EPSS	
Left Atrial dimension	41	19-40	PHI	
Left vent End Diastolic dimension	45	36-55	A Velocity (cm/sec)	
Left vent End Systolic dimension	30		E Velocity (cm/sec)	
LVEF Teichgraves	10	08-12	E/A Ratio	
PMV Thickness	10	08-11	RVP: S/s	3'
Right vent Diameter	23	08-26	(mmHg): D/s	
Fractional Shortening	32%	Ejection Fraction (Normal Range 50-70%)		60%
IVRT		DCT		
Valves				
	Gradient (mmHg)		Velocity (m/sec)	Valve Area (cm ²)
	Peak	Mean	Doppler	
Mitral valve	24.5	12.1	1.45	1.32
Aortic valve				
Tricuspid valve				
Pulmonary valve				
				Trace

Comments:

- Mildly dilated LA.
- Normal size LV with preserved systolic function.
- No regional wall motion abnormality at rest.
- Thickened, doming and noncalcific mitral valve with mild MR.
- Other valves are normal in structure.
- MVA=1.45cm² on Doppler, 1.32cm² on 2D.
- No ASD, VSD or PDA seen.
- No clot or pericardial effusion seen.

Conclusions:

- Preserved LV systolic function.
- Moderate MS with mild MR.
- Mild TR with pulmonary hypertension.

Consultant Cardiologist

Registered with H.C.C.

Mr. ROOHULLAH
Cardiac Technologist

[Handwritten signature]

[Handwritten signature] 08/06/2016



Ann - "D" (17)

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications Should be Addressed to The Director General
Health Services Peshawar and not to any official by name
Office: Ph: 091 - 9210269 Exchange: 74 091 - 9210187, 091 - 9210196 Fax: 091 - 9210230

OFFICE ORDER.


In the light of recommendation of enquiry report, Mrs. Dilhara Begum D/O Sardar Wali, Charge Nurse BPS-16 DHQ Hospital, Charsadda is hereby transferred / posted to Category-C Hospital Shabqadar Charsadda against the vacant post on administrative grounds, in the interest of public service with immediate effect.

NB: - Arrival/ departure report should please be submitted to this Directorate for record.

Sd/-
**DIRECTOR GENERAL HEALTH
SERVICES, KP PESHAWAR.**

No. 62441-47 /E.II, Dated Pesh. 26 / 12 /2018.
Copy forwarded to the:-

01. DHQ Hospital, Charsadda.
02. Medical Supdt. DHQ Hospital, Charsadda.
03. DAO, Charsadda.
04. DA-concerned DGHS Office Peshawar.
For information and necessary action.


DEPUTY DIRECTOR (NURSING)
**DIRECTORATE GENERAL HEALTH
SERVICES, K.P PESHAWAR**

26/12

Ann-"E"

18

بخدمت جناب ڈائریکٹر جنرل ہیلتھ سروسز خیبر پختونخوا ایشیا اور

عنوان: تبادلہ (Transfer)

جناب عالی!

گزارش ہے کہ ایم۔ ایس ڈی ایچ کیو ہسپتال چارسدہ نے بحوالہ آفس آرڈر نمبر

(3306/D.H.Q Hospital Charsadda) بتاریخ 5 جون 2018ء کو مجھے انتظامی بنیادوں

(Relieve on Administrative Grounds) پر ہسپتال سے فارغ کیا۔ میں نے

8 جون 2018ء کو حکمانہ درخواست (Departmental Appeal) کی۔ آپ صاحبان نے بحوالہ آفس آرڈر

No 2263-67/ E.II Dated Pesh the 8/6/2018

(1) ڈاکٹر اکرام اللہ صاحب (ڈائریکٹر ایمن) ڈی جی ایچ ایس

(2) فرید شاہ صاحب (ڈپٹی ڈائریکٹر نرسنگ) ڈی جی ایچ ایس

کو انکوائری کے لئے مقرر کیا۔

12 جون 2018ء کو نوٹہ کورہ بالا افسران نے ڈی۔ ایچ۔ کیو ہسپتال چارسدہ میں انکوائری کی۔

مختلف اوقات میں جانکاری کرنے کے باوجود بھی میرے کیس پر کوئی پیش رفت نہیں ہوئی۔ حکمانہ درخواست اور انکوائری کے چار ماہ بعد میں نے قانونی طور پر سروس

ٹریبونل KPK میں اپنا کیس دائر کیا۔ معزز عدالت نے 14 اکتوبر 2018ء کو اپنے واضح ہدایت میں ایم ایس چارسدہ کے آفس آرڈر

(3306/D.H.Q Hospital Charsadda date 5 June 2018) کو غیر قانونی، نااہل اور سرسری قرار دیا۔ اور میری پوسٹنگ اور تنخواہ کھولنے کی ہدایات

جاری کیں۔

معزز عدالت کے ہدایت نامہ کو میں نے ڈائری نمبر 31597 تاریخ 23 اکتوبر 2018ء کو DGHS کے ڈائری سیکشن میں جمع کیا۔ لیکن معزز عدالت کے واضح آرڈر کو

ماننے اور سہوتا ڈکرنے میں تاخیر کر کے استعمال کیے گئے۔ اور 2 ماہ 22 دن بعد مجھے دوبارہ انتظامی بنیادوں (Administrative Grounds) پر آفس آرڈر نمبر

(6244-47 / E.II Dated pesh 26/12/2018) کو کیٹگری سی ہسپتال شہد رٹانسفر کی گئی۔

چونکہ میں (Dignosed Cardic Patient) اور جسمانی طور پر کمزور ہوں اور ہسپتال تک پہنچنے کے لئے مجھے تین تین سواریاں تبدیل کرنے پڑتی ہے۔

لہذا آپ صاحبان سے آفس آرڈر (6244-47 / E.II Dated pesh 26/12/2018) کو منسوخ کرنے کی اور ڈی ایچ کیو ہسپتال چارسدہ میں باعزت طور پر

پوسٹنگ کی درخواست کرتی ہوں۔

المرقوم 24 جنوری 2019

العارضی

آپ کی وفادار

Di. Memon

دل آرا بیگم چارسدہ

0333-9221612

دوسن اینڈ چلڈرن ہسپتال راج

چارسدہ



(1/9)

OFFICE OF THE
DISTRICT HEALTH OFFICER
CHARSADDA

No. 3128/DHO

Ann - "F"
Dated Charsadda the 9/4/2019

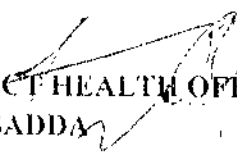
To

The Director General
Health Services, Khyber Pakhtunkhwa
Peshawar.

Subject: - OFFICE ORDER

It is to inform you that Mrs. Dilhara Begum D/o Sardar Wali, charge nurse (BS-16) has been posted at Category C Hospital Shabqadar vide order No. 6244-47/E.II Dated 26/12/2018, how she reported for duty today on 9/04/2019 after laps of three and half months.

You are therefore requested to refresh the order and also make a copy to DHO Charsadda for further necessary action.


DISTRICT HEALTH OFFICER
CHARSADDA

20

Ann-G

بخدمت جناب ڈائریکٹر جنرل ہیلتھ سروسز خیبر پختونخوا ایشاور

عنوان: تبادلہ (Transfer)

جناب عالی!

گزارش ہے کہ بار پھر میری تبادلہ تھوڑی سے ترمیم کے بعد انتظامی بنیادوں (Administrative Grounds) پر بحوالہ آفس آرڈر (No 6608 - 12 / E.II Dated pesh 24/4/2019) دو من اینڈ چلڈرن ہسپتال رجز چارسدہ کی گئی۔ جو انصاف کے تقاضوں کے منافی ہے۔ کیونکہ خیبر پختونخواہ سروسز ٹریبونل کے معزز عدالت نے ایم ایس، ڈی ایچ کیو ہسپتال چارسدہ کے آفس آرڈر (3306/DHQ Hosital Charsadda dated 5/6/2018) کو غیر قانونی، غلط اور سرسری قرار دیا ہے۔ چونکہ گیارہ مہینوں سے میری تنخواہ بند ہے۔ لہذا بدمر مجبوری میں نے دو من اینڈ چلڈرن ہسپتال رجز چارسدہ 25 اپریل 2019 کو جوائن کر لیا۔ لیکن آپ صاحبان سے ایک بار پھر میری التجا ہے کہ معزز عدالت کے حکم کو مد نظر رکھتے ہوئے مجھے باعزت طور پر ڈی ایچ کیو ہسپتال چارسدہ پوسٹ کیا جائے تاکہ انصاف کے تقاضے پورے ہو۔

الرقوم: 23 مئی 2019ء

العارض

آپ کی وفادار

Dil Arshad

دل آرا بیگم چارج نرس

0333-9221612

دو من اینڈ چلڈرن ہسپتال رجز

چارسدہ

(21)
H
Ann →

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

Khyber Pakhtunkhwa
Service Tribunal

In Re S.A. 1217 /2018

Diary No. 1454ⁿ

Dated 04-10-2018

Mst. Dilara staff nurse District Head Quarters office
Charsadda.

----- (Petitioner) -----

VERSUS

1. Secretary Health Government of Khyber
Pakhtunkhwa Civil Secretariat Peshawar.
2. Director General Health Services Khyber
Pakhtunkhwa at Civil Secretariat Peshawar.
3. Medical Superintendent District Headquarters
Hospital Charsadda.


----- (Respondents) -----

**SERVICE APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT
1974 AGAINST THE IMPUGNED OFFICE
ORDER NO. 3306/DHQ, HOSPITAL
CHARSADDA DATED 05/06/2018 WHEREBY
THE APPELLANT HAS ILLEGALLY BEEN
RELIVED/TRANSFERRED FROM DHQ
HOSPITAL CHARSADDA ON
ADMINISTRATIVE GROUNDS IN A
CURSORY AND WHIMSICAL MANNER.**

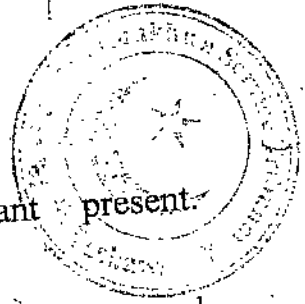
Filed to-day
0
Registrar
4/10/18

Respectfully Sheweth,

1. That the Appellant is a naturally born
bonafide citizen of the Islamic Republic
of Pakistan & hails from respectable
family.

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

22



19.10.2018

Learned counsel for the appellant present.
Preliminary arguments heard.

Appellant (Staff Nurse) has filed the present appeal u/s of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against the order dated 05.06.2018 whereby she was relieved from DHQ Hospital Charsadda on administrative grounds and was directed to report Director General Health Services Khyber Pakhtunkhwa Office. Learned counsel for the appellant while assailing the impugned order argued inter alia that the salary of the appellant has also been stopped.

Points raised need consideration. The present appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 05.12.2018 before S.B.

Till the next date fixed, ad-interim relief is granted to the effect that the Director General Health Services Khyber Pakhtunkhwa (respondent No.2) is directed to release the salary to the appellant from the date of her arrival/joining of her new posting in compliance of the order dated 05.06.2018.

Member

Certified to be true copy

Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of P

Name

Designation

Address

Telephone

Mobile No.

E-mail

Signature

6-800
28-

22-10-18
22-10-18

23

BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

In Re S.A. 1217 /2018

Khyber Pakhtunkhwa
Services Tribunal

Diary No. 1454
Date 04-10-2018

Mst. Dilara staff nurse District Head Quarters office
Charsadda.

-----(*Petitioner*)

VERSUS

1. Secretary Health Government of Khyber Pakhtunkhwa Civil Secretariat Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa at Civil Secretariat Peshawar.
3. Medical Superintendent District Headquarters Hospital Charsadda.



-----(*Respondents*).

SERVICE APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT
1974 AGAINST THE IMPUGNED OFFICE
ORDER NO. 3306/DHQ HOSPITAL
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THE APPELLANT HAS ILLEGALLY BEEN
RELIVED/TRANSFERRED FROM DHQ
HOSPITAL CHARSADDA ON
ADMINISTRATIVE GROUNDS IN A
CURSORY AND WHIMSICAL MANNER.

Respectfully Sheweth,

1. That the Appellant is a naturally born bonafide citizen of the Islamic Republic of Pakistan & hails from respectable family.

Certified to be true copy

Khyber Pakhtunkhwa,
Services Tribunal,
Peshawar

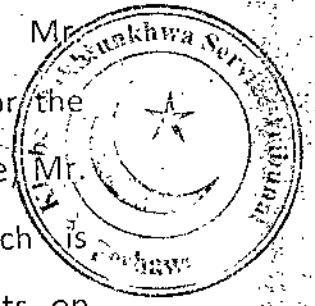
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Khyber Pakhtunkhwa,
Services Tribunal,
Peshawar

24

09.05.2019

Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. The learned Member (Executive) Mr. Hussain Shah is on leave, therefore, the bench is incomplete. Adjourned. To come up for arguments on 13.06.2019 before D.B.



MA

(Muhammad Amin Khan kundi)
Member

13.06.2019

Appellant alongwith her counsel and Mr. Riaz Ahmad Paindakheil, Assistant AG for the respondents present. Learned counsel for the appellant furnished copy of order dated 26.12.2018 whereby the appellant has been transferred from DHQ Hospital Charsadda to Category-C Hospital Shabqadar Charsadda. He also furnished a copy of order dated 24.04.2019, whereby the appellant has been transferred from DHQ Hospital Charsadda to Women & Children Hospital Rajjar Charsadda. Copies of both the orders placed on record. Learned counsel for the appellant also stated that he wants to challenge the aforesaid orders through amendment in service appeal. Learned Assistant AG expressed no objection. As such, to come up for amended service appeal on 10.07.2019 before D.B.

A

(Ahmad Hassan)
Member

MA

(M. Amin Khan Kundi)
Member

Certified to be true copy
[Signature]
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Appeal 17-6-19
Number of Words 800
Copying Fee 6-00
Urgent 2
Total 6-00
Name of Copy [Signature]
Date of Completion of Copy 18-6-19
Date of Delivery of Copy 18-6-19

25

وکالت نامہ

بعدالت سرور شیخ شریف علی صاحب
 نام کوٹہ و ضلع
 منجانب Appellate تاریخ ۱۵/۲/۲۰۱۸

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی بمقام _____ کے لئے

جاوید اقبال گل بیلہ ایڈوکیٹ ہائی کورٹ

کو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موہمف کی اطلاع دیکر حاضر عدالت کروں گا اگر پیشی پر من مظهر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہیں ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے کسی اور جگہ ساعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر من مظهر کو کوئی نقصان پہنچنے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا اختیار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل و مگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرنے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد دہائی و رضی نامہ کو فیصلہ برخلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم انتہائی یا ترقی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادا جنگی علیحدہ مختیار نامہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزو کی کارروائی کے واسطے یا بصورت اپیل، اقبال کے واسطے کسی دوسرے وکیل یا ہیر مشرک بجائے اپنے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موصوف کو حاصل ہیں اور پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختیار نامہ لکھ دیا تاکہ سند رہے مورخہ _____ مضمون مختیار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا اور منظور ہے۔

ATTESTED & ACCEPTED

Dikana

سہ ماہ دلہرا

جاوید اقبال گل بیلہ ایڈوکیٹ ہائی کورٹ پشاور

Handwritten signatures and stamps at the bottom of the document.

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

In Re S.A 1217 /2018

Mst. Dilara

VERSUS

Secretary Health Government of Khyber Pakhtunkhwa
Civil Secretariat Peshawar and Others

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Dated : 03/10/2018

Appellant

Through

JAVED IQBAL GULBELA
&
SAGHIR IQBAL GULBELA
Advocate, High Court,
Peshawar.

Off Add: 9-10A Al-Nimrah Centre, Govt College Chowk Peshawar

①

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

Khyber Pakhtunkhwa
Service Tribunal

In Re S.A. 1217 /2018

Diary No. 1454

Dated 04-10-2018

Mst. Dilara staff nurse District Head Quarters office
Charsadda.

-----(*Petitioner*)

VERSUS

1. Secretary Health Government of Khyber
Pakhtunkhwa Civil Secretariat Peshawar.
2. Director General Health Services Khyber
Pakhtunkhwa at Civil Secretariat Peshawar.
3. Medical Superintendent District Headquarters
Hospital Charsadda.

-----(*Respondents*).

**SERVICE APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT
1974 AGAINST THE IMPUGNED OFFICE
ORDER NO. 3306/DHQ HOSPITAL
CHARSADDA DATED 05/06/2018 WHEREBY
THE APPELLANT HAS ILLEGALLY BEEN
RELIVED/TRANSFERRED FROM DHQ
HOSPITAL CHARSADDA ON
ADMINISTRATIVE GROUNDS IN A
CURSORY AND WHIMSICAL MANNER.**

Filed to-day
9/10/18
Registrar

Respectfully Sheweth,

1. That the Appellant is a naturally born
bonafide citizen of the Islamic Republic
of Pakistan & hails from respectable
family.

2. That appellant was inducted into service after going through the mandatory required tests and interview on 02/06/2008 as charge nurse.
3. That being a pragmatic, regular, punctual, dutiful and devoted fellow the appellant got her accelerated promotions because of her whetted skills and professionalism and is now serving as charge nurse and posted at District Headquarters Hospital Charsadda.
4. That abruptly the appellant was relieved from the DHQ Hospital Charsadda vide impugned office order NO. 3306/DHQ Hospital Charsadda dated 05/06/2018 by medical superintendant DHQ Hospital Charsadda, on administrative grounds without any reason, prior notice, show cause notice, inquiry or any sort of written complaint. (Copy of the impugned order dated 05/06/2018 is annexed as annexure "A")
5. That feeling aggrieved the appellant preferred departmental appeal, but

inspite of laps of statutory period nothing came up over the same. (Copy of departmental appeal is annexed as annexure "B")

6. That interestingly after relieving the appellant on administrative grounds, which relieving order amounts to punishment as being carried on administrative grounds, an alleged inquiry was ordered vide order dated 08/06/2018. (Copy of order dated 08/06/2018 is annexed as annexure "C")
7. That feeling highly aggrieved the appellant prefers the instant departmental appeal for setting aside the impugned office order dated 05/06/2018 upon the following grounds inter alia:-

Grounds:-

- A. That the petitioner is naturally born bona-fide citizen of the Islamic Republic of Pakistan and is fully and equally, on equality basis, entitled to all basic and fundamental rights as

enshrined in the fundamental law of the land.

B. That the impugned relieving order is Quorum non judice, vide illegal, unwarranted and is liable to be set aside.

C. That the appellant has been condemned unheard.

D. That the relieving order on administrative grounds is always considered and declared as punishment by superior courts of the land.

E. That keeping in view the above principle, no penalty can be imposed without conducting any proper inquiry, issuing show cause or final show cause notice, statement of allegations or opportunity of personal hearing and if any penal action is lacking any the aforementioned essential ingredients commencing from show cause notice, then the very penal action is void and

(5)

illegal and same is the case of appellant.

F. That neither any opportunity was ever extended to the appellant to defend her case against the alleged occurrence, nor any mandatory instruments in the form of any notice was ever issued to the appellant, but even then was made an escape goat.

G. That even the salary of appellant has been illegal stopped, which even amount to infringement of fundamental rights.

H. That from every angle the impugned relieving order is illegal, void and is liable to be concealed and set aside.

I. That any other ground not raised here may graciously be allowed to raised at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of the instant appeal, the impugned office order

(6)

No.3306/DHQ Hospital Charsadda dated 05/06/2018 by medical superintendant DHQ Hospital Charsadda be set aside and the petition may kindly be allowed to service as staff nurse as DHQ Hospital Charsadda.


Any other relief, not specifically asked for may also graciously be extended in favor of the appellant in the circumstances of the case.

Dated: 03/10/2018


Appellant


Through


JAVED IQBAL GULBELA
&


SAGHIR IQBAL GULBELA
Advocate, High Court,
Peshawar

NOTE:-

No such like appeal for the same appellant upon the same subject matter has earlier been filed by me before this Hon'ble Tribunal.


Advocate.

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

In Re S.A _____/2018

Mst. Dilara

VERSUS

Secretary Health Government of Khyber Pakhtunkhwa
Civil Secretariat Peshawar and Others

AFFIDAVIT

I, Mst. Dilara staff nurse District Head Quarters office Charsadda, do hereby solemnly affirm and declare that all the contents of the accompanied **appeal** is true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

[Handwritten Signature]

Identified By:

Javed Iqbal Gulbela
Advocate High Court
Peshawar.

[Handwritten Signature]
DEPONENT



(8)

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

In Re S.A _____/2018

Mst. Dilara

VERSUS

Secretary Health Government of Khyber Pakhtunkhwa
Civil Secretariat Peshawar and Others

ADDRESSES OF PARTIES

APPELLANT.

Mst. Dilara staff nurse District Head Quarters office
Charsadda.

RESPONDENTS:

1. Secretary Health Government of Khyber
Pakhtunkhwa Civil Secretariat Peshawar.
2. Director General Health Services Khyber
Pakhtunkhwa at Civil Secretariat Peshawar.
3. Medical Superintendent District Headquarters
Hospital Charsadda.

Dated : 03/10/2018

Appellant

Through

JAVED IQBAL GULBELA
&
SAGHIR IQBAL GULBELA
Advocate, High Court,
Peshawar.

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

In Re C.M No# _____ / 2018

In Re S:A _____ /2018

Mst. Dilara

VERSUS

Secretary Health Government of Khyber Pakhtunkhwa
Civil Secretariat Peshawar and Others

**APPLICATION FOR SUSPENSION OF
IMPUGNED OFFICE ORDER
NO.3306/DHQ HOSPITAL CHARSADE
DATED 05/06/2018**

RESPECTFULLY SHEWETH,

1. That the petitioner is filing the accompanying appeal, the contents of which may graciously be considered as integral part and parcel of the instant petition.
2. That prima facie case exists in favour of the Petitioner.
3. That balance of convenience is also lies in favor of Petitioner and his quite sanguine of his success.

4. That if the instant application is not allowed the petitioner shall suffer irreparable loss.

It is, therefore, most humbly prayed that on acceptance of the instant petition impugned office order No.3306/DHQ Hospital Charsadda dated 05/06/2018 of the office of M/S DHQ Hospital Charsadda may kindly be suspended till the final disposal of the accompanying appeal.

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

Dated: 03/10/2018

Muhammad

Appellant

Through

J.I.

JAVED IQBAL GULBELA
& *S.A.*
SAGHIR IQBAL GULBELA
Advocate, High Court,
Peshawar

11

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

In Re S.A _____/2018

Mst. Dilara

VERSUS

Secretary Health Government of Khyber Pakhtunkhwa
Civil Secretariat Peshawar and Others

AFFIDAVIT

I, Mst. Dilara staff nurse District Head Quarters office Charsadda, do hereby solemnly affirm and declare that the contents of the Instant **application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

D. Dilara
DEPONENT

Identified By: [Signature]

JAVED IQBAL GULBELA

Advocate High Court

Peshawar



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

In Re C.M No# _____ / 2018

In Re S.A. _____ /2018

Mst. Dilara

VERSUS

Secretary Health Government of Khyber Pakhtunkhwa
Civil Secretariat Peshawar and Others

**APPLICATION FOR RELEASE OF
SALARY OF PETITIONER**

RESPECTFULLY SHEWETH,

1. That the petitioner is filing the accompanying appeal, the contents of which may graciously be considered as integral part and parcel of the instant petition.
2. That prima facie case exists in favour of the Petitioner.
3. That balance of convenience is also lies in favor of Petitioner and his quite sanguine of his success.

(13)

4. That if the instant application is not allowed the petitioner shall suffer irreparable loss.

It is, therefore, most humbly prayed that on acceptance of the instant petition the salary of the Petitioner May kindly be released till the final disposal of the accompanying appeal.

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

Dated: 03/10/2018

D. Memon
Appellant

Through *J. Iqbal*

S. Iqbal
JAVED IQBAL GULBELA
&
SAGHIR IQBAL GULBELA
Advocate, High Court,
Peshawar

(14)

A
"A"

DISTRICT HEADQUARTER HOSPITAL CHARSADDA
KHYBER PAKHTUNKHWA

No: 3306 /DHQ Hosp. Charsadda

Dated: 05/06/2018

To

Mst. Dil Ara
Staff Nurse, Night Shift, Casualty Department
DHQ Hospital Charsadda

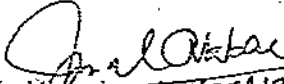
Sub: RELIEVE ON ADMINISTRATIVE GROUNDS

It has been reported by the night supervisor as well as night DMS that you are not performing your duty and categorically refused to perform your duty in casualty.

Yesterday you came to the office of the undersign along with your husband and in presence of DMS morning shift, matron and night supervisor, you were consistently arguing and screaming against both, despite of the fact MS gave you the assurance that continue with your duty and you will be facilitated next month or you may ask any of your colleague to exchange duty for your convenience. After decision you all went to matron office and after about 10/15 minutes report and complaint received by both matron and supervisor that you quarrel with them, abuse them and beat them. Your this kind of harsh, irresponsible and aggressive attitude towards your seniors is absolutely not tolerable and highly objectionable. You are therefore strictly warned to refrain from such type of behavior and attitude.

Moreover it has been reported by the DMS night shift (Dr. Jibran) that you have invited and approached media people for a press conference against the hospital administration and government institute/hospital. You being government employee should know your limitations/restrictions and service rules that no government servant can directly approach media without prior permission of the competent authority.

You are therefore relieved from DHQ Hospital Charsadda on administrative grounds and directed to report to Director General Health Services KP office.


Medical Superintendent
DHQ Hospital Charsadda
05/06/18

Copy to:

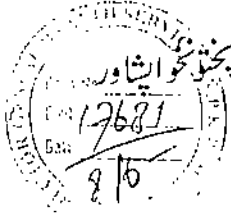
1. Director General Health Services Khyber Pakhtunkhwa Peshawar
 2. Assistant Director (Nursing) DGHS Office Khyber Pakhtunkhwa Peshawar
 3. Additional DG Health (HRM) Services Khyber Pakhtunkhwa, Peshawar
 4. PS to Secretary Health Khyber Pakhtunkhwa, Peshawar
 5. Matron DHQ Hospital Charsadda
 6. DAO Charsadda
 7. Accounts Section of this hospital to stop her pay forthwith.
- For information:



(15)

'Auss'
'B'

2/5/18



بخدمت جناب ڈائریکٹر جنرل ہیلتھ سروسز خیبر پختونخوا ایشاور
عنوان: Departmental Appeal

جناب عالی!

گزارش ہے کہ میں دل آرائیگم 2 جون 2008ء کو چارسدہ ہسپتال میں بطور چارج نرس بھرتی ہوئی اب تک مجھ سے کوئی Explanation طلب نہیں ہوا ہے کیونکہ میں اپنی ڈیوٹی نہایت ایمانداری سے سرانجام دیتی ہوں۔ جون 2018ء میں میری نائٹ ڈیوٹی Due تھی اس لئے میں نے ایک ہفتہ پہلے میٹرن جیلہ فرید اور ایم جہاں اکبر صاحب سے درخواست کی کہ میرا دو سالہ بیٹا اور میں خود بھی بیمار ہوں اور نائٹ ڈیوٹی کرنے سے قاصر ہوں اسلئے میری نائٹ ڈیوٹی اگلے مہینے لگائی جائے جس پر میٹرن جیلہ کو رہ نے مجھ سے رشوت طلب کی اور میری معذرت پر اتفاقاً میری ڈیوٹی کچھ لمبی میں لگائی۔

4 جون 2018ء کو میں اپنے شوہر کے ہمراہ ایم ایس کے دفتر گئی اور دوبارہ اس سے ڈیوٹی تبدیل کرنے کی درخواست کی اور بتایا کہ جنوری میں میرے سائٹ تھ ڈیوٹی کرنے والی چارج نرسوں کی ڈیوٹی آپ نے تبدیل کی ہے لہذا میری بھی تبدیل کجائے لیکن بے سود۔ ایم ایس کے دفتر سے باہر آنے کے بعد معمولی تکرار پر نائٹ سپروائزر مریم بی بی نے میٹرن کے کہنے پر مجھے گالیاں دیں اور تھپتھپا رہے۔ یہ واقعہ صبح 9 بجے ایم ایس کے دفتر کے سامنے ہوا لیکن اس نے صورتحال جاننے کی زحمت گوارا نہ کی اور میرے کہنے کے باوجود بھی میٹرن اور نائٹ سپروائزر کے خلاف تادیبی کارروائی نہیں کی۔ انصاف کے حصول کیلئے مجھے مجبوراً میڈیا کا سہارا لینا پڑا لیکن ایم ایس صاحب نے میرے اس اقدام پر ناراضگی کا اظہار کرتے ہوئے انتقامی طور پر مجھے ہسپتال سے Relieve کیا۔

مہربانی فرما کر مجھے دوبارہ اپنی ڈیوٹی پر بحال کیا جائے

الرقوم 8 جون 2018ء

العارض

آپ کی وفادار

دل آراء بیگم چارج نرس
0333-9221612

This case is worth a disquietful
end for both. The open air
dissemination in the part of
the area through a channel
needs to be investigated
for obvious reasons.
Dr. Muzaffar Ahmad
Mr. Muzaffar Ahmad
to enquire & report
back of this case.

(16)

Amr
"C"



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications Should be Addressed to The Director General
Health Services Peshawar and not to any official by name
Office Ph + 091 - 9210269 Exchange - 091 9210187, 091 9210196 Fax + 091 9210230

OFFICE ORDER

The following officers are hereby nominated as enquiry officer to conduct enquiry against Mrs. Dilhara Begum D/O Sardar Wali, Charge Nurse (BS-16) DHQ Hospital, Charsadda being unwilling worker and categorically refused to perform her duty in Casualty Department and submit report within 15 days positively.

01. Dr. Ikramullah, Director (Admn) DGHS KP Peshawar.
02. Mr. Faridullah Shah Deputy Director (Nursing) DGHS KP Peshawar.

Sd/-
DIRECTOR GENERAL HEALTH
SERVICES, KPK, PESHAWAR.

No. 2263-67 /E.II, Dated Pesh. The 8/6 /2018.

Copy forwarded to the:-

01. Medical Supdt. DHQ Hospital, Charsadda.
02. Director (Admn) DGHS Khyber Pakhtunkhwa Peshawar.
03. Deputy Director (Nursing) DGHS Khyber Pakhtunkhwa Peshawar.
04. Deputy Director (Account) DGHS Khyber Pakhtunkhwa Peshawar.
05. PA to DGHS Khyber Pakhtunkhwa Peshawar.

For information and necessary action.

ADDL. DIRECTOR GENERAL (HRM)
DIRECTORATE GENERAL HEALTH
SERVICES, KPK, PESHAWAR

AP 08/06/18

17



To

The Director General Health Services,
Khyber Pakhtunkhwa, Peshawar

Subject: RELEASE OF PAY (SALARY).

R/Sir,

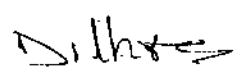
It is submitted that I have been relieved from duties on 5th June 2018. An enquiry was conducted against me on 12th June 2018, but it is still in balance, and I am waiting for resumption of any duties and released of pay. I have not received my pay for the last three months.

Therefore, I philanthropically request you to order for released of my pay and obliged.

Thanking you in anticipation.

Yours Faithfully,

Dated: 28.08.2018


Dilhara Begum D/O
Sardar Wali

091-5272021 (فارم) 091-5402115 (مقامی)

ABC

DAILY AUSAF PESHAWAR

شماره: 3 | شکر: 20 روپياں | پبلشر: 1953ء | باني: 2010ء | 21 نومبر 2015ء | صفحات: 16 | قیمت: 15 روپياں | 329

چار سو روپياں ایشاف پشاور دل آراء
 کا تصور کی ایک انگریزی کا اخبار
 پشاور، (پشاور ہائیڈرو پاور ایجنسی کے ہسپتال پر
 سنائی شریف میں نظر آتا ہے) تمام روزانہ شکر جاری ہے
 سے اس پر مشتمل ہے اور اس میں ہر روز کے قصوں کے
 انگریزی کے ایشاف پشاور کے آواز کے ہوتے ہوئے
 آرام کا ہے کہ اس میں ہرگز سے پہلے پہلے ہر ماہ
 پشاور ہائیڈرو پاور ایجنسی کے ہسپتال پر نظر آتا ہے
 پشاور ہائیڈرو پاور ایجنسی کے ہسپتال پر نظر آتا ہے۔

WISTEL



PESHAWAR HEART CENTER

(19)

Behind Khyber Medical Center Dabgari Garden Peshawar.
Mob: 0306-5997878-0314-9697745

Echocardiography Report

Name: Dil Aram Echo No: 0123 Address: Chini Sadda
 Date: 24/01/2018 Age: 40 Years Referred By: Dr. Syed Sheraz Jamal

Measurements	Observed	Normal range (mm)	Parameter	Value
Aortic root dimension	28	20-40	EPSS	
Left Atrial dimension	41	19-40	PHI	
Left ventricular Dimension	45	36-56	A Velocity (cm/sec)	
Left ventricular Dimension	30		E Velocity (cm/sec)	
Left Ventricle	10	08-12	E/A Ratio	
Right Ventricle	10	08-11	RVP (mmHg)	3'
Right Ventricle	23	08-26	Diast	

Fractional Shortening: 32% Ejection Fraction (Normal Range 50-70%): 60%
 IVRT: DCT

Valves	Gradient (mmHg)	Velocity (m/sec)	Valve Area (cm ²)	Regurgitation
Mitral	Peak: 24.5, Mean: 12.1		Doppler: 1.45, 1.32	+1
Aortic				+1
Tricuspid				Trace

Comments:

- Mildly dilated LA.
- Normal size LV with preserved systolic function.
- No regional wall motion abnormality at rest.
- Thickened, doming and noncalcific mitral valve with mild MR.
- Other valves are normal in structure.
- MVA=1.45cm² on Doppler, 1.32cm² on 2D.
- No ASD, VSD or PDA seen.
- No clot or pericardial effusion seen.

Conclusions:

- Preserved LV systolic function.
- Moderate MS with mild MR.
- Mild TR with pulmonary hypertension.

Consultant Cardiologist

Registered with H.C.C.

Mr. ROOHULLAH
Cardiac Technologist

[Signature]

[Signature] 08/06/2018

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 2210 /ST

Dated 12/11/2018

To

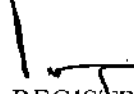
The Director General Health Services,
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: -

ORDER IN APPEAL NO. 1217/2018, MST. DILARA.

I am directed to forward herewith a certified copy of Order dated 19.10.2018 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications Should be Addressed to The Director General
Health Services Peshawar and not to any official by name

Office Ph: (091 - 9210269) Exchange Ph: 091 - 9210187, 091 - 9210196 Fax: (091 - 9210230)

OFFICE ORDER.

In the light of recommendation of enquiry report, Mrs. Dilhara Begum D/O Sardar Wali, Charge Nurse BPS-16 DHQ Hospital, Charsadda is hereby transferred / posted to Category-C Hospital Shabqadar Charsadda against the vacant post on administrative grounds, in the interest of public service with immediate effect.


NB: - Arrival/ departure report should please be submitted to this Directorate for record.

Sd/-

**DIRECTOR GENERAL HEALTH
SERVICES; KP PESHAWAR.**

No. 62421-47 /E.II, Dated Pesh. 26 / 12 /2018.
Copy forwarded to the:-

01. DHQ Hospital, Charsadda:
02. Medical Supdt. DHQ Hospital, Charsadda.
03. DAO, Charsadda.
04. DA-concerned DGHS Office Peshawar.
For information and necessary action.


**DEPUTY DIRECTOR (NURSING)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P PESHAWAR**

26/12

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

SERVICE APPEAL NO. 1217 OF 2018

Dilara.....Appellant

Versus

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

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

Respectfully Sheweth,

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 the present form and also in the present circumstances of the issue.
5. That the Appellant has filed the instant appeal with mala-fide intention hence liable to be dismissed.
6. That the Appellant has not come to the Tribunal with clean hands.
7. That the Appeal is time barred.
8. That the Honorable Tribunal has no Jurisdiction to adjudicate upon the matter.

ON FACTS:

1. Para-01 pertain to record, needs no comments.
2. Para-02 pertain to record, needs no comments.
3. Para-03 is correct to the extent that the Appellant was serving as Charge Nurse and was posted at DHQ Hospital, Charsadda, remaining para is subject to proof on behalf of the Appellant.
4. In reply to Para-04, it is submitted that the Appellant was not abruptly transferred, rather the Medical Superintendent DHQ Hospital, Charsadda, was a Competent Authority to relieve the Appellant on Administrative Ground for further posting. Furthermore, the relieving order clearly manifests the misconduct, willful negligence and non willingness of the Appellant in proper performance in her duty for a constant period of time, the gross misconduct on the part of the Appellant is also quite evident from

the fact that despite being a Civil Servant, she invited media personnels for highlighting & propagating a departmental administrative affair before general public as pressurizing and black mailing tactics for her own vested interest & wrongful gain in the given circumstances.

Therefore she was relieved from DHQ Hospital, Charsadda vide letter No. 3306/DHQ, dated 05/06/2018 (Annex-A) on valid reasons and fully justifiable in all respects and in the best interest of the department & Public at large.

5. Para-5 is misleading and as admittedly a proper enquiry was conducted vide order dated 08.06.2018 of the Respondent No. 2 i.e. Director General Health Services & her application was found baseless (Annex-B).
6. Para-6 is wrong & misleading, hence denied. The detailed reply has already been furnished in the preceding para.
7. Para-7 is denied, as the Appellant is not an aggrieved person on the strength of the impugned Office Order dated 05.06.2018 to knock at the door of this Honorable Tribunal through the instant appeal.

ON GROUNDS.

- A. Ground-A is legal, need no comments.
- B. Para-B is wrong, incorrect & misleading. The impugned order has been validly issued by the Competent Authority and fully in accordance with facts and law on the subject.
- C. Para-C is incorrect. The Appellant has been counseled on many occasions to be efficient in performance of her official duty and to keep proper liaison with her senior in discharging of her duties, but no heed was paid upon it.
- D. Para-D is incorrect, as a relieving order based on just cause & reasons is always considered as effective tool in the proper functions and administration of a department, as the situation required in the instant case.
- E. Para-E is wrong, as it is an admitted fact that the Appellant was not only disinclined towards performance of her duty, disrespectful to his seniors, but also bent upon maligning and degrading the whole department by taking the self created matter to the media against all norms of rules &

procedure, therefore the relieving order was made as a last resort, which in the given circumstances could not be termed as punishment or penalty in the original sense of the word, in suing conducting proper inquiry, issuing show cause or final Show Cause notice, statement of allegation, especially when if the Appellant was personally heard on many occasion and advised to obey the rules & procedure in performance of her sacred duty. Moreover, the Appellant being a Civil Servant under the Civil Servant Act 1973 & as per Section 10 of the Act ibid "A Civil Servant is bound to serve any where, as per needs and interest of the department.

F. Para-F is wrong, incorrect & misleading. Detailed reply has already been furnished in preceding para.

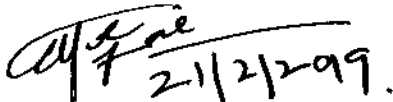
G. Para-G is misleading & incorrect. As the Appellant was supposed to withdraw her salary from the place of her new posting according to rules and procedure.

H. Para-H is wrong, incorrect, misleading, hence denied. The detailed reply has already been furnished in the preceding paras.

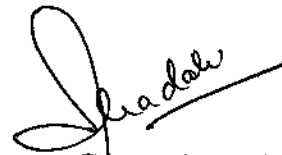
I. Para-I is legal, need no comments.

PRAYER:

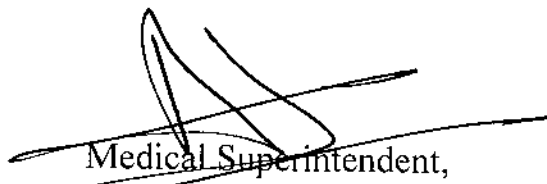
It is therefore most humbly prayed that on acceptance of comments, the instant Appeal may very graciously be dismissed with cost.


21/2/2019.

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



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



Medical Superintendent,
DHQ Hospital, Charsadda.
Respondent No. 03

MS
51
 Additional DG Health (HRM)

DISTRICT HEADQUARTER HOSPITAL CHARSADDA
 KHYBER PAKHTUNKHWA

No. 3306 DHQ Hosp. Charsadda

Dated: 05/06/2018

To
 Mst Dll Ara
 Staff Nurse, Night Shift, Casualty Department
 DHQ Hospital Charsadda

Sub: RELIEVE ON ADMINISTRATIVE GROUNDS

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Yesterday you came to the office of the undersign along with your husband and in presence of DMS morning shift, matron and night supervisor, you were consistently arguing and screaming against both, despite of the fact MS gave you the assurance that continue with your duty and you will be facilitated next month or you may ask any of your colleague to exchange duty for your convenience. After decision you all went to matron office and after about 10-15 minutes report and complaint received by both matron and supervisor that you quarrel with them, abuse them and beat them. Your this kind of harsh, irresponsible and aggressive attitude towards your seniors is absolutely not tolerable and highly objectionable. You are therefore strictly warned to refrain from such type of behavior and attitude.

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You are therefore relieved from DHQ Hospital Charsadda on administrative grounds and directed to report to Director General Health Services KP office.

Amel Akbar
 Medical Superintendent
 DHQ Hospital Charsadda
 05/06/18

Copy to:

1. Director General Health Services Khyber Pakhtunkhwa Peshawar
 2. Assistant Director (Nursing) DGIIS Office Khyber Pakhtunkhwa Peshawar
 3. Additional DG Health (HRM) Services Khyber Pakhtunkhwa, Peshawar
 4. PS to Secretary Health Khyber Pakhtunkhwa, Peshawar
 5. Matron DHQ Hospital Charsadda
 6. DAO Charsadda
 7. Accounts Section of this hospital to stop her pay forthwith.
- For information.

61



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

All communications Should be Addressed to The Director General
Health Services Peshawar and not to any official by name
Office Ph : 091 - 9210262 Exchange - 091 - 9210187, 091 - 9210196 Fax : 091 - 9210230

OFFICE ORDER

The following officers are hereby nominated as enquiry officer to conduct enquiry against Mrs. Dilhara Begum D/O Sardar Wali, Charge Nurse (BS-16) DHQ Hospital, Charsadda being unwilling worker and categorically refused to perform her duty in Casualty Department and submit report within 15 days positively.

- 01. Dr. Ikramullah, Director (Admn) DGHS KP Peshawar.
- 02. Mr. Faridullah Shah Deputy Director (Nursing) DGHS KP Peshawar.

Sd/-
DIRECTOR GENERAL HEALTH
SERVICES, KPK, PESHAWAR.

No. 2263-67 /E.II, Dated Pesh. The 8/6 /2018.

Copy forwarded to the:-

- 01. Medical Supdt. DHQ Hospital, Charsadda.
- 02. Director (Admn) DGHS Khyber Pakhtunkhwa Peshawar.
- 03. Deputy Director (Nursing) DGHS Khyber Pakhtunkhwa Peshawar.
- 04. Deputy Director (Account) DGHS Khyber Pakhtunkhwa Peshawar.
- 05. PA to DGHS Khyber Pakhtunkhwa Peshawar.

For information and necessary action.

2

ADDL. DIRECTOR GENERAL (HRM)
DIRECTORATE GENERAL HEALTH
SERVICES, KPK, PESHAWAR

MP
08/06/18

17/5/19.

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

12171 18
In S.A# 553/2017

Mst. Dilara

Versus

Secretary Health, Government of Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar & Others .

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Dated: 15/04/2019

Dilara
Appellant

Through

Javed
JAVED IQBAL GULBELA,
Advocate High Court
Peshawar

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

In S.A# 1217/2018

Mst. Dilara staff nurse District Head Quarters Office
Charsadda. Petitioner

Versus

Secretary Health, Government of Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar & Others

..... Respondents

REJOINDER ON BEHALF OF
APPELLANT TO THE
COMMENTS FILED BY THE
RESPONDENTS

Respectfully Sheweth,

Reply to Preliminary objection:-

1. Para No. 1 of the Preliminary objections is misleading, wrong, incorrect and sternly denied. The petitioner has a strong locus standi and prima facie case, besides having solid cause of action.
2. Para No. 2 of the Preliminary objections is incorrect, wrong, misleading and is therefore denied.

3. Para No. 3 of the Preliminary objections is misleading, incorrect and is therefore denied. Moreover the appeal of the appellant is according to law and rules.
4. Para No. 4 of the Preliminary objections is misleading, incorrect, hence denied.
5. Para No. 5 of the Preliminary objections is incorrect, misleading and hypocritic, hence denied.
6. Para No. 6 of the Preliminary objections is incorrect, hence denied.
7. Para No. 7 of the Preliminary objections is incorrect, hence denied. Moreover, the appellant filed the appeal in time, according to law.
8. Para No. 8 of the Preliminary objection is incorrect and misleading, hence denied. Moreover, this Hon'ble Tribunal has ample jurisdiction to entertain the instant appeal according to law.

On Facts:-

1. Para No. 1 of the comments is incorrect, concocted, fabricated, baseless, wrong and hypocritic, hence denied, while that of the main appeal is true and correct.

2

2. Para No. 2 of the comments is incorrect, wrong, baseless, concocted, fabricated and hypocritical, hence denied, while that of the main appeal is true and correct.

3. Para No. 3 of the comments is incorrect, wrong, baseless, misleading and hypocritical, hence denied, while that of the main appeal is true and correct and a detail true picture is given in the preceding Para of the main appeal.

4. Para No. 4 of the comments is incorrect, concocted, fabricated, misleading, malicious, baseless and hypocritical, hence denied while that of the main appeal is true and correct and the detail of true picture is given in the main appeal.

5. Para No.5 of the comments is incorrect, concocted, fabricated, misleading, hence denied, while that of the main appeal is true and correct.

6. Para No. 6 of the comments is incorrect, concocted, fabricated, baseless, misleading, malicious and hypocritical,

hence denied, while that of the main appeal is true and correct.

7. Para No. 7 of the comments is incorrect, concocted, fabricated, misleading, hence denied, while that of the main appeal is true and correct.

On Grounds:-

A.No comments.

B.Incorrect, baseless and denied.

C.Incorrect, baseless, concocted, fabricated and denied.

D.Incorrect, baseless, concocted, fabricated and denied.

E.Incorrect and denied. Moreover the Respondents are making a probate and reprobate and in preliminary objections; moreover the true picture in detailed in main appeal.

F.Incorrect and malicious, hence denied.
True picture in detailed in main appeal.

G. Incorrect and malicious, hence denied.

True picture in detailed in main appeal.

H. Incorrect and denied.

I. Incorrect and denied.

It is, therefore, most humbly prayed that appeal of the appellant be allowed on prayed for therein, in favour of the appellant.


Appellant

Through


Javed Iqbal Gulbela

Advocate, High Court
Peshawar.

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

In S.A# 553/2017

Mst. Dilara

Versus

Secretary Health, Government of Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar & Others

AFFIDAVIT

I, Mst. Dilara staff nurse District Head Quarters Office Charsadda, do hereby solemnly affirm and declare on oath that contents of the Rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble court.

Dilara
DEPONENT





OFFICE OF THE
DISTRICT HEALTH OFFICER
CHARSADDA

No. 3128/DHO

Dated Charsadda the 9/4/2019


To

The Director General
Health Services, Khyber Pakhtunkhwa
Peshawar.

Subject: - OFFICE ORDER

It is to inform you that Mrs. Dillara Begum D/o Sardar Wali, charge nurse (BS-16) has been posted at Category C Hospital Shabqadar vide order No. 6244-47/E.II Dated 26/12/2018, how she reported for duty today on 9/04/2019 after laps of three and half months.

You are therefore requested to refresh the order and also make a copy to DHO Charsadda for further necessary action.


DISTRICT HEALTH OFFICER
CHARSADDA

TO BE SUBSTITUTED FOR THE SAME NUMBER AND DATE.



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to The Director General
Health Services Peshawar and not to any official by name.
Office Ph : 091 - 9210269 Exchange 31 091 - 9210187, 091 - 9210196 Fax : 091 - 9210230

OFFICE ORDER.

In the light of recommendation of enquiry report, Mrs. Dilhara Begum D/O Sardar Wali, Charge Nurse BPS-16 DHQ Hospital, Charsadda is hereby transferred / posted to Category-C Hospital Shabqadar Charsadda against the vacant post on administrative grounds, in the interest of public service with immediate effect.

NB: - Arrival/ departure report should please be submitted to this Directorate for record.

Sd/-
DIRECTOR GENERAL HEALTH
SERVICES, KP PESHAWAR.

No. **6244-47** /E.II, Dated Pesh. **26** / **12** /2018.
Copy forwarded to the:-

01. District Health Officer, Charsadda.
02. Medical Supdt. DHQ Hospital, Charsadda.
03. DAO, Charsadda.
04. DA-concerned DGHS Office Peshawar.
For information and necessary action.

DEPUTY DIRECTOR (NURSING)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P PESHAWAR

Am