FORM OF ORDER SHEET

Court of	
Case No	150/ 2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/1/2023	The appeal of Dr. Niaz Ali Khan presented today by Mr. Nasir Mahmood Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on Parcha Peshi is given to appellant/counsel.
		By the order of Chairman
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BEFORE THE COURT OF HON'BLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA PESHAWAR

Appeal No. 150 /2023

Dr Niaz Ali Khan.....Appellant

VERSUS

Govt of KPK & othersRespondents

INDEX

INDEX		
Description of Documents	Annex	Pages
Memo of appeal		1-8
Affidavit		9
Application for suspension		10 - 11
Affidavit		12
Copy of Order dated 29.7.2020 & 14.11.2020	A & B	13 - 14
Copy of co-called managed complaint	С	15
Copy of Office Order dated 10.09.2021	D	16
Copies of the Letters	E	17 - 45
Copy of Office Letter dated 26.08.2021	F	46
Copy of month wise deduction	G	47-
Copies of various newspapers headlines	H	48-49
Copy of Letter dated 23.09.2022	I	50
Copy of letter dated 06.10.2022	J	51
Copy of Departmental Appeal	K	52-53
Copy of the enquiry report	L	54-56
Wakalat nama		52
	Affidavit Application for suspension Affidavit Copy of Order dated 29.7.2020 & 14.11.2020 Copy of co-called managed complaint Copy of Office Order dated 10.09.2021 Copies of the Letters Copy of Office Letter dated 26.08.2021 Copy of month wise deduction Copies of various newspapers headlines Copy of Letter dated 23.09.2022 Copy of letter dated 06.10.2022 Copy of Departmental Appeal Copy of the enquiry report	Affidavit Application for suspension Affidavit Copy of Order dated 29.7.2020 A & B & 14.11.2020 Copy of co-called managed complaint Copy of Office Order dated D 10.09.2021 Copies of the Letters Copy of Office Letter dated F 26.08.2021 Copy of month wise deduction G Copies of various newspapers H headlines Copy of Letter dated I 23.09.2022 Copy of letter dated 06.10.2022 J Copy of Departmental Appeal K Copy of the enquiry report

Through

Date: 16.01.2023

NASIR MAHMOOD

Advocate, Supreme Court

Of Pakistan

BEFORE THE COURT OF HON'BLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA PESHAWAR

Appeal No. /50 /2023

VERSUS

1. Government of Khyber Pakhtunkhwa, through Chief Secretary Khyber Pakhtunkhwa, Peshawar.

2. Government of Khyber Pakhtunkhwa, through Secretary Health Khyber Pakhtunkhwa, Peshawar.

> APPEAL UNDER SECTION 4 OF KP SERVICES TRIBUNAL ACT 1974 AGAINST THE TRANSFER ORDER DATED 06.10.2022, VIDE WHICH THE APPELLANT WAS TRANSFERRED FROM POST DEPUTY DHO KARAK, WHEREBY THE APPELLANT FILED DEPARTMENTAL APPEAL BEFORE THE RESPONDENT NO 2 ON 07.10.2022, WHICH WAS NOT RESPONDED TILL DATE, HENCE THE INSTANT APPEAL.



Prayer in Appeal:

On acceptance of this service appeal, the impugned Transfer Order dated 06.10.2022, may kindly be set aside and direct the respondents to restore Appellant on his Original Position.

Respectfully Sheweth:

- 1. That the Appellant is a peaceful and law abiding citizen of Pakistan and is entitled for all the legal and fundamental rights constitution of Islamic Republic of Pakistan 1973.
- 2. That the Appellant has been serving Health Department since 04.07.2002 and currently has been posted as Deputy Director Health Officer Karak since 29.07.2020 and was handed over the charge of Acting DHO vide order dated 14.11.2020. (Copy of Order dated 29.7.2020 & 14.11.2020 are attached as annexure A & B)
- 3. That the Appellant rendered the aforesaid responsibility efficiently, dedicatedly and punctually upto the satisfaction of respondent No 1 to 3.

- 4. That an anonymous complaint was managed somehow, alleging ghost doctors in Karak allegedly with the support of the Appellant, carrying no date, addressed to none. (Copy of co-called managed complaint is attached as annexure C)
- That in the backdrop of so-called complaint the respondent No 3 deemed it appropriate to constitute an enquiry committee vide Office Order No 14010-13/HRM dated 10.09.2021.
 (Copy of Office Order dated 10.09.2021 is attached as annexure D)
- 6. That it is pertinent to mention here that the said enquiry was to be conducted against medical superintendent (BS-19) type-C Hospital Takht-e-Nasrati and the Appellant. That according to provisions of Government Servants, (Efficiency and Discipline) Rules 1973, the Head of the Enquiry of Committee must be senior at least one scale to the officer against whom enquiry is to be conducted but in the instant case one of the member of the enquiry committee is in BPS-19 while MS Type-C Hospital Takht e Nasrati is also in BPS-19, which renders the committee as Coram Non Judice, hence illegal.

- 7. That it is needless to mention that MS of each Hospital is responsible for Management and working of his respective Hospital and the Appellant has been observing vigilantly the management of hospitals across the District after undertaking tours of the Hospitals. In this respect the Appellant issued a letter to all MOs, SMO, ECG Technicians and CT Officials of Type-C Hospital Takht e Nasrati through various letters, highlighting lapses in the respective Hospitals. (Copies of the Letters are attached as annexure E)
- 8. That the MS Type C Hospital Takht e Nasrati, circulated on such letter of the Appellant vide his Letter No 915 dated 26.08.2021 for compliance. (Copy of Office Letter dated 26.08.2021 is attached as annexure F)
- 9. That as a result of aforesaid vigil the appellant was constrained to deduct salaries from medical officers as well as other staff who were reported absent. (Copy of month wise deduction is attached as annexure G)
- 10. That ironically anonymous complaints are shelved and not adhered to but in this case the enquiry committee, out of malafide and ulterior



motive turned hostile by going ahead and least bothered to follow the policy in this respect which is liable to be struck down.

- 11. That the findings of the enquiry committee are based on mis-reading and non-reading of material points and have overlooked the watchdog role, having performed by the Appellant in the shape of various letters to the MS concerned for compliance but out of discriminatory attitude towards Appellant the enquiry Committee has recommended for transfer of the Appellant from the post of acting DHO which is based on whims and surmises, not tenable in the canons of law which is liable to be struck down.
- 12. That the Enquiry Committee have turn bling to the fact that the enquiry is silent about alleged ghost doctors despite whistle-blowing conduct of the enquiry committee and followed by medias sinister campaign. (Copies of various newspapers headlines is attached as annexure H)
 - 13. That a result of above stated recommendations of enquiry committee, the appellant was relived from acting charge of DHO karak vide order dated 23.09.2022 which is an offshoot of

malicious and scandalous campaign against the Appellant for no fault. (Copy of Letter dated 23.09.2022 is attached as annexure I)

- 14. That after having been relieved from the acting charge of DHO Karak on 23.09.2022 the respondents were pleased to further victimize discriminately by issuing another order dated 0610.2022 whereby the Appellant was removed from post of Deputy DHO Karak and directed to report to DG Health Services KP. (Copy of letter dated 06.10.2022 is hereby attached as annexure J)
- 15. That the Appellant feeling aggrieved from the successive colorable and orders based on malafide, filed an Appeal before respondent No 2 for remedial measures on 07.10.2022, which has not yet been decided. (Copy of Departmental Appeal is attached as annexure K)
- 16. That the appellant aggrieved from the illegal premature transfer orders of the respondents, having no other alternate, efficacious remedy available but to approach this Hon; ble Tribunal, inter alia on the following grounds:

(60)



GROUNDS:

- A) That the Impugned office Orders dated 23.09.2022 & 06.10.2022 based on recommendations of enquiry committee are nullity in eye of law, rules of business and posting transfer policy of the Government on subject.
- That the enquiry committee has no locus standi to conduct enquiry against an officer who is equal in rank / scale thus liable to be set at naught.
 - C) That the enquiry constituted on the basis of anonymous complaint loses its efficacy and worth because it has found no parallel in the annals of service rules and regulations, this liable to be struck down. (Copy of the enquiry report is attached annexure L)
 - D) That the constitution provides security to the servants, serving in the province but in this case the Appellant has been made a scapegoat on the basis of allegations having no foothold what to talk of ghost doctors in District Karak.
 - E) That the fundamental right of the Appellant has blatantly violated by the Respondents and the Appellant have been discriminated and has



been denied his due rights under the Constitution of Islamic Republic of Pakistan, 1973.

- F) That the Appellant has been twice penalized for no wrong successively by agonizing in various ways and on fabricated allegations which warrants indulgence of this Hon'ble Court.
- G) That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

It is, therefore, most humbly prayed that On acceptance of this service appeal, the impugned Transfer Order dated 06.10.2022, may kindly be set aside and direct the respondents to Restore the Appellant on his Original Position.

Any other relief may deemed fit in the circumstances of the law may also be granted in favour of the appellant against respondent.

Through

Date: 16.01.2023

NASIR MAHMOOD

Advocate, Supreme Court

Of Pakistan

Apportunition

BEFORE THE COURT OF HON'BLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA

Appeal No/2023	
Dr Niaz Ali Khan	Annellant
VERSU	
Govt of KPK & others	Respondents

PESHAWAR

AFFIDAVIT

I, Dr Niaz Ali Khan Deputy District Health Officer Karak, do herby solemnly affirm and declare on oath that the contents of accompanying **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.

CNIC # _____Cell # ____

BEFORE THE COURT OF HON'BLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA PESHAWAR

Appeal No/2023	,
Dr Niaz Ali Khan	Appellant
VERSU	
Govt of KPK & others	Respondents

APPLICATION FOR SUSPENSION OF THE IMPUGNED TRANSFER ORDER DATED 06.10.2022, TILL THE FINAL DECISION OF THE SERVICE APPEAL.

Respectfully Sheweth:-

- 1. That the above noted service appeal is being filed before this Honourable Tribunal, in which no date of hearing has yet been fixed.
- 2. That the facts and grounds of the service appeal may kindly be read as an integral part of this application.
- 3. That the applicant has got a good prima facie case in her favour, and is sanguine about its success.

- That the balance of convenience also lies in 4. favour of the applicant.
- That if the transfer order dated 16.01.2023 5. not suspended, than the applicant would suffer irreparable loss. because appellant has not yet relieved his charge.

It is, therefore, respectfully prayed that on acceptance of this application, the impugned transfer order 06.10.2022 may kindly be suspended and the Appellant may graciously be restored into his original position, till the final decision of the case.

Through

Date: 16.01.2023

NASIR MAHMOOD

Appellant,

Advocate, Supreme Court

Of Pakistan

(12)

BEFORE THE COURT OF HON'BLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA PESHAWAR

Appear No/2023
Dr Niaz Ali KhanAppellant VERSUS Govt of KPK & othersRespondents
<u>AFFIDAVIT</u>
I, Dr Niaz Ali Khan Deputy District Health Officer
Karak, do herby solemnly affirm and declare on oath
that the contents of accompanying Application are true
and correct to the best of my knowledge and belief and
nothing has been concealed from this Honorable court.
DEPONENT
CNIC #
Call #

Annex="A"

Government of Khyber Pakhtunkhwa, . Health Department

Dated Peshawar the 29th July, 2020

VOTIFICATION

NO SOHOLOVE V/4-4/2020 The competent authority has been pleased tostiansfelepia Niaz Ali Khan, Senior Medical Officer (BS-18) Type-C Hospital Taking e Nasrati Karak and post him as Deputy District Health Officer Karak in his while scales against the vacant post, in the best public interest and with

> Secretary Health Government of Khyber Pakhtunkhwa

Endst Oveven No. & Date

Accountants General Khyber Pakhtunkhwa, Peshawar.

Accountants General Khyber Pakhtunkhwa, Peshawar.

Director General Health Services, Khyber Pakhtunkhwa, Peshawar.

Director General Health Services, Khyber Pakhtunkhwa, Peshawar.

Director General Karak.

Director Health Officer, Karak.

District Health Officer, Karak.

Director Health Department, with the direction to upload the opening official website.

Totification on official website.

Posto Minister for Health Department, Khyber Pakhtunkhwa.

Posto Minister for Health Department, Khyber Pakhtunkhwa.

Posto Minister for Health Department, Khyber Pakhtunkhwa.

concerned.

(Mahammad/Irfan Usman)

Section/Officer (E-V)



Government of Khyber Pakhtunkhwa, Health Department Annex

Dated Peshawar the 14th November, 2020

NOTIFICATION

The Competent Authority has been NO. SOH(HD)/E-V/4-4/2020 pleased to transfer Dr. Sadiq Shah (BS-19), District Health Officer, Karak and direct him to report to Directorate General Health Services, Khyber Pakhtunkhwa Peshawar with immediate effect, in public interest.

Consequent upon the above, Dr. Niaz Ali (BS-18), Deputy District Health Officer, Karak is hereby directed to look after the vacant post of District Health Officer Karak as a stop-gap arrangement till the posting of a proper incumbent.

Secretary Health Government of Khyber Pakhtunkhwa

ENDST. OF EVEN NO. & DATE.

Copy to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.

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

3. Deputy Commissioner, Karak.

4. District Health Officer, Karak.

5. DAO, Karak.

- 6. Deputy Director (IT), Health Department, with the direction to upload the notification on official website.
- 7. PS to Minister for Health Department, Khyber Pakhtunkhwa.
- 8. PS to Secretary Health Department, Khyber Pakhtunkhwa.

9. Doctors concerned.

Section Officer (

Annex c"

GHOST DOCTORS IN KARAK SUPPORTING BY ACTING DITO 1.Dr saad arshad belong KARAK FOR HIS PERSONAL BENEFITS from charsada absent since his arrival report attached to type c hospital Takhti Nasrati as he is giving 50000 per month to dho karak. 2.Dr ijaz anwar SMO attached to type c hospital Takhti Nasrati absent since his posting. 3.Dr baseer MO surgery attached to type c Takhti Nasrati absent. 4.Dr inam on general duty at Takhti Nasrati absent as he giving 30000 per month. 5.dr kiramat wazir came for 1 day attached to type c Takhti Nasrati then remained absent. 6.dr noreen shabana gynaecologist only came on Saturday and monday then remained absent and gynae ward is closed as she pays money to incharge and dho karak. 7. Nadia nurse absent since 8 months as she pays 15000 per month. 8. Samina nurse absent since 8 months as she pays 15000 per month. 9.dr Noor Anwar is in Saudi Arabia and he left the duty station without sanction of leave but dho is silent. 10.dr tahir saeed district surgeon absent since long attached to THQ bdshah. 11. Dr sidra baig attached to THQ bdshah absent since long.12.dr umer khyiam is in America attached to bdshah. 13. Dr habil khan attached to bdshah is in Kuwait but he has paid all salaries till june 2021 despite of the fact that his name is also not included in adhoc extension. 14.Dr shahid rehman attached to THQ bdshah only perform sunday duty in month as he paid 30 thousands to incharge and dho karak. 15. Four dental surgeons are working in THQ bdshah but opd less than 10 per week as each dental surgeon perform only 1 day duty per week. 16. Dho karak,incharge THQ bdshah and concerned clerk have purchased various medicines and other items on local purchase basis without MCC lists for their commissions etc.

Les My y Green A



TORATE GENERAL HEALTH SERVICES. KHYBER PAKHTUNKUWA PESHAWAR

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

Office Ph 1001 - 9210769 | fictional = 9210187, for 1 021 - 9210710



OFFICE ORDER

An enquiry committee consisting of the following officers is hereby constituted to conduct fact finding inquiry into the ghost doctors in District Karak supporting by acting DHO Karak for his personal benefits.

1. Dr. Muhammad Saleem Medical Superintendent (BS-19) Karak.

2. Dr. Hidayaullah Deputy Director (Coord) DGHS KP, Peshawar.

The committee should probe and investigate into the matter and submit its report with proper recommendations duly backed and supported by relevant laws/rules within 15-days positively for conward submission to the Govt:

> Sd/xxxxxx DIRECTOR GENERAL HEALTH. SERVICES KHYBER PAKHTUNKHWA.

No. 14010-131HRM

Dated //> /09/2021.

Copy forwarded to the:-

- 1. Secretary to Govt: of Health Department KPK for information wir to his letter quoted above.
- 2. Dr. Muhammad Saleem Medical Superintendent (BS-19) Karak
- 3. Dr. Hidayatullah Deputy Director (Coord) DGHS KP, Peshawar For information and necessary action. A copy of relevant documen on which remarks of DG Sahab is recorded is attached for perusaplease.
- 4. P.A to DGHS KPK Peshawar for information.

ADDITIONAL DIRECTOR GENERAL (HRM) HEALTH SERVICES KHYBER PAKHTUNKHIVA

Annex E

OFFICE OF DISTRICT HEALTH OFFICER

KARAK

(Khyber Pakhtunkhwa) Phone & # Fax & #: 0927-290537

No.

/Admn:

Dated: 99 /02/2021

- 1. Dr. Abdur Rehman SMO Type-C Hospital Takhti Nasrati.
- 2. Dr. Sajid Ali MO Type-C Hospital Takhti Nasrati
- 3. Dr. Mudassir MO Type-C Hospital Takhti Nasrati.
- 4. Dr. Faheem MO Type-C Hospital Takhti Nasrati. 5. Asmat Fardous ECG Technician Type-C Hospital Takhti Nasrati.
- 6. Mehboob CT(Pharmacy) Type-C Hospital Takhti Nasrati.

Subject:

To

During the surprise visit of the undersigned on dated: 06-02-2020 to Type-

C Hospital Takhti Nasrati, it has been observed that you all lest your duty station at about

01:00PM, which is gross negligence on the part of your duty.

Therefore, you all are hereby directed that not to have the place of duty/OPD

before 02:00PM.

ealth Officer Karak

Endst of No. & Dated Even:

Copy to:

1. Medical Superintendent Type-C Hospital Takhti Nasrati.

Tealth Officer Karak



Karak -

(Khyber Pakhtunkhwa) Phone 🕾 # Fax & #: 0927-290537

787-88 /Admn:

Dated: 18 /02/2021

0

Medical Superintendent Type-C Hospital Takhti Nasrati.

Subject:

JUSTIFICATION OF DUTY ROASTER

Reference to your office duty roaster issued vide No. 463/D.R Dated: 30-01-2021, during the scrutiny of the duty roaster it has been noticed that doctor has been deputed for various specialties (for OPD as well as Wards). The admission record of the OPD's/wards patients may kindly be share for the month of January 2021 as mentioned in duty roaster with this office.

Furthermore, one medical officer nominated for coordination in duty roaster while DMS already exist. In my opinion no need such like post in the presence of DMS. Some doctors are not mentioned in the duty roaster whereas they are drawing pay from Type-C Hospital Takhti Nasrati. In "Note" Sr.No 1. you have mentioned that "No Substitution allowed", as such impersonation have been came in your notice in past, so kindly share such type illegalities with undersigned, to take disciplinary proceeding against the defaulter/defaulters to stop such type of malpractice in the Govt. institution.

You are request to share daily attendance of all staff working at Type-C Hospital Takhti Nasrati on WhatsApp.

Constitution realth Officer Karak

Endst of No. & Dated Even:

Copy to:

 Account Section DHO Office Karak with the direction to provide doctors record working in Type-C Hospital Takhti Nasrati to tally with duty roaster.

> bistrict Health Officer Karak

(Khyber Pakhtunkhwa) Phone & # Fáx # #: 0927-290537

Admn:

Dated: 20/06/2021

Medical Superintendent, Type-C Hospital Takhti Nasrati.

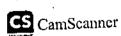
Subject:

QF. OR/NURSES/PARAMEDICS/CLASS-IV

In continuation of this office letter No. 987-88/Admn: dated: 18-02-2021, it is observed that duty roaster of your health facilities are not according to the Govt. of Khyber Pakhtunkhwa, Health Department notification and directives. It is illegal that 01 medical officer/WMO/Nurse/paramedics/Class-IV perform 24 hours duty and then he/she will be grant OFF for the test of the week and it is gross violation of Govt. Rule and Policy. It is further added for your information that in case of any mishap you will not able to defend such discrepancies in the duty roaster as such have been experienced in past in Type-C Hospital Takhti Nasrati by the undersigned. Moreover, the undersigned being a Head of Department received various complaint from public regarding the same and in no way undersigned defend the same. You are hereby directed to refine such discrepancies in duty roaster under intimation to this office as earlier. The matter should be treated on priority basis.

warshamin/CO DHO Office decel 10 file: DHO Office

District Health Officer Karak





> (Khyber Pakhtunkhwa) Phone 图 # Fax 基 #: 0927-290537

Dated: 09/07/2021

Ţο

1. Medical Superintendent Type-C Hospital City, Karak.

2. Medical Superintendent THQ Hospital BD Shah

3. Incharge Type-D Hospital Latamber/ Sabir Abad.

4. Incharge Civil Hospital Teri/Gurguri/Bahadar Khel.

5. Incharge RHC Nari Panos/Ahmad Abad/SG Khel.

Subject:

DISCREPANCIES DOCTOR/NURSES/PARAMEDICS/CLASS-IY ROASTER

OF.

It has been observed from the general observation that duty roaster of health facilities are not according to the Govt. of Khyber Pakhtunkhwa, Health Department medical 01 that illegal directives. is completely It notification and officer/WMO/Nurse/paramedics/Class-IV perform 24 hours duty and then he/she will be grant OFF for the rest of the week and it is gross violation of Govt. Rule and Policy. It is further added for your information that in case of any mishap you will not able to defend such discrepancies in the duty roaster as such have been experienced in past in various health facilities by the undersigned. Moreover, the undersigned being a Head of Department received various complaint from public regarding the such malpractice. All Incharges of health facilities to follow morning, evening & night shift duty roaster protocol. The matter

Endst. No & Dated Even:-. Copy to:-

should be treated on priority basis,

1. DMO(IMU) Health Department Karak for information.

District Health Officer Karak

SERVICE OFFICE CONTRACTOR #119 file: DHO Office



KARAK

(Khyber Pakhtunkhwa) Phone & Fax & N: 0927-290537

/Admn:

/08/2021 Dated: #

Medical Superintendent, Type-C Hospital Takhti Nasrati.

WMO'S DUTY AT LABOUR ROOM

It has been come into the notice of undersigned that 05 WMO's are working in your hospital but they are oncall to their duty place (i-e Labour Room). Therefore you are directed to ensure the physical presence of your WMO's in labour room instead of oncall. If anyone not follow this direction report them to the undersigned, failing which strict disciplinary action might be taken against them.

> calth Officer Karak.

Asserthernholog DHO office kursh doc=205 file: DHO Office



(22)

OFFICE OF DISTRICT HEALTH OFFICER

KARAK

(Khyber Pakhtunkhwa) Phone 哲 # Fax 器 #: 0927-290537

No. 3729

/Admn:

Dated: 25 10 2021

0

Incharge,

Type-D Hospital Latamber.

Subject:

DISCREPANCIES IN DUTY ROASTER / IMPERSONATION IN

GOVT: DUTY

It has been reported by IMU health to the undersigned that doctors of your health facility are not following duty roaster of your health facility. It has also been reported that doctors perform duty for 03 days duty at once and grant OFF for undefined period which it is gross violation of Govt. Rule and Policy. Some doctors are also involve in impersonation, who are performing Govt. duty instead of someone else, so kindly share such type illegalities with undersigned, to take disciplinary proceeding against the defaulter/defaulters to stop such type of malpractice in the Govt. institution.

CO.



(Khyber Pakhtunkhwa) Phone 🕾 # Fax 🗸 #: 0927-290537

No. 3782-88 /Admn:

Dated: 37 /08/202

To

 Mrs. Nadia Sultan Charge Nurse Type-C Hospital Takhti Nasrati.

 Mrs. Samina Akhtar Charge Nurse Type-C Hospital Takhti Nasrati. Both under transfer to THQ Hospital BD Shah on administrative grounds

Subject:

EXPLANATION

Reference to this office order No. 3483-87/Admn: dated: 11-08-2021, whereas you both were relieved by Medical Superintendent Type-C Hospital Takisti Nasrati vide his office letter No. 894-95/ dated: 07-08-2021 on account of continuous absenteeism from the essential services of emergency form a long duration without any information/any reason. Hereinafter, this office placed your services at the disposal of Medical Superintendent THQ Hospital BD Shah on administrative ground but you both failed to submit arrival at the office of Medical Superintendent THQ Hospital BD Shah to till date. Hence, this office didn't know your where about.

Therefore, you both are hereby directed to explain your position within 03 days positively otherwise this office will place your services at the disposal of Director General Health Services, Khyber Pakhtunkhwa, Peshawar for further posting.

District Health Officer Karak

Endst: No & Dated Even:

Copy to:-

1. Medical Superintendent Type-C Hospital Takhti Nasrati.

2. Medical Superintendent THQ Hospital BD Shah,

3. Account Section DHO Office Karak with the direction to stop the pay of the above named charge nurses.

Ament amin/co DHO office karak doc/201 file: DHO Office

Stopping of pay PAYROLL SYSTEM
AMENDMENT FORM
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(Khyber Pakhtunkhwa) Phone & # Fax & #: 0927-290537

No._38/2

/Adınn:

Dated: 08 /09/2021

To

Medical Superintendent,
Type-C Hospital Takhti Nasrati.

Subject:

APPLICATION

Reference to your office letter No. No. 894-95/ dated: 07-08-2021, wherein Mrs. Nadia Sultan & Samina Akhter Charge Nurses previously attached to your hospital was relieved on account of continuous absenteeism from the essential services of emergency from a long duration without any information/any reason. Hereinafter both the charge nurses were adjusted at THQ Hospital BD Shah on administrative ground. It was astonishing that at the sudden they assured you regularity in Govt. duty in future and request for compulsion being female...? In meanwhile your office also provide the comments that this office will have no objection if they retransferred to Type-C Hospital Takhti Nasrati which was beyond the sense and again it is too much astonishing.

It is therefore requested to kindly provide ground to above facts that undersigned will able to retransfer both the charge nurse to Type-C Hospital Takhti Nasrati.

Anwarshamim/co DHO office karak doc#217 file: DHO Office

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62



(Khyber Pakhtunkhwa) Phone &# # Fax & #: 0927-290537

No. 3926

/Admn:

Dated: <u>2</u>/09/2021

To

Medical Superintendent,

Type-C Hospital Takhti Nasrati.

Subject:

SOLID CLEAR CRYSTAL INFORMATION/POSITION OF DR. SAAD ARSHAD Dr. MUHAMMAD AHMAD & DR. ASMA RAHIM WITHIN

24HOURS

Kindly refer to the subject cited above and kindly submit report solid clear crystal information/position of Dr. Saad Arshad & Dr. Muhammad Ahmad MO's and Dr. Asma Rahim WMO in 24hours attached to your health facility that either the concerned doctor are on duty or otherwise.

Absorbania/eo DHO office karak doc#217, file: DBO Office

rice Health Officer Karak



(Khyber Pakhtunkhwa) Phone St Fax & #: 0927-290537

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Admn:

Dated: 0 /09/2021

Reminder Through Kacha Cover

To

Medical Superintendent,

Type-C Hospital Takhti Nasrati.

Subject

SOLID CLEAR CRYSTAL INFORMATION/POSITION OF DR. SAAD ARSHAD Dr. MUHAMMAD AHMAD & DR. ASMA RAHIM WITHIN 24HOURS

Reference to this office letter No. 3926/Admn: dated: 07-09-2021 on the subject cited above & to submit solid clear crystal information/position of Dr. Saad Arshad & Dr. Muhammad Ahmad MO's and Dr. Asma Rahim WMO in 24hours attached to your health facility that either the concerned doctor are on duty or otherwise and you fail to submit report in the stipulated time period. You are once again directed to submit report of the aforesaid doctors in 24 hours as they were also report as chronic/habitual absent. If you fail to do ex-parte decision will taken and their services will be placed at the disposal of the Director General Health Services, Khyber Pakhtunkhwa, Peshawar.

District Health Officer Karak

Endst. No & Dated Even:-

Copy to:-

1. Director General Health Services, Khyber Pakhtunkhwa, Peshawar for information.

District Health Officer Karak

enhancing DHO office bank doc/243 fbr: DHO Office

Stopping of pay PAYROLL SYSTEM AMENDMENT FORM SHALL EMPLOYEE ENTRY Grade (Pay Scale Group) OFFICE OF THE : Personnel Number 7 FOR THE MONTH OF . GENERAL DATA CHANGES 0 0 9 4 0 3 3 2 DISTRICT HEALTH OFFICER KAVAK 出る Medical Officer THO BO SHAH CHANGE IN PAYMENTS / DEDUCTIONS Auditod/Checked By * Start Stop was not recommended for extension by the undersigned (copy attached) with source two. Entered / Verified By

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ą į AMENDMENT FORM
SINGLE EMPLOYEE ENTRY PAYROLL SYSTEM Stoppege of pay Coet Cerrier) K OFFICE OF THE . DISTRICT HEALTH OFFICER KARAK FOR THE MONTH OF 1 07 2021 Personnel Number 7 Grade (Pay Scale Group) GENERAL DATA CHANGES 1 7 m Medical Officer 6 9 1 Description THO BO SHAH Status Status Date 7 National ID • from the extension of contract by the The concerned doctor was dropped out Secretary to Govt of XPX vide issued undersigned (copy attached). 24/05/2021, the concerned doctar is not notification no SOH(E-II)/1-1/2021 Dated his salary regularly. His pay may please be renewal (copy attached) but he is drawing included in the extension of contract stopped with Immediate effect. Page No. 1 7301-8289285-1 A CONTRACTOR

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Accounts Office Karrak

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2224-Adhoc Relief All 2017 10%				3,957.00
2247-Adhoc Relief All 2018 10%				3,957.00
2309-Adhoc Relief All 2021 10%	-			2,904.00
5002-Adjustment House Rent				2,304100
Gross Pay and Allowances DEDUCTIONS:				140,763.00
IT Payable 62,756.60 Deducted	12.562	.00	TAX: (3609)	6,276.00
GPF Balance 59,780.00	12,000	. • •	Subre	4,270.00
3501-Benevolent Fund				1,500.00
3534-R. Ben & Death Comp Fresh	•			900.00
5801-Adj Basic Pay			•	4,029.00
•	-	·		***************************************
		•		
Total Deductions				16,975.00
				123,788.00
D. O. B	I ED A			
10.06.1985 04 Years 11 Months 027 Days	LFP Qu ALLIED 001003	BANK	LIMITED All:	led Bank Karak

.

OFFICE OF DISTRICT HEALTH OFFICER KARAK

(Khyber Pakhtunkhya)
Phone 50 y Fax 2c 4: 0927-290537

/Admn:

Dated: 07/10/2021

OF

Medical Superintendent/ Incharge,

Iype-C Hospital Takhti Nasrati/Karak, Type-D Hospital Sabir
Ahad/Latamber, THQ Hospital BD Shah.

Subject:

DISCREPANCIES IN DUTY ROASTER
DOCTOR/NURSES/PARAMEDICS/CLASS-IV

It is observed by that duty roaster of your health facilities are not according to the Govt. of Khyber Pakhtunkhwa, Health Department notification and directives.

- 1. It is illegal that 01 medical officer/WMO/Nurse/paramedics/Class-IV perform 24 hours duty and then he/she will be grant OFF for the rest of the week and it is gross violation of Govt. Rule and Policy.
- 2. In some of health facilities it has also been observed that 03 doctors/paramedic were placed in duty roaster in single shift but only 01 doctor/paramedic has on duty for 10, 10 days and rest of the month they will OFF which is completely malpractice.
- 3. If any doctor found in impersonation, who are performing Govt. duty for other doctor. Such practice may avoided and reported to undersigned for further disciplinary action under E&D Rules 2020.

Therefore your all are direction to strictly avoid the above

discrepancies.

District Health Officer Karak

CO DHO Office doct 301 file: DHO Office

<u>PITAL TAKHTI NASRATI</u> NO.415 | DATE 24/08/2021

Appen

All WMOs Type. C-Hospital TAkhti Nasrati

subject:

WMOs Duty at Labor Room

Memo

Reference DHO office Letter No 3730/admin dated 25.08.021 All WMOs working in labor room of Type.C.Takhti Nasrati is hereby directed to be physically present at shift wise duty.

> Medical Superintendent Type .C. Hospital Takhti Nasrati

Even No & Date

Copy to;

District Health Officer Karak for information please with reference to your office letter No 3730/Admin dated 25.08.2021

Medical Superintendent <u>he.C.Hospital</u> Takhti Nasrati

OFFICE OF THE DISTRICT HEALTH OFFICER KARAK

Phone 🗗 # Fax 🗗 #: 0927-290537

Dated: 62/09/2021

to: Medical Superintendent Type-C Hospital Takhti Nasrati with the direction to ensure t implementation of order.

ict Health Officer

CS CamScanner

Americ 64"

MONTH WISE DEDUCTION FROM OFFICERS/OFFCIALS OF THE HEALTH
DEPARTMENT KARAK DURING THE PERIOD OF DR. NIAZ ALI KHAN (ACTING
DHO KARAK)

<u> </u>	DUC	KAKAK)
S.No.	Month	Deduction Amount
1	December 2020	76201
2	Jan-21	27770
3	Feb-21	193019
4	Mar-21	188659
5	Apr-21	99461
5	May-21 ;	156223
7	Jun-21 :	167763
	Total	909095
<u> </u>	Jul-21	120319
		<u> </u>
3	Sep-21	。 15000
4		273757
<u> </u>	Oct-21	111574
5	Nov-21	271709
6	Dec-21	6634
7	Jan-22	22007
3	Feb-22	49288
)	Mar-22	22165
10	Apr-22	37470
11	Мау-22	40312
12	Jun-22	3169
.3	Jul-22	68112
4	Aug-22	45000
.5	Sep-22	29567
	Total	1116083

G.Total	.*.	•	١	2025178
 			<u> </u>	

DISTRICT HEALTH OFFICER KARAK
District Health Officer
Karak

Annew 1 (48)

نفرني كرك بيع شكامات بيتي عن سين ين بين ا نتا ندى كالى هي كرمية يكل ونيشر واكر سيد بسيبال م ای ڈیونی نہیں کررہا اور اس کے بدیلے سینیا طور پر ڈی ف انج اوکرک کو 50 ہزار روپے ماہوار دیتے جارتے ہیں ہے۔ ڈاکٹر اعجاز انورا ٹی تعیناتی کی مدت نے غیر حاضر ، ڈاکٹر بصیرغیر حاضر، ڈاکٹرانعام پراین ڈیوٹی کی بچائے 30 ہزاررویے دیے ، ڈاکٹر کرامت وزیرای تعیناتی کے بعیر ہے۔ صرف ایک دن کیلئے حاضر ہوا تھا، ڈاکٹر نورین شاینہ بر مھی غیر حاضری کے بدلے میے دیے، نرس نادیہ آور شینہ یر فیر ماضری کے بدلے15،15 ہزار روکیے ما واردین کا الزام ہے ، اس طرح ڈاکٹر تور اتور بر 0 معود ک^{ور ب} ہے ہی ہونے کے باوجود یا قاعد**گی کے ساتھ** ۔ ج تخواج ادر بيلته يردنينل الاونس لينه كالزام لكايا بي ا ان تان کیلئے منکمہ سخت ہے۔ انگواری کا حکم دیا۔ ان**کوائری** مو ر بيرث بيل مذكوره دونول افسرول كونوري طور يرعمدول ت تبديل كرنے، غير حاضر ذاكيرز كخلاف ايكش لينے جا ادر معودی عرب میں مقیم ذاکٹر کینلاف تادی **کارروائی ج** کرنے کی ۔فارش کی گئی ہے،۔ احد ز ایونل دیا



GOVERNMENT OF KHYBER PAKHTUNKHWA HEALTH DEPARTMENT

Dated Peshawar the 23rd September, 2022

NOTIFICATION

SOH(E-V)/4-4/2022 The Competent Authority (Chief Minister, Khyber Pakhtunkhwa) is pleased to order posting/ transfer of the following doctors, with Immediate effect, in the best public interest:-

S.NO	NAME	FROM	To
1.	Dr. Shaukat Sohail, Management Cadre (BS-20)	Principal, Paramedical Institute, Abbottabad	District Health Officer, Karak against the vacant post by relleving Dr. Niaz Ali, Deputy DHO from look after charge of the post.
2.	Dr. Shahid Mehmood, Management Cadre (BS-19)	Deputy District Health Officer, Abbollabad	Principal, Paramedical Institute, Abbottabad, Vice S.No. 1

SECRETARY HEALTH GOVERNMENT OF KHYBER PAKHTUNKHWA

Endst. of even No. & Date

Accountant General, Khyber Pakhtunkhwa, Peshawar.

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

3. District Health Officer, Karak & Abbottabad.

4. Principal, Paramedical Institute, Abbottabad
5. District Accounts Officer, Karak & Abbottabad.

6. Deputy Director (IT), Health Department, with the direction to upload the notification on official website.

7. PS to Minister for Health Department, Khyber Pakhtunkhwa.

8. PS to Secretary Health Department, Khyber Pakhtunkhwa.

9. All concerned doctors.

(NADIR NAZAR) SECTION OFFICER (E-V)



TO BE SUBSTITUTED WITH THE SAME NO. & DATED

GOVERNMENT OF KHYBER PAKHTUNKHWA HEALTH DEPARTMENT

Dated: Peshawar the 06th Culober, 202

NOTIFICATION

In light of recommendations of the inquiry NO.SOH (E-V)/2-2/2022 committee regarding ghost doctors/ employees under the control of DHO Karak, the following posting/ transfer of doctors are hereby ordered with immediate effect, in the best public interest:-

effect, in the best public interest.								
S.NO.	NAME OF DOCTOR Dr. Qadoos, Principal Dental Surgeon (BS-19)	(BS-19)/	Report to Directorate General Health Services, Khyber Pakhtunkhwa					
2.	Dr. Niaz All, Senior Medical Officer (BS-18)	Deputy DHO Karak	Report to Directorate General Health Services, Khyber Pakhtunkhwa					

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA **HEALTH DEPARTMENT**

1/Notification of even No. & dated:

Copies forwarded to the:-

- 1. Accountant General, Khyber Pakhtunkhwa Peshawar.
- 2. Director General Health Services. Khyber Pakhtunkhwa.
- 3, District Health Officer, Karak.
- 4. District Accounts Officer, Karak.
- 5. PS to Secretary Health Department Khyber Pakhtunkhwa.
- 6. Deputy Director (IT), Health Department, Peshawar.
- 7. Both the doctors concerned.
- 8. Personal files of the doctors concerned.

(NADIR NAZAR)

3-10-22

SECTION OFFICER (E-V)



OFFICE OF DISTRICT HEALTH OFFICER Annex K 3)

KARAK

(Khyber Pakhtunkhwa)

Phone 🕾 # Fax 🗸 #: 0927-290537

/Admn/KK

Dated: 07/10/2022

To,

The Secretary to Government of, : Khyber Pakhtunkhwa Health Department, Peshawar.

APPEAL FOR CANCELLATION OF THE ORDER OF DEPUTY DHO KARAK Subject: Respected Sir,

I have the honour to stat that I had been posted as Deputy DHO Karak vide your good office notification No: SOH (HD)/E-V/4-4/2020 dated 29-7-2020.

Sir, I have been assigned the look after charge of DHO Karak on dated 14-11-2020, due the transfer of the then DHO Karak Dr Sadiq Shah vide your good office notification No: SOH(HD)/E-V/4-4-2020.

Sir, on the anonymous complaint about ghost doctors at district Karak, an inquiry had been conducted on the directive of DGHS KP Peshawar during the year 2021 consisting of the following members

- 1: Dr. Mohammad Saleem MS DHQ Hospital Karak
- 2: Dr. Hidayat Ullah Deputy Director Dev/ (Coord-1) DGHS Peshawar

1: GHOST DOCTORS:

As far as the issue of ghost doctors is concerned, mentioned in the complaint, is not proved in the inquiry, conducted by the above mentioned officers. (Copy of inquiry attached)

2: DUTY ROASTER:

. The inquiry committee mentioned that the duty roaster was at the convenience of doctors. It is not directly related to DHO Karak, furthermore I have directed the medical superintendents of all hospital several times regarding the standard protocols of duties to be followed strictly according to the government SOPs. (Copy attached)

3: ABSENTEEISM OF DOCTORS AND OTHER STAFF

appropriate actions this regard I would like to say that I have taken (explanations, salary deductions, HPA deduction, warnings, relieving of disobedient doctors, reported doctors having poor performance) , whenever reported by IMU health, MSs, health facility Incharges, District managers, administrative officers, or found absent on my assigned routine visit to health facilities.(copy of Deductions attached)

Page Cont: -2

Unlike the reports of inquiry officers, I have never turned blind eye towards any irregularities in the hospitals, which is quite evident from my actions taken. I, the acting DHO Karak have not committed any negligence on part of my duties. In the light of above explanations it does not make sense to recommend the DHO Karak (acting) to be transferred.

Even though if the recommendations of the inquiry committee are to be considered, the DHO(acting) has already been relieved of his charge on dated 23-9-2022 vide your good office

No allegation, whatsoever, had been mentioned against the Deputy DHO Karak in the inquiry order No: SOH(E-V)/4-4/2022 dated 23.09.2022. report and even then the Deputy DHO Karak has been transferred vide your good office letter No: SOH(E-V)/2-2/ 2022 dated 06.10.2022.Upon baseless allegations against the DHO (acting) Karak.

I request your good self that I, Deputy DHO Karak, Dr Niaz Ali Khan may please be retained on my post as Deputy DHO Karak and my transfer order may pleas be withdrawn in the best interest of public.

Deputy District Health Officer Karak







INQUIRY REPORT REGARDING CHOST DOCTORS IN KARAK

In compliance to the DGHS Rhyber Pakhtunkhvia office order booring office order No. IAO10-13/HRM deted 10/09/2021, the inquiry report is submitted as unders

Backaround:-

A complaint received to DGH5 Kliybar Pakhtunkhwa that there are ghost Doctors in Karak who are being supported by acting OHO Karak for his personal benefits. The following Doctors and other staff were mentioned in the complaint.

- Dr. Saad Arshad (Type C Hospital Takhti Hasrati) is obsent since his arrival and giving SOCOD per to DHO Karak.
- 2. Or. IJaz Anwar SIAO (Type-C Hospital Takhti Hasrati) is absent since his posting-
- 3. Or. Baseer IAO Surgery (Type-C Hospital Takhti Hasrati) is absent.
- 4. Dr. Inam on general duty (Takhti Hasrati) absent giving 30000 per month.
- 5. Or, Kiramat Wazir (Takhti Nasrati) came only for one day and then remained absent.
- Or, Norman Shabana Gynaecologist is coming only on Saturday and Monday and then remains absent in rest of the week and gives money to incharge and DHO Karak.
- 7. Hadia Hurse is absent since 8 months as sho pays 15000 per month.
- 8. Samina Murso is absent sinco 8 months as she pays 15000 per month.
- Or, Noor Anwar Is in Saudi Arabia and he has left duty station without sanction of leave but DHO is silent over it.

inquiry of the remaining officers/officials including in the above mentioned complaint who belongs to THC Hospital Banda Daud Shah, Karok have already been carried out by another inquiry committee.

The Inquiry committee visited Type-C Hospital Takhti Nasrati and the office of the District Health Officer Karak on 20/09/2021 to record the statements of Incharge Type-C Hospital Takhti Nasrati, DHO Karak and the above mentioned staff.

Statement of Dr. Niaz Ali Khan (DHO):

Dr. Niez All Khan (DHO) totally denied the allegations leveled against him in the complaint and submitted a detailed report along with (documented proofs) of actions taken against the officer/officials mentioned in the complaint (Annex-A).

Statement of Incharge Type-C Takht-e-Nasrati:

incharge Type-C Hospital Takht-e-Nasrati also denied all the allegations against him and DHO Karak, He stated that all the Doctors and staff of his hospital are regularly performing their duties. About 400 patients are being seen daily in the OPD, 50-80 emergencies being conducted in the casualty and about hundred deliveries per month in labour room (Annex-B).

Statement of Medical SuperIntendent, Type-C Hospital Karak.

The MS Type-C Hospital stated in his written statement stated that Dr. Noor Anwar Medical Officer submitted application for 730 days EDL (without Pay) which was regretted by the competent authority and he wrote to DAO Karak for stoppage of pay and informed the MO concerned accordingly through a letter on his home address (Annex-C).

In our

Page 1 of 3



Findings:

- According to DHO Karak; satisfactory performance report of Dr. Saad Medical Officer
 has been received from incharge Medical Superintendent Takhte Nasrati and forwarded
 to DGHS Khyber Pakhtunkhwa for his contract renewal while on the other hand he has
 stated that according to IMU he was found absent several times due to that explanation
 was called and salary was deducted accordingly. It needs to be mentioned that during
 the inquiry committee visit, the said Medical Officer was found absent too.
- According to duty roster of August & September 2021 (Annex-D) only three duties of 8
 hours were assigned to Dr. Saad Medical Officer by MS Takht e Nasrati and according to
 MS he is satisfied from his duties.
- Dr. IJaz Ahmad SMO was found present during the visit of the committee to the above hospital and he was attending promotion training at DHQ Hospital Karak since 10/09/2020 to 09/12/2020 vide DGHS office order No/ 15474-75/A.E-I dated 08/09/2020 (Annex-E).
- Dr. Baseer Ahmad Medical Officer was found absent during the visit of the inquiry.
 Committee and according to duty roster of August 2021, only three duties of 8 hours were assigned to him by the MS Takht e Nasrati while he was not assigned any duties in the duty roster of September 2021 and according to MS he is satisfied from his duties.
- Dr. Inam was found present during the visit of the inquiry committee and he is regular
 in performing of his duties.
- Dr. Kiramat Wazir was found absent from his duties on the day of inquiry committee invisit, he was mentioned in general OPD Duty roster in August 2021 while no duty was assigned to him in the month of September 2021 but despite of these facts the DHO and MS stated that he is regular in his duties.
- Dr. Noreen Gynecologist was found present during the visit of the committee but according to the IMU in charge she was found absent several times during IMU Monitoring staff visits. She was marked as tick v by the Incharge Type-C Hospital Takhte-Nasrati instead of signature about which she stated that this is her Initial (Annex-F).
- Samina Akhtar and Nadia Sultan Charge Nurses; both of them were absent during the
 committee visit to the said hospital and according to DHO Karak, proper action
 regarding long absent has been taken against them.
- Dr. Noor Anwar; according to Medical Superintendent Type-C Hospital Karak, he had applied for 730 days EOL (Without Pay) through online to DGHS Khyber Pakhtunkhwa which was forwarded to Secretary Health Khyber Pakhtunkhwa vide letter No. 9195/E.I dated 23/06/2021, which was regretted by Secretary Health vide letter No. SOH(E-II)/4-1/2021 dated 03/08/2021 but the Doctor concerned has submitted his departure on 15/07/2021 after confirming that his application is forwarded to Secretary Health. MS Type-C Hospital Karak stopped his pay vide letter No. 805 dated 03/08/2021 and also informed the doctor concerned through a copy of the letter on his home address regarding regretting of his leave application and report for duty vide letter No. 941-44 dated 15/09/2021 but the reply of the concerned doctor is still awaited.

Recommendations:

As per duty roster prepared by the incharge Type-C Hospital Takht-e-Nasrati, some of the doctors and nurses were found absent on the visit day as well and the duty roster developed according to the convenience of the staff, almost all of the staff are performing two days duties per week, therefore strict disciplinary action may be taken against the doctors/staff and the incharge due to not following the government

John Stranger

the same of



directives regarding no of hours per week. Therefore they may not be given / entitled for Health Professional Allowance and Conveyance allowance for their absent period.

- Incharge Type-C Hospital Takht-e-Nasrati may be transferred immediately on account of poor performance and negligence.
- The DHO Karak (Acting) seems to have closed his eyes on these irregularities & negligence, being responsible for the above mentioned facts may be transferred from the post of DHO.
- Salary of Dr. Noor Anwar may be stopped immediately and disciplinary action may be initiated against him under E&D Rules 2011 and also over payments made to him in salarles may be recovered.
- In case of salary received by Dr. Noor Anwar after July 2021 strict action may be taken against the Medical Superintendent, Type-C Hospital Karak.

(Inquir) (Micer)

Dr. Hidayat Ullah, Daputy Director (Dav/Coord-I) DGHS (Inquiry Officer)

Dr. Muhammad Saleem MS DHQ Hospital Karak

<u> 26 مخانب</u> in old who دعوي BL = 378 جرم CNIC= 17301- 2470715 MOB= 0333-917677 باعث تحررة نكه مقدمه مند بجرعنوان بالايس الخي طرف سه واسط بيروى وجواب دى وكل كارواكي متعلقة آن مقام مسلم مسلم مسلم المسلم الم مقرد كرك اقراركيا جاتاب كرصاحب موصوف كومقدمه كك كاروالى كاكال اختيار وكاينز وسيل صاحب كوراضي نامه كرين وتقرر ثالبته وفيصله برحلف دسيع جواب دبي اورا قبال دعوي اور بصورت ذمرى كرف اجراءا درصولى چيك درويدارعرضى دعوى ادر درخواست برتتم كى تقدريق زرای پردستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیردی یا ڈگری کیطرفہ یا اپیل کی برا مدگی اورمنسوخی نیز دائر کرنے اپیل مگرانی دنظر ثانی دیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ ندکور کے کل یا جزوی کا روائی کے واسطے اور دیل یا مخار قانونی کوایے ہمراہ یا اسے بجائے تقرر کا اختیار موگا _اورصاحب مقررشده کومهی و بی جمله مذکور «بااختیارات حاصل موں مےاوراس کا ساخته مرواخت منظور قبول موكادوران مقدمديس جوجر چدد مرجان الترائ مقدمد كسيب سهوموكار کوئی تاریخ بیتی مقام دوره پر بو یا حدے باہر موتود کیل صاحب پایک موال کے کہ بیروی مدكوركر مين البذاوكالت نامه كهديا كدسندر ي

کے سلے منظور ہے۔

jehul)

بمقام