


## FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- \_\_\_\_\_ **156/2023**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/1/2023	<p>The appeal of Mr. Nasib Zada presented today by Mr. Wali Ullah Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Parcha Peshi is given to appellant/counsel.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

**CHECK LIST** *General*

Case Title: Narib Zada vs Director Health KR Peshawar etc.

S#	CONTENTS	YES	NO
1	This Appeal has been presented by _____		
2	Whether counsel / appellant/ respondent/ deponent have signed the requisite document?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent oath commissioner?	✓	
8	Whether Appeal / Annexures are properly paged?	✓	
9	Whether Certificate regarding filing any earlier appeal on the subject, furnished?		
10	Whether annexures are legible?		
11	Whether annexures are attested?		
12	Whether copies of annexures are readable/ clear?		
13	Whether copy of appeal is delivered to AG/ DAG?		
14	Whether Power of Attorney of the Counsel engaged is attested and signed by Petitioner/ Appellant / Respondents?		
15	Whether number of referred cases given are correct?		
16	Whether appeal contains cutting / overwriting?		
17	Whether list of books has been provided at the end of the appeal?		
18	Whether case relate to this Court?		
19	Whether requisite number of spare copies are attached?		
20	Whether complete spare copy is filed in separate file cover?		
21	Whether addresses of parties given are complete?		
22	Whether index filed?		
23	Whether index is correct?		
24	Whether security and process fee deposited? On _____		
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, Notice along with copy of Appeal and annexures has been sent to Respondents? On _____		
26	Whether copies of comments / reply / rejoinder submitted? On _____		
27	Whether copies of comments/ reply/ rejoinder provided to opposite party? On _____		

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

Name:-Wali Ullah

Advocate High Court, Peshawar

Signature: - W. Ullah

Dated: - 16/1/2023

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICES TRIBUNAL PESHAWAR**

In S.A. 156 /2023

Nasib Zada

**VERSUS**

Govt of KP through Secretary Health & Others

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Dated: 16-01-2023

Appellant

Through

W. Ullah 

Wali Ullah  
Advocate High Court,  
Peshawar.

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

In S.A. 156 /2023

Nasib Zada, Ex Medical Technician (BPS-14)  
District Health Officer, Mardan.

.....Appellant

**VERSUS**

1. Government of KP through Secretary Health, Health Department, Peshawar.
2. D.G Health Services, KP, Peshawar.
3. District Health Officer, Mardan

.....Respondents

**APPEAL UNDER SECTION 4 OF  
KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL ACT 1974  
FOR SEEKING PROFORMA  
PROMOTION.**

**Respectfully Sheweth,**

1. That Appellant was appointed in the Health Department on 10-03-1983. (Copy of Appointment Order is attached as Annexure "A").

2. That he rendered services with full zeal and devotion, as such, he was promoted to the post of Health Technician.
3. That besides the Diploma in Medical Technology, he has been awarded the Degree of BS (Honors) in Paramedical Science from University of Peshawar. **(Copies of Diploma & BS Honors are attached as Annexure "B & C" respectively).**
4. That he was eligible for promotion at the very juncture but to the dismay of the appellant there <sup>was</sup> no service rules, therefore, he was not considered for promotion.
5. That thereafter, service rules were framed and the respondent department prepared working paper wherein the appellant's name has been mentioned at Serial No.11. **(Copies of working paper and seniority list are attached as Annexure "D & E")**
6. That appellant was ignored, despite the fact his length of service and PER dossier were complete in all respect.
7. That the respondent department issued the retirement order on 21/09/2020. **(Copy of Order is attached as Annexure "F")**

- 8. That respondent department has not considered the appellant for promotion, despite the fact that he was eligible on all fours. Furthermore, the appellant was entitled for proforma promotion as the respondent department has issued promotion orders in the year 2020 and 2021.
- 9. That appellant approached respondent department for providing necessary documents but he could not laid hand on the same, despite the fact, he filed application for providing the same. **(Copy of Application is annexure "G")**
- 10. That the respondent department has not provided the required documents, he was constrained to file complaint to the information commission. **(Copy of Complaint and order are annexed as Annexure "H")**
- 11. That on 5/7/2022, the appellant received a letter from respondent department but the requested documents were not provided; the same was obtained by the appellant 16/09/2022. **(Copy of letter is attached as Annexure "I")**
- 12. That appellant filed departmental appeal on 19/9/2022, <sup>(Annex J)</sup> the same remained un-responded

(4)

within the stipulated period, have the instant appeal, inter-alia on the following grounds:-

**Grounds:**

- A. That appellant has not been treated in accordance with law, rules, policy on the subject, which is contrary to Article 4 of the Constitution 1973, hence <sup>not</sup> tenable.
- B. That the appellant was eligible on all fours; his PER dossiers were complete in all respect; his length of service was also complete, and; he was qualified for the post of Technologist M. P (BPS-17) as he has the BS (Hons) Degree in para-medical services.
- C. That there was no fault on the part of the appellant and the respondent department has prepared the working papers but was not considered for promotion for the reason best known to them.
- D. That as per dicta laid down by the August Apex Court, the right acquired during the same, the same cannot be withheld for the reason that the Civil Servant is no more in the service.
- E. That the appellant is entitled to be given the monetary benefit of the promotion.

F. That it is settled by law that monitory benefits can be given to the civil servant irrespective of his retirement.

G. That the appellant has been discriminated which goes contrary to Article 25 of Constitution of 1973.

H. That the appellant seeks leave of the Court to raise additional grounds at the time of argument.

*It is, therefore, most humbly prayed that the Proforma promotion may kindly be granted to the appellant w.e.f his entitlement.*

Dated: 16-01-2023.

Appellant  
Through *W.ullah*  
**Waliullah Khan**  
& *A*  
**Abbas Bakhtiar**  
**Advocates, High Court,**  
**Peshawar.**

**NOTE:**

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

**Advocate.**  
*W.ullah*



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**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICES TRIBUNAL PESHAWAR**

In S.A. \_\_\_\_\_/2023

Nasib Zada

**VERSUS**

Govt of KP through Secretary Health & Others

**AFFIDAVIT**

I, Nasib Zada, Ex Medical Technician (BPS-14) District Health Officer, Mardan., do hereby solemnly affirm & declare on oath that all content of the instant Service Appeal, are true & correct to the best of my knowledge & belief and nothing has been concealed or misstated from this Hon'ble Tribunal.

*Nasib Zada*

DEPONENT

CNIC: 16101-1138960-5

Cell No: 0314-5555937

0345-9323111

Identified BY

*W. Ullah*

**Wali Ullah**

Advocate, High Court,  
Peshawar.

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

In S.A. \_\_\_\_\_/2023

Nasib Zada

**VERSUS**

Govt of KP through Secretary Health & Others

**ADDRESSES OF PARTIES**

**APPELLANT**

Nasib Zada, Ex Medical Technician (BPS-14) District Health Officer, Mardan.

**ADDRESSES OF RESPONDENTS**

1. Government of KP through Secretary Health, Health Department, Peshawar.
2. D.G Health Services, KP, Peshawar.
3. District Health Officer, Mardan

Dated: 16-01-2023

*Appellant*

Through

*W. Ullah*

**Wali Ullah**

Advocate High Court,  
Peshawar.

Annex - A (8)

OFFICE OF THE DISTRICT HEALTH OFFICER MARDAN  
OFFICE ORDER

As a result of interview Dated 28/2/1983 held in the office of the undersigned that Mr/~~xxx~~; Naseeb Zada is hereby offered the post of Compounder in the N.P.S. of Rs. 315-12-399/14-525-16-605 plus usual allowances permissible under the rules and post at Primary Health Centre Katlong on the following terms and conditions, with effect from \_\_\_\_\_

- 1) He/~~xxx~~ is domicile in Mardan District.
- 2) He/~~xxx~~ is declared Medically fit for Government Service.
- 3) He/~~xxx~~ will not be entitled to any TA/DA for medical examination joining the first appointment.
- 4) He/~~xxx~~ will be Governed by such rules and Orders as may be issued by the Government for the category of Govt. servant to which he/she belongs.
- 5) If he/~~xxx~~ wishes to resign at any time he/she will resign in written and will continue to serve the Govt. till the acceptance of resignation by the Competent Authority.
- 6) His/~~xxx~~ appointment in health department is purely temporary & his/~~xxx~~ services may be terminated without any reason being assigned at any time irrespective of the fact that he/she was original recruit.
- (-) FOR COMPOUNDEA ONLY: - He/she is appointed as Compounder on purely temporary basis against the post of Medical Technician and his/her services will be terminated when a qualified Medical Technician will be come available.
- 7) If he/she accepts to offer in the above mentioned condition he/she should please report to the Medical Officer I/G.P.H.C Katlong at his own expenses within 7 days of the receipt of the offer failing which the offer will be considered as cancelled.

District Health Officer,  
Mardan.

No. 2694-97 / DHO, Dated Mardan 10-3

Copy forwarded to the:-

- 1) Mrs. Naseeb Zada S/O Khair Zada Vill; Alam Gunj P.O. Peepal Teh; & Dist. Mardan.
- 2) Medical Officer I/G Primary Health Centre Katlong Arrival report should be sent to this office.
- 3) Account Clerk D.H.O. Office Mardan.
- 4) Chairman; Distt; Council Mardan for approval.

*Asst*  
*Attended*  
*8*





# University of Peshawar Pakistan

*Handwritten signature*

This certifies that

**Naseeb Zada** son of **Khair Zada**

having fulfilled all the requirements is hereby admitted to the degree of  
**Bachelor of Science (Honours) in Paramedical Sciences**  
and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 28th day of October, 2016.  
*Attested*

*Sundus*  
Sundus  
M.A. Shamozai  
Registrar

*Handwritten signature*  
Registrar

Roll No: 1085  
Session: Annual 2014  
Reg. No: 87-PA-24825



129488

*Handwritten signature*  
Vice Chancellor

DIRECTORATE GENERAL HEALTH SERVICES,  
KHYBER PAKHTUNKHWA, PESHWAR.



WORKING PAPER:-

1. There are 436 sanctioned posts of PHC Technologists (MP) BS-17 in the Health Institutions including MTIs & Merged Districts, Health Department Khyber Pakhtunkhwa, out of which 364 Posts were upgraded to PHC Technologists (MP) BS-17 during ratio enhancement/ restructuring of Paramedical Staff in the Health Institutions including MTIs & Merged Districts, Health Department for availing promotion due to anomalous allocation in different scales. (Annexure-I).
2. Amongst 436 posts of PHC Technologists (MP) BS-17, 26 posts of PHC Technologists (MP) BS-17 has already been occupied by the incumbents of the posts (40% Quota) and 15 post of PHC Technologists (MP) BS-17 has recently been filled-in by way of 20% Quota for Degree Holders in the relevant Technology. (Annexure-II).
- ✓ 3. Now 394 posts of PHC Technician (MP) BS-17 are lying vacant and required to be filled-in the light of approved Services Rules vide Notification NO.SOH-III/HD/5/2014 dated 10-05-2016 (Annexure-III).
  - (a) Forty percent by promotion on the basis of seniority-cum-fitness, from amongst the Chief Technicians and Chief PHC Technicians with Three years' Service as such in the relevant Technology.
  - (b) Twenty percent by promotion on the basis of seniority-cum-fitness from amongst the chief Technicians, Senior Technicians and Technicians having qualification prescribed for initial recruitment with three years' service as such in the relevant Technology.Note:- For the purpose of promotion, there shall be maintained a joint seniority list of Chief Technicians, Senior Technicians, and Technicians with reference to the dates of their acquiring qualification prescribe for initial recruitment as in column No.3.

Provided that if two or more officials acquired the qualification prescribed for initial recruitment in the same session, then the officials who obtains the highest marks or grade in the examination shall be deemed to be senior to the other officials.

  - (c) Forty percent by initial recruitment.

In the light of above service Rules :-

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*[Handwritten mark]*

- i. 148.4 posts are required to be filled-in by way of promotion on the basis of seniority cum-fitness from amongst the Chief PHC Technician (MP) BS-16 with three years' Service as such in the relevant Technology.
- ii. 72.2 posts are required to be filled-in by way of promotion on the basis of seniority-cum-fitness from amongst the Chief PHC Technician (MP) BS-16, Senior PHC Technician (MP) BS-14 and PHC Technician (MP) BS-12 having Qualification for initial recruitment with three years' service as such in the relevant Technology.
- iii. 174.4 posts of PHC Technologists (MP) BS-17 are to be filled-in by initial recruitment through PSC.

As per Final seniority list of Qualified Paramedics of PHC Technician (MP) cadre (Annexure-IV) the following Chief PHC Technician (MP) BS-16 Senior PHC Technologists (MP) BS-14 & PHC Technician (MP) BS-12 are due for promotion to the post of PHC Technician (MP) BS-17 according to approved service' rules.

S.NO	Name/F, Name of Officials	Date of appointment /Designation	Whether three years Service Completed or Not	Whether PERs Completed or Not	Place of posting.	Remarks.
1.	Murad Ali S/O Sher Bahadar	26-12-2016	2 years & 11 Months Completed	Completed	DHO Malakand	
2.	Khalid Farooq S/O Muhammad Rafique	07.11.1990	Completed	Completed	AS FR Kohat	
3.	Hidayat Ullah S/O Sahib-ul-Haq	23.05.2006	Completed	Completed	DHO Batagram	
4.	Ghulam Rabbani S/O Hajat Mand	7/1/2013	Completed	Completed	DHO Shangla	
5.	Misbahuddin S/O Dost Muhammad	13-04-2001	Completed	Completed	DHO Dir	
6.	Sajf Ullah Khan S/O Muhammad Pervesh	19-08-2017	2 years & 2 months Completed	Completed	DHO Swat	
7.	Zahid Ali S/O Muhammad Shuaib	21.02.1985	Completed	Completed	DHO Mardan	
8.	Zia-ul-Hasan S/O Sahib Dad Kha	05/03/1986	Completed	Completed	DHO DIKhan	
9.	Miraj uddin S/O Umar Din	12.05.1987	Completed	Completed	DHO Mardan	
10.	Muhammad Tahir S/O Sain Muhammad	14.07.2008	Completed	Completed	DHO Manselira	

19.8.2017  
18.8.2019  
18.8.2015  
19.8.2020

11.	Naseeb Zada S/O Khair Zada	06.04.1988	Completed	Completed	DHO Mardan
12.	Sarfraz Ali S/O Sardar Ali	21-11-2006	Completed	Completed	AS Kurram
13.	Miraj Ali S/O Fazal Dad	07.02.2009	Completed	Completed	DHO Mardan
14.	Abdul Jalil S/O Abdul Aziz	07.09.2010	Completed	Completed	MMMTH D.I.Khan
15.	Ghulam Taunsavi S/O Mir Salam Khan	01.12.1994	Completed	Completed	NW Agency
16.	Mumtaz Ali S/O Ahmad Ali	27-05-2013	Completed	Completed	AS Kurram
17.	Muhammad Waseem Iqbal S/O Muhammad Iqbal	16.06.2009	Completed	Completed	DHO Peshawar
18.	Bahadar Zeb S/O Muhammad Jan	23.11.2006	Completed	Completed	AS B ajour
19.	Faheem Ur Rahman S/O Fazale Hakeem	14.04.2004	Completed	Completed	DHO Mardan
20.	Usman Ali S/O Mir Ahmad Khan	17.01.2012	Completed	Completed	DHO Lakki Marwat
21.	Saeed Ur Rahman S/O Sultan Wazir	16.07.2004	Completed	Completed	DHO Peshawar
22.	Muhammad Anwar Zeb S/O Syed Jahanzeb	22.05.2006	Completed	Completed	DHO Peshwar
23.	Salcem Yousaf S/O Muhammad Yousaf	27.01.2005	Completed	Completed	DHO Battagram

It is certified that:-

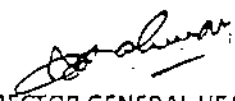
- No Departmental/Anti Corruption/Judicial proceedings are pending against the above officials.
- The officials are holding the posts of Chief PHC Technician (MP) BS-16 Sr. PHC Technician (MP) BS-14 & PHC Technician (MP) BS-12 on regular basis and not holding the post on Adhoc/ temporary basis.
- The officials are not actually on deputation or long leave.
- The officials have completed the prescribed minimum length of Service/ experience as per Service Rules.
- The provisional seniority list of Qualified Paramedics of PHC (MP) has been circulated amongst all the concerned on 26-01-219.
- The final seniority list is undisputed. As per (Annexure-IV).

*[Handwritten Signature]*




g. The synopsis of PERs & No Disciplinary Action Certificate are at (Annexure-V)

The Departmental Promotion Committee is requested to determine the suitability of the above mentioned 22 Qualified Chief PHC Technician (MP) BS-16, Senior PHC Technician (MP) BS-14 & PHC Technician (MP) BS-12 for promotion to the posts of Clinical Technologists (MP) BS-17 with immediate effect.

  
DIRECTOR GENERAL HEALTH SERVICES  
KHYBER PUKHTUNKHWA, PESHAWAR.

(13)



**Final Seniority list of Degree Holder Paramedics PHC (MP) 2019.**

Name & Father Name	Date of 1st appointment	Current BPS	Date of Passing Degree	Total/ Obtained Marks & Division.	Percentage	Board/ University/ Institution	Present Posting	Domicile	Date of Birth	Date of Retirement
Murad Ali S/O Sher Bahadar	26-12-2016	BS-12	12-02-2015 BS (H)	3528/5000	70.56	University of Peshawar	DHO Malakand	Malakand	04-04-1985	03-04-2018
Khalid Farooq S/O Muhammad Rafique	07.11.1990	BS-12	12/2/2015 BS (H)	3308 / 5000	66.16	University of Peshawar	AS PR Kohat	Kohat	12.04.1965	11.04.2019
Hidayat Ullah S/O Sahib-ul-Haq	23.05.2006	BS-12	12/2/2015 BS (H)	3266 / 5000	65.32	University of Peshawar	DHO Batagram	Battagram	14.05.1984	13.05.2044
Ghulam Rabbani S/O Hajat Mand	7/1/2013	BS-12	12/2/2015 BS (H)	3251 / 5000	65.02	University of Peshawar	DHO Shangla	Shangla	15-03-1982	14-03-2044
Misbahuddin S/O Dost Muhammad	13-04-2001	BS-12	12/2/2015 BS (H)	3227 / 5000	64.54	University of Peshawar	DHO Dir	Upper Dir	5/1/1974	4/1/2034
Saif Ullah Khan S/O Muhammad Pervesh	19-08-2017	BS-12	12/2/2015 BS (H)	3222/5000	64.44	University of Peshawar	DHO Swat	Swat	4/5/1984	3/5/2044
Zahid Ali S/O Muhammad Shuaib	21.02.1985	BS-16	12/2/2015 BS (H)	3174 / 5000	63.48	University of Peshawar	DHO Mardan	Mardan	12.01.1964	11/01/2019
Zia-ul-Hasan S/O Sahib Dad Kha	05/03/1986	BS-14	12/2/2015 BS (H)	3172 / 5000	63.44	University of Peshawar	DHO DIKhan	DIKhan	17.05.1967	16/05/2019
Miraj uddin S/O Umar Din	12.05.1987	BS-14	12/2/2015 BS (H)	3121 / 5000	62.42	University of Peshawar	DHO Mardan	Mardan	04.05.1987	03/05/2019
Muhammad Tahir S/O Sain Muhammad	14.07.2008	BS-12	02-04/2015 BS (H)	3200/5000	64.00	University of Peshawar	DHO Mansehra	Mansehra	05.07.1982	04/07/2018
Naseeb Zada S/O Khair Zada	06.04.1988	BS-14	28-10-2016 BS (H)	3109/5000	62.18	University of Peshawar	DHO Mardan	Mardan	01/12/1988	30/12/2018
Sarfaraz Ali S/O Sardar Ali	21-11-2006	BS-12	12/2/2015 BS (H)	3076 / 5000	61.52	University of Peshawar	AS Kurram	Kurram	18/11/1973	17/11/2018

*Alkhan*

Miraj Ali S/O Fazal Dad	07.02.2009	BS-12	12/2/2015 BS (H)	3034/5000	60.68	University of Peshawar	DHO Mardan	Mardan	16.03.1984	15.3.2011
Abdul Jalil S/O Abdul Aziz	07.09.2010	BS-12	12/2/2015 BS (H)	2963/5000	59.26	University of Peshawar	MMMTW B I Khan	D I Khan	03.03.1985	02.03.2011
Ghulam Taunsi S/O Mir Salam Khan	01.12.1994	BS-12	2/8/2017 BS (H)	2954/5000	59.8	Peshawar University	NW Agency	Miranshah	1/07/1963	30/8/2011
Mumtaz Ali S/O Ahmad Ali	27-05-2013	BS-12	8/11/2017 BS (H)	2893/4000	72.33	Indira Khan University	AS Kurram	Kurram	22-07-1979	21-07-2011
Muhammad Waseem Iqbal S/O Muhammad Iqbal	16.06.2009	BS-12	20-02-2018 BS (H)	3.85	3.85	KMU Peshawar	DHO Peshawar	Peshawar	15.02.1986	14-02-2011
Bahadar Zeb S/O Muhammad Jan	23.11.2006	BS-12	20-02-2018 BS (H)	3.34	3.34	KMU Peshawar	AS B ajour	Bajour	01-04-1982	21-01-2011
Faheem Ur Rahman S/O Fazale Hakeem	14.04.2004	BS-12	20-02-2018 BS (H)	2.05	2.85	KMU Peshawar	DHO Mardan	Mardan	02.01.1984	13/2/2011
Usman Ali S/O Mir Ahmad Khan	17.01.2012	BS-12	april.2018 BS (H)	3.03	3.03	Bacha Khan University	DHO Lakki Marwat	Lakki	12.04.1979	11/4/2011
Saeed Ur Rahman S/O Sultana Wazir	16.07.2004	BS-12	30-08-2018 BS (H)	3.37	3.37	KMU Peshawar	DHO Peshawar	Karak	09.04.1984	04.2011
Muhammad Anwar Zeb S/O Syed Jahanzeb	22.05.2006	BS-12	30-08-2018 BS (H)	3.35	3.35	KMU Peshawar	DHO Peshawar	Peshawar	21.04.1979	22.04.2011
Saleem Yousaf S/O Muhammad Yousaf	27.01.2005	BS-12	19-10-2018 BS (H)	3.14	3.14	KMU Peshawar	DHO Battagram	Battagram	10.04.1979	10.04.2011

v. Syed Amjad Ali Shah Office Assistant, Syed Farman Ali Shah Sr. Clerk, Syed Mehmood Ali Shah J/C cum C.O Rooh Ullah C.O Muhammad Anwar J/C & Checked by Shehraz Shah

Director General  
Khyber Pakhtunkhwa

DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA, PESHAWAR.



Mmr-F 17

Office Ph# 091 - 9210269 Exchange# 091 - 9210187, 091 - 9210196, Fax #091 - 9210239

All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.

OFFICE ORDER.

Sanction to the encashment of 365 days pay in lieu of LPR is hereby accorded in favour of Mr. Naseeb Zada S/O Khair Zada PHC Technician (MP) BPS-17, attached to District Health Officer, Mardan.

Without prejudice to the legal remedies available to Provincial Government and in pursuance of judgement of the Peshawar High Court dated 19/02/2020 in WP No.5673-P/2019, The official concerned shall stand retired from Government Service on 30/11/2020, on attaining the age of superannuation as his date of birth is 01/12/1960 subject to CPLA/Appeal of the Provincial Government against aforementioned judgement of Peshawar High Court and any order contrary as and when issued by the apex Court of Pakistan.

Sd/xxxxxxxxx  
DIRECTOR GENERAL HEALTH  
SERVICES KPK, PESHAWAR.

No. 7245-50/AE-VI, Dated Peshawar the 22/10/2020.

Copy forwarded to the:-

1. District Health Officer, Mardan w/r to his letter No. 10771/DHO, dated 12/08/2020.
2. District Accounts Officer, Mardan.
3. Deputy Director (Accounts) DGHS KPK Peshawar.
4. Supdt. Promotion Cell with the request to delete his/her name from the seniority list accordingly.
5. DA concerned.
6. Official concerned.

For information and necessary action.

Additional Director General (HRM)  
Directorate General Health Services  
Khyber Pakhtunkhwa, Peshawar.

17/19  
Att  
2

The Director General Health Services  
KPK, Peshawar

- Subject: Request to providing of
- DPCs meeting minutes regarding PHC Technicians (MP) degree holders promotion dated 31/12/2017, July 2020 and 14/07/2021
  - Names and pay scales of the promoted PHC Technician (MP) degree holders before promotion

The Applicant humbly submits as under

That it is submitted with due respect, that I am in need of attested copies of the documents mentioned above as well as information as detailed above under relevant sections of Right to information Act 2013.

It is, therefore, most humbly submitted that the above mentioned documents may kindly be provided under the right to information Act 2013 for some legal purposes.

Your Sincerely

*Naseeb Zada*

Naseeb Zada S/O Khair Zada Retired PHC Technician (MP)  
30-11-2020 R/O Village Alam Gunj, P.O Pepal Tehsil Katlang  
District Mardan Cell No: 0301-8182121 / 0314-5555937

Order attached

Note

One copy of above is retained with me

9702 / 18  
10/8/22

*Attest*  
*D*



PIF  
Process  
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GOVERNMENT OF KHYBER PAKHTUNKHWA  
KP INFORMATION COMMISSION  
Near BRT Abdara Station, Behind Jabar Flats,  
Arbab Colony, University Road, Peshawar  
Email: [Complaints.kprti@kp.gov.pk](mailto:Complaints.kprti@kp.gov.pk)  
Ph: 92-91-9216557  
Fax: +92-91-9216561

Annex-H (19)

**REMINDER**

No. KPIC/AR/1-8993/2022

Dated:

10 3 JUN 2022

6420  
83

To

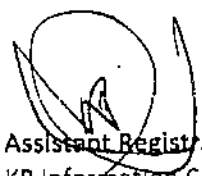
The Deputy Director/PIO,  
Directorate General Health Services,  
Peshawar.

Sub:

**COMPLAINT AGAINST NON-SUPPLY OF INFORMATION**  
**(COMPLAINT NO: 08993)**

I am directed to refer the Office letter No. RTIC/AR/1-8993/2022/5805-08 dated 16<sup>th</sup> May, 2022, and to state that the reply is still awaited.

It is to direct that the necessary compliance is required within five days positively of the receipt of this letter under intimation to this Commission.

  
Assistant Registrar  
KP Information Commission  
KPK, Peshawar.

Copy to:-

**OFFICE OF DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA.**

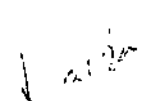
Subject: - **COMPLAINT AGAINST NON-SUPPLY OF INFORMATION (COMPLAINT NO.08993)**

Endo://DD Coord/ RTI/ 2022/ 3927-28 Dated: 09 /06/2022.

Copy of the above is forwarded to the: -

**Reminder**

- Deputy Director (Paramedics) DGHS, Khyber Pakhtunkhwa for information and furnishing the requisite information within five (05) working days positively.
- Assistant Registrar, KP Information Commission, Peshawar.

  
Director (Admn), DGHS,  
Khyber Pakhtunkhwa, Peshawar.





DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA, PESHAWAR.

Office Ph# 091 - 9210269 Exchange# 091 - 9210187, 091 - 9210196, Fax #091 - 921023

All communications should be addressed to the Director General Health Services Peshawar official by name  
No. 4683-85 /Promotion Cell Dated: 05/07/2022

Annex-I  
20

To:

Mr. Naseeb Zada S/O Khair zada  
Retired PHC Technician  
Alan Ganj Peapl Fehsil kattang District Mardan.

Subject: COMPLAINT AGAINST NON-SUPPLY OF INFORMATION (COMPLAINT NO. 08993)

Kindly refer to your application/complaint ( received through Assistant Registrar Khyber Pakhtunkhwa information Commission Peshawar) and to send the following documents as desired.

1. Working papers regarding, 22 qualified Chief PHC Technicians (MP) to the post of Clinical Technologist (MP) BS-17.
2. Copy of Notification No.SOH-III/8-60/2018, dated 01-02-2018.
3. Working papers regarding promotion of 10 qualified PHC Technicians (MP) to the post of Clinical Technologist BS-17.

The Minutes of the DPC meeting regarding promotion of PHC Technologist (MP) BS-17 (2021) may be obtained from Health Department Khyber Pakhtunkhwa Peshawar

ADDI: DIRECTOR GENERAL (HRM)  
DIRECTORATE GENERAL HEALTH SERVICES, KHYBER  
PAKHTUNKHWA PESHAWAR.  
3/06/22

Cc:

1. Assistant Registrar (RTI) Peshawar for information with reference to his letter No.RTIC/AR/1-8993/2022/5805/08 dated.16-05-2022.
2. Section officer – III Health Department Peshawar.

Allerted  
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بخدمت جناب سیکریٹری صاحب ہیلتھ صوبہ خیبر پختونخواہ پشاور

محکمہ اپیل برائے ترقی

جناب عالی! اپیل حسب ذیل عرض ہے۔

- 1- یہ کہ سائل سال 1983ء میں محکمہ ہذا میں بھرتی ہوا تھا اور بی ایس ایڈ (Honors) کی ڈگری پشاور یونیورسٹی سے حاصل کی ہے۔
- 2- یہ کہ سائل ترقی کا حقدار تھا کیونکہ سائل کا مدت ملازمت اور سنیارٹی سب پورا تھا لیکن محکمہ ہذا میں سروس رولز نہ ہونے کی وجہ سے ترقی نہ پاسکا۔
- 3- یہ کہ جب رولز بن گئے تو ترقی کیلئے ورکنگ پیپر بن گیا اور سائل سیریل نمبر 11 پر تھا مگر نامعلوم وجوہات کی بنا پر ترقی نہ پاسکا۔
- 4- یہ کہ 21/9/2020 کو سائل ریٹائر ہوا اور سائل حقدار تھا کہ اس کو Proforma Promotion 2020 ملے مگر محکمہ ہذا نے کوئی عمل درآمد نہیں کیا۔
- 5- یہ کہ ضروری کاغذات سائل کو محکمہ ہذا نہیں دے رہا تھا تو سائل نے RTA کے تحت درخواست گزاری اور کمیشن میں ایک شکایت بھی درج کی اس کے باوجود سائل کو 5/7/2022 کو ایک لیٹر موصول ہوا مگر ضروری کاغذات 16/9/2022 کو مہیا کی گئی۔
- 6- یہ کہ سائل پر لحاظ سے ترقی کا حقدار ہے کیونکہ دوران ملازمت سائل محکمہ کی غلطی کی وجہ سے ترقی نہ پاسکا اس لیے Proforma Promotion کا آرڈر جاری کیا جائے تاکہ سائل کو اس کا حق مل سکے۔

لہذا استدعا ہے کہ Proforma Promotion سائل کے حق میں

دینے کے احکامات صادر فرمائے جاویں۔ المرقوم: 16/09/2022

ارض

سائل: نصیب زادہ ولد خیر زادہ صاحب عام لیج، ڈاکخانہ پشاور، تحصیل ماہانڈر ضلع مردانہ

رابطہ نمبر: 0345-9323111



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نمبر: 50	4851	  
ایڈریس: ولی اللہ		
بار کونسل ایسوسی ایشن نمبر: bcl-9822		<p>پشاور بار ایسوسی ایشن، خیبر پختونخواہ</p> <p>ضلع دشتون فوہاہ سروس ٹریڈنگ کمپنی</p>
رابطہ نمبر: 0301-8862559		

بعدالت جناب:

مخاطب: امیرانہ	دعویٰ: سروس ٹریڈنگ
کعبہ زادہ ولد ضمیر زادہ	علت نمبر:
بنام	مورخہ:
حکومت پاکستان درجہ سکریٹری سیدتی	جرم:
سیدتی ڈیپارٹمنٹ	تھانہ:

### باعت تحریر آگہ

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

آن مقام کے لیے عماسکس نمبر 4 ولی اللہ درجہ سکریٹری کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری بیکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگزانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخست منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 16-01-2023

العبد العبد  
 مقام کے لیے  
 Attested  
 accepted  
 by

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

W. M. M.

Handwritten signature/initials on the left margin.