

11.11.2022

Counsel for the appellant present.

Muhammad Adeel Butt learned Additional Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment in order to further prepare the brief. Adjourned. To come up for arguments on 28.12.2022 before D.B.

SCANNED
KPST
11/11/2022


(Fareeha Paul)
Member (E)


(Rozina Rehman)
Member(J)

28.12.2022

Due to winter vacation, the case is adjourned to 05.04.2023 for the same as before.


Reader

21.06.2022

Mr. Muhammad Arif, Advocate (junior of learned counsel for the appellant) present. Mr. Safiullah, Focal Person alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is indisposed today. Adjourned. To come up for arguments on 12.09.2022 before the D.B.



(Fareeha Paul)
Member (E)



(Salah-ud-Din)
Member (J)

11.09.2022

Counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for respondents present.

Learned counsel for the appellant requested for adjournment in order to submit rejoinder. He may do this within 10 days with last opportunity for arguments on 11.11.2022 before D.B.



(Fareeha Paul)
Member (E)




(Rozina Rehman)
Member (J)

S.A No. 15919/2020

09.12.2021

Nemo for the appellant. Security and process fee have not been deposited by the appellant, therefore, notice be issued to appellant as well as his counsel for 01.04.2022 before the D.B.


Appellant Deposited
Security & Process Fee
31/22



(Mian Muhammad)
Member (E)

01.04.2022

Junior of learned counsel for the appellant present. Mr. Mr. Noor Zaman Khan Khattak, District Attorney for official respondents present.

Junior to counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court. Adjourned. To come up for arguments before the D.B on 21.06.2022.


(Rozina Rehman)
Member (J)


(Salah-Ud-Din)
Member (J)

12/2021

Learned counsel for the appellant present. Preliminary arguments heard.

12.08.2021 Learned counsel for the appellant while giving background of the case leading to the instant petition, stated that the appellant was...

The respondents on pre-admission notice have already submitted their written reply. Counsel for the appellant seek...

permission to file rejoinder. The appellant is allowed to file rejoinder within 10 days in office failing which the...

performance evaluation reports for the years 2003-2004 permission so given shall be deemed as withdrawn. The...

appeal is admitted for full hearing. The appellant is directed to deposit security and process fee within 10 days.

File to come up for arguments on 09.12.2021 before the 199. The appellant is directed to deposit security and process fee within 10 days.

assailed in the Writ Petition No. 386/2020 which was disposed of on the ground of jurisdiction under Article 21 of the Constitution. High Court judgment dated 09.09.2021.

The Peshawar High Court while disposing of the Writ Petition treated it as an appeal. The appellant is directed to deposit security and process fee within 10 days.

and the appellant is directed to deposit security and process fee within 10 days. Thereafter, notice is to be issued to respondents for submission of reply comments to come up for...

reply comments to come up for arguments before the S.B.

SCANNED
KPS-1
Peshawar

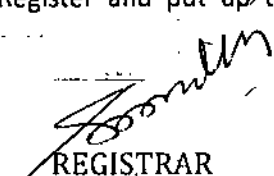

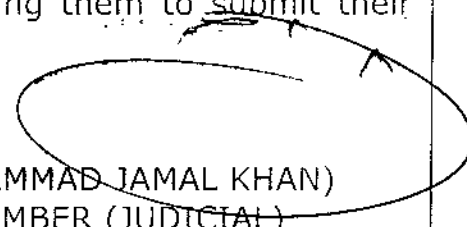

Chairman 09/2021

(Mian Muhammad)
Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 15919 /2020

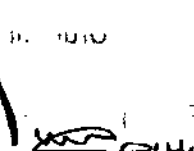
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/12/2020	<p>The appeal of Dr. Niamatullah resubmitted today by Mr. Jalal-ud-Din Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>25/01/2021</u></p> <p> CHAIRMAN</p>
	25.01.2021	<p>Appellant is present alongwith his counsel Mr. Jalal-ud-Din, Advocate.</p> <p>In view of the arguments addressed at the bar by the learned counsel representing appellant, it is deemed appropriate to issue pre-admission notice to respondents for 29.04.2021, simultaneously, directing them to submit their reply/comments before S.B.</p> <p> (MUHAMMAD JAMAL KHAN) MEMBER (JUDICIAL)</p>
	29.04.2021	<p>Due to demise of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 12.08.2021 for the same as before.</p> <p> Reader</p>

The appeal of Dr. Naimat Ullah Medical Officer Shakar Dara Civil Hospital Kohat received today i.e. on 10.12.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Copy of impugned dismissal order mentioned in para-7 of the memo of appeal is not attached with the appeal which may be placed on it.

No. 4036 /S.T.

Dt. 14/12 /2020


REGISTRAR,
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Jalal-ud-Din Adv. Pesh.

Sir
15/12/2020
The impugned merit list of seniority is already annexed as "G" at page-16 of the instant appeal hence the case may please be fixed before the honorable members for arguments and show ~~use~~ ^{now} it was a clerical mistake para No (7).
Jalalud Din
Counsel
15/12/2020.

BEFORE THE KHYBER PUKHTOON KHWA SERVICE TRIBUNAL

PESHAWAR.

Service Appeal No 15919/2020

Dr. Niamatullah

VERSUS

Government of KPK & Others

I N D E X

S.No	Documents	Annexure	Pages
1.	Grounds of Appeal along with affidavit		1-4
2.	Application for condonation alongwith affidavit		5
3.	Addresses of parties		6
4.	Copy of CNIC	A	7
5.	Copy of appointment letter	B	8
6.	Copy of extension and posting letter	C & D	9-12
7.	Copy of regularization letter	E	13-14
8.	Copy of dairy Number	F	15
9.	Copy of promotion letter dated 08.05.2019, appeal and dairy dispatch number	G, H & I	16-22
10.	Copy of letter	J K I	23-26
11.	Wakalatnama		27

THROUGH

APPELLANT

Jalaluddin
JALALUDDIN

ADVOCATES, HIGH COURT
PESHAWAR &

Saqibullah Khan
SAQIBULLAH KHAN
Advocate Peshawar

Flat No.16, Second Floor, Al-Syed Plaza, Abdara Chowk
University Road, Peshawar.
Cell # 0333-9216527

BEFORE THE KHYBER PUKHTOON KHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No-----/2020

(1)

Dr. Niamat Ullah Medical Officer Shakar Dara,
S/o Sarwar Khan, Now Posted at Civil Hospital Kohat
Permanently Resident of District Waziristan

APPELLANT.

VERSUS

1. **The Govt of Khyber Pukhtoonkhwa**
through Chief Secretary; Civil Secretariat
Khyber Pukhtoonkhwa Tehsil & District Peshawar.
2. **The Secretary health**
Government of Khyber Pukhtoonkhwa
Office at Civil Secretariat, Khyber Pukhtoonkhwa, Peshawar.
3. **Director General Health services,** Khyber Pukhtoonkhwa
Office at Civil Secretariat, Khyber Pukhtoonkhwa, Peshawar.
4. **Medical Superintendent DHQ**
Hospital Tank.....

RESPONDENTS.

**APPEAL UNDER SECTION 4 OF THE SERVICES TRIBUNAL ACT, 1974,
AGAINST THE RESPONDENTS WHEREBY THE APPELLANT HAS NOT
BEEN PROMOTED AND AGAINST WHICH THE DEPARTMENTAL
REPRESENTATION FILED BY THE APPELLANT WAS NOT CONSIDERED
BY THE RESPONDENTS, WHICH ACTION OF THE RESPONDENTS ARE
ILLEGAL, Unlawful AND IN EFFECTIVE UPON THE RIGHT OF THE
APPELLANT AND THE SAME MAY PLEASE BE DECLARED AS NILL AND
VOID AND THE PETITIONER MAY PLEASE BE PROMOTED ON THE
BASIS OF SENIORITY IN ACCORDANCE WITH LAW AND RULES OF THE
RESPONDENTS WITH THE ALL BACK BENEFITS.**

PRAYER IN APPEAL: On acceptance of this appeal, the appellant may graciously be promoted on the basis of seniority to PBS-18 and thereafter promoted to BPS-19 in accordance with law and rules of the respondents with all back benefits.

RESPECTFULLY SHEWETH.

1. That the appellant is the citizen of Pakistan and belongs to a noble respectable family, having high educated in his field and having impeccable character and unblemished record throughout his services. **(Copy of CNIC is annexed as A).**
2. That the appellant was initially appointed as Medical Officer (MO) at DHO Battagram in BPS-17 vide appointment letter dated 24.02.1999, and rendered spotless services according to the satisfaction of Higher-Up and without any objection from any Quarter regularly from the respondents for about 04 years at Battagram Station. **(Copy of the appointment Letter dated 24.02.1999 is annexed as B).**

3. That thereafter, the services contract of the appellant was renewed on 09.10.2002 and through a letter dated 26.03.2003 the appellant was transferred to Medical Officer LMH Kohat and assumed the charge at LMH Kohat and during this period, the appellant also qualified the Competitive exam through PCS in the year 2004 and the appellant was considered on permanent basis in the respondents department. **(Copies are annexed as C & D respectively).**
4. That respondents after considered all the legal and codel formalities regularized the services of the petitioner alongwith other colleagues vide regularization Notification No.So(E)H-II/3-18/2016 dated 17.10.2017 W.E.F 01.07.2001 in BPS-17, wherein the petitioner was placed at serial No.342 of the regularization list on the basis of sonority. **(Copy of the regularization annexed as E).**
5. That the appellant served the respondents without having any chance of complaint with the satisfaction of high ups for more than 19 years of services despite the facts the appellant having the legal rights to be promoted to the next high grade after completion of required length of services as per rules of the respondents and law but the appellant was deprived from his legal right for promotion on the basis of seniority hence the appellant submitted his departmental representation. **(Copy of the dairy pitch annexed as F).**
6. That now on 06.07.2020, it has come into the knowledge of the appellant that similar placed employees/Doctors of the respondents department was promoted from BPS-18 to BPS-19 who was regularized with the appellant W.E.F 01.07.2001 through a previous Notification dated 17.10.2017 vide impugned letter of promotion dated 08.05.2019 by the departmental Selection Committee but the appellant was discriminated without any rhymes and reasons hence the appellant submitted his departmental representation for promotion on the basis of seniority to the respondents but the respondents has not responded the departmental appeal of the appellant. **(Copy of promotion letter dated 08.05.2019 of similar placed employees/Doctors, Departmental representation, and dairy dispatch are annexed G, H, & I).**
7. That the appellant being aggrieved from the impugned letter of promotion as well as for not considered and responded the departmental appeal of the appellant has approached this Hon'able Tribunal on the following ground inter alia:-

GR OUN D S :-

- a. That the action and inaction of the respondents for not considered the appellant for promotion on the basis of seniority as well as not to decide the final departmental appeal, are void-ab-initio, arbitrary, without jurisdiction, Coram-non-judice, illegal and without any lawful authority hence liable to set aside and the appellant is liable to be promoted to the next higher grade of BPS-18 and then subsequently to BPS-19 as per requirement and rules of the respondents department with all back benefits.
- b. That the appellant having the accrued right for promotion on the basis of seniority since 2007 to BPS-18 and thereafter eligible for next promotion in 2019 to BPS-19 in the light of Doctrine accrued rights and legitimate expectancy but the said rights have been violated by the respondents and the appellant has been deprived from the said rights hence the appellant is entitled for the secured and guaranteed rights ordinate by the Constitution of the Islamic Republic of Pakistan 1973.

3. That thereafter, the services contract of the appellant was renewed on 09.10.2002 and through a letter dated 26.03.2003 the appellant was transferred to Medical Officer LMH Kohat and assumed the charge at LMH Kohat and during this period, the appellant also qualified the Competitive exam through PCS in the year 2004 and the appellant was considered on permanent basis in the respondents department. **(Copies are annexed as C & D respectively).**
4. That respondents after considered all the legal and codel formalities regularized the services of the petitioner alongwith other colleagues vide regularization Notification No.So(E)H-II/3-18/2016 dated 17.10.2017 W.E.F 01.07.2001 in BPS-17, wherein the petitioner was placed at serial No.342 of the regularization list on the basis of sonority. **(Copy of the regularization annexed as E).**
5. That the appellant served the respondents without having any chance of complaint with the satisfaction of high ups for more than 19 years of services despite the facts the appellant having the legal rights to be promoted to the next high grade after completion of required length of services as per rules of the respondents and law but the appellant was deprived from his legal right for promotion on the basis of seniority hence the appellant submitted his departmental representation. **(Copy of the dairy pitch annexed as F).**
6. That now on 06.07.2020, it has come into the knowledge of the appellant that similar placed employees/Doctors of the respondents department was promoted from BPS-18 to BPS-19 who was regularized with the appellant W.E.F 01.07.2001 through a previous Notification dated 17.10.2017 vide impugned letter of promotion dated 08.05.2019 by the departmental Selection Committee but the appellant was discriminated without any rhymes and reasons hence the appellant submitted his departmental representation for promotion on the basis of seniority to the respondents but the respondents has not responded the departmental appeal of the appellant. **(Copy of promotion letter dated 08.05.2019 of similar placed employees/Doctors, Departmental representation, and dairy dispatch are annexed G, H,& I).**
7. That the appellant being aggrieved from the impugned letter of promotion as well as for not considered and responded the departmental appeal of the appellant has approached this Hon'able Tribunal on the following ground inter alia:-

GRUNDS :-

- a. That the action and inaction of the respondents for not considered the appellant for promotion on the basis of seniority as well as not to decide the final departmental appeal, are void-ab-initio, arbitrary, without jurisdiction, Coram-non-judice, illegal and without any lawful authority hence liable to set aside and the appellant is liable to be promoted to the next higher grade of BPS-18 and then subsequently to BPS-19 as per requirement and rules of the respondents department with all back benefits.
- b. That the appellant having the accrued right for promotion on the basis of seniority since 2007 to BPS-18 and thereafter eligible for next promotion in 2019 to BPS-19 in the light of Doctrine accrued rights and legitimate expectancy but the said rights have been violated by the respondents and the appellant has been deprived from the said rights hence the appellant is entitled for the secured and guaranteed rights ordinate by the Constitution of the Islamic Republic of Pakistan 1973.

(3)

- c. That the appellant has been deprived from the legal rights which is clear violation of Article 4 of Constitution of the Islamic republic of Pakistan 1973.
- d. That the promotion of the appellant was due since 2007 and also vacant posts were lying in the respondents department but the appellant was Jeopardizing by the respondents department and not considered the appellant for promotion.
- e. That by not promoting the appellant to the next grade on the basis of seniority, the belated promotion has not only truncated the socio-economic rights of the appellant but also his future promotion will also effected hence the appellant is entitled for promotion with all back benefits.
- f. That the respondents were required have to held the DPC within the statutory period for the promotion of the appellant and while doing so, the respondents bulldozed all the rules and regulations and merit for the promotion.
- g. That appellant is qualified for the next high promotion grade to BPS-18 and subsequently to BPS-19 but with malafide intention and without any sold reasons the respondents not promoting the petitioners hence the act of the respondents is against the law and Constitution of Islamic Republic of Pakistan 1973.
- h. That under section 21 and section 24-A of the General Clauses Act, once a rights has been extended and created to the individual through a proper manner by the competent authority, then no one has power to undo it, and hence on this score alone, the appellant is entitled for the promotion as per seniority.
- i. That by not promoting the appellant is an act of discriminatory in nature, which is against Article 25 of The Constitution of Islamic Republic of Pakistan 1973 because similar place employees / Doctors who were appointment with the appellant were given promotion and they are now working in BPS-19 with all privileges but the appellant is still working in PBs-17 it is also important to be mentioned here that those who having objections on their service record were removed by the respondent by issuing them to them a notice for removal of objection but the appellant was discriminated. **(Copy of the Similar placed colleagues is already annexed above while the removal of deficiency letter dated 26.11.2018 is annexed as J).**
- j. That promotion of the other similar place colleagues were made at the back of the appellant and the appellant has come to the knowledge of the same on 06.07.2020 hence immediately submitted his appeal but the appellant was not considered
- k. That rules of fair just requires opportunity of being heard and every person against whom any kind of action is taken or order which is directly effect's him, the same will provided opportunity of being heard but in the present case the action of the respondents is crystal clear violation of guidelines provided by the law thus the appellant has not been treated in accordance with law nor extended the equal protection of law, which is the basic fundamental right of the petitioner under article 4 of the Constitution of Islamic republic of Pakistan 1973.
- l. That the respondents by not promoting the appellant on the basis of seniority is also against the norms of natural justice and fair play and of directions of the apex Court in different judgments and the respondents have make mockery of his policy by itself as well as the rules on the subject matter.

4

m. That in the peculiar facts and circumstances of the case, the interference of this Hon'able Court is warranted under the Law.

n. That any other ground would be adduced by Appellant during arguments on the instant appeal with the permission of this Hon' able Tribunal.

It is, therefore, most humbly prayed that on acceptance of this appeal, the appellant may graciously be promoted on the basis of seniority to PBS-18 and thereafter promoted to BPS-19 in accordance with law and rules of the respondents with all back benefits.. Any other relief not specifically asked by the Appellant may be pleased be granted to the Appellant in the circumstances.

THROUGH

APPELLANT

Jalaluddin

JALALUDDIN
ADVOCATES, HIGH COURT
PESHAWAR &

SAQIBULLAH KHAN
Advocate Peshawar

AFFIDAVIT:-

I, Dr. Niamatullah Medical Officer Shakar Dara, S/o Sarwar Khan, Now Posted at Civil Hospital Kohat Resident of District Waziristan do hereby solemnly affirm and declare on Oath that the contents of the above Appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Hon' able Tribunal.

DEPONENT

Munir

IDENTIFY BY

Jalaluddin
JALAL-UD-DIN
Advocate

ATTESTED



10/11/2020

BEFORE THE KHYBER PUKHTOON KHWA SERVICE TRIBUNAL

PESHAWAR.

5

Service Appeal No-----/2020

Dr. Niamatullah.....VERSUSGovernment of KPK & Others

APPLICATION UNDER SECTION 5 OF LIMITATION ACT, 1908 READ WITH SECTION 30 OF THE KHYBER PUKHTUNKHWA EPIDEMIC CONTROL AND EMERGENCY RELIEF ACT, 2020 FOR CONDONATION OF DELAY IN FILING OF INSTANT APPEAL, IF ANY.

RESPECTFULLY SHEWETH:-

1. That the above titled appeal has been filed before this Hon'able Tribunal, in which no date of hearing is yet been fixed.
2. That respondents had issued a notification to the effect that all Medical officer who performed one weak duties with the COVID-19 patient will remained quarantined himself for further two weak at their home and admittedly the appellant performed his duties with the COVID-19 patients ward and due to this reasons, appellant and his family suffered from the virus of COVID-19 and were quarantined for more than one month. **(Notification & medical record are annexed as K & L).**
3. That the Government of Khyber Pukhtunkhwa declared emergency on 01.03.2020 which is still intact under the Khyber Pukhtunkhwa Epidemic Control and Emergency Relief Act, 2020 and due to the epidemic emergency of COVID-19 (Corona Virus), the instant appeal could not be filed in time.
4. That the appellant moves the instant application Under section 5 of the limitation Act, 1908 readwith section 30 of the Khyber Pukhtunkhwa Epidemic Control and Emergency Relief Act, 2020 for the condonation of delay if any caused in filing the main appeal.

It is, therefore, most humbly prayed that on acceptance of this application, the condonation of delay if any caused, may kindly be condoned in the best interest of justice and fair play.

THROUGH

APPLICANT/APELLANT

JALALUDDIN
ADVOCATES, HIGH COURT

SAQIBULLAH KHAN
Advocate Peshawar

AFFIDAVIT.

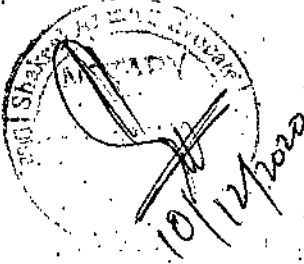
I, Dr. Niamatullah Medical Officer Shakar Dara, S/o Sarwar Khan, Now Posted at Civil Hospital Kohat Resident of District Waziristan do hereby solemnly affirm and declare on Oath that the contents of the above Application are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Hon' able Tribunal.

ATTESTED

DEPONENT

IDENTIFY BY

JALAL-UD-DIN
Advocate



BEFORE THE KHYBER PUKHTOON KHWA SERVICE TRIBUNAL

PESHAWAR.

(6)

Service Appeal No-----/2020

Dr. Niamatullah

VERSUS

Government of KPK & Others

MEMO OF ADDRESSES OF PARTIES

APPELLANT.

Dr. Niamat Ullah Medical Officer Shakar Dara,
S/o Sarwar Khan, Now Posted at Civil Hospital Kohat
Resident of District Waziristan.

RESPONDENTS.

1. **The Govt of Khyber Pukhtoonkhwa**
through Chief Secretary, Civil Secretariat
Khyber Pukhtoonkhwa Tehsil & District Peshawar.
2. **The Secretary health**
Government of Khyber Pukhtoonkhwa
Office at Civil Secretariat, Khyber Pukhtoonkhwa, Peshawar.
3. **The Director General Health services,** Khyber Pukhtoonkhwa
Office at Civil Secretariat, Khyber Pukhtoonkhwa, Peshawar.
4. **Medical Superintendent DHQ**
Hospital Tank

THROUGH

APPELLANT

Jalaluddin
JALALUDDIN
ADVOCATES, HIGH COURT
PESHAWAR &

SAQIBULLAH KHAN
Advocate Peshawar

(7)

Annexed - A

حکومت پاکستان
 قومی شناختی کارڈ
 21505-0927987-1
 نام: سرور خان
 پیدائش: 07/04/1966
 علی ارشد حکیم
 آٹا میں پیدائش: 07/04/1966
 دستخط مال کارڈ
 دستخط سرور خان

XP3F6S خانان سیر: 21505-0927987-1
 15766090129
 22/11/2021
 22/11/2011
 دستخط سرور خان

Attest
 Tahirul
 Counsel

(8)

Annexed-B

DIRECTORATE GENERAL HEALTH SERVICES, N.W.F.P., PESHAWAR.

OFFICE ORDER

In pursuance of the Govt of NWFP Health Department Notification No. SON-IV/3-18/(B), dated 4.2.1999, Dr. _____

s/o/D/o _____ Hiamatullah

on his/her appointment as MC/WMO on Contract Fixed Salary basis is hereby posted at the disposal of _____ for a period of Three years from the date of assumption of charge on the terms and conditions in the agreement deed, already executed by the doctor concerned.

If the offer of appointment is acceptable on the terms and conditions ibid, you are hereby directed to report at your place of posting within One week's time at your own expenses, failing which the offer of appointment/ _____ will automatically stands withdrawn.

NB:- Handing/taking over charge report should be submitted to this Directorate General urgently.

SD/XXXXXXXXXXXXXXXXX DIRECTOR GENERAL HEALTH SERVICES, NWFP, PESHAWAR.

NO 5525-22 /E.I, DATED PESHAWAR THE 24/02/1999.

Copy forwarded to the:-

- 01. Secretary to Govt of NWFP Health Department Peshawar.
- 02. D.H. Qureshi _____ for information and necessary action. He is hereby directed to submit monthly report with regard to attendance and devotion to duty of the MC concerned. Copy of the agreement deed is enclosed herewith.
- 03. Distt. Accounts Officer, _____
- 04. Doctor Concerned.

DIRECTOR GENERAL HEALTH SERVICES, NWFP, PESHAWAR.

24/2/99

ABDUL ALEEM
24.02.1999

Attested
Assistant Director (Admin).

(9)

Amused-C

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (HEALTH) BATTAGRAM

OFFICE ORDER.

Consequent upon the renewal of Contract of the following Medical Officers whose services are placed at the disposal of the undersigned, they are posted in District Headquarter Hospital Battagram to strength the DHQ Hospital according to the Government Policy.

- 1- Dr. Iqbal Hussain.
- 2- Dr. Said Badshah
- 3- Dr. ~~Naimatullah Khan.~~

Sd/-
EXECUTIVE DISTRICT OFFICER
(HEALTH) BATTAGRAM

No. 2078 /G-C/ Dated Battagram the Tuesday, November 19, 2002

Copy forwarded to the Medical Superintendent DHQ Hospital Battagram for information.

EXECUTIVE DISTRICT OFFICER
(HEALTH) BATTAGRAM

Sd/-
19/11

GOVERNMENT OF NWFP
HEALTH DEPARTMENT.

Dated Peshawar, the 9th: October, 02.

NOTIFICATION.

SO(E)H-IV/3-18/2002:- The following MOS appointed on contract basis against posts of MO on Special Slab/fixed salary for a period of three years vide this department notification No.SO.H-IV/3-18/98(S), dated 4.2.1999 is hereby converted into simple contract appointment in B-17 with effect from their renewal dates for a period of one year noted against each on usual terms and conditions applicable to contract employees.

S.NO.	NAME OF DOCTOR WITH PLACE OF POSTING.	DATE OF RENEWAL OF CONTRACT IN (EPS-17).
1.	Dr. Ibtisam Qazi BHU, Pishtikhara Distt: Peshawar.	24.2.2002.
2.	Dr. Khalilur Rehman BHU, Kolai (Kohistan).	1.3.2002.
3.	Dr. Gul Nazar BHU, Band Khad (Kohistan).	28.2.2002.
4.	Dr. Gul Rehman MO BHU, Baryar (Kohistan).	28.2.2002.
5.	Dr. Mian Feroz Shah BHU, Gabarai (Kohistan).	2.3.2002.
6.	Dr. Hidayatullah Khalil BHU, Raziqa (Kohistan).	3.3.2002.
7.	Dr. Raza Ali Orakzai BHU, Mona Khel (Karak)	25.2.2002.
8.	Dr. Ghulam Mohiuddin BHU, Summari Payeen Kohat.	25.2.2002.
9.	Dr. Shaidai Ahmad THQH: Garam Chishma (Chitral)	26.2.2002.
10.	Dr. Bibi Saeda CH, Booni (Chitral).	28.2.2002.
11.	Dr. Zahida Parveen THQH: Drosk Chitral.	28.2.2002.
12.	Dr. Shuja Ahmad BHU Reshan (Chitral).	28.2.2002.
13.	Dr. Hidayatullah BHU, Khut (Chitral).	18.3.2002.
14.	Dr. Ahmad Shah Arbab BHU, Kesu (Chitral).	28.2.2002.
15.	Dr. Muhammad Hussain RHC, Nagrai (Bunir).	1.3.2002.
16.	Dr. Akbar Hussain BHU, Dokada (Bunir).	28.2.2002.
17.	Dr. Abdul Ghafoor BHU, Koga (Bunir)	28.2.2002.
18.	Dr. Pirzada BHU, Korai (Bunir).	28.2.2002.
19.	Dr. Sardeep Kumar BHU, Battara Bunir.	28.2.2002.
20.	Dr. Sajid Aghaz BHU, Meshta (Malakand).	02.3.2002.
21.	Dr. Intiaz Ahmad BHU, Gunyar (Malakand).	26.2.2002.
22.	Dr. Said Bad Shah BHU, Roopkani (Battagram).	28.2.2002.
23.	Dr. Naimatullah ^{Khan} BHU, Batta Mori (Battagram).	26.2.2002.
24.	Dr. Iqbal Hussain BHU, Paimal Sharif Battagram.	27.2.2002.
25.	Dr. Ikramur Rehman BHU, Bettian (Battagram).	26.2.2002.
26.	Dr. Fazal Rahim; BHU, Talang (Swat).	03.03.2002.
27.	Dr. Riaz Shahid BHU, Luqmani Banda (Dir.)	24.02.2002.
28.	Dr. Muhammad Hameed BHU, Bandai (Dir).	25.2.2002.

(C. Cont: 02).

(11)

- 29. Dr. Muhammad Usman Shah BHU, Chaniali (A-Abad)
- 30. Dr. Noor Qadeem BHU, Sher Kot (Kohistan)

25.02.2002.
04.03.2002.

Consequent upon their renewal of contract appointment in EPS-17 their services are placed at the disposal of their respective EDO(Health) for further posting except the doctor at Sr.No.10 as her place of posting may be read as RHC Koghuzi, Chitral instead of C.H. Booni Chitral.

SD/--
Secretary Health NWFP.

OFFICE OF THE DG, HEALTH SERVICES, NWFP, PESHAWAR

NO. 27973-96 /E.T. DATED PESH: THE 19 /10 /2002.

Copy to the:-

- 11. Executive District Officers, Peshawar, Kohat, Karak, Kohistan, Bunir, Battagram, Malakand, Swat, Abbottabad, Upper Dir, and Chitral.
- 12. Accountant General NWFP, Peshawar.
- 13. District Accounts Officers, Kohat, Karak, Kohistan, Bunir, Battagram, Swat, Abbottabad, Upper Dir, and Chitral.
- 22. Agency Accountss Officer, Malakand at Batkhela.
- 23. Doctors concerned.
- 24. E.IV DGHS, Office Peshawar.

for information and n/action.

[Signature]
DIRECTOR GENERAL HEALTH SERVICES, NWFP, PESHAWAR.

M. ISHAQ KHAN

18.10.2002.

- 1000.S.8
- 1000.S.85
- 1000.S.88
- 1000.S.25
- 1000.EO.80
- 1000.SO.45
- 1000.S.88

File
Ch

Copy to Council for information

GOVERNMENT OF N.W.F.P.
HEALTH DEPARTMENT.

12
Dated Peshawar, the 26th March, 03

Amended-D

NOTIFICATION:

NO.SO(Estab.)II-IV/4-1/2003:- The following posting/transfers of Senior Medical Officer/Medical Officers are hereby ordered in the interest of public service with immediate effect.

Sr.No	Name	From	To
1.	Dr. Muhammad Isa Khan (BS-18)	SMO THQH Matta Swat	SMO RHC Khwazakhela Swat against the vacant post.
2.	Dr. Saeed Ahmad (BS-17)	MO THQH Alpuri Shangla.	MO THQH Matta Swat vice No.1.
3.	Dr. Niamatullah Khan (BS-17)	MO DHQH Battagram.	MO LMH Kohat against the vacant post.

SECRETARY HEALTH.

Endst. No. & date even.

Copy forwarded to the:-

1. Director General, Health Services, NWFP, Peshawar.
2. EDO (H), Swat/Shangla/Kohat.
3. MS DHQH Koha/Batagram.
4. DAO Swat/Shanga/Kohat.
5. PS to Minister for Health.
6. PS to Secretary, Health.
7. Doctors concerned.

27/3/03

26

(MUHAMMAD TAYYAB)
SECTION OFFICER (ESTT:)

13

TO BE SUBSTITUTED FOR THE NOTIFICATION BEARING THE SAME NO. AND DATE

Amended

GOVERNMENT OF NWFP BAJRATUNKHAYA
HEALTH DEPARTMENT.

Dated: 17th October 2007

NOTIFICATION

No. 801 (HE/HS-16/2013) - This is to certify that the following names of the doctors are appointed on contract basis under the provisions of Section 2 of Ordinance No. 1 of 2007 and sub-section 2 of Section 2 of the act of 2005. The Government of NWFP has amended the NWFP (Khyber Pakhtunkhwa) Act No. 1 of 2005 and the NWFP (Khyber Pakhtunkhwa) Act No. 1 of 2005 and the NWFP (Khyber Pakhtunkhwa) Act No. 1 of 2005 and the NWFP (Khyber Pakhtunkhwa) Act No. 1 of 2005.

Sr.	Name of Doctor	D.O.B / Domicile	Date of Initial Appointment on contract basis	Date of Regularization under Act 2005
1	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
2	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
3	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
4	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
5	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
6	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
7	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
8	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
9	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
10	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
11	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
12	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
13	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
14	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
15	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
16	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
17	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
18	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
19	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005
20	Dr. Yousaf Khan S.O	13.04.1981	24.11.1995	01.07.2005

16

357	Dr. Khair S. D. ...	01.10.1973	16.01.1980	16.01.1980
358	Dr.
359	Dr.
360	Dr.
361	Dr.
362	Dr.
363	Dr.
364	Dr. Sabhat Sultan d/o	26.3.1972	20.01.1980	20.01.1980
365	Dr.
366	Dr.
367	Dr.
368	Dr.

OFFICE OF THE
MEDICAL SUPERINTENDENT DHQ HOSPITAL
DISTRICT TANK

15

Amir - F

No. _____
Dated _____/_____/2017.

To
The Director General Health Services,
Khyber Pakhtunkhwa Peshawar.

Subject: ACR FORMS IN RESPECT OF DR. NAIMAT ULLAH MEDICAL OFFICER DHQ HOSPITAL TANK

R/Sir,
Enclose please find herewith ACR Forms for the years (2014, 2015 & 2016) in respect of Dr. Naimat Ullah Medical Officer BPS-17 DHQ Hospital Tank for favour further necessary action.

///
MEDICAL SUPERINTENDENT
DHQ HOSPITAL TANK

No. 5469-701 Dated 18/11/2017.

Copy to the:

- ✓ 1. Dr. Naimat Ullah Medical Officer DHQ Hospital Tank
2. Office file for record.

Covering letter
Dairy No. 15
Amir - F

8889

Dated

~~Amir - F~~

lp
MEDICAL SUPERINTENDENT
DHQ HOSPITAL TANK



16

GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Amended

Dated Peshawar, the 6th May, 2019

NOTIFICATION

NO.SOHIE-VII-22/2019 The Government of Khyber Pakhtunkhwa on the recommendations of the Provincial Selection Board is pleased to promote the following Senior Medical Officers BS-18 to the post of Principal Medical Officers BS-19 on regular basis with immediate effect.

S NO	Name of Doctor	S NO	Name of Doctor
1	Dr Nayyar Hashim S/O Tazzeemul Haq	21	Dr Ahsan Khan S/O Chakral Khan
2	Dr Muhammad Yousaf S/O Saadullah Khan	22	Dr Naz Muhammad S/O Taj Muhammad
3	Dr Muhammad Saadullah Khan	23	Dr Muhammad Anwar S/O Faraz Muhammad
4	Dr Sher Jaman S/O Hajj Sherif Khan	24	Dr Niaz Mehmood Khan S/O Dara Khan
5	Dr Masood-ul-Jaman S/O Al Jaman	25	Dr Basim Ahmad S/O Sheraz Khan
6	Dr Farooq Munir S/O Taj Ali	26	Dr Saad Ahsan S/O Inayatullah
7	Dr Zubair Khan S/O Janna Khan	27	Dr Muhammad Qasim S/O Farooq
8	Dr Farzana Ayub S/O Sahibzada Muhammad Ayub	28	Dr Akbar Khan S/O Faraz Memon
9	Dr Najma Sultana S/O	29	Dr Muhammad Yousaf S/O Muhammad Shah
10	Dr Abdul Rehman S/O Asim Khan	30	Dr Niazuddin S/O Behrooz Gul
11	Dr Iqbal Jan S/O Wahidullah Farooq	31	Dr Faza Raza Awan S/O Faraz Khan
12	Dr Saad Buz S/O Muhammad Saadullah Khan	32	Dr Saad Hussain S/O Khan Sahibzada
13	Dr Muhammad Faraz S/O Razi Sughar	33	Dr Muhtasib Raza Ayub S/O Muhammad Ali Ayub
14	Dr Zulfqar Ali S/O Shukail Ali	34	Dr Fahim Shah Bughare S/O Masood Shah
15	Dr Rashid Hussain Khan S/O Amanullah Khan	35	Dr Muhammad Nadeem S/O Iqbal Khan
16	Dr Raza Muhammad S/O Farooq Khan	36	Dr Hameed Gul S/O Hayat Gul
17	Dr Ijaz Hussain Zaidi S/O M. Mehmood Zaidi	37	Dr Saad Ahmad S/O Habib Ahmad
18	Dr Muhammad Saleem S/O Muhammad Ahsan	38	Dr Feroz Shah S/O Raza Shah
19	Dr Abdul Mujeeb S/O Abdul Wahid	39	Dr Ambreen Wali S/O Abdul Wali
20	Dr Iqbal Hussain S/O Musaffar Khan	40	Dr Waqar Khalid S/O Sahibzada Saad Johar

S NO	Name of Doctor	S NO	Name of Doctor
41	Dr Shahr Ali S/O Ghulam Muhammad	68	Dr Tilawat Shah s/o Muhammad Akbar
42	Dr Akhtar Ali Shah S/O Muzaffar Shah	69	Dr Munawar Khan S/O Gul Zaman
43	Dr Sanaullah Khan S/O Inayatullah Khan	70	Sr Saifur Rehman S/O Abdul Baseer Khan
44	Dr Farwad Badshah S/O Mian Mehtab Khan	71	Dr Muhammad Ayub Masood S/O Mido'lah Khan
45	Dr Arif Mahmood S/O Malik Rubanwaz Khan	72	Dr Amiruddin S/O Abul Kabir Buda
46	Dr Aminulata S/O Shera Jan	73	Dr Abdul Hameed Afridi S/O Ghousi
47	Dr Sajad Ali S/O Amir Nawaz	74	Dr Harisudat Rehman S/O Habibur Rahman
48	Dr Abdul Janan S/O Haji Gul Akbar	75	Dr Abdul Malik S/O Haji Mezar Khan
49	Dr Muhammad Ayaz S/O Faez Rafiq	76	Dr Sher Muhammad S/O Haji Gul Muhammad
50	Dr Easar Muhammad S/O Muhammad Khan	77	Dr Ihsanul Haq S/O Saif Khan
51	Dr Zameer Akmal S/O Asrat Hussain	78	Dr Munir Hussain S/O Sultan Hassan
52	Dr Mansoor Shamim Khan S/O Muhammad Nadeer Khan	79	Dr Rahmatullah S/O Pir Muhammad Tayyib
53	Dr Muhammad Akmal S/O Mustafa	80	Dr Miranullah S/O Amir Khan
54	Dr Muhammad Anam S/O Muhammad Anam	81	Dr Amir Hamza S/O Saif Khan
55	Dr Muhammad Jamil S/O Akcullah	82	Dr Hidayatullah S/O Hafeez
56	Dr Muhammad Haroon S/O Jan Muhammad	83	Dr Zahir Shah S/O Asad Khan
57	Dr Shabir Ahmad S/O Yaqoob Khan	84	Dr Abbas Saman Khan S/O Hajj Javed Khan
58	Dr Saaduddin Afridi S/O Noorullah Afridi	85	Dr Hafiz Khan S/O Saif Khan
59	Dr Zafarullah S/O Gul Bahar Khan	86	Dr Shah Alam S/O Muhammad Shabbir Khan
60	Dr Muhammad Jamshed Khan S/O Ghulam Khan	87	Dr Omprakash S/O Isam Das
61	Dr Muhammad Tahir Saeed Khan S/O Muhammad Alzal Khan	88	Dr Mian Syed Dost S/O Mian Saif Omar
62	Dr Habib Gul S/O Mian Khan	89	Dr Nisar Ahmad S/O Saif Muhammad
63	Dr Saif Ali Khan S/O Sher Gul Khan	90	Dr Nazeer Ahmad Akmal S/O Jan Muhammad Khalid
64	Dr Asad Jehangir S/O Jehangir Khan Anwar	91	Dr Raees Mohmand S/O Ahmad Jan
65	Dr Qaiser Zaman S/O Khajab Gul	92	Dr Saqib Ahmad S/O Shabbir Ali
66	Dr Qasim Rafiq S/O Qazi Naveed	93	Dr Taj Muhammad S/O Jan Muhammad
67	Dr Iran Shah S/O Hamidullah Shah	94	Dr Ibrahim Iqbal S/O Saif Khan

18

S NO	Name of Doctor S/O	S NO	Name of Doctor
95	Dr Saadullah Khan S/O Muhammad Ayub Khan	119	Dr Sagat Ahmad S/O Wahzedullah
96	Dr Parva Muneer/Wahed S/O Mehar Qazi Khan	120	Dr Zahir Shah S/O Serwar Khan
97	Dr Haroon Nusr Khatik S/O Habib Nawaz	121	Dr Muneer Elahi S/O Muhammad Khurshid
98	Dr Fazel Rehman S/O Muhammad Anwar Khan	122	Dr Fiaz Muhammad Khan S/O Shahjari Khan
99	Dr Yousaf Khan S/O Saad Rehman	123	Dr Muhammad Karim S/O Samiullah Khan
100	Dr Haridullah S/O Muhammad Saleem	124	Dr Shahab Khan S/O Wali Khan
101	Dr Mustafa S/O Haji Babramand	125	Dr Muhammad Shuhrawan S/O Muhammad Alamzot
102	Dr Nadeem Ahmad Khan S/O Jari Muhammad	126	Dr Asrar Rehman S/O Ghous Farhan
103	Dr Rizwanullah S/O Amjad Khan	127	Dr Mubashir Haq S/O Ishtiaq
104	Dr Zaffar Iqbal S/O Muhammad Anwar	128	Dr Rafiqullah S/O Asad Jari
105	Dr Akram Haroon Khan S/O Abdul Majeed Khan	129	Dr Muhammad Faqir S/O Waheed Jari
106	Dr Anwar Ali Shah S/O Mian Muhammad Ali Shah	130	Dr Akram Khan S/O Arbab Khan
107	Dr R. Mulla S/O Haji Farooq	131	Dr Ijaz Akbar S/O Mir Akbar
108	Dr Ali Shah S/O Fazle Ghateer	132	Dr Muhammad Ayub Khan S/O Baqirullah Gul
109	Dr Shauq Ahmad S/O Javed Khan	133	Dr Shaukullah S/O Muhammad Zameer Khan
110	Dr Masood Jaleel S/O Khushdar Khan	134	Dr Muhammad Hasham S/O Ghulam Usman
111	Dr Masood Khan S/O Harisullah Khan	135	Dr Umar Zada S/O Zor Nouri
112	Dr Muhammad Zahid S/O Qaiser Ahmad	136	Dr Syed Muhammad Tahir S/O Ghulam Mustafa Shah
113	Dr Imroz Ahmad S/O Fazle Karim	137	Dr Meraaj Gul S/O Sami Gul
114	Dr Shouab Ahmad S/O Gulshan Khan	138	Dr Fazel Rahman S/O Gul Sheikh
115	Dr Anwar Saad S/O Nour Muhammad	139	Dr Izzat Khan S/O Rasool Jan
116	Dr Fazel Sukhan S/O Ghous Nadeem	140	Dr Habibullah Jan S/O Mir Abdullatif
117	Dr Spin Gul S/O Haji Idris	141	Dr Yasir Muhammad S/O Syed Akbar
118	Dr Zaffar Ali Shah S/O Syed Badshah	142	Dr Fida Hussain S/O Haji Kalyat Hussain

S NO	Name of Doctor	S NO	Name of Doctor
143	Dr. Muhammad Gul S/O Rehmat Gul	170	Dr. Sawab Gul S/O Badshah Gul
144	Dr. Mazhar Hayat S/O Malik Hazrat Ma	171	Dr. Rab Nayaz Khan Afridi S/O Hayat Sair Jan
145	Dr. Badarshah Jan S/O Muhammad Jan	172	Dr. Sajid Yaqoob D/O Muhammad Yaqoob
146	Dr. Mohsin Ali Shah S/O Ahmad Shah	173	Dr. Syed Anwar Hussain S/O Noor Syed Mian
147	Dr. Muhammad Iqbal S/O Syed Paacha	174	Dr. Syeda Shahnaz Jabeen D/O Israrullah Shah
148	Dr. Khurshid Alam S/O Jan Akbar	175	Dr. Sultan-un Nisa D/O Hayat Mahabat Khan
149	Dr. Fazal Gul S/O Hayat Meera Khan	176	Dr. Nisreen Haider D/O Haider Khan
150	Dr. Taj Gul S/O Amin Gul	177	Dr. Inayatullah Rahman S/O Moin Khan
151	Dr. Gohar Zaman S/O Muhammad Zaman	178	Dr. Nisreen Ali S/O Sher Ali
152	Dr. Yash Muhammad S/O Gul Ghani Khan	179	Dr. Saadqullah Gumbal S/O Saadqullah
153	Dr. Gohar Khan S/O Inayatullah	180	Dr. Muhammad Ayaz S/O Noor Ahmad Shah
154	Dr. Haji Mahomed Khan S/O Ghani Khan	181	Dr. Sajid Khan S/O Sher Muhammad
155	Dr. Daryah Wali Khan S/O Haqir Wali Khan	182	Dr. Jamshed Qadir S/O Qadir Gul
156	Dr. Muhammad Zahir Shah S/O Babbar Khan	183	Dr. Sandeep Kumar S/O Hukam Chand
157	Dr. Saad Muhammad S/O Ali Gul Khan	184	Dr. Muhammad Raza S/O Ghulam Rasool
158	Dr. Muhammad Faris Khan S/O Abdul Sattar	185	Dr. Farid Khan S/O Zafar Khan
159	Dr. Gul Ali S/O Hassan Ali	186	Dr. Muhammad Ayaz S/O Zahirullah
160	Dr. Zahid Din S/O Yasir Hussain	187	Dr. Noor Muhammad S/O Ahmad Saad
161	Dr. Syed Haseebullah S/O Zaman Shah	188	Dr. Shammar Rehman S/O Hayat Muhammad
162	Dr. Gul Rashid S/O Muhammad Gul	189	Dr. Kaizer Begum D/O Ghulam Farid Khan
163	Dr. Ashiq Muhammad S/O Muhammad Ishaq	190	Dr. Gulzar Zaman S/O Muhammad
164	Dr. Ali Muhammad S/O Ahmad Ali	191	Dr. Abdul Karam S/O Farid Khan
165	Dr. Feroz Hassan S/O Wazir Hussain	192	Dr. Shah Ali S/O Sher Bahadar
166	Dr. Mustafa Jan S/O Amir Jan	193	Dr. Zein Khan S/O Bahadur
167	Dr. Muhammad Mehbub S/O Ihtishar Sardar Ali Khan	194	Dr. Muhammad Ali Jan S/O Mughdadi Jan
168	Dr. S. Ihtishar Hussain S/O Kamal Hussain	195	Dr. Munir Ali S/O Anwar Khan
169	Dr. Anwar Khan S/O Anwarullah Khan	196	Dr. Azra Sarwar D/O Saad Jan

20

S. NO	Name of Doctor	S. NO	Name of Doctor
197	Dr Zafar Ali S/O Anis Chishti	215	Dr Hamidullah S/O Saad Azam Khan
198	Dr Azeed Ali S/O Sarfaraz Khan	220	Dr Khairun Nabi S/O Gul Naba
199	Dr Shehna Saeed D/O Saeed Ahmad	221	Dr Muhammad Zameer Khan S/O Hayat Khan
200	Dr Fayyaz Ali S/O Qaiser Khan	222	Dr Aamir Khan S/O Farooz Khan
201	Dr Khalid Mahmood S/O Rehmatullah	223	Dr Mansoorullah S/O Malik Matloob Khan
202	Dr Tahir Hussain S/O Chohan Muhammad	224	Dr Aftab Saleem D/O Muhammad Saleem
203	Dr Saadeur Rehman S/O Ashtar Khan	225	Dr Sofia Khan D/O Muhammad Rashid
204	Dr Fazli Raziq S/O Fazle Maula	226	Dr Muhammad Iqbal S/O Azam Khan
205	Dr Muhammad Parvez Khan Durani S/O Muhammad Naeem Durani	227	Dr Khaleel Iqbal Durk S/O Akhtar Khan Durk
206	Dr Raheed Sultana D/O Muhammad Akram	228	Dr Imran Khan S/O Professor Rashid Ali
207	Dr Akhtar Nawaz S/O Muhammad Amir Khan	229	Dr Muhammad Arshad Khan S/O Shah Jehan
208	Dr Rozal Shah S/O Mursaleem Shah	230	Dr Muhammad Araf Raziq S/O Abbas Raziq
209	Dr Sara Gulzar D/O Aftab Khan	231	Dr Zameer Khan S/O Khair Zaki Khan
210	Dr Muhammad Humayun S/O Muhammad Usman	232	Dr Shaleeh Khan S/O Saad Wahab
211	Dr Saba Gul S/O Mansoor Gul	233	Dr Badshah Khan S/O Raees Khan
212	Dr Janal Hayat S/O Sultan Zameer	234	Dr Syed Umar Hussain S/O Syed Majid Hussain
213	Dr Amir Sher S/O Dr Muhammad Khan	235	Dr Nuzrat Ara D/O Abdulrahman Jan
214	Dr Taj Wali Shah S/O Gul Sher	236	Dr Shazia Gul D/O Masoom Ahmad
215	Dr Saad Badshah S/O Musatar Khan	237	Dr Seema Shouf D/O Sharif Gul
216	Dr Abdul Ghaloer S/O Badshah Khan	238	Dr Shamsul Qamar D/O Muhammad Hani
217	Dr Gul Nazar S/O Sumair Khan	239	Dr Fatmeeda Khan D/O Ali Khan
218	Dr Zohra Rasir D/O Nazir Shah	240	Dr Raaz Shafiq S/O Rehmat Khan

2. In terms of Rule 6 (3) of Civil Servants Act, 1973 and Rule 15 (1) of Appointment, Promotion and Transfer Rules, 1956, they will be on probation till their retirement.

3. The postings/transfers of the above named doctors shall be notified later on.

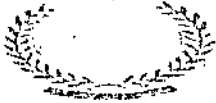
SECRETARY HEALTH
Govt of Khyber Pakhtunshwa

9 حضرت صاحب سیکرٹری (21) kpk سٹیٹ

7710 عمران
L.N.O. 8-2-97
Date
Secy

Bps-17

سٹیٹ ہوا۔ بجلی حکومت 201 سے دنگول کر دے گی۔ حکمی اور سٹیٹ
3 سال سے دعوے میں آئے ACR کے لئے حکم ڈائری میں
کو آئیٹم لکھو جو ہے۔
مگر ناصحیح وضع میں ہے ACR سٹیٹ میں لکھ دیا ہے، جسکی بنا پر لکھے
سیٹیٹیٹی ڈرائنگ کر دیا گیا۔ تاویجی ہے ACR داسی لکھے
اسی وجہ سے 9 دفعہ ٹائٹ سے اگر دفتر کا
آخر کار ACR دلا جائے پھر خانہ دربار کا
میں نافذ والے ڈائری 201 میں لکھے تہہ تہہ
تہہ میں تہہ دیا گیا ہے۔ انہوں میں بہترین
کے باوجود تہہ 7 اس کا بہترین ہے۔
آخر کار شیخ دربارہ میں بہترین ہے۔
اسی وجہ سے اگر تہہ میں لکھے تہہ
سٹیٹ لکھا جائے گا ہے۔
دے جائے۔ لغویت
حیاتیوں
ڈائری
540



22

OFFICE OF THE
DISTRICT HEALTH OFFICER
KOHAT

Amir J

A copy of letter No 17506-90/ALJ, dated 13.11.2018, from Deputy Director (HRM) DGHS, KPK, Peshawar addressed to this office & others.

Subject: PROMOTION OF SENIOR MEDICAL OFFICERS (BS.18) TO THE POST OF PRINCIPAL MEDICAL OFFICER (BS.19) IN THE HEALTH DEPARTMENT, K.P.K.

Please furnish the PERs alongwith No Departmental / Anti Corruption Certificate (two copies) and fifteen (15) fresh photographs passport size Course Completion Certificate of the mandatory training required for promotion to BS.19 in respect of the following Senior Medical Officers BPS-18 working under the control, to this Directorate within 15 days of the receipt of this communication as the same is urgently required to the Government in connection with their promotion.-

S.No.	Name of Senior Medical Officers	Place of Posting	Missing ACRs Required
1-209, 210	XXXXX Dr. Haroon Nasir Khattak S/O Rab Nawaz MBBS	XXXXX DHO Office Kohat	XXXXX 01.07.2001 to 2004 & 2017
211-216, 217	XXXXX Dr. Abdul Hameed Khan S/O Abdul Majeed Khan	XXXXX SMO, DHO Office Kohat	XXXXX 01.07.2001 to 2004 & 2017
218-222, 223	XXXXX Dr. Habibullah Khan S/O Hamidullah Khan	XXXXX SMO, CD Ghari Mawaz Khan	XXXXX 01.07.2001 to 2004 & 2017
224, 225	XXXXX Dr. Javed Iqbal, Muhammad Qasim	XXXXX At the disposal of DHO (D) Kohat	XXXXX 01.07.2001 to 2004 & 2017
226-518, 519	XXXXX Dr. Nasrullah Khan s/o Izza Khan	XXXXX At the Disposal of DHO Kohat	XXXXX 2002, 2003, 2004 & 2017
520-529	XXXXX	XXXXX	XXXXX

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

OFFICE OF THE DISTRICT HEALTH OFFICER, KOHAT.

No 6641-45 C.S. Kohat dated the 26 /11/2018.

- Copy forwarded to:-
1. Dr. Javed Iqbal, SMO, Type-D Hospital Lachi.
 2. Dr. Haroon Nasir Khattak SMO, DHO Office Kohat.
 3. Dr. Abdul Hameed, SMO, DHO Office Kohat.
 4. Dr. Habibullah Khan, SMO, Police Hospital Kohat.
 5. Dr. Nasrullah Khan, SMO, RHC Garibat.

For information & necessary action.

7c

Amir J
DISTRICT HEALTH OFFICER
KOHAT
26/11/18

(23) Amended - K

OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING KDA KOHAT

OFFICE ORDER

No. 1937 / DHQ Hospital

Dated Kohat the 30 September 2020.

Your Doctor Naimat Ullah MO is hereby deputed to perform night duty in Corona Ward on 01-10-2020 to 30-12-2020 for three months according to roster.

You are further advised to maintain strictly preventive measurement during duty. And after each week duty you will quarantine two weeks at home.

In case of high temperature during duty, you should inform Corona unit incharge on time.

Medical Superintendent DHQ Teaching
Hospital KDA KOHAT

Encl: No & date even

Copy forwarded to the

1. DMS (HR) and ADMN DHQ Hospital Kohat for information.
2. Incharge Corona Ward
3. Doctor Concern

Medical Superintendent DHQ Teaching
Hospital KDA KOHAT 30/9/20

24

**THE KHYBER PAKHTUNKHWA EPIDEMIC CONTROL AND EMERGENCY
RELIEF ACT, 2020**

(KHYBER PAKHTUNKHWA ACT NO. XXVII OF 2020)

Amended

CONTENTS

PREAMBLE

SECTIONS

**PART-I
PRELIMINARY**

1. Short title, extent and commencement.
2. Definitions.
3. Serious and imminent infection threat declaration.

**PART-II
GENERAL HEALTH
PROTECTION MEASURES**

4. Power to impose duties, confer functions etc.
5. General restrictions and requirements.
6. Directions and restrictions relating to attendance of public places, schools and burials etc.

**PART-III
CONTROL OF EVENTS, GATHERINGS AND
PREMISES**

7. Prohibition or restriction of events and gatherings.
8. Closing or restricting entry into and exit from a premises.
9. Restricting entry into and exit from a general area.

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**THE KHYBER PAKHTUNKHWA EPIDEMIC CONTROL AND EMERGENCY
RELIEF ACT, 2020**

(KHYBER PAKHTUNKHWA ACT NO. XXVII OF 2020)

(First published after having received the assent of the Governor of the Khyber
Pakhtunkhwa in the Gazette of the Khyber Pakhtunkhwa.
(Extraordinary), dated 24/07/2020)

**AN
ACT**

*to provide for prevention and control of infectious diseases
in the Province of the Khyber Pakhtunkhwa and to provide
relief to the people in emergency situation.*

WHEREAS it is expedient to provide for prevention and control of infectious diseases in the Province of the Khyber Pakhtunkhwa, to implement and enforce mechanism to control the spread of such diseases and to provide relief to the people in an emergency situation arising due to spreading of such infectious diseases and for matters connected therewith and ancillary thereto;

AND WHEREAS it is necessary to amend certain laws relating to public health and disaster management in order to bring them at par in combating the epidemic and other infectious diseases;

It is hereby enacted as follows:-

**PART-I
PRELIMINARY**

1. Short title, extent and commencement.--- (1) This Act may be called the Khyber Pakhtunkhwa Epidemic Control and Emergency Relief Act, 2020.

(2) It shall extend to the whole of the Province of Khyber Pakhtunkhwa.

(3) It shall come into force at once.

2. Definitions.--- In this Act, unless the context otherwise requires,-

(a) "declaration" means the declaration of a serious and imminent infection threat, made under section 3 of this Act and may also include declaration of any emergency relating to outbreak of any disease under any law relating to public health and disaster management;

28. **Relief by Government.**--- (1) Notwithstanding anything contained in any other law, for the time being in force, Government may,-

- (a) provide total or partial exemption, suspension or deferral of the payment of the provincial taxes, duties, fees, cess, levies and charges in the manner as may be notified; and
- (b) appoint the health staff on short term contracts under locum tenens or otherwise, with such package and on such terms and conditions as the Government may specify:

Provided that the health staff, hired for short-term services under clause (b) of this sub-section, shall not be entitled to any permanent status, regularization or absorption into Government service in any manner.

(2) No penalty or surcharge shall be imposed for late submission of sales tax or other returns under the Khyber Pakhtunkhwa Finance Act, 2013 (Khyber Pakhtunkhwa Act No. XXI of 2013) by the relevant authorities for the months of March 2020 to June 2020.

29. **Courts proceedings to be through video link.**--- (1) Notwithstanding anything contained in any law, for the time being in force, all the Courts and Tribunals, wherever possible, may direct any litigant, accused, witness, legal representative or any other person or officer of the Court to participate in any proceeding of the Court, through video link:

Provided that while giving such directions the Courts or Tribunals, as the case may be, must consider all the circumstances of the case and may rescind such directions where it appears to the Court or the Tribunal that it is not in the interest of justice to do so.




Provided further that any proceedings so undertaken through video link shall be considered judicial proceedings and shall form part of the record. Upon pronouncement of a decision upon such proceedings, it shall not be called in question on the ground that presence of persons concerned was not procured physically.

(2) The powers of the Court or Tribunal under this section are in addition to and not in derogation of any other powers already available to such Courts or Tribunals, in this respect.

(3) High Court, if so deems appropriate, may issue guidelines for regulating the proceedings before Courts or Tribunals through video-link, which guidelines, if so issued, shall be notified in the official Gazette and shall be binding on all concerned.

30. **Period of limitation under various laws.**--- Notwithstanding anything contained in the Limitation Act, 1908 (Act No. IX of 1908) or any other law prescribing limitation for initiating any legal proceedings, the limitation period provided under various laws shall remain frozen from 1st March 2020 till the culmination of the emergency period and the proceedings so filed before any court or tribunal during or immediately upon cessation of such emergency period, shall not be time-barred on account of any delay for the aforesaid period.

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تاریخ 50	41680			
ایڈوکیٹ: Jalal ud-din		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: BC-09-0287		7		
رابطہ نمبر: 0333-9216527		صدر سٹریٹ منٹونل کسٹیاور		
بعدالت جناب:				

مخانب: Relativeness	دعویٰ: Promotions Appeal
ذات اللہ لہجہ اللہ	علت نمبر:
بنام	موضوع:
حکومت سندھ حکومتی چوٹی او ایس ڈی	مزم:
	تھانہ:

بابت تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی کی تھانہ
 آن مقام کسٹیاور کیلئے جیولجی ایسوسی ایشن سندھ ماہیت اللہ اور کسٹیاور کو وکیل مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل 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 کی طرف یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کارروائی 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 با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخہ منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانبہ 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: 18/11/2020

العواہ شہادہ

Attested by
 Accpted
 Jalal ud-din
 Advocate

مقام
 Saqib ulah
 Advocate
 Peshawar

ذات اللہ لہجہ اللہ

41680			
ایڈوکیٹ: Taha nd dhs		پشاور بار ایسوسی ایشن، خیبر پختونخواہ	
بار کونسل ایسوسی ایشن نمبر: PC-09-0287		صدر مسٹر منوئل کسٹاوار	
رابطہ نمبر: 0333-8216527			

بعدالت جناب: صدر مسٹر منوئل کسٹاوار

Relitinered	مخانب:	Promotion Appeal	دعویٰ:
د اللہ الرحمن اللہ			علت نمبر:
بنام			مورخہ:
حکومت خیبر پختونخواہ			جرم:
			تھانہ:

باعت تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی کے متعلق
 ان مقام منشی اور کیلئے **احمد علی احمد** صاحب نے کو وکیل مقرر کیا
 کہ اس کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زوریں پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری یا طرف یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو کوئی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانب التوا کے 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: 18/11/2020

**PESHAWAR BAR ASSOCIATION
KHYBER PAKHTUNKHWA**

A Hosted case
 Accepted by
Taha nd dhs
 Advocate
 High Court

مقام
Saqib ulah
 Advocate
 Peshawar

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 15919 OF 2020

Dr. Niamat Ullah 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 did locus standi to file the instant Appeal.
2. That the Appellant has filed the instant Appeal just to pressurize the respondents.
3. That the instant Appeal is against the prevailing Law and Rules.
4. That the Appeal is not maintainable in its present form³ 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.
9. That the instant Appeal is bad for mis-joinder of unnecessary and non-joinder of necessary parties.

ON FACTS:

1. Pertains to record, hence no comments.
2. Pertains to record, hence no comments.
3. Pertains to record, hence no comments.
4. Pertains to record, hence no comments.
5. Incorrect, the appeal of the appellant was not received. However, it is pertinent to mention here that the promotion of the appellant was deferred by the PSB due to his deficient PERs as he has provided his PERs for the year from 2009 to 2014 vide application dated 15.06.2020 and for the year from 2019-2020 vide application dated 12.03.2020 (attached at Annex-A & B). Now the appellant has completed his PERs and his promotion case will be submitted to Government for consideration in next PSB meeting after finalization of seniority list of general cadre doctors.

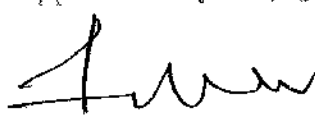
6. Correct to the extent of promotion of doctors but the appellant was deferred from promotion by the PSB due to his deficient PERs as mentioned in the preceding paras.
7. Incorrect. The appellant is not aggrieved from the impugned order.


ON GROUNDS:

- A. Incorrect. The action of the respondents is according to law and rules as the appellant was deferred from promotion by the PSB due to his deficient PERs.
- B. Incorrect, as explained in para-5 & A above.
- C. Incorrect, the appellant has not been deprived from his right but as per rules PERs are mandatory for promotion which he failed to provide in time.
- D. Incorrect, as explained in para-C above.
- E. Incorrect, as explained in para-C above.
- F. Incorrect, PSB was arranged earlier in the year 2018 but the appellant was deferred due to non production of PERs.
- G. Incorrect, as explained in above paras.
- H. Incorrect, as explained in above paras.
- I. Incorrect, as explained in Para-5 & A above.
- J. Incorrect, no appeal has received in this office, at this score alone the appeal in hand be dismissed.
- K. Incorrect, in promotion cases personal hearing are not necessary which depends upon the provisions of all documents required for promotion.
- L. Incorrect, as explained in above paras.
- M. No comments.
- N. No comments being formal.

PRAYER:

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


Secretary to Govt. of Khyber
Pakhtunkhwa Health Department
Respondent No. 01


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

T₀

The DE Health
KPK.

Subject:- Submission of ACR for
period from 2009 to 2014

Sir,

with due respect, it is
that, I am submitting
ACR - forms from the
of 2009 to 2014, as
Section reservation.

PS, except my application
for promotion in the
PSB.

Date of - 15/06/20

Therms

Dr. Naimath Ullah

M.O BPS - 1

mobile - 0334 - 8258379

15/06/20

The ODE Health

RDK

COV
Acr

Subject - submission of Acr



Sir,
With due respect, it is

stated that my Acr

for the year 2019-2020

for further necessary action

P.S.

Theme

You should
Dr. Naimille Kallang

M.O 13pc 17

Dr. Naimille Kallang

10/12/20

19/10/2021



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUN KHWA PESHAWAR

E-Mail Address: mytpdghs@yahoo.com office Ph# 091-9210269
Exchange# 091-9210187, 9210196 Fax # 091-9210230
No: 1-99 /AE-I Dated: 01/01/2020


To,

1. All Hospital Directors of Teaching Hospital in Khyber Pakhtunkhwa.
2. All Principals of Medical/Dental Colleges in Khyber Pakhtunkhwa.
3. All Medical Superintendents DHQ Hospitals in Khyber Pakhtunkhwa.
4. Dean, PGMI/HMC/LRH/KTH, Peshawar.
5. Director Health Services Merge District Khyber Pakhtunkhwa.
6. All District Health Officers in Khyber Pakhtunkhwa.
7. Director General, PHSA, Khyber Pakhtunkhwa.
8. All Officers, DGHS Office, Khyber Pakhtunkhwa.

SUBJECT:- PERFORMANCE EVALUATION REPORTS(PER) FOR THE YEAR,2019.
Memo.

As you know year 2019 is going to close on 31/12/2019 and the reporting officers are bound to write the PERs/ACRs of the doctors belonging to Management/General/Specialists Cadre and other officers including Drugs Inspectors, Pharmacists and other categories of staff of Health Department Khyber Pakhtunkhwa working under their control.

You are hereby requested to submit PERs/ACRs in respect of the above mentioned officers of Health Department till 31st January, 2020 failing which strict disciplinary action will be initiated against the officers/reporting officers under the rules.


DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR
24/11/20

CC.

1. PS to Secretary to Govt: of Khyber Pakhtunkhwa Health Department Pesh.
2. PA to DG Health Services, Khyber Pakhtunkhwa., Peshawar.

meeting after finalization of seniority list of general cadre doctors.