

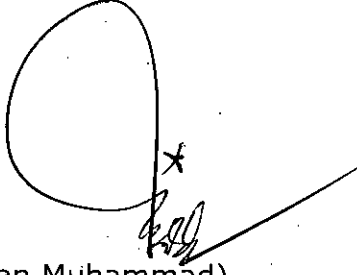


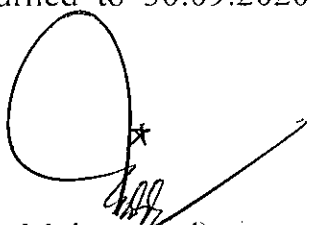
S.No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	30.09.2020	<p><u>Present.</u></p> <p>Mr. SAJID UR REHMAN ... For appellant Advocate</p> <p>Mr. USMAN GHANI, District Attorney ... For respondents</p> <p>This appeal is also accepted  as per detailed judgment of today placed on file in service appeal no. 608/2019 titled "Muhammad Safer -vs- Director General Health, Khyber Pakhtunkhwa, at Directorate General Health Services, Peshawar and four others." Parties are left to bear their own costs. File be consigned to the record room.</p> <p><u>ANNOUNCED</u> 30.09.2020</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">  (ROZINA REHMAN) Member (Judicial) </div> <div style="text-align: center;">  (Mian Muhammad) Member (Executive) </div> </div>

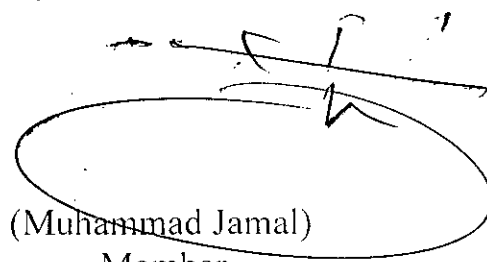
15.09.2020

Appellant in person alongwith his counsel Mr. Sajid Ur Rehman, Advocate is present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Mr. Muhammad Bashir, CT Technologist for respondents present.

Learned Assistant Advocate General is seeking time for consulting the authority concerned with regard to some important issue involved in the instant appeal. Learned counsel for the appellant stressed that the appellants have not been adjusted so far since the lapse of eighteen (18) months and they are suffering as such due to non-receipt of their salaries and requested the bench for a short period of time. While keeping in view the issue involved and the sensitivity of the matter and as per request of the learned counsel, the appeal has to be heard at principal seat at Peshawar where the parties and their respective counsels have to appear.

Adjourned to 30.09.2020 for arguments before D.B at Peshawar.


(Mian Muhammad)
Member(E)


(Muhammad Jamal)
Member
Camp Court A/Abad

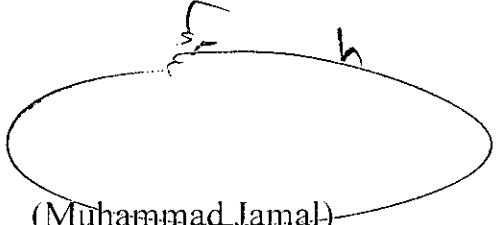
14.09.2020

Appellant in person alongwith his counsel Mr. Sajid Ur Rehman, Advocate is present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Dr. Ijaz, DMS for respondents present.

There is rush of work and almost arguments in four appeals have been concluded. It is now quarter past 4 O'clock. The time of the Tribunal is over, therefore, the appeal is adjourned by tomorrow.


Adjourned to 15.09.2020 for arguments before D.B at camp court Abbottabad.

(Mian Muhammad)
Member(E)


(Muhammad Jamal)
Member
Camp Court A/Abad

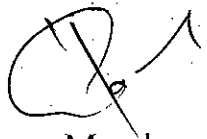
18.12.2019

Appellant in person present. Mr. Usman Ghani, District Attorney alongwith M/S Muhammad Bashir, C.T Technologist on behalf of respondent No. 2, Muhammad Shahab, Computer Operator on behalf of respondent No. 3 and Ahmad Zaman, Assistant on behalf of respondent No. 5 present. Written reply on behalf of respondents No. 1 to 4 already submitted while representative of respondent No. 5 requested for further time to file written reply. Adjourned to 23.01.2020 for written reply/comments before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad.

23.01.2020

Appellant in person present. Mr. Muhammad Jan learned Deputy District Attorney alongwith Ahmad Zaman Assistant, Muhammad Bashir Focal Person and Amjid Ali Assistant present. Written reply on behalf of respondent No.5 submitted. Adjourn. To come up for rejoinder if any and arguments on 20.02.2020 before D.B at Camp Court Abbottabad.


Member
Camp Court, A/Abad

Postscript

23.10.2019

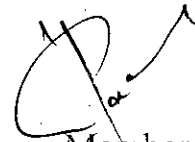
In the meanwhile Mr. Adeel Khan, Senior Auditor representative of the respondent No.4 turned up and furnished written reply, placed on file. To come up for written reply of respondent No. 5 on 19.11.2019 before S.B at camp Court, Abbottabad.



Member
Camp court, A/Abad

19.11.2019

Learned counsel for the appellant present. Mr. Usman Ghani learned District Attorney alongwith M/S Amjid Ali Assistant (for respondents No.1 to 3), Adeel Khan Senior Auditor (for respondent No.4) and Ahmad Zaman Assistant (for respondent No.5) present. Reply on behalf of respondents No.1 to 4 already submitted. Ahmad Zaman Assistant representative of respondent No.5 seeks adjournment to furnish written reply/comments. Adjourn. To come up for written reply/comments on behalf of respondent No.5 on 18.12.2019 before S.B at Camp Court, Abbottabad.




Member
Camp Court, A/Abad

19.09.2019

Appellant alongwith his counsel present. Mr. Muhammad Bilal, Deputy District Attorney alongwith M/S Muhammad Bashir, C.T Technologist, Muhammad Imran, Senior Clerk and Adeel Khan, Senior Auditor for the respondents present. Learned counsel for the appellant stated that in the instant service appeal, District Health Officer, Haripur is a necessary party but inadvertently, he was not impleaded in the panel of respondents therefore, requested that he may be impleaded as respondent in the panel of respondents as a necessary party.

Learned Deputy District Attorney expressed no objection. Hence, Muharrar is directed to enter the name of District Health Officer, Haripur in the panel of respondents and also issue notice to him for written reply/comments. Case to come up for written reply/comments on 23.10.2019 before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad


23.10.2019

Counsel for the appellant present. Mr. Usman Ghani, District Attorney present. Mr. Amjad Ali, Assistant for respondent No. 1 present. Dr. Mushtaq, M.S for respondents No. 2 & 3 present. Mr. Ahmad Zaman, Assistant for respondent No. 5 present. Joint parawise comments of respondents No. 1, 2 and 3 have already furnished. No one is present on behalf of respondent No. 4. Fresh notice be issued to respondent No. 4. Representative of respondent No. 5 requests for further time to furnish requisite reply. To come up for written reply/comments of respondents No. 4 & 5 on 19.11.2019 at camp Court, Abbottabad.

Member
Camp court, A/Abad

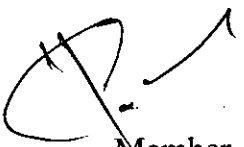
11.07.2019

Appellant alongwith his counsel present. Mr. Muhammad Bilal, Deputy District Attorney alongwith Dr. Dildar Khan, Deputy Medical Officer and Mr. Muhammad Imran, Record Keeper Litigation for the respondents present. Representative of the department and learned Deputy District Attorney requested for adjournment. Last chance is given to the respondents to submit written reply/comments on main appeal as well as reply/arguments on application for suspension of operation of impugned order and release of salary of appellant on 22.08.2019 before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

22.08.2019

Appellant with counsel present. M/S Dildar DMS and Amjid Ali Assistant for respondents No.1 to 3 present and submitted written reply/comments. No one present on behalf of respondent No.4. Notice be issued to the respondent No.4 with direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on behalf of respondent No.4 on 19.09.2019 before S.B at Camp Court, Abbottabad.


Member
Camp court A /Abad

17.06.2019

Counsel for the appellant present.

Contends that relieving/transfer order could not be legally passed as punishment to a civil servant. The order dated 14.01.2019 itself suggested that the appellant was relieved from DHQ Hospital Haripur in consequence to an enquiry wherein he was found guilty by the enquiry committee. On the other hand, such penalty awarded to the appellant, is nowhere provided in the Khyber Pakhtunkhwa Civil Servants Act, 1973 or the rules applicable. Further, on 05.03.2019 an office order was issued by respondent No. 1 whereby the service of appellant was placed at the disposal of DHO Haripur for further posting, however, the appellant has not been posted till date.

In view of the available record and arguments of learned counsel instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 11.07.2019 before S.B at Camp Court Abbottabad.

Alongwith the appeal there is an application for suspension of the operation of impugned order and release of salary of appellant. Notice of application be also given to the respondents for the date fixed.

Appellant Deposited
Security & Process Fee

28/6/19





Chairman
Camp court, A/Abad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 610/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/05/2019	<p>The appeal of Mr. Anayat Ullah resubmitted today by Mr. Habit Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please</p> <p style="text-align: right;">  REGISTRAR 9/5/19 </p>
2-	15-5-19	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>12-07-2019</u></p> <p style="text-align: right;">  CHAIRMAN </p>

70

The Worthy Registrar,
Service Tribunal,
1st,
Perthawar.

Subject: Complaint as well as humble
appeal.

Respected Sir,

With due honor, I beg to
acknowledge your kind notice, that almost 10
months have elapsed since the time when
my appeal was filed, and I am still
awaiting a decision upon my service
appeal, as this is a violation of the
principle of the superior courts "non-
interference" and I would request
you to address the things upon
merit.

So, I would humbly submit your
kind notice, that, as along with the
other appeals, may kindly be placed upon
the Worthy Tribunal for the decision on
merit.
Thank you.

Yours sincerely
Haider Khan A.D.U.C

The joint appeal of Manzoor Ahmad and Badrul Alam SST of District Battagram received today i.e. on 17/04/2019 is in complete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days
The joint appeal of M/S Iftikhar Ahmad, Muhammad Safeer, Niaz Elahi, Anayatullah, Sajid Ali and Awais Tasleem received today i.e. on 08/04/2019 is in complete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 2- Annexures of the appeal may be attested.
- 1- Memorandum of appeal may be got signed by the appellants.
- 2- Annexures of the appeal may be attested.
- 3- Annexures of the appeal may be attested.
- 4- Sub-rule-2 of rule-3 of the appeal rules 1986 requires that every affected civil servant shall prefer the appeal separately. Therefore, the appeal of the above appellants may be filed separately/individually.
- 5- Copy of departmental appeal respect of appellant no.6 is not attached with the appeal which may be placed on it.
- 6- Copy rejection order of departmental appeal mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 7- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent in each appeal may also be submitted.

No. 718/S.T

Dt. 8/4/2019

Mr. Shahid Ahmad Khan Adv.
High Court A.Abad

Mr. Habit Khan Adv.
High Court A.Abad

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Objection no. 3 and 7 are still stand therefore, the appeal is again returned to the counsel for the appellant for completion and resubmission with in 15 days.

No. 865/S.T,

Dt. 30-4-2019

Habit Khan Adv. High Court A.Abad.

Registrar
Khyber Pakhtunkhwa
Service Tribunal
Peshawar.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Appeal No. 610 /2019

Anayatullah

...APPELLANT

V E R S U S

DG Health Khyber Pakhtunkhwa and others

...RESPONDENTS

SERVICE APPEAL

INDEX

S.No.	Description of Document	Annexure	Page No.
1.	Service Appeal alongwith affidavit and Certificate	--	1-7
2.	Application for suspension alongwith affidavit	--	8-9
3.	Copy of the notice	"A"	10
4.	Copy of impugned orders	"B"	11
5.	Copy of Departmental Appeal / order	"C"	12-13
6.	Copy of impugned order	"D"	14
7.	Copy of Departmental appeal / Order	"E"	15-16
8.	Vakalat Nama	--	17

...APPELLANT

Through:

Dated:- 9/11/2019


(HABIT KHAN)

Advocate High Court, Abbottabad.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Appeal No. ⁶¹⁰ /2019

Anayatullah s/o Rowait Khan R/o Haripur Present Ward Orderly at DHQ Hospital Haripur.

...APPELLANT

V E R S U S

- 1) DG Health Khyber Pakhtunkhwa, at Directorate General Health Services, Peshawar.
- 2) Medical Superintendent DHQ Hospital Haripur.
- 3) Deputy Medical Superintendent DHQ Hospital Haripur.
- 4) District Account Office Haripur.

5 District Health Officer, Haripur. ...RESPONDENTS

**SERVICE APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT, 1974 AGAINST THE ORDER NO.255-7 DATED
07.01.2019, ISSUED BY RESPONDENT NO.2 VIDE
WHICH THE APPELLANT WAS ILLEGALLY
RELIEVED FROM HIS RESPECTIVE POSITION
AND THEREAFTER THE APPELLANT FILED
DEPARTMENTAL APPEAL BUT ALL IN VAIN
HENCE THIS SERVICE APPEAL.**

Re-submitted to -day
and filed.

Registrar
9/5/19

vide
order
sheet
19.9.19

PRAYER:-

ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE IMPUGNED ORDERS NO.255-60 DATED 07.01.2019, ISSUED BY RESPONDENT NO.2 AND ORDERD NO. 769 DATED 21.01.2019 ISSUED BY RESPONDENT NO.1 & orderd no. 988 dated 06/02/2019, ISSUED BY RESPONDENT NO.2 AND ORDERD NO. 2274-78 DATED 05.02.2019 ISSUED BY RESPONDENT NO.1 MAY KINDLY BE DECLARED NULL AND VOID & APPELLANT ME KINDLY BE RESTORED TO HIS POSITION.

Respectfully Sheweth,

FACTS:

Following facts giving rise to the instant Service Appeal, are arrayed as under:-

1. That, the appellant has been serving in the Health Department at DHQ Hospital Haripur.
2. That, appellant is law abiding citizen and never been found in any illegal, unprofessional, immoral, unethical and corrupt practices.

3. That, due to discriminatory conduct of the Respondent No.3 the union announced the peaceful protest regarding which due notice was served upon the respondent No.2 and other respondent of the district. **(Copy of the notice is attached as Annexure "A")**
4. That, upon assurance of eradication of Mal practice and discrimination the peaceful protest have been withdrawn.
5. That, after sometime, Respondent No.2 without conducting proper enquiry relieved the appellant from his position. **(Copy of impugned order is annexed as Annexure "B")**
6. That, the appellant filed Departmental Appeal before the Respondent No.1 which was decided with the direction of proper enquiry should be conducted against the appellant if he is guilty of misconduct. **(Copy of Departmental Appeal order is annexed as Annexure "C")**
7. That the Respondent No.2 instead of complying the order of appellate authority again relived the Appellant. **(Copy of impugned order is attached as Annexure "D")**
8. That, thereafter, the appellant again filed the Departmental Appeal and respondent No.1 decided in

negative hence this service appeal. (Copy of Departmental appeal order is annexed as Annexure "E")

GROUND S:-

- a) That, the orders No.255-60 dated 07.01.2019, issued by Respondent No.2 is illegal, ultravires, arbitrary, fanciful, perverse, against the principle of natural justice and equity and liable to be set aside on the following grounds.
 - i. That, no proper enquiry has been conducted and appellant has been punished in a brutal way.
 - ii. That the appellant approached this forum for the redressal of his grievance and appeal is well within time and the Court has the jurisdiction to entertain the same.
- b. That, the action/ order of the respondent No.2 is amounting to discourage the Public Servant from doing his legal functions as assigned to him under the Rules of Business of the Government.
- c. That the instant service appeal is well within time and Hon'ble Tribunal has the jurisdiction to entertain the same.

PRAYER:

It is, therefore, humbly prayed that on acceptance of the instant Service Appeal, the

impugned orders No.255-60 dated 07.01.2019 and order No. 988 dated 06.02.2019 issued by Respondent No.2 may kindly be declared null and void.& appellant be restored to his respective position.

عنایت اللہ خان

...APPELLANTS

Through:



(HABIT KHAN)

Advocate High Court, Abbottabad
Federal Shariat Court

Dated:- 9/4 /2019

VERIFICATION:-

Verified that the contents of the instant Service Appeal are true and correct to the best of my knowledge and belief and that nothing material has been suppressed from this Honorable Court.

Dated:- 9/4 /2019

...APPELLANT

عنایت اللہ خان

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Appeal No. _____ /2019

Anayatullah

...APPELLANT

VERSUS

DG Health Khyber Pakhtunkhwa and others

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, *Anayatullah s/o Rowait Khan R/o Haripur Present Ward Orderly at DHQ Hospital Haripur Appellant*, do hereby solemnly affirm and declare on Oath that the contents of instant *Appeal* are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

Dated:- 9/6 /2019

IDENTIFIED BY:-

(Signature)
(HABIT KHAN)

Advocate High Court, Abbottabad.

Habit Khan
Advocate High Court &
Federal Shariat Court



DEPONENT

عنایت اللہ خان

...APPELLANT

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Appeal No. _____ /2019

Anayatullah

...APPELLANT

V E R S U S

DG Health Khyber Pakhtunkhwa and others

...RESPONDENTS

SERVICE APPEAL

CERTIFICATE

*Certified that no such Service Appeal has earlier been filed
before this Hon'ble Tribunal.*

عنایت الدخان

...APPELLANTS

Through:

Dated:- 9/4 /2019


(HABIT KHAN)

Advocate High Court, Abbottabad.

Habit Khan
Advocate High Court &
Federal Shariat Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Appeal No. /2019

Anayatullah

...APPELLANT

V E R S U S

DG Health Khyber Pakhtunkhwa and others

...RESPONDENTS

SERVICE APPEAL

=====

**APPLICATION FOR SUSPENSION OF THE OPERATION
OF IMPUGNED ORDER AND SIMULTANEOUSLY
RESPONDENT NO.4 BE DIRECTED TO RELEASE THE
SALARIES OF APPELLANT INCLUDING PENDING
ONE, TILL FINAL DISPOSAL OF APPEAL.**

=====

Respectfully Sheweth,

1. That titled appeal is filed before this Honourable Tribunal Court, the contents of the same may be treated as an integral part of this application.
2. That appellant has a good Prima-Facie case and balance of convenience also lies in his favour.
3. That if the impugned orders issued by Respondents No.1 & 2 are not suspended then appellant would suffer irreparable loss and the purpose of filing appeal would become infructuous.

4. That the salaries of the Appellant has been stopped due to impugned order and this is absolutely illegal and against the settled law.

It is, therefore, humbly prayed that on acceptance of the foregoing application, the salaries of the Appellant may kindly be released by suspended the impugned orders and respondent No.4 be directed in this regard till final disposal of the titled appeal.

...APPELLANT

Through:

Dated:- _____/2019

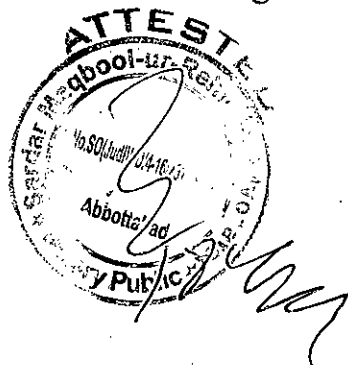

(HABIT KHAN)

Advocate High Court, Abbottabad.

AFFIDAVIT:-

I, *Anayatullah s/o Rowait Khan R/o Haripur Present Ward Orderly at DHQ Hospital Haripur Appellant*, do hereby solemnly affirm and declare on Oath that the contents of instant *Application* are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

Dated:- 9/4/2019




...APPELLANT

IDENTIFIED BY:-


(HABIT KHAN)

Advocate High Court, Abbottabad.

Annexure "A" (10)

B
AC report
to enquiry
for
Khanpur
annual report

پیرا میڈیکل ایسوسی ایشن

درجہ چہارم محکمہ صحت ہری پور

Office of D.C Haripur
Diary No. 20291
Date 06/11/18

S-12 DEPUTY COMMISSIONER
HARI PUR

نمبر 4/HPR

پیرا میڈیکل ایسوسی ایشن ہری پور کے صدر اور دیگر افسران کا ایک دستاویز جس میں ان کے بارے میں معلومات فراہم کی گئی ہیں۔ اس کے علاوہ ان کے بارے میں دیگر معلومات فراہم کی گئی ہیں۔

- 1- حروف 6/12 اور 7/18 بروز جمعہ بائزن پر سیاہ پٹیاں بائزن طرز میں لگی ہیں۔
- 2- حروف 8/18 سے تا حکم نامہ تک کل پٹیاں لگی رہیں گی۔ جب تک حالات بہتر نہیں ہوتے۔

تاریخ 5-12-18

6-15/HPR

- 1- ضابطہ نمبر 1، حروف 6/12
- 2- ضابطہ نمبر 2، حروف 7/18
- 3- ضابطہ نمبر 3، حروف 8/18
- 4- ضابطہ نمبر 4، حروف 9/18
- 5- ضابطہ نمبر 5، حروف 10/18
- 6- ضابطہ نمبر 6، حروف 11/18
- 7- ضابطہ نمبر 7، حروف 12/18
- 8- ضابطہ نمبر 8، حروف 13/18
- 9- ضابطہ نمبر 9، حروف 14/18
- 10- ضابطہ نمبر 10، حروف 15/18

CFC
Attested
Shahet Khan
Advocate High Court &
Jahangir Court

Handwritten signature

11



**OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR**

Ph:No. 0995-611850, Fax No.0995-610069

No 255-60 /Dated 07/01/2019

To,

The Director General Health Services
Khyber Pakhtunkhwa Peshawar.

Subject: RELIEVING ORDER.

Dear Sir,

Upon the directives of Deputy Commission Haripur vide his office letter No. 1(5)/Misc/App:AS/DC(H) dated 06-12-2018 and Assistant Commissioner Haripur vide letter No./Reader/09/1300-01/AC(H) dated 14-12-2018, an inquiry was conducted by Inquiry Committee and recommend the Disciplinary action against the officials who were involved illegal/unlawful strike on 08/12/2018. They hampered the peaceful atmosphere of the Hospital and provoked the other class IV for strike. Therefore the following class-IV are hereby relieved from their duties with immediate effect and directed to report to your good office for further posting.

1. Mr. Niaz Ellahi sweeper
2. Mr. Anayat Ward orderly
3. Mr. Sajid Mali

**MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR**

Cc:

1. Deputy Commissioner Haripur, for information w/r to above please.
2. Account Section undersigned office required action with immediate effect.

**MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR**

CIC
Alienial
Alienial
THE
ACTING
FEDERAL
JUDICIAL
COURT &

(12) America (ع)
 Defamation Appeal

خدمت جناب ڈائریکٹر صحت بیدھ سرگودھا خیر و خیر خواہان
 عنوان - درخواست برائے اپیل ٹر اسفروالپس کی جائے

جناب عالی

نیابت احترام کے ساتھ گزارش کی جاتی ہے کہ سائنس الیوسی الین حدڈا نے منتخب جران میں جو کہ حکم عد
 خیر و خیر خواہان سے جو کہ ڈسٹرہ تبلیغ ہے۔ جتنا DMS ڈاکٹر دلدار صاحبان کے مکمل طور پر ملرز میں ڈسٹرہ
 DHQ ہسپتال پر پور کئے غیر اخلاقی رویہ اپنا کر غیر قانونی تنخواؤں میں تنخواہیں شروع کی ہیں۔ اور
 مکمل طور پر ملرز میں کو عالم گلوچ گھرتے ہیں۔ ڈی ایم۔ ایس ڈاکٹر دلدار صاحبان کے اس کا عائدہ رویہ
 کے خلاف ٹی بار MS صاحبان کو آگاہ کیا ہے جس پر ٹی بار عمل درآمد نہیں ہوا۔ اسکے بعد ہم نے اپنے مکمل
 طور پر ملرز میں کے جائز حقوق کے حصول کے لیے پراسرار علاقہ میں احتجاج کا حکم سرگودھا پور پور فوٹس دیا کہ
 بیمار و مکمل طور پر ملرز میں کی تنخواؤں میں کو ٹی بار والپس کی جائے اور ہم پراسرار علاقہ میں ہسپتال میں
 محصور ہو کر یا غیر اخلاقی رویہ استعمال نہیں کیا۔ اسکے بعد MS صاحبان نے بیمار کے جائز مسائل و مطالبات کے
 صلی ہی کیا ہے۔ سیاسی بنیادوں پر سفر کرنے کے مکمل طور پر ملرز میں کے بچوں کے ساتھ ظلم کی انتہا اور
 جو کہ ٹورٹ 7 جنوری 2019ء کو اڈیس 255-60 ہے گا ہی ہے۔ ہم مکمل طور پر
 انتہائی گریبا ٹوٹی ہیں۔ الیوسی الین متیسا کا پیشہ تو شخصیت کا ہے۔
 لہذا ہم آری صاحبان کی خدمت میں عہدہ دارانہ درخواست عرض ہے کہ ہماری ٹر اسفروالپس کی
 حکم کے کا موقع دیں۔

9/11/2019 ایم آئی صاحبان کے تصورات ذہنی و ماٹو ادنیٰ

الفارض
 عن نواز کوٹھوتی
 آئیے قالمبدار
 ① نیاز الہی سوہیل نیاز الہی
 2 عنایت وارڈ ارول عنایت اللہ خان
 3 محمد شاہد علی صاحبی
 CAC
 Ahmed
 Naileet Khan
 Advocate High Court &
 Federal Shariat Court

13

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**



E-Mail Address: dgshs@kpk.gov.pk Office Phn: 091-9210269 Lachangan Phn: 091-9210267, 92102196 Fax: 091-9210230
No. 768 / Personnel Dated: 21 / 01 / 2019

The Medical Superintendent
DHQ Hospital Haripur.

Subject: RELIEVING ORDER.
Memo:

I am directed refer to your letter No.255-60 dated 07.01.2019 on the subject noted above.

You are requested to withdraw the relieving order in respect of Mr. Niaz Ellahi Sweeper, Mr. Anayat Ward Orderly & Mr. Sajid Mall and initiate disciplinary action against them under E&D Rules 2011 if they are guilty of misconduct as relieving/ transfer of unwilling worker is no remedy.

ASSISTANT DIRECTOR (Ministerial)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P PESHAWAR.
21/01/19

File
Attorial
H. A. Khan
Advoc. High Court &
Federal Shariat Court.



**OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR**

Ph: No. 0995-611850, Fax No. 0995-610069

No. 988 / Dated 06 / 02/2019

To

The Director General Health Services
Khyber Pakhtunkhwa Peshawar.

Sub: RELIEVING ORDER.

Dear Sir,

With the ref. of your office letter vide no. 494/personal dated 14/01/2019;
No. 769 / personal Dated 21/01/2019 and no. 1266 /personal 29/01/2019.

I have the honor to state that the following class IV were relieved from this Hospital on administrative ground. These class IV were creating administrative problems for the Hospital administration and also provoking the other class IVs not to perform duties. They were also not performing their own duties and were unwilling workers and proved guilty in the inquiry.

1. Mr. Muhammad Safeer ward orderly.
2. Mr. Muhammad Farid X-Ray attendant.
3. Mr. Ifikhar ward orderly.
4. Mr. Niaz Ellahi sweeper. ✓
5. Mr. Anayat Ward Orderly. ✓
6. Mr. Sajid Mali. ✓
7. Mr. Awais Tasleem ward orderly.

You are requested to place them on the disposal of DHO Haripur for further posting.

Medical superintendent
DHQ Hospital Haripur.

G.C

Special

Haibat Khan
Advocate High Court &
Federal Shariat Court

Annex E

15

ڈائریکٹر جنرل ہیلتھ سروس پشاور خیبر پختونخواہ

نشان ایڈجسٹمنٹ آڈر

گزارش ہے کہ آپ کے دفتر سے جاری کردہ لیٹر نمبر 494 با تاریخ 14-01-2019 اور دوہرا لیٹر نمبر 1769 با تاریخ 21-01-2019 کے مطابق آپ نے ہمارے آڈر Withdraw کرنے اور ڈی ایچ کیے ہسپتال ہری پور میں تعیناتی کے لیے اجازت جاری کیے تاہم اس کے بعد ہم متعدد بار حاضری کے لیے گئے لیکن ہماری حاضری منظور نہ کی گئی اور نا ہی ہمیں کوئی تسلی بخش جواب دیا گیا ہر بار یہ کہہ کر نہیں کہ کرنا لیا دیا جاتا ہے۔ کہ آپ کا جواب ڈی جی آفیس کو لکھ دیا گیا آپ لوگ ڈی جی آفیس سے جواب آنے تک انتظار کریں۔ ہمارے ساتھ دفتر میں ناروا سلوک کیا جاتا ہے۔ ایم ایس کے ساتھ ملاقات کا موقع نہیں دیا جاتا اور ہر بار توہین امیر روایا اختیار کر کے ہمیں ناجائز اور عزیت اور کوف میں مبتلا کیا جاتا ہے۔ خطہ کے ہمارے اہل سنگھوت الزامات لگائے گئے ہیں لہذا ہماری آپ سے گزارش ہے کہ آپ فلففور ہماری داد رکھی کریں اور ہماری درخواست پر غور کریں۔ تمام آڈر کی کاپیاں ہمارے درخواست کے ساتھ لف ہے۔

نام درخواست گزار۔

محمد سفیر "وارڈ بوائے" سہیل

فرید خان "ایکسپریس اینڈنٹ" ایف ڈی

ساجد "مالی" سہیل

افتخار احمد "وارڈ بوائے" سہیل

عنایت اللہ "وارڈ بوائے" عنایت اللہ خان

نیاز الہی "سوپر" سہیل

Amir

Amir

High Court & District Court

16

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUN KHW PESHAWAR**



E-Mail Address: dgshs@khyber.gov.pk Office Phn 091-9210269 Fax Exchange: 091-9210187, 92-0196 Fax: 091-9210236

OFFICE ORDER

As approved by the competent authority the services of following Class-IV staff relieved by MS DHQ Hospital Haripur are hereby placed at the disposal of DHO Haripur for further posting under his control against the vacant post in the interest of public service with immediate effect.

- i) Mr. Muhammad Saeed Ward Orderly.
- ii) Mr. Muhammad Farid X-Ray Attendant.
- iii) Mr. Iflikhar Ward Orderly.
- iv) Mr. Niaz Elahi Sweeper.
- v) Mr. Anayat Ward Orderly.
- vi) Mr. Sajid Mali.
- vii) Mr. Awais Tasleem Ward Orderly.

Arrival/ departure report should be submitted to this Directorate for record.

Sd/-
DIRECTOR GENERAL HEALTH
SERVICES, K.P PESHAWAR.
Dated 05/02/2019

No. 2274-78 /Personnel

Copy forwarded to the:-

- 1. DHO Haripur.
- 2. MS DHQ Hospital Haripur w/r to his letter No. 988 dated 06.02.2019.
- 3. DAO Haripur.
- 4. P.A to DGHS Khyber Pakhtunkhwa Peshawar.
- 5. Officials concerned.

For information and necessary action.

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

6/2/19

CGC
Aerial

Muhammad
Haider Khan
Advocate High Court &
Federal Shariat Court

17

کورٹ فیس

وکالت نامہ

Service Tribunal 1979

عنوان: عساکر الہند نام بی بی - بی بی - بی بی بعدالت

متجانب: اسسٹنٹ

توجیہ مقدمہ

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و حجاب وہی کل کارروائی متعلقہ آن مقام اس کے نام سے عساکر الہند صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقریر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقریر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داختم مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ دہر جائے التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز تقایم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو تقایم ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالین بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔ لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

13/4/19

المقوم

بمقام

دکاس و نوٹس پجری (ایٹ آف)

Accepted

(Handwritten Signature)

Maibet K...
Advocate High Court &
Federal Shariat Court

تمایب اصلاح خان وکیل قلم نویس

عائفت المؤمنان

**BEFORE THE HONOURABLE SERVICE TRIBUNAL OF KHYBER
PAKHTUNKHWA PESHAWAR**

Service appeal No 610 / 2019.

Anayatullah.

.....Appellant.

VERSUS

DG Health Khyber Pakhtunkhwa and others.

.....Respondents-

INDEX

Joint Para Wise Comments/Reply on the behalf of Respondent no. 1,2 and3:

S. no.	Description of Documents	Annexure NO.	Pages
1.	Reply/comments.	A - D	4
2.	Affidavit	E	1
3.	Explanation/warning	1 - 8	8
4.	Enquiry	9 - 29.	21
5.	DGHS letter to take action	30	1
6.	MLC	31	1
6.	FIR	32	1
7.	Relieving to DG after FIR	33	1
8.	On the disposal of DHO	34	1
9.	Letter to DG no vacant post of class IV in DHQ Hospital Haripu.	35	1

Dated _____


Respondent

A

**BEFORE THE HONOURABLE SERVICE TRIBUNAL OF KHYBER
PAKHTUNKHWA PESHAWAR**

Service appeal No 610 / 2019.

Anayatullah

.....Appellant.

VS

DG Health Khyber Pakhtunkhwa and others

.....Respondents-

Service Appeal.

Joint Para Wise Comments/Reply on the behalf of Respondent no. 1,2 and3:

Most Respectfully Sheweth:-

Preliminary objections:

1. That the appellant has got no cause of action/locus standi to file the instant appeal.
2. That the appellant has not come to this honorable Service Tribunal with clean hands.
3. That the appellant has concealed the facts from this honorable Service Tribunal. Hence not entitled for any relief and appeal is liable to be dismissed.
4. That the appellant has filed appeal on malafide.
5. That the appeal is against the prevailing law and rules.
6. That the appellant is estopped by his own conduct to file instant appeal.
7. That the instant appeal is not maintainable in its present form and also in the present circumstances of the issue.
8. That the appeal is liable to be dismissed due to mis-joinder and non-joinder of necessary parties.

9. That the competent authority has done all proceedings according to the law & Rules therefore appeal is liable to be dismissed.
10. That this Honorable service tribunal has no jurisdiction to adjudicate the matter.

Facts:

1. It is correct.
2. Incorrect. That the appellant was involved in unprofessional and unethical activities. He was nondutiful employee. Several times verbal and written explanations and warnings were issued to the appellant but he did not mend his attitude.
 - a. (Copies no. 1,2,3,4,5,6,7,8 attached)
3. Incorrect. There was no discriminatory conduct of respondent no. 3. Respondent no. 3 time and again directed the appellants to be dutiful as per law and follow the professional ethics and service rules for a period of one year during daily morning Hospital round, but he refused to perform his lawful duty and demanded exemption from duty on the bases of being representative of class IV union which is illegal and against the service rules.
4. Incorrect.
5. Incorrect. Inquiry was conducted upon the directives of Deputy Commissioner Haripur and the appellant was found guilty by the enquiry committee and was recommended for disciplinary action.
 - a. (copies 21 pages attached no. 9 - 29)
6. Incorrect. However a letter was issued by the Assistant director (ministerial) requesting, for withdrawal of relieving letter and to initiate disciplinary proceedings and to take

C

disciplinary action under E&D Rules 2011 against the appellants if they were guilty. (copy no. 30 attached)

That the appellant entered in the office of respondent no. 02 on 23/02/2019 with reference of letter of the Assistant director (ministerial) requesting, for withdrawal of relieving letter and to initiate disciplinary proceedings, they started victory slogans, abused the administration and One appellant namely Mr. Iftikhar Ahmed attacked on the attendant of respondent no. 02 (Medical Superintendent), made him injured (Copy no. 31 of MLC report attached) and FIR was lodged against the appellant Mr. Iftikhar in P/S City Haripur. (Copy of fir no. 32 attached) they were not accepted and once again directed to report DGHS KP for further posting. (Copy no. 33 attached)

7. Incorrect, Respondent no. 2 relieved them on administrative ground after fulfillment of legal formalities and directed them to report DGHS KP for further posting.
 8. Incorrect. Respondent no. 01 DGHS KP posted and placed the appellant at the disposal of DHO Haripur for further posting under his control. (Copy of order no. 34 attached.)
-

Furthermore there is no vacant post of class IV in the DHQ Hospital Haripur, as informed to DGHS KP through a letter vide no 5366-68/MS/DHQ/NF, Dated : Haripur the 13/07/2019. (Copy no. 35 attached)

D

Grounds:

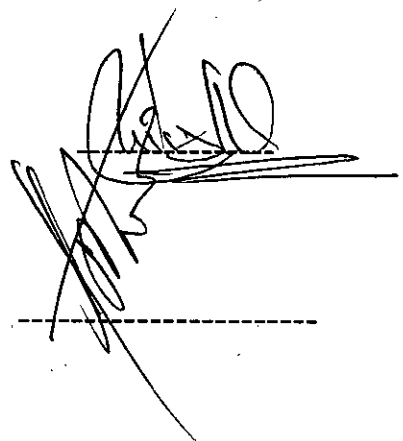
- a. Incorrect. That order no. 255-60 dated 07/01/2019 issued by the respondent no. 02 is legal and lawful under the E&D rules of 2011.
- i. Enquiry was conducted upon the directives of Deputy Commissioner Haripur. Enquiry committee found the appellant guilty and recommended disciplinary action against this class IV.
- ii. Incorrect hence denied.
- b. Incorrect as stated. Being public servant the appellant is bound to follow the official norms and in case of any malpractice on his part he was liable to be proceeded according to the law.
- c. Incorrect; that the instant service appeal is hopelessly time barred at law and this honorable Service Tribunal has no jurisdiction as was not challenged before the departmental hierarchy.

It is therefore, most respectfully prayed that the appeal of the appellant may graciously be dismissed with cost.

Respondents:

1. MS DHQ Hospital Haripur. Respondent no. 02

2. D&HS KPK Peshawar Respondent no. 01



BEFORE THE HONOURABLE SERVICE TRIBUNAL OF KHYBER
PAKHTUNKHWA PESHAWAR

E

Service appeal No 610 / 2019.

Anayatullah

.....Appellant.

VS

DG Health Khyber Pakhtunkhwa and others

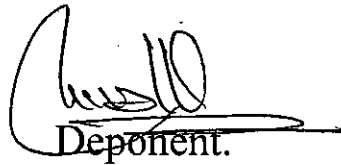
.....Respondents-

Joint Para Wise Comments/Reply on the behalf of Respondent no. 1,2 and3:

AFFIDAVIT:

I, Dr. Mushtaq Khan Tanoli Medical superintendent DHQ Teaching Hospital Haripur do here by solemnly affirm and declare that contents of fore going comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable court.

Dated. _____


Deponent.



**OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPU**

Ph:No. 0995-611850, Fax No.0995-610069

No 1456-58 Dated 07 /03/2018

To,

Mr. Safer W/Orderly
DHQ Hospital Haripur.

Subject: EXPLANATION

Memo:

It is noted with great concerned that under which authority you were changed / altered the duties of Awais and Ghulam Mohayu Din W/Orderlies without any prior permission/information of the undersigned. Your this irresponsible and negative attitude is highly offensive.

Therefore, you are directed to explain your position within three days of receipt of this letter, otherwise stern disciplinary action will be taken against you.

MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR

Cc:

- ✓ 1. Dr. Dildar khan DMS DHQ Teaching Hospital Haripur.
- 2. Supervisor Class-IV DHQ Teaching Hospital Haripur

MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR



2

**OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR**

Ph:No. 0995-611850, Fax No.0995-610069

No 4574-75 Dated 29 /06/2018

To,

Mr. Awais Tasleem W/Orderly Paeds deptt:
DHQ Teaching Hospital Haripur

Subject: WARNING

Reference your reply to the explanation bearing dated Nil.

Your reply of Explanation is not satisfactory, you are hereby strictly directed to follow the rules and perform duties with proper uniform, if found without proper uniform in future you will be considered as absent & your pay will be deducted & also stern disciplinary action will be initiated against you.

**MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR**

Cc:

- DMS DHQ Teaching Hospital Haripur.

**MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR**



OFFICE THE MEDICAL SUPERINTENDENT

DHQ HOSPITAL HARIPUR

Tel: 0995-611850, Fax # 0995-610069

No 6290-93 /Dated 18/09/2018.

To,

1. Mr. Muhammad Safeer ward orderly
2. Mr. Shoukat Zaman ward orderly
3. Mr. Iftikhar ward orderly

Subject: **EXPLANATION**

Memo,

It was notice with great concern that you do not perform your lawful duty. You are involved in illegal and unethical practice which is violation of service rules.

You are hereby directed to explain cogent reasons of such unethical attitude and malpractice during your duty hours within three days positively, abstain yourself from illegal and malpractice in future. Otherwise disciplinary proceedings will be initiated against you under the Khyber Pakhtunkhwa Govt: Servants (Efficient and Discipline) rules 2011.

Medical Superintendent
DHQ Hospital Haripur.

Cc:

DMS DHQ Hospital Haripur for information.

Medical Superintendent
DHQ Hospital Haripur.



OFFICE THE MEDICAL SUPERINTENDENT

DHQ HOSPITAL HARIPUR

Tel: 0995-611850, Fax # 0995-610069

No 6296-93 /Dated 28/09 /2018.

To

1. Mr. Muhammad Safeer ward orderly
2. Mr. Shoukat Zaman ward orderly
3. Mr. Iftikhar ward orderly

Subject: **WARNING:**

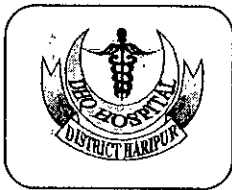
You are hereby strictly warned to refrain yourself from illegal activities and perform your lawful duties other wise strict disciplinary proceeding under E&D rules of 2011 will be initiated.

Medical Superintendent
DHQ Hospital Haripur.

Cc:

DMS DHQ Hospital Haripur for information.


Medical Superintendent
DHQ Hospital Haripur.



OFFICE THE MEDICAL SUPERINTENDENT

DHQ HOSPITAL HARIPUR

Tel: 0995-611850, Fax # 0995-610069

No 6290-93 /Dated 18/09/2018.

To,

1. Mr. Muhammad Safeer ward orderly
2. Mr. Shoukat Zaman ward orderly
3. Mr. Iftikhar ward orderly

Subject: **EXPLANATION**

Memo,

It was notice with great concern that you do not perform your lawful duty. You are involved in illegal and unethical practice which is violation of service rules.

You are hereby directed to explain cogent reasons of such unethical attitude and malpractice during your duty hours within three days positively, abstain yourself from illegal and malpractice in future. Otherwise disciplinary proceedings will be initiated against you under the Khyber Pakhtunkhwa Govt: Servants (Efficient and Discipline) rules 2011.

Medical Superintendent
DHQ Hospital Haripur.

Cc:

DMS DHQ Hospital Haripur for information.

Medical Superintendent
DHQ Hospital Haripur.



6

**OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR**

Ph: No. 0995-611850, Fax No. 0995-6160069

No. 7957-60 Dated 13/11/2018

To

1. Mr. Shoukat Zaman W/ orderly.
2. Mr. Muhammad Safer W/Orderly.
3. Mr. Iftikhar W/orderly:
DHQ Hospital Haripur.

Subject: WARNING.

It was noted with great concern that inspite of repeated written and verbal directions you are not refraining yourself from unethical and illegal activities. Your this attitude is also encouraging the other staff to disobey the administrative orders.

Once again you are hereby warned to be dutiful and wear proper uniform and refrain yourself from illegal/unethical activities otherwise you will treated with E & D rules of 2011.

Medical Superintendent
DHQ Hospital Haripur.

Cc:

DMS DHQ Hospital Haripur for information.

Medical Superintendent
DHQ Hospital Haripur.



7

OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR

Ph:No. 0995-611850, Fax No.0995-610069

No 8917-19 Dated 14 /12/2018

To,

Mr. Owais Tasleem W/Orderly
DHQ Teaching Hospital Haripur.

Subject: EXPLANATION

Memo:

It is reported by C/Nurse of ICU/CCU on Night Duty that you were found absent from duty for three days, without prior information / permission. You're this act of negligence and irresponsible attitude towards your duties is against the service rules.

You are hereby directed to explain regarding irresponsible attitude within three days otherwise strict disciplinary action will be taken against you under E&D rules 2011.

**MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR**

Cc:

- DMS DHQ Teaching Hospital Haripur.
- Supervisor Paramedics/Class-IV for information.

**MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR**



8

**OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR**

Ph:No. 0995-611850, Fax No.0995-610069

No 159-83 /Estab/E/Exp

Dated 03 /01/2019

To,

1. Mr. Tariq Ward Orderly, Casualty Unit
2. Mr. Sajjad Ali Sweeper Surgical Male Unit
3. Mr. Awais Tabasum Ward Orderly CCU Night Shift
4. Mr. Anayat Ward Orderly, Paeds Ward

DHQ Teaching Hospital Haripur .

SUBJECT: Explanation.

Memo:

It has been reported by Incharges of above Department / Wards that you all were not physically present at your place of duty, the dates mentioning in the reports. This shows negligence on your part.

You all are therefore directed to explain reason of your willful absence within three days positively; otherwise strict disciplinary action shall be taken against you under E&D Rules 2011.


MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR

CC:

Accounts Section undersigned office with the direction to deduct (02) days salary of the above officials on account of absence and deposit the deducted amount into Government Treasury. Their absence is treated as leave without pay.

MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR



To
The Medical Superintendent,
DHQ Teaching Hospital Haripur

Sub: **INQUIRY REPORT (CLASS IV ASSOCIATION RESOLUTION STRIKE) DHQ HARIPUR**

Sir,
With reference to your directive vide letter No.1300-01/AC(H) dated 14/12/2018, the Inquiry Committee comprising of Dr. Waseem Ahmed PMO and Dr. Rafique Tanoli PMO conducted an inquiry regarding subject (annexure C). During the course of inquiry the members of the inquires committee recorded statement of Dr. Dildar DMS, other officials and gathered circumstantial evidences; the findings, conclusions and recommendation are summarized below: -

Findings:

1. It has been found that the allegations against Dr. Dildar DMS are baseless and fabricated. The fact of the matter is that Dr. Dildar DMS has been found to be a dedicated and dutiful officer, the conduct of said officer has been found modest during the whole episode.
2. The crime of Dr. Dildar is that he put his utmost efforts for smooth running of hospital's daily affairs.
3. It is the duty of Dr. Dildar DMS to implement the TOR's (duties) of all paramedics & Class-IV, in this context, he persuades class-IV to be dutiful and wear proper uniform (Cap) during duty hours. He reports the officials who remain habitually absent from duty to MS for disciplinary action. Consequently the MS of the hospital does the necessary action which includes deduction of pay under Khyber Pakhtunkhwa (E&D) rules 2011 with the involvement of IMU personnels.
4. The inquiry committee probed further and found that "to wear cap during duty hours" is the pivotal point on which class-IV showed concerns and they are not willing to wear proper cap during duty hours as designated by Government of Khyber Pakhtunkhwa Health Department. It is worth mentioning that different colour of caps are allotted to various class-IV as their dress code i.e. black colour cap for Security Guards, green for Sweepers and red for Ward Orderly.
5. It has been found that most of the class-IVs take it as a disgrace to wear proper cap during their duties, perhaps they are considered as doctors in their local communities.
6. It has been found that they choose wrong way i.e. strike for fulfilment of their un-lawful demands. Consequently they observed strike in DHQ Teaching Hospital Haripur on 08-12-2018. Some of the class-IV took active participation and engaged provincial association in the said strike. As a result the smooth running of hospital hampered and public suffered a lot (Annex - I).
7. The names of class-IVs who planned the strike, provoked it and took active participation are
 - a. Shoukat Zaman Ward Orderly
 - b. Safeer, Ward Orderly
 - c. Iftikhar Ward Orderly
 - d. Awais Tasleem Ward Orderly
 - e. Fareed X Ray Attendant
 - f. Saeed Ayub, Behshti BHU Kokalian Peeran
 - g. Anayat Ward Orderly
 - h. Sajid, Mali
 - i. Niaz Elahi, Sweeper
8. Majority of the class-IVs remained inactive and did not participate in strike.

is attached (Annex- I to IX).

Conclusions:

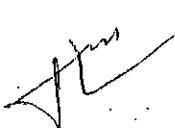
1. The observed strike was unjustifiable and un-lawful.
2. The observed strike brought disgrace to prestige of Dr. Dildar Khan DMS.
3. The way, the strike conducted i.e raise of slogans in public against Dr. Dildar, involvement of Provincial Associations and out siders.

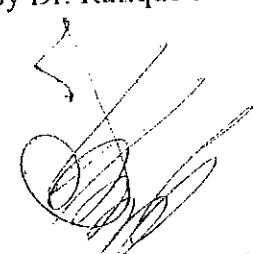
Recommendations:

1. The Enquiry Committee recommends disciplinary action against the culprit Class-IV.
2. Uniform & cap should be provided to all Class IV staff as is practicing in all Teaching Institutes.

Enclosures:

1. J - IX, The List (09 pages) of non-strikers (Class IV) who did not participate in strike.
2. G, H, I, J (Photos of Class - IV observing strike 04 pages).
3. A (letter from Assistant Commissioner Haripur to MS DHQ Teaching Hospital Haripur)
4. B (letter from Deputy Commissioner Haripur to Assistant Commissioner Haripur)
5. C (Resolution letter from Class - IV DHQ Teaching Hospital Haripur)
6. D (letter from Deputy Commissioner Office Haripur regarding strike)
7. E (statement of Dr. Dildar DMS DHQ Teaching Hospital Haripur)
8. F (statements of Class IV in response to enquiry conducted by Dr. Rafique & Dr. Tahir Aziz)

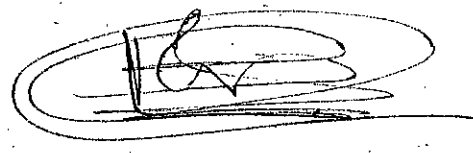

Dr. Waseem Ahmed (PMO)
 (Enquiry Officer)
 DHQ Teaching Hospital Haripur


Dr. Rafique Tanoli (PMO)
 (Enquiry Officer)
 DHQ Teaching Hospital Haripur

Estt

Re-line to report to DGHS for
 further posting in first phase
 - Safer W/ordesty
 - Officer W/ordesty
 - Fareed x-ray attendant
 Fareed

(۱) کہ اس سے کہ درج ذیل ملازمین سے دستخط کر کے
 معہ اپنے پہلی فون کے اکھٹے ہیں کہ ہم حلف اٹھا
 سیں کہ ہمارا یہ مقالہ سے لڑائی تعلق نہیں
 ہے۔



Deputy Medical Superintendent
 District Teaching Hospital
 Haripur

Phone Number	Name	Address	Occupation
0307-5499835	Wahid	of D.
0336-9799697	...	Emergency	...
0323-9815188	ADIC	Emergency	...
0334-9581496	Ning	---	...
0313-5777995	Rick	of D -	...
0335-8348418	Engr	---	...
0310-5005858	ADIC	---	...
0348-9213296	...	---	...
0313-913722	...	---	...
0333-5099204	S. Sand	Word	...
0312-9404616	Balla	---	...
0336-0088844	---	Ent.
0316-0288500
0334-5668256	Bibi Afreen
0334-5668256	L. ...	---	...
0313-7488858	...	---	...
0334-9655847	J. ...	Sweeper	...

Phone Number	Name	Job Title	Other Info
3331-5788254	[Signature]	Sweeper	سجاد علی
13420904158	[Signature]	Ward Boy	شرفیور
3345665296	Abhinav	Ward	ابھیان
336-9003148	M. [Signature]	Ward	م. سجاد
317-1592828	[Signature]	Ward	م. سجاد
	Sahil	Ward	سجاد
	[Signature]	Ward	سجاد
3229136948	Arnav	Ward	سجاد
3129692419	SS [Signature]	Sweeping	سجاد
331-3169245	Arjun	[Signature]	سجاد
336-9790710	Sahil	Night Ward Sweep	سجاد
316-9719736	K. [Signature]	Night Ward Boy	سجاد
31-0594547	A. [Signature]	Night Ward Boy	سجاد
332-584101	Arjun	Sweep Night	سجاد
340-8169533	M. [Signature]	Security Guard (Night)	سجاد
335-5637401	[Signature]	Ward Boy Night	سجاد
31-8168245	Arjun	Electrical	سجاد
312-0532655	[Signature]	Electrical	سجاد
06-5309639	[Signature]	Electrical	سجاد
34-5677509	[Signature]	Electrical	سجاد
311-5524123	a YASIR	Sweeper	سجاد

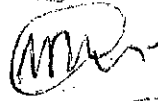
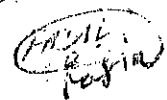
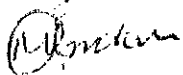
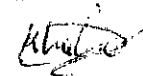
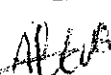
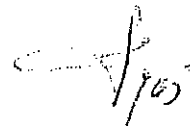

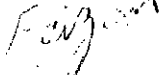
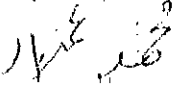
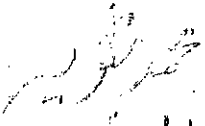

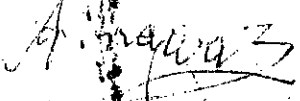


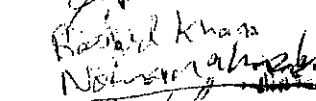
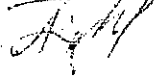
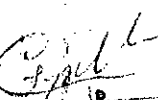
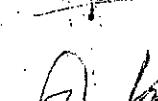
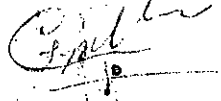

WATER PHONE NUMBER PROFESSION NAME

WATER	PHONE NUMBER	PROFESSION	NAME
Mr. Anwar	0334-9644102	سولر وارڈ	ان خان
د	0322-5728542	وارڈ	غلام
فصل	0336-5071824	وارڈ	ان خان
Farooq Anwar	0312-5447247	وارڈ	ان خان
د	0348-9821713	-	ان خان
عالم شاہ	0312-5450247	وارڈ	عالم شاہ
د	0336-5604326	سیکوریٹی	سید الہی خان
ZIA	0301-8108073	-	ان خان
د	0317-5956712	-	ان خان
د	0314-7311194	-	ان خان
د	0314-95101560	وارڈ	قادر خان
عمران	0334-9655272	کیڈر	عمران
محمد قاسم	0313-2155746	"	محمد قاسم
د	0333-5762990	II	ایاز
د	0335-7048070	سیکوریٹی	ایوب خان
د	0334-8110916	وارڈ	غلام علی الدین
غلام محمد	0316-5120640	ٹرانسپورٹ	غلام محمد
Adil	0308-3340241	ADMIN	عادل
د	0332-5926832	سیکوریٹی	فہم
د	0306-5309639	ایڈمنسٹریشن	محمد
د	0332-5072201	سیکوریٹی	عالم شہزاد
د	0314-2358881	سیکوریٹی	محمد ساجد
ذوالفقار	0312-5429026	"	ایوب محمد
د	0313-5912282	"	محمد سعید
د	0312-9136948	وارڈ	اختر دین

Signature	Phone Number	Profession	Name
	0311-9353303	وارڈ واٹ	مظہر عباس
	0344-9432439	"	حفصہ خان
	0316-9626907	"	زنا بیگم نورجوان
SHAZEB	0331-5355986	"	شہزادہ شہزاد
	0337-3219823	سویپر	نور بیگم
	0311-5813823	وارڈ واٹ	وفا بیگم
	0336-9796710	سویپر	شہزاد
Nayan	0312-1551191	وارڈ واٹ	وفا بیگم
	0316-0365834	"	مظہر عباس
	0323-3371765	وارڈ واٹ	ماہر
	0323-9773762	سویپر	نور بیگم
	03135866394	وارڈ واٹ	مظہر عباس
	0332-5259675	وارڈ واٹ	نور بیگم
	0310-5877387	"	حفصہ خان
	0313-5814581	"	نور بیگم
	0343-9359157	سیکوریٹی	شہزاد
	0308-5648428	وارڈ واٹ	مظہر عباس
	0347-5270160	"	نور بیگم
	0316-5817256	سویپر	نور بیگم
	0344-9441451	وارڈ واٹ (OPD)	نور بیگم
	0312-9872894	سویپر	نور بیگم
	0312-7671409	وارڈ واٹ	مظہر عباس
	0312-5969873	"	نور بیگم
	0344-9414223	(OPD) "	نور بیگم
	0310-5280085	"	نور بیگم
	0347-8945065	سویپر	نور بیگم

Signature	Phone number	Profession	Name
	0332-0924346	-	احمد حسن
	0333-9361658	-	محمد اویس
Amir HAMAYUN	0311-99755446	19 ٹی لوٹ	ناصر جمالی
Tahir	0317-1592296	سیویئر	طاہر
	0314-7311894	"	عزیز
	0315-9634009	-	احمد ذوال
	0312-4431344	-	مبینا علی
	0345-9633505	وارد ٹی لوٹ	عمر
	0345-9575132	-	فاطمہ بیگم
	0310-4035657	LAB	شکیلہ
	0300-5623520	وارد ٹی لوٹ	سید زین
	0346-5622275	وارد ٹی لوٹ (آئی)	سید نیرم
Punam	0334-5900900	وارد ٹی لوٹ (LAB)	نائرمان
	0331-5856889	"	واہد مراد
	0305-8914296	سٹیورٹی	راوان
	03025104156	وارد ٹی لوٹ (بریم)	اعجاز
	03160221510	Sweper	شیرازی
	0313-5893142	ڈائی	تالیم
Tahira Akhter	0313-5893142	سٹیورٹی	طاہرہ اختر
	03365374674	وارد ٹی لوٹ	ارشاد
	0336-5071640	سیویئر	زوالفقار
	0336-8101088	وارد ٹی لوٹ	ایمان
	0308-5628167	سیویئر	سید علی
	0307-8900645	سیویئر	شیامان
	02970551025	سیویئر	انتہام

Signature	PHONE NUMBER	Profession	Name
Ahmed Rehan	0312-6618866	فاریڈ پرائی	شیخ الہامان
[Signature]	0345-9893981	سیلورٹی	ابوالور
فہمید	0307-5074431	سوئیپر	لی محمد
[Signature]	03349640806	سیلورٹی	باس
[Signature]	03459471698	landwidg	نہایت
Abdul Jalay	0346-5891429	سوئیپر	عزیز شاہ
[Signature]	0305-8672095	landwidg	عاشق
THSEEN	—	Ayca	Taseen
[Signature]	0310-5346995	Sweeper	نیفانہ
[Signature]	03149794702	landwidg	[Name]
[Signature]	03005074170	سوئیپر	[Name]
[Signature]	03214229866	[Profession]	[Name]
[Signature]	0348-49101779	[Profession]	[Name]
[Signature]	0312-5902969		[Name]
[Signature]	0327-8576228	/	[Name]
[Signature]	0300-9113617		[Name]
[Signature]	0339-5037938		[Name]
[Signature]	03115030091	OPD	وناس
[Signature]	03018108073	/	صبا
[Signature]	03138778858	سوئیپر	نالیہ خان
Beckow	343-9483-21	OPD Peads	بابر
Hameed Khan	03344221023	سوئیپر	الہام
[Signature]	0333-5097297	ڈیڑر لہوائے	فہران
[Signature]	0305911199	ڈیڑر لہوائے	شہزاد
[Signature]	03118635710	ڈیڑر لہوائے	محمد لہوائے

Name	Phone number	Address	City
Fazlollah Hussain	0315 5663184	دار ذرات	یادگیری
	0305 5911474	خبر کبیرا	دار ذرات
	0511-5944072	دار ذرات	دار ذرات
	0315-5803606	دار ذرات	دار ذرات
	0347 8921477	سوئیس	سوئیس
	0347 9750193	"	آفتاب
	0334 3104080	ادبی اشیرا	دار ذرات
	0336 9903659	سوئیس	یادگیری
	0336 5754480	دار ذرات	دار ذرات
		"	دار ذرات
	0333-7766149	سوئیس	دار ذرات
	0336-9163465	سوئیس	دار ذرات
	0312-9136948	Ward Bay	دار ذرات
	0334-4654054	"	دار ذرات
	0345 1585245	Sauvigny	دار ذرات
	0335 #33068	"	دار ذرات
	0336 5427831	"	دار ذرات
	0332 9708164	"	دار ذرات
	0334 5711460	"	دار ذرات
	0336-0088844	"	دار ذرات
	0334-0594422	دار ذرات	دار ذرات

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Shahzaib

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سید اللہ خان

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Basit Khan

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0310-9304149

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0334-5393765

0311-5842571

0344-9417163

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0347 5269509

Security guard

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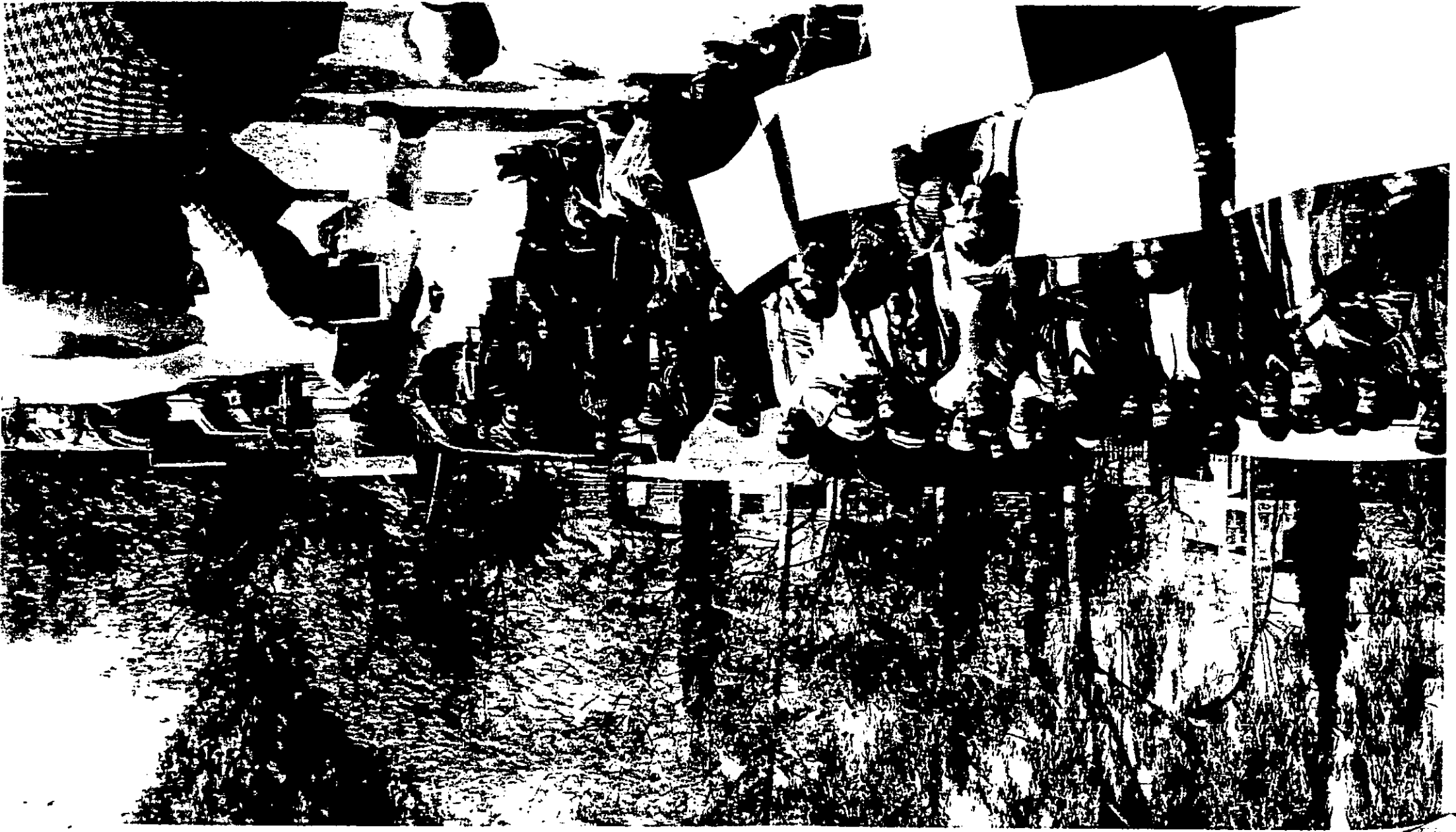
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24 (A)



OFFICE OF THE ASSISTANT COMMISSIONER, HARIPUR

No. /Reader/09/ 1300-01 /AC (H)

Date: 14 / 12 / 2018

Phone No: 0995-610455

To,

The Medical Superintendent,
DHQ Hospital,
Haripur.

Subject: **SESSION OF PARA MEDICS ASSOCIATION, HARIPUR.**

Enclosed please find herewith letter No. 1(5) /Misc/App: /AS/DC (H) dated 06-12-2018 along with the Resolution No. 6-15/HPR dated 05-12-2018 of Para Medical Association, Class-VI, Health Department Haripur, received from The Deputy Commissioner Haripur to enquire into the matter and detailed report.

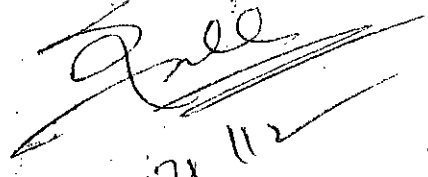
It is requested to inquire into the matter and detailed report and comment at an early date positively for onward submission to Deputy Commissioner Haripur please.


Assistant Commissioner,
Haripur.

Copy to:

The Deputy Commissioner, Haripur for information please.


Assistant Commissioner,
Haripur.

~~Dr. was in~~ Dr. was in PMO + Dr. ~~was in~~ PMO
Do as directed

24/12

25

(12)

(2)



Office of the Deputy Commissioner, Haripur

Phone No. 0995 - 613391, 613389 FAX - 615412

No. 1(5)/Misc/App/AS/DC (H)

Dated: 06 /12/2018

Matter important / urgent

To,

✓
The Assistant Commissioner,
~~Haripur~~ Haripur.

Subject: SESSION OF PARA MEDICS ASSOCIATION, HARIPUR.

Enclosed please find herewith a copy of memo No. 04/HPR dated 05-12-2018, on the subject noted above from the General Secretary, Para Medical Association, Haripur with the request to inquire into the matter and submitted detailed report at an early date, please..

ENCLS: {02 ONLY}

AC Office Haripur

Diary No. 1708

Date: 07-12-2018

Deputy Commissioner,
Haripur.

Copy to:

The General Secretary, Para Medical Association, Haripur for information with reference to above.

*Read
call all concerned
for inquiry at the
earliest.*

Deputy Commissioner,
Haripur.

ASSISTANT COMMISSIONER
HARIPUR

AC/H
07/12/18

Send to enquiry
for Haripur
report

پیرا میڈیکل ایسوسی ایشن

درجہ چہارم محکمہ صحت ہری پور

Office of D.C Haripur
Diary No. 20241
Date: 06/12/18

5-12-18 DEPUTY COMMISSIONER
HARIPUR

نمبر HPR/04

مفتیوں اور ایسوسی ایشن پیرا میڈیکل ایسوسی ایشن ہری پور کے ذریعہ
 آج مورخہ 12/18 کو ایسوسی ایشن نے طلبہ کے لیے طلبہ کے لیے طلبہ کے لیے
 پیرا میڈیکل ایسوسی ایشن درجہ چہارم ملڈرین عوام ڈسٹرکٹ ہسپتال ہری پور منعقد ہوا جس میں تنظیم کے تمام
 اہلکاروں اور دیگر ملڈرین نے شرکت کی۔ شرکاء نے ہسپتال کے ڈسٹرکٹ ڈائریکٹر کے ملڈرین کے ساتھ
 سخت برہمچی کا اظہار کیا۔ ڈسٹرکٹ ڈائریکٹر نے طلبہ کے ساتھ برہمچی کا اظہار کیا۔
 ڈسٹرکٹ ڈائریکٹر نے طلبہ کے ساتھ برہمچی کا اظہار کیا۔ ڈسٹرکٹ ڈائریکٹر نے طلبہ کے ساتھ
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ڈسٹرکٹ ڈائریکٹر نے طلبہ کے ساتھ برہمچی کا اظہار کیا۔ ڈسٹرکٹ ڈائریکٹر نے طلبہ کے ساتھ
 برہمچی کا اظہار کیا۔ ڈسٹرکٹ ڈائریکٹر نے طلبہ کے ساتھ برہمچی کا اظہار کیا۔
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 برہمچی کا اظہار کیا۔ ڈسٹرکٹ ڈائریکٹر نے طلبہ کے ساتھ برہمچی کا اظہار کیا۔

- 1- مورخہ 12/18 بروز جمعرات اور 18/12 بروز جمعہ بائیں پٹیاں بائیں پٹیاں کے ذریعہ
 - 2- مورخہ 12/18 سے تا حکم نامہ تک ہر سال جاری رہے گی۔ جب تک مطالبات تسلیم نہیں ہوئے۔
- ہمارا احتجاج جاری رہے گا۔

تاریخ 5-12-18

بم HPR/15-6

- کالی براء اطلاع و فوری کارروائی
- 1- ڈپٹی سیکریٹری، ہری پور
 - 2- ڈپٹی ڈائریکٹر، ہری پور
 - 3- ڈپٹی ڈائریکٹر، ہری پور
 - 4- ڈپٹی ڈائریکٹر، ہری پور
 - 5- ڈپٹی ڈائریکٹر، ہری پور
 - 6- ڈپٹی ڈائریکٹر، ہری پور
 - 7- ڈپٹی ڈائریکٹر، ہری پور
 - 8- ڈپٹی ڈائریکٹر، ہری پور
 - 9- ڈپٹی ڈائریکٹر، ہری پور
 - 10- ڈپٹی ڈائریکٹر، ہری پور
- جنرل سیکرٹری
سعید ایوب
- دستخط

حکومت کے مطابق 06.12.2018 تا 07.12.2018 بوقت 11:00 بجے بمقام ڈی ایچ کیو ہسپتال ہری پور علاقہ
 میں ایک سرکاری کارروائی میں شہداء کے بارے میں پتہ چلایا گیا کہ ان کے بارے میں کوئی اطلاع نہیں ہے۔
 اس کے خلاف کلاسن فور ملازمین احتجاج کریں گے اور مورخہ 08.12.2018 کو تاحکم خانی کھلی ہڑتال کی جائے گی۔
 اس فور ملازمین کا کہنا ہے کہ ڈاکٹر لڈار ہماری خواہشوں سے کہتی کرتا ہے ہر ملازم سے مدد طلب اور حراساں کرتا

ڈی جیشن صاحب ہری پور کو بھیجا جائے۔

[Handwritten signature]
 ڈی جیشن صاحب ہری پور

A-SB ~~Chandra~~ Harijwal has already been
 appointed to conduct enquiry
 on the above allegation. PJ send it
 to his office for further n/actin.

[Handwritten signature]
 6/12/18

- g. Ana
- h. Sajid, Mali
- i. Niaz Elahi, S

8. Majority of the class-
 is attached (Annex- 1)



OFFICE OF THE DEPUTY MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR

Telephone #: 0995-611850, Fax #: 0995-610089

No. 101 Dated 01/11/2019

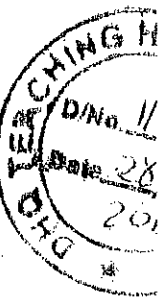
اسلام علیکم۔ ممبرز انکوائری کمیٹی۔

گزارش ہے کہ ہسپتال میں گزشتہ کئی سال سے کچھ کلاس فور ملازمین کا رویہ ٹھیک نہیں تھا۔ نہ ہی اپنی ڈیوٹی ادا کر رہے تھے اور نہ ہی ڈیوٹی کے دوران ٹوپی پہنتے تھے۔ یہ لوگ ہسپتال آتے تھے اور ان کا رویہ ایسا تھا جیسے یہ ہسپتال میں بہت بڑے ڈان ہیں جب کسی کو ڈسپین کی پاپنڈی کرنے اور ٹوپی پہننے کا کہا جاتا تو یہ مداخلت کرتے اور مدمعاشی کرتے تھے۔ اور بیغیر ایم ایس صاحب کی اجازت کے اپنی مرضی سے چھٹی کرتے تھے

میں نے ان کی ڈیوٹی لگائی اور ٹوپی پہننے کا کہا اس کے علاوہ جو بیغیر ایم ایس صاحب کی منظوری کے غیر حاضر ہوتا اس کی تحریری رپورٹ ایم ایس صاحب کو کرتا جس وجہ سے ان لوگوں کو تکلیف ہونی کہ ہماری ڈیوٹی ڈی ایم ایس نے کیوں لگائی۔ اس طرح انہوں نے دوسرے لوگوں کو ہڑتال کرنے کے لئے اکسایا۔ اور ناکام ہڑتال کی جبکہ 196 کلاس فور ملازمین میں سے 165 ملازمین نے لکھ کر دیا کہ ہمارا ہڑتال کے ساتھ ہمارا کوئی تعلق نہیں۔

غیر حاضر لوگوں کے خلاف یا ڈیوٹی نہ کرنے اور ٹوپی نہ پہننے والوں کے خلاف کارروائی کرنا ایم ایس صاحب کا اختیار ہے میرا کام صرف ایم ایس صاحب کو رپورٹ کرنا ہے جو کہ میں نے کی ہے۔

DEPUTY MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR.



A committee comprising of the following is constituted to prepare a report within 07 days -
- Dr. Rafiq Tanoli
- Dr. Tahir Aziz

بخدمت جناب MS صاحب DHQ ہسپتال ہری پور

جواب نوٹس نمبری 54-9246 مورخہ 24.12.2018

27/12/18

جناب عالی! جواب نوٹس ذیل ہے۔

یہ کہ مسائل بطور کلاس فور ملازم ہے اور عرصہ دراز سے بقیے فرائض احسن طریقہ سے سرانجام دے رہے ہیں اور اس دوران مسائل کسی قسم کی غیر قانونی کام میں ملوث نہیں پائے گئے یہ کہ مسائل اور دیگر ممبرز یونین نے باقاعدہ پرامن احتجاج ریکارڈ کرائے کی نسبت ایک نوٹس مورخہ 5.12.2018 جاری کیا کہ کلاس چہارم کے ایمپلائز ڈاکٹر دلدار DMS کیخلاف پرامن سیاہ پٹیاں باندھ کر احتجاج کریں گے کیونکہ DMS بلاوجہ کلاس فور ملازمین کی تنخواہوں سے گزشتہ 3/4 ماہ سے غیر قانونی کٹوتی بغیر کسی نوٹیفکیشن/ آرڈر کی جارہی ہیں۔ ملازمین درجہ چہارم بے جا طور پر گالی گلوچ کرنا، DMS صاحب نے دظہیرہ بنایا ہوا ہے جس نسبت اس سے قبل بھی اپنی شکایات جناب کے پاس کر چکے ہیں۔ کوئی کارروائی نہ ہونے کی صورت میں درجہ چہارم کے ملازمین نے مجبوراً سیاہ پٹیاں باندھ کر پرامن احتجاج ریکارڈ کرایا باوجود کہ جناب نے کلاس فور ملازمین کو یقین دلایا تھا کہ آپ کی تمام شکایات دور کر دی گئی ہیں آئندہ کسی کلاس فور کو کوئی شکایت نہ ہوگی اور نہ ہی کوئی written کارروائی کی جائے گی۔

یہ کہ آئندہ کی طرف سے جاری کردہ نوٹس سراسر غلط ہے کیونکہ ہمارا احتجاج پرامن تھا اور احتجاج کی وجہ سے سریشوں کو کوئی تکالیف نہ پہنچائی گئی ہے نہ ہی انتظامیہ کو ہراساں کیا گیا ہے اور ہم نے پرامن احتجاج بطور پبلک سروٹ قاعدہ و قوانین کے اندر رہ کر کیا ہے۔ لہذا نوٹس ہذا میں لگائے گئے الزامات سبب بنیاد ہونے کی بناء پر نوٹس قابل منسوختی ہے۔

لہذا استدعا ہے کہ نوٹس ہذا حقائق کے منافی ہونے کی بناء پر داخل دفتر فرمایا جائے۔

محمد رفیق
سرگرم

ادیس

رہنما

M-Sapcey

رہنما راہدہ
عنایت اللہ خان
منسٹر اہل خان

محمد رفیق

13

46

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**



E-Mail Address: mgfdgsh@peshawar.com office Ph# 091-9210169 Exchange# 091-9210187, 9210196 Fax# 091-9210230
No. 494 / Personnel Dated: 14 / 01 / 2019

To,

The Medical Superintendent
DHQ Hospital Haripur.

Subject:
Memo:

RELIEVING ORDER.

I am directed refer to your letter No.167/ dated 03.01.2019 on the subject noted above.

You are requested to withdraw the relieving order in respect of Mr. Muhammad Safer Ward Orderly, Mr. Iftikhar Ward Orderly & Mr. Muhammad Farid X-Ray Attendant and initiate disciplinary action against them under E&D Rules 2011, if they are guilty of misconduct as relieving/ transfer of unwilling worker is no remedy.

[Handwritten Signature] 14/1/19

ASSISTANT DIRECTOR (Ministerial)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P PESHAWAR. 14/1/19

[Handwritten notes and signatures]
CIC
Arif
Court & Court

No. 22/19 Name Wahid Ahmad Son of M. A. D. Yaqoob Age 16 Sex M Caste AN Occupation _____
Residence Sari Sakhi Name of relative or friend _____ Date of examination 22/2/19

Date and hour of arrival 22/2/19 2:25pm
No. And date of Police docket A-100-AHC
No. And date of Constable D. H. Khan
If admitted Date of admission _____ Date of discharge _____
Date and hour of report sent to Police 22/2/19

Space for particulars as to further reference to the case date of Giving evidence in Court of despatch of articles said to contain poison.

[Handwritten signature]

Two Identification marks: _____

Particulars of injuries or symptoms, in case of poisoning.

*pt is conscious and oriented
① incised wound of 7 1/2 cm long
and bone exposed on back
of left hand.*

1 Nature of injuries Bone exposed
(Simple, grievous or dangerous) _____ } The kind of weapon used or poison suspected in the case of poisoning Sharp edges
Probable duration of injury For 24 hrs (to heal approximately)

Dated _____ of _____ 20 }
22/2/19

(In Police case No fee received)
[Signature]
Examining Medical Officer

In Private case A fee of Rs. _____ Paid to the Medical Officer.

Signature or Thumb-impression of Private Party.

[Signature]
Examining Medical Officer

31

کارم نمبر 23-15

کاڈنٹر فائیل

0335-7808070

ابتدائی اطلاعی رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ 152 مجموعہ ضابطہ نو جہازاری 05-8566-1330

ضلع لاہور

پیشگی

تھانہ

43 نمبر 243

Handwritten notes and signatures in the top left margin.

1	تاریخ و وقت پیشگی 27 و وقت 11:10 ع	جاگہ لکھی گئی 27/2/2011 وقت 13:30 ع
2	نام و کثرت اطلاع دہندہ	تھانہ لاہور ضلع لاہور
3	مختصر کیفیت جرم (مذکورہ) حال اگر کچھ ایسا ہو	زیر دستم
4	جائے وقوعہ فاصلہ تھانہ سے	تھانہ لاہور ضلع لاہور
5	نام و کثرت ملزمان	مذکورہ
6	کارروائی پیشگی کے متعلق کی ای آر ایس	مذکورہ
7	تھانہ سے روانگی کی تاریخ و وقت	مذکورہ

Handwritten report text in Urdu, detailing the investigation process and findings.

ابتدائی اطلاع کے مطابق...

تھانہ لاہور ضلع لاہور...

مذکورہ...

...

ASi. ps. CMJ
27. 2. 19



**OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR**

Ph: No. 0995-611850, Fax No. 0995-610069

No. 1498-1505 / Dated 23/02/2019

To

The Director General Health Services
Khyber Pakhtunkhwa Peshawar.

Sub: RELIEVING ORDER.

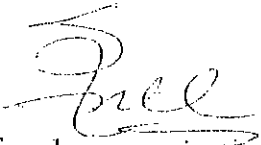
Dear Sir,

With the ref. of your office letter vide no. 494/personal dated 14/01/2019;
No. 769 / personal Dated 21/01/2019 and no. 1266 /personal 29/01/2019
and this office vide letter no. 988 dated 06/02/2019.

I have the honor to state that the following class IV were relieved from this Hospital on administrative ground. These class IV were creating administrative problems for the Hospital administration and also provoking the other class IVs not to perform duties. They were also not performing their own duties and were unwilling workers and proved guilty in the inquiry conducted against them vide diary no. 19 dated 02/01/2019. (Copy of inquiry report attached).

1. Mr. Muhammad Safeer ward orderly.
2. Mr. Muhammad Farid X-Ray attendant.
3. Mr. Ifikhar ward orderly.
4. Mr. Niaz Ellahi sweeper.
5. Mr. Anayat Ward Orderly.
6. Mr. Sajid Mali.
7. Mr. Awais Tasleem ward orderly.

Furthermore today they abused the employees on duty in MS office and attacked and injured the person on duty at MS office. This office is unable to accept such employees in this office. You are therefore requested to transfer them out of district.


Medical superintendent
DHQ Hospital Haripur.

16

DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUN KHWA PESHAWAR

Postal Address: 2371/Indus Road, Haripur Office Phd 091-9210269 In Changan, P O S 9210107, 92-0196 Fax 921-9219210



OFFICE ORDER

As approved by the competent authority the services of following Class-IV staff relieved by MS DHQ Hospital Haripur are hereby placed at the disposal of DHO Haripur for further posting under his control against the vacant post in the interest of public service with immediate effect.

- i) Mr. Muhammad Saeed Ward Orderly.
- ii) Mr. Muhammad Farid X-Ray Attendant.
- iii) Mr. Hfikhar Ward Orderly.
- iv) Mr. Niaz Elahi Sweeper.
- v) Mr. Anayat Ward Orderly.
- vi) Mr. Sajid Mali.
- vii) Mr. Awais Tasleem Ward Orderly.

Arrival/Departure report should be submitted to this Directorate for record.

Sd/-
DIRECTOR GENERAL HEALTH SERVICES, K.P PESHAWAR.
Dated 05/02/2019

No. 9274-78 /Personnel
Copy forwarded to the:-

- 1. DHO Haripur.
- 2. MS DHQ Hospital Haripur w/r to his letter No. 983 dtd 06.02.2019.
- 3. DAO Haripur.
- 4. P.A to DGHS Khyber Pakhtunkhwa Peshawar.
- 5. Officials concerned.

For information and necessary action.

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

31/02/19

CTC
Ammal
Washiq A



DHQ TEACHING HOSPITAL HARIPUR

Ph # 0995-611850, Fax # 0995-610069

Email: hrp7008@gmail.com

No. *186-CP* /MS/DHQ/INF

Dated: Haripur the *13* /07/2019

To,

The Director General Health Services,
Khyber Pakhtunkhwa Peshawar.

Subject: VACANT POST OF CLASS-IV CONSTITUENCY.

Sir,

Reference your letter No. 8548-85/ADMN dated 11-07-2019.

I have the honor to forward herewith the requisite information on prescribed format for your kind information and further necessary action.

S.No	Name of Facilities	Name of posts	Number of posts	Filled	Vacant
1	DHQ Teaching Hospital Haripur	OT Attendant	1	1	0
2		Blood Bank Attendant	1	1	0
3		Dental Attendant	1	1	0
4		Lab: Attendant	2	2	0
5		X-Ray Attendant	2	2	0
6		Dai	6	6	0
7		Ward Orderly	57	57	0
8		Ward Attendent	51	51	0
9		Ward Aya	1	1	0
10		Baheshti	1	1	0
11		Chowkidar	20	20	0
12		Mali	10	10	0
13		Sweeper	53	53	0
14		Laundry Attendent	2	2	0
15		Laundry Operator (Dhobi)	2	2	0
Total			210	210	0

Full
Medical Superintendent

DHQ Hospital Haripur

Cc:

1. PS to Minister for Health Khyber Pakhtunkhwa.
2. PS to Secretary to Govt. Khyber Pakhtunkhwa for information.

Full
Medical Superintendent

DHQ Hospital Haripur

BEFORE THE KHYBER PAKHTUNKHWA SERVICES

TRIBUNAL, PESHAWAR

Appeal No.610/2019

Anayatullah S/o Rowait Khan R/O Haripur present ward orderly at DHQ Hospital
Haripur.

.....APPELLANT

VERSUS

- 1) DG Health Khyber Pakhtunkhwa, at Directorate General Health Services,
Peshawar.
- 2) Medical Superintendent DHQ Hospital Haripur.
- 3) Deputy Medical Superintendent DHQ Hospital Haripur.
- 4) District Account Office Haripur.

(Para wise reply on behalf of respondent No.04)

Preliminary Objection:-

- 1) That the petitioner has no cause of action.
- 2) That the petition in hand is not maintainable.

Respectfully Sheweth:-

- 1) No comments related to Respondent No.1,2
- 2) No comments
- 3) No comments related to Respondent No.2,3
- 4) No comments related to Respondent No.2,3
- 5) No comments related to Respondent No.2,3
- 6) No comments related to Respondent No.2,3
- 7) No comments related to Respondent No.2
- 8) No comments related to Respondent No.1

GROUNDS:-

- a) No comments related to Respondent No.2
 - i) No comments related to Respondent No.2
 - ii) No comments related to Respondent No.2
- b) No comments related to Respondent No.2
- c) No comments

Keeping in view spirit of letter No 1998-1505 dt23/02/2019 (copy of letter attached for ready reference) a FORM PAY 02 for stoppage of salary was received from respondent-02 for action.


DISTRICT ACCOUNTS OFFICER |
HARIPUR

BEFORE THE KHYBER PAKHTUNKHWA SERVICES

TRIBUNAL, PESHAWAR

Appeal No.610/2019

Anayatullaha S/o Rowait Khan R/O Haripur present ward orderly at DHQ Hospital
Haripur.

.....APPELLANT

VERSUS

- 1) DG Health Khyber Pakhtunkhwa, at Directorate General Health Services,
Peshawar.
- 2) Medical Superintendent DHQ Hospital Haripur.
- 3) Deputy Medical Superintendent DHQ Hospital Haripur.
- 4) District Account Office Haripur.

(Para wise reply on behalf of respondent No.04)

Preliminary Objection:-

- 1) That the petitioner has no cause of action.
- 2) That the petition in hand is not maintainable.

Respectfully Sheweth:-

- 1) No comments related to Respondent No.1,2
- 2) No comments
- 3) No comments related to Respondent No.2,3
- 4) No comments related to Respondent No.2,3
- 5) No comments related to Respondent No.2,3
- 6) No comments related to Respondent No.2,3
- 7) No comments related to Respondent No.2
- 8) No comments related to Respondent No.1

GROUNDS:-

- a) No comments related to Respondent No.2
 - i) No comments related to Respondent No.2
 - ii) No comments related to Respondent No.2
- b) No comments related to Respondent No.2
- c) No comments

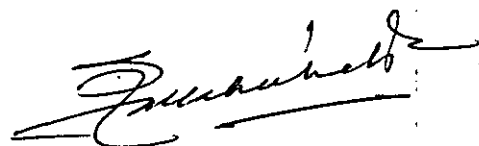
Keeping in view spirit of letter No 1998-1505 dt23/02/2019 (copy of letter attached for ready reference) a FORM PAY 02 for stoppage of salary was received from respondent-02 for action.


DISTRICT ACCOUNTS OFFICER
HARIPUR

INDEX

S.No.	Description of Documents	Annexure	Pages
1.	Reply / Comments	A-D	2
2.	Explanation / Warning	1-8	8
3.	Enquiry	9-29	21
4.	DGHS letter to take action	30	1
5.	MLC	31	1
6.	FIR	32	1
7.	Relieving to DG after FIR	33	1
8.	On the disposal of DHO	34	1
9.	Letter to DG no vacant pot of Class-IV in DHQ Hospital haripur	36	1

Dated _____



District Health Officer
of Haripur

BEFORE THE HONOURABLE SERVICE TRIBUNAL OF KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal No. 610

Anayatullah and Other Vs DGHS KP & Others.

Para-wise comments / reply on the behalf of respondent No. 5

Respectfully Sheweth

Preliminary Objection

1. That the appellant has got no cause of action / Locus standi to file the instant appeal.
2. That the appellant has concealed the facts from this honourable service tribunal hence not entitled for any relief and appeal is liable to be dismissed
3. That the appellant has not come to this honourable service tribunal with clean hand.
4. That the appellant has filed appeal on mollified
5. That the appeal is against the prevailing law and rules.
6. That the appellant is estopped by his own conduct to file instant appeal.
7. That the instant appeal is not maintainable in its present form and also in the present circumstances of the issue.

ON FACT:

1. Pertains to record.
2. Incorrect, that the appellant was involved in unprofessional and unethical activities. He was, non-dutiful employee. Several time verbal and written explanations and warnings were issued to the appellant but he did not mend his attitude.
(copies No. 1,2,3,4,5,6,7,8 attached).
3. Incorrect, there was no discriminatory conduct of respondent No. 3, respondent No. 3 time and again directed the appellant to be dutiful as per law and follow the professional ethics and service rules for a period of one year during daily morning hospital round, but he refused to perform his lawful duty and demanded exemption from duty on the bases of being representatives of class-V union which is illegal and against the service rules.
4. incorrect.
5. incorrect. inquiry was conducted upon the directives of Deputy Commissioner Haripur and the appellant was found guilty by the enquiry committee and was recommended for disciplinary action.
(copies 21 pages attached No. 9-29)
6. Incorrect. However a letter was issued by the Assistant director (Ministerial) requesting, for withdrawal of relieving letter and to initiate disciplinary proceedings and to take disciplinary action under E&D Rules 2011 against the appellant if he was guilty. (copy No. 30 attached).

That the appellant entered in the office of respondent No. 02 on 23/02/2019 with reference of letter of the Assistant Director (Ministerial) requesting, for withdrawal of relieving letter and to initiate disciplinary proceedings, they started victory slogans, abused the administration and one appellant namely Mr. Iftikhar Ahmad attacked on the attendant of respondent No. 2 (Medical Superintendent). Made him injured (copy No. 31 of MLC report attached) and FIR was lodged against the appellant Mr. Iftikhar in P/S City Haripur. (Copy of FIR No.32 attached). They were not accepted and once again directed to report DGHS KP for further posting. (Copy No. 33 attached).

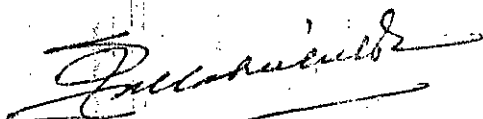
7. Incorrect, Respondent No.2 relieved them on administrative ground after fulfillment of legal formalities and directed them to report DGHS KP for further posting.
8. Incorrect. Respondent No. 01 DGHS KP posted and placed the appellant at the disposal of DHO Haripur for further posting under his control (copy of order No. 34 attached)
9. There is no vacant post of Class-IV in DHO Office Haripur informed to DGHS through a letter No. 3184 dated 01/04/2019 (copy enclosed)

Furthermore, there is no vacant post of Class-IV in the DHQ Hospital Haripur, as informed to DGHS KP through a letter No. 5366-68/MS/DHQ/NF, dated 13/07/2019 (copy attached).

GROUND:

- a. Incorrect. That order No. 167-69 dated 03/01/2019 issued by the respondent No. 02 is legal and lawful under the E&D rules of 2011.
 - i. Enquiry was conducted upon the directives of Deputy Commissioner Haripur. Enquiry committee found the appellant guilty and recommended disciplinary action against the Class-IV.
 - ii. Incorrect hence denied.
- b. Incorrect as stated. Being public servant the appellant is bound to follow the official norms and in case of any malpractice on his part he was liable to be proceeded according to the law.
- c. Incorrect: that the instant service appeal is hopelessly time barred at law and this honorable Service Tribunal has no Jurisdiction as was not challenged before the departmental hierarchy.

It is therefore, most respectfully prayed that the appeal of the appellant may graciously be dismissed with cost.



Respondent No. 5
District Health Officer
Haripur.



OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR

Ph: No. 0995-611850, Fax No. 0995-610959

No. 1456-58 Dated 07/03/2018

To,
Mr. Safer W/Orderly
DHQ Hospital Haripur.

Subject: EXPLANATION

Memo:

It is noted with great concerned that under which authority you were changed / altered the duties of Awas and Ghulam Mohayt Din W/Orderlies without any prior permission/information of the undersigned. Your this irresponsible and negative attitude is highly offensive.

Therefore, you are directed to explain your position within three days of receipt of this letter, otherwise stern disciplinary action will be taken against you.


MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR

- Cc:
1. Dr. Dildar khan DMS DHQ Teaching Hospital Haripur.
 2. Supervisor Class-IV DHQ Teaching Hospital Haripur

MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR



**OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR**

Phone: 631001, 631002, 631003, 631004

No. 2427/1111 Dated 27/10/2010

To,

Mr. Awais Talsan W/Orderly Pwds Deptt:
DHQ Teaching Hospital Haripur

Subject: WARNING

Reference your reply to the explanation bearing dated NR.

Your reply of Explanation is not satisfactory. You are hereby advised that you follow the rules and perform duties with proper uniform, if you do not wear proper uniform in future you will be considered as absent. If your reply is not satisfactory, also stern disciplinary action will be initiated against you.

MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR

Cc:

- DMS DHQ Teaching Hospital Haripur.

MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR



OFFICE THE MEDICAL SUPERINTENDENT

DHQ HOSPITAL HARIPUR
D.H.Q. HOSPITAL HARIPUR

No. 6290-93 Dated 18/10/2018.

To,

1. Mr. Muhammad Safer ward orderly
2. Mr. Shoukat Zaman ward orderly
3. Mr. Iftikhar ward orderly

Subject: EXPLANATION

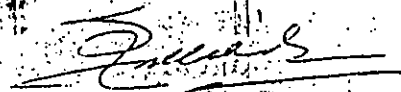
Memo,

It was notice with great concern that you do not perform your lawful duty. You are involved in illegal and unethical practice which is violation of service rules.

You are hereby directed to explain cogent reasons of such unethical attitude and malpractice during your duty hours within three days positively, abstain yourself from illegal and malpractice in future. Otherwise disciplinary proceedings will be initiated against you under the Khyber Pakhtunkhwa Govt. Servants (Efficient and Discipline) rules 2011.


Medical Superintendent
DHQ Hospital Haripur.

Cc:
DMS DHQ Hospital Haripur for information.


Medical Superintendent
DHQ Hospital Haripur.



OFFICE THE MEDICAL SUPERINTENDENT

DHQ HOSPITAL HARIPUR
Tel. 0352-611001, Fax 0352-610005
No. 6195-23 Dated 23/09/2018

To

1. Mr. Muhammad Safeer ward orderly
2. Mr. Shoukat Zaman ward orderly
3. Mr. Iftikhar ward orderly

Subject: WARNING:

You are hereby strictly warned to refrain yourself from illegal activities and perform your lawful duties other wise strict disciplinary proceeding under E&D rules of 2011 will be initiated.

Medical Superintendent
DHQ Hospital Haripur.

Cc: DMS DHQ Hospital Haripur for information.


Medical Superintendent
DHQ Hospital Haripur.



OFFICE THE MEDICAL SUPERINTENDENT

DHQ HOSPITAL HARIPUR

Tel: 0995 611850 Fax: 0995 610089

No. 6290-93 /Dated 18/09/2018.

To,

1. Mr. Muhammad Safer ward orderly
2. Mr. Shoukat Zaman ward orderly
3. Mr. Ifikhar ward orderly

Subject: **EXPLANATION**

Memo,

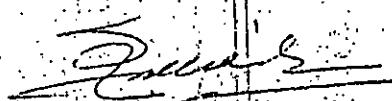
It was notice with great concern that you do not perform your lawful duty. You are involved in illegal and unethical practice which is violation of service rules.

You are hereby directed to explain cogent reasons of such unethical attitude and malpractice during your duty hours within three days positively, abstain yourself from illegal and malpractice in future. Otherwise disciplinary proceedings will be initiated against you under the Khyber Pakhtunkhwa Govt. Servants (Efficient and Discipline) rules 2011.


Medical Superintendent
DHQ Hospital Haripur.

Cc:

DMS DHQ Hospital Haripur for information.


Medical Superintendent
DHQ Hospital Haripur.



OFFICE OF THE MEDICAL SUPERINTENDENT

DHQ HOSPITAL HARIPUR

Ph: No. 0995-611850, Fax No. 0995-616069

No. 7957-60 Dated - 13/11/2018

To

1. Mr. Shoukat Zaman W/ orderly.
 2. Mr. Muhammad Safer W/Orderly.
 3. Mr. Ifikhar W/orderly.
- DHQ Hospital Haripur.

Subject: WARNING.

It was noted with great concern that inspite of repeated written and verbal directions you are not refraining yourself from unethical and illegal activities. Your this attitude is also encouraging the other staff to disobey the administrative orders.

Once again you are hereby warned to be dutiful and wear proper uniform and refrain yourself from illegal/unethical activities otherwise you will treated with E & D rules of 2011.

Medical Superintendent
DHQ Hospital Haripur.

Cc:

DMS DHQ Hospital Haripur for information.

Medical Superintendent
DHQ Hospital Haripur.



OFFICE OF THE DEPUTY COMMISSIONER
HARIPUR DISTRICT

7
Tel. No. 0993-611850, Fax No. 0993-61000

No. 8917-19 Dated 14/12/2018

To,

Mr. Owais Tasleem W/Orderly
DHQ Teaching Hospital Haripur.

Subject: EXPLANATION

Memo:

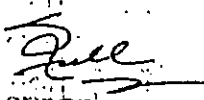
It is reported by C/Nurse of ICU/CCU on Night Duty, that you were found absent from duty for three days, without prior information / permission. You're this act of negligence and irresponsible attitude towards your duties is against the service rules.

You are hereby directed to explain regarding irresponsible attitude within three days otherwise strict disciplinary action will be taken against you under E&D rules 2011.

MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR

Cc:

- DMS DHQ Teaching Hospital Haripur.
- Supervisor Paramedics/Class-IV for information.


MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR

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OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR
PhNo. 0995-611850, Fax No. 0995-610669

No 157-83 /Etab/L/Exp

Dated 03/01/2019

To,

1. Mr. Tariq Ward Orderly, Casualty Unit
2. Mr. Sajjad Ali Sweeper Surgical Male Unit
3. Mr. Awais Tabasum Ward Orderly CCU Night Shift
4. Mr. Anayat Ward Orderly, Paeds Ward

DHQ Teaching Hospital Haripur

SUBJECT: Explanation.

Memo

It has been reported by Incharges of above Department / Wards that you all were not physically present at your place of duty, the dates mentioning in the reports. This shows negligence on your part.

You all are therefore directed to explain reason of your willful absence within three days positively; otherwise strict disciplinary action shall be taken against you under E&D Rules 2011.

Fule
MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR

CC:

Accounts Section undersigned office with the direction to deduct (02) days salary of the above officials on account of absence and deposit the deducted amount into Government Treasury. Their absence is treated as leave without pay.

/s/
MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR

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The Medical Superintendent,
DHQ Teaching Hospital Haripur

Sub: INQUIRY REPORT (CLASS IV ASSOCIATION RESOLUTION STRIKE) DHQ HARIPUR

Sir,

With reference to your directive vide letter No.1300-01/AC(H) dated 14/12/2018, the inquiry committee comprising of Dr. Waseem Ahmed PMO and Dr. Rafique Tanoli PMO conducted an inquiry regarding subject (annexure C). During the course of inquiry the members of the inquires committee recorded statement of Dr. Dildar DMS, other officials and gathered circumstantial evidences; the findings, conclusions and recommendation are summarized below: -

Findings:

1. It has been found that the allegations against Dr. Dildar DMS are baseless and fabricated. The fact of the matter is that Dr. Dildar DMS has been found to be a dedicated and dutiful officer, the conduct of said officer has been found modest during the whole episode.
2. The crime of Dr. Dildar is that he put his utmost efforts for smooth running of hospital's daily affairs.
3. It is the duty of Dr. Dildar DMS to implement the TOR's (duties) of all paramedics & Class-IV, in this context, he persuades class-IV to be dutiful and wear proper uniform (Cap) during duty hours. He reports the officials who remain habitually absent from duty to MS for disciplinary action. Consequently the MS of the hospital does the necessary action which includes deduction of pay under Khyber Pakhtunkhwa (E&D) rules 2011 with the involvement of IMU personnels.
4. The inquiry committee probed further and found that "to wear cap during duty hours" is the pivotal point on which class-IV showed concerns and they are not willing to wear proper cap during duty hours as designated by Government of Khyber Pakhtunkhwa Health Department. It is worth mentioning that different colour of caps are allotted to various class-IV as their dress code i.e. black colour cap for Security Guards, green for Sweepers and red for Ward Orderly.
5. It has been found that most of the class-IVs take it as a disgrace to wear proper cap during their duties, perhaps they are considered as doctors in their local communities.
6. It has been found that they choose wrong way i.e. strike for fulfillment of their un-lawful demands. Consequently they observed strike in DHQ Teaching Hospital Haripur on 08-12-2018. Some of the class-IV took active participation and engaged provincial association in the said strike. As a result the smooth running of hospital hampered and public suffered a lot (Annex - I).
7. The names of class-IVs who planned the strike, provoked it and took active participation are.
 - a. Shoukat Zaman Ward Orderly
 - b. Safeer, Ward Orderly
 - c. Iftikhar Ward Orderly
 - d. Awais Tasleem Ward Orderly
 - e. Farced X Ray Attendant
 - f. Saeed Ayub, Behshri, BHU Kokatium Peeran
 - g. Anayat Ward Orderly
 - h. Sajid, Mali
 - i. Niaz Elahi, Sweeper.
8. Majority of the class-IVs remained inactive and did not participate in strike, the list of those class-IV is attached (Annex - I to IX).

Conclusions:

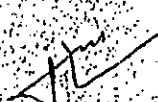
1. The observed strike was unjustifiable and un-lawful.
2. The observed strike brought disgrace to prestige of Dr. Dildar Khan DMS.
3. The way, the strike conducted i.e raise of slogans in public against Dr. Dildar, involvement of Provincial Associations and out siders.

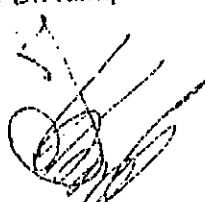
Recommendations:

1. The Enquiry Committee recommends disciplinary action against the culprit Class-IV.
2. Uniform & cap should be provided to all Class IV staff as is practicing in all Teaching Institutes.

Enclosures:

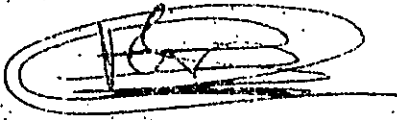
1. I - IX, The List (09 pages) of non-strikers (Class IV) who did not participate in strike.
2. G, H, I, J (Photos of Class - IV observing strike 04 pages).
3. A (letter from Assistant Commissioner Haripur to MS DHQ Teaching Hospital Haripur)
4. B (letter from Deputy Commissioner Haripur to Assistant Commissioner Haripur)
5. C (Resolution letter from Class - IV DHQ Teaching Hospital Haripur)
6. D (letter from Deputy Commissioner Office Haripur regarding strike)
7. E (statement of Dr. Dildar DMS DHQ Teaching Hospital Haripur)
8. F (statements of Class IV in response to enquiry conducted by Dr. Rafique & Dr. Talir Aziz)


 Dr. Waseem Ahmed (PMO)
 (Enquiry Officer)
 DHQ Teaching Hospital Haripur


 Dr. Rafique Tanolt (PMO)
 (Enquiry Officer)
 DHQ Teaching Hospital Haripur

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Deputy Medical Superintendent
 C.M.O. Teaching Hospital
 Haripur

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336-9799697	Handwritten	Emergency	بیمارستان
0323 9615188	ADIC	Emergency	بیمارستان
0334 9501496	Handwritten	---	بیمارستان
0313-5777995	Handwritten	OPD -	بیمارستان
0335-8348418	Handwritten	---	بیمارستان
0310-5005858	Handwritten	---	بیمارستان
0348-4213296	Handwritten	---	بیمارستان
0313-911722	Handwritten	Diagnosis	بیمارستان
0333-99204	Handwritten	Word	بیمارستان
0310-9404616	Handwritten	---	بیمارستان
0356-0088444	Handwritten	---	بیمارستان
0316-0288500	Handwritten	---	بیمارستان
0336-5668256	Handwritten	---	بیمارستان
0334-5668256	Handwritten	---	بیمارستان
0313-7488858	Handwritten	---	بیمارستان
0334-9655847	Handwritten	Shopee	بیمارستان

331-5188254	Handwritten name	Sweeper	Handwritten name
342-0904158	Handwritten name	Ward Boy	Handwritten name
334-5665296	Handwritten name	Ward	Handwritten name
336-9003148	Handwritten name	Ward	Handwritten name
317-1592828	Handwritten name	Ward	Handwritten name
329-9136948	Handwritten name	Ward	Handwritten name
312-9672419	Handwritten name	Sweeper	Handwritten name
331-375245	Handwritten name	Night Ward Boy	Handwritten name
336-9790763	Handwritten name	Night Ward Boy	Handwritten name
318-9719736	Handwritten name	Night Ward Boy	Handwritten name
317-0594547	Handwritten name	Sweep Night	Handwritten name
332-2084101	Handwritten name	Security Guard	Handwritten name
340-8169533	Handwritten name	Ward Boy Night	Handwritten name
335-5637401	Handwritten name	Electrical	Handwritten name
31-0168245	Handwritten name	Electrical	Handwritten name
312-0532655	Handwritten name	Electrical	Handwritten name
06-5309639	Handwritten name	Electrical	Handwritten name
34-5077509	Handwritten name	Sweeper	Handwritten name
311-5524123	Handwritten name		Handwritten name

Handwritten notes and signatures on the right margin, including names and possibly dates.

نام	فون نمبر	پتہ	مقام
مستور	0311-9353303	وارڈ 1	مکمل عباس
Q	0341-9432439	"	مقام خیر آباد
Q	0316-9026907	"	زاہد الزحورون
SHAZEB	0331-5355980	"	شاہد حسین
میرا	0337-3019823	سوسائٹی	سوسائٹی
میرا	0311-5813823	وارڈ 1	وارڈ 1
میرا	0336-9790716	سوسائٹی	مقام
Waqar	0312-155091	وارڈ 1	مقام
میرا	0316-0265834	"	مقام
میرا	0323-3377765	وارڈ 1	مقام
میرا	0323-9773762	سوسائٹی	مقام
میرا	031358113941	وارڈ 1	مقام
میرا	0332-5053075	وارڈ 1	مقام
میرا	0310-5877387	"	مقام
میرا	0313-5874581	"	مقام
میرا	0342-9353157	سوسائٹی	مقام
میرا	0308-5148428	وارڈ 1	مقام
میرا	0347-5270160	"	مقام
میرا	0316-5817256	سوسائٹی	مقام
میرا	0344-9411451	وارڈ 1 (G.A)	مقام
میرا	0312-9373894	سوسائٹی	مقام
میرا	0312-7671409	وارڈ 1	مقام

Name	Phone Number	Profession	Address
(Kusni)	0332-492 4346	-	1st floor
Yay	0333-9361658	-	1st floor
Amir HAMAYUN	0311-99755446	1st floor	1st floor
Tahli	0317-1592296	1st floor	1st floor
	0314-7311194	"	1st floor
	0315-9634009	-	1st floor
	0312-4431344	-	1st floor
	0345-9633505	1st floor	1st floor
	0345-9575739	-	1st floor
S. S. S.	0310-4035657	LAB	1st floor
	0302-5623580	1st floor	1st floor
	0346-5622295 (0.7)	1st floor	1st floor
	0334-5900960	1st floor	1st floor
	0331-5850581	"	1st floor
	0305-2914296	1st floor	1st floor
	0302 5104156	1st floor	1st floor
	03160221510	Sweeper	1st floor
Tahni		1st floor	1st floor
Ahmad	0313-5893142	1st floor	1st floor
		1st floor	1st floor
Ahmad	0336-5374674	1st floor	1st floor
	0336-5671660	1st floor	1st floor

نام	فون نمبر	پتو	پتو
Ahmed Raza	0312-6618866	فاریڈ پورہ	پتو
سید	0345-2823981	سیالکوٹی	پتو
فیل محمد	0307-5074431	سوہیہ آباد	پتو
سید	03317610801	سیالکوٹی	پتو
سید	031-9471094	Wahabp	پتو
سید	0310-5891420	سوہیہ	پتو
سید	0305-8692075	Wahabp	پتو
TH Seem		Ajmer	Tarapur
سید	0310-5346995	Sawacpur	پتو
سید	03149794722	Wahabp	پتو
سید	03005072170	پتو	پتو
سید	0311229806	پتو	پتو
سید	0543-9901779	پتو	پتو
سید	0312-5902969	پتو	پتو
سید	0327-8576225	پتو	پتو
سید	0300-9113617	پتو	پتو
سید	0337-5037953	پتو	پتو
سید	03115230091	OPD	پتو
سید	03018108079	پتو	پتو
سید	03138778858	پتو	پتو
Richa	0343-948300	OPD Pads	پتو
Ibnul Khaw	05544221023	پتو	پتو

Signature	Phone Number	Address	City
Fayyaz Hussain	0315 5663184	دار ذوات	لاہور
(MA)	0305 8911474	چند گتھار	لاہور
(Fazal Farid)	0511-5944072	وارڈ ہونہ	لاہور
(Alman)	0315 5803606	دار ذوات	لاہور
(Alman)	0347 2421477	سوسائٹی	لاہور
ALFA	0347 97501193		لاہور
(Fazal)	0334 3104050	ادنی ڈسٹریکٹ	لاہور
(Fazal)	0336 9903657	سوسائٹی	لاہور
(Fazal)	0336 57511480	وارڈ ذوات	لاہور
(Fazal)		سوسائٹی	لاہور
(Fazal)	0333-7766149	سوسائٹی	لاہور
(Fazal)	0336 9163465	سوسائٹی	لاہور
(Fazal)	0312-9136945	Waral Bary	لاہور
(Fazal)	0334-4654054	لاہور	لاہور
(Fazal)	0345 1585215	Sac of vely	لاہور
(Fazal)	0335 #330087	" "	لاہور
(Fazal)	0336 5427831	" "	لاہور
(Fazal)	0332 9303164	" "	لاہور
(Fazal)	03345711460	" "	لاہور

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0302-8948466

Security guard

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شاه

0312-9978975

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0334-5393745

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0311-5842571

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0344-9417163

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0317-5984311

سوئیٹر

شاہ

0347-5269509

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113

Shahzad

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سید شاہ

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سید شاہ
Basil Khan

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OFFICE OF THE ASSISTANT COMMISSIONER, HARIPUR

No. /Reader/09/1300 - D.L. /AC (II)

Date: 14/12/2018

Phone No: 095 612113

21

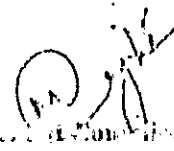
To,

The Medical Superintendent,
DHQ Hospital,
Haripur.

Subject: SESSION OF PARA MEDICS ASSOCIATION, HARIPUR


Enclosed please find herewith letter No. 1(5) /MHC/MP/AS/DC (II) dated 05-12-2018 along with the Resolution No. 6-15/MPR dated 05-12-2018 of Para Medical Association, Class VI, Health Department Haripur, received from The Deputy Commissioner Haripur to enquire into the matter and detailed report.

It is requested to inquire into the matter and detailed report and comment at an early date positively for onward submission to Deputy Commissioner Haripur please.


Assistant Commissioner,
Haripur.

Copy to:

The Deputy Commissioner Haripur for information, please.


Assistant Commissioner,
Haripur.

Dr. was in HHO + D.L. 11/12/18
Do as directed
Geo
2/12

28

(B)

(2)



Office of the Deputy Commissioner, Haripur

Phone No. 0995 - 613391, 613389 FAX - 615412
No. 1(5)/Misc/App/AS/DC (H)
Dated: 06/12/2018

Matter important / urgent.

To,

✓
The Assistant Commissioner,
~~Haripur~~ Haripur.

Subject: SESSION OF PARA MEDICS ASSOCIATION, HARIPUR.

Enclosed please find herewith a copy of memo No. 04/HPR dated 05-12-2018, on the subject noted above from the General Secretary, Para Medical Association, Haripur with the request to inquire into the matter and submitted detailed report at an early date, please.

ENCL: { 02 ONLY }

AC Office Haripur
Biliary No. 1708
Date: 27-11-2018
Deputy Commissioner,
Haripur.

Copy to:

The General Secretary, Para Medical Association, Haripur for information with reference to above.

*Reason
call all concerned
for inquiry at the
earliest*

[Signature]
Deputy Commissioner,
Haripur.

ASSISTANT COMMISSIONER
HARIPUR

*ACAH
07/12/18*

(2)

پندرہ میڈیکل ایسوسی ایشن

S-12 DEPUTY COMMISSIONER TRIPUR

6-15/HRP

آج بروز 15/12/1978 کو ایسوسی ایشن کے تمام ممبروں نے ایک اجلاس منعقد کیا تاکہ اس اجلاس میں صدر اور نائب صدر کی حیثیت سے کام لیا جائے اور دیگر ممبروں نے بھی اپنی اپنی ذمہ داریاں ادا کیں۔ اس اجلاس میں صدر نے اپنی تقریر میں کہا کہ اس وقت ملک میں حالات خراب ہیں اور حکومت نے جو پالیسیاں اختیار کی ہیں وہ اس وقت کے حالات کے مطابق نہیں ہیں۔ اس اجلاس میں صدر نے کہا کہ اس وقت ملک میں حالات خراب ہیں اور حکومت نے جو پالیسیاں اختیار کی ہیں وہ اس وقت کے حالات کے مطابق نہیں ہیں۔ اس اجلاس میں صدر نے کہا کہ اس وقت ملک میں حالات خراب ہیں اور حکومت نے جو پالیسیاں اختیار کی ہیں وہ اس وقت کے حالات کے مطابق نہیں ہیں۔

اس اجلاس میں صدر نے کہا کہ اس وقت ملک میں حالات خراب ہیں اور حکومت نے جو پالیسیاں اختیار کی ہیں وہ اس وقت کے حالات کے مطابق نہیں ہیں۔ اس اجلاس میں صدر نے کہا کہ اس وقت ملک میں حالات خراب ہیں اور حکومت نے جو پالیسیاں اختیار کی ہیں وہ اس وقت کے حالات کے مطابق نہیں ہیں۔ اس اجلاس میں صدر نے کہا کہ اس وقت ملک میں حالات خراب ہیں اور حکومت نے جو پالیسیاں اختیار کی ہیں وہ اس وقت کے حالات کے مطابق نہیں ہیں۔

تاریخ 15-12-78

6-15/HRP

جنرل سیکرٹری
سعید ایوب
پندرہ میڈیکل ایسوسی ایشن

1. صدر 15/12
2. نائب صدر 16/12
3. جنرل سیکرٹری 17/12
4. ڈپٹی سیکرٹری 18/12
5. ڈپٹی سیکرٹری 19/12
6. ڈپٹی سیکرٹری 20/12
7. ڈپٹی سیکرٹری 21/12
8. ڈپٹی سیکرٹری 22/12
9. ڈپٹی سیکرٹری 23/12
10. ڈپٹی سیکرٹری 24/12

(D)

FNK NO: 614714

7 Dec 2018

کے مطابق 07.12.2018ء کو 11:00 بجے تمام ڈی این کے سربراہان کی ہری پور علاقہ
 تمام سرکار کے سربراہان کی ہری پور کے بارہ ڈول سپاہیوں کے ساتھ میٹنگ کے دوران ایڈیشنل ڈی این احمد علی
 نے کہا کہ تمام سرکار کے سربراہان کی ہری پور کے بارہ ڈول سپاہیوں کے ساتھ میٹنگ کے دوران ایڈیشنل ڈی این احمد علی
 نے کہا کہ تمام سرکار کے سربراہان کی ہری پور کے بارہ ڈول سپاہیوں کے ساتھ میٹنگ کے دوران ایڈیشنل ڈی این احمد علی

ڈی این صاحب ہری پور کے سربراہان کے نام ہے۔

(Handwritten signature)
 ڈی این احمد علی

(Handwritten notes and scribbles)
 H. Sajid
 Niaz Elahi
 Majority of the class
 is attached (Annex-I)

g. Anna
 h. Sajid, Mali
 i. Niaz Elahi, S
 8: Majority of the class
 is attached (Annex-I)

of those class-

(E)



OFFICE OF THE DEPUTY MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR

Telephone No: 0995-611850, Fax No: 0995-610089

No. 124 Date: 11/11/2011

السلام علیکم، سیدرز انکوائری کہی

گزشتہ سال میں گزشتہ کسی سال سے کچھ کانس فور ملازمین کا رویہ ٹھیک
نہیں تھا۔ ان کے رویے اور ڈیوٹی کے دوران ٹوپی پہننے
توڑے۔ یہ لوگ ہسپتال سے گئے اور ان کا رویہ ایسا تھا جیسے یہ ہسپتال میں بہت بڑے
ان کے رویے کو ٹھیک کرنے اور ٹوپی پہننے کا کہا جاتا تو یہ مداخلت
میں اور مدام ٹوپی کرتے تھے۔ اور بیغیر ایم ایس صاحب کی اجازت کے اپنی مرضی
میں چھٹی کر کے تھے۔

میں نے ان کو روکی لگائی اور ٹوپی پہننے کا کہا اس کے علاوہ جو بیغیر ایم ایس
میں مداخلت کر کے ٹوپی پہننے ہوتا اس کی تحریری رپورٹ ایم ایس صاحب کو
کرتا تھا۔ وہ سے ان لوگوں کو تہ لیف ہونی کہ ہماری ڈیوٹی ڈی ایم ایس نے کیوں
لگائی۔ ان لوگوں کو دو سڑے لوگوں کو ہڑتال کرنے کے لئے اکسایا اور ناکام
ہڑتال کی۔ اس کے علاوہ اس نے ملازمین میں سے 16 ملازمین نے لکھ کر دیا کہ
ہم ہڑتال کرنے سے باز آگئے ہیں۔

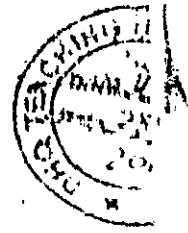
اس کے علاوہ لوگوں کو خلتا یا ڈیوٹی نہ کرنے اور ٹوپی نہ پہننے والوں کے خلاف
کارروائی کرنا ایم ایس صاحب کا اقرار ہے میرا کام سرب ایم ایس صاحب کو رپورٹ
کرنے اور کہ میں نے کو ہے۔

DEPUTY MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR.

8. Maj

is at

(F)



A summary comprising of the following is submitted to you for report within 05 days.
Dr. Rafiq Tahir
Dr. Tahir Aziz

جواب نمبر 54-924E مورخہ 18.12.2018
27/12/18

جواب والی اجواب نمبر ذیل :-

یہ کہ مسائل باور کابیس فور ملزم ہے اور عرصہ دراز سے ایسے فراہم احسن طریقہ سے ختم انجام دے رہیں ہیں اور اس دور اس مسائل کسی قسم کی غیر قانونی کام میں موٹ نہیں پائے گئے۔
یہ کہ مسائل اور دیگر ہرزہ یونین نے باقاعدہ پران احتجاج ریکارڈ کرنے کی نسبت ایک نوٹس مورخہ 5.12.2018 جاری کیا کہ وہیں چہارم کے ایسپانڈڈ انٹر ولڈرز DMS بخلاف پراسن سیاہ بیٹیاں باندھ کر مہینہ گزرتے کیونکہ DMS اور ملازمین کی تنخواہوں سے گزشتہ 3/4 ماہ کے غیر قانونی کٹوتی ایسے کسی نوٹنگ میں اثر رکھتی جاری ہیں۔ ملازمین درجہ چہارم بے جا طور پر گالی گوج کرنا، DMS صاحب نے دایرہ بنایا اور اسے راجست اس سے اس بھی اپنا شکایات جناب کے پاس کر چکے ہیں۔ کوئی کارروائی نہ ہونے کی صورت میں درجہ چہارم کے ملازمین نے جو سیاہ بیٹیاں باندھ کر پراسن احتجاج ریکارڈ کر لیا اور جو درجہ چہارم نے کابیس فور ملازمین کو یقین دلایا تھا کہ آپ کی تمام شکایات دور کردی گئی ہیں اسلئے کسی کلاس نوٹ کو کوئی شکایت نہ دی اور نہ ہی کوئی written کارروائی کی جائے گی۔
یہ کہ آختساب کی طرف سے جاری کردہ نوٹس سراسر غلط ہے کیونکہ ہمارا احتجاج پراسن تھا اور احتجاج کی وجہ سے سر ایسٹوں کو کوئی شکایات نہ پہنچائی گئی ہے نہ ہی انتظامیہ کو ہراساں کیا گیا ہے اور ہم نے پراسن احتجاج بطور پبلک سرانٹ ڈیوٹی کے اندر رہ کر کیا ہے۔ لہذا نوٹس ہذا میں لگائے گئے الزامات سے ہٹا دیونے کی بنا پر نوٹس قابل مسترد تھی ہے۔

لہذا استدعا ہے کہ نوٹس ہذا احتجاج کے منافی ہونے کی بنا پر داخل دست فرمایا جائے۔

مستند
مستند

ادرس تیم

حکومت

S

M. Saeed

رہنما راجست
مستند
مستند

زبان

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16

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**



Local Address: Peshawar, Khyber Pakhtunkhwa. Phone: (091) 923-21101/2/3/4/5. Fax: (091) 923-21106. Post: 251-021/03/04
No. 494/Personnel Dated: 16/01/2019

To: The Medical Superintendent
DHQ Hospital Haripur.

Subject: RELIEVING ORDER
Memo:

I am directed refer to your letter No. 677 dated 03.01.2019 on the subject cited above.

You are requested to withdraw the relieving order in respect of Mr. Muhammad Safer, Ward Orderly, Mr. Mukhar Ward Orderly & Mr. Muhammad Farid X-Ray Attendant and initiate disciplinary action against them under E&D Rules 2011, if they are guilty of misconduct as relieving transfer of unwilling worker is no remedy.

[Signature] 14/1/19
ASSISTANT DIRECTOR (Administration)
DIRECTORATE GENERAL HEALTH
SERVICES, KP PESHAWAR

[Handwritten notes and signatures]
C/O
Arif
Munir
District Court

روزنامه اخبار اقتصادی شماره 13200 و 13201 (دوره شانزدهم) شماره 13200 تا 13201 (دوره شانزدهم) شماره 13200 تا 13201

کلام تبریک (1) ابتدائی اطلاعاتی در مورد شهادت الجودی

0315 - 7708070

ایستادن استقامت و شجاعت و شرف و کرامت و اخلاق و عفت و تقوی و وفای عهد و پیمان و وفای عهد و پیمان

طباع و سلیقه و وقت و زمان و 22

Handwritten signature and notes on the left margin.

1	11110	277	1330
2	11110	277	1330
3	11110	277	1330
4	11110	277	1330
5	11110	277	1330
6	11110	277	1330

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Handwritten notes or a signature at the bottom left, including the number 13201.

**OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR**

Ph: No. 0995-611850, Fax No. 0995-610069

No. 1495-1505 / Dated 23/02/2019

To

The Director General Health Services
Khyber Pakhtunkhwa Peshawar.

Sub: RELIEVING ORDER.

Dear Sir,

With the ref. of your office letter vide no. 494/personal dated 14/01/2019;
No. 769 / personal Dated 21/01/2019 and no. 1266 /personal 29/01/2019
and this office vide letter no. 988 dated 06/02/2019.

I have the honor to state that the following class IV were relieved
from this Hospital on administrative ground. These class IV were
creating administrative problems for the Hospital administration and
also provoking the other class IVs not to perform duties. They were
also not performing their own duties and were unwilling workers and
proved guilty in the inquiry conducted against them vide diary no. 19
dated 02/01/2019. (Copy of inquiry report attached)

1. Mr. Muhammad Safer ward orderly.
2. Mr. Muhammad Parid X-Ray attendant.
3. Mr. Iftikhar ward orderly.
4. Mr. Niaz Ellahi sweeper.
5. Mr. Anayat Ward Orderly.
6. Mr. Sajid Mali.
7. Mr. Awais Tasleem ward orderly.

Furthermore today they abused the employees on duty in MS office
and attacked and injured the person on duty at MS office. This office
is unable to accept such employees in this office. You are therefore
requested to transfer them out of district.


Medical Superintendent
DHQ Hospital Haripur.

16

**DIRECTORATE GENERAL
KHYBER PAKHTUNKHWA**

OFFICE ORDER

As approved by the competent authority, the services of the following staff members relieved by MS DHO Hospital Haripur are hereby placed at the disposal of DGHS for further posting under his control against the vacant posts in the interest of the service with immediate effect.

- i) Mr. Muhammad Saifur Ward Orderly
- ii) Mr. Muhammad Farid X-Ray Assistant
- iii) Mr. Illikhar Ward Orderly
- iv) Mr. Niaz Elahi Sweeper
- v) Mr. Anayat Ward Orderly
- vi) Mr. Sajid M.I.I.
- vii) Mr. Awais Tasleem Ward Orderly

Arrival/ departure report should be submitted to this Directorate for record.

(Signature)
DIRECTOR GENERAL
SERVICES, K.P. PESHAWAR
Date: 25/11/2013

No. 2274-78 Personnel
Copy forwarded to the:-

- 1. DHO Haripur.
- 2. MS DHC Hospital Haripur w/r to his letter No. 415 dated 01.01.2013.
- 3. DAO Haripur.
- 4. P.A to DGHS Khyber Pakhtunkhwa Peshawar.
- 5. Officials concerned.

For information and necessary action.

(Signature)
DIRECTOR GENERAL
SERVICES, K.P. PESHAWAR

C.T.C.
Amir
M. J. Q.



DHQ TEACHING HOSPITAL HARIPUR

Ph # 0995-811850, Fax # 0995-810050

Email: hq700129@mail.com

35

No. MS/DHQ/HP

Date: 15/07/2019

To, The Director General Health Services,
Khyber Pakhtunkhwa Government.

Subject: VACANT POST OF CLASS-IV COMPETITIVE

Sir, Reference your letter No. 8548-15/ADMIN dated 11-07-2019.

I have the honor to forward herewith the requisite information on prescribed format for your kind information and further necessary action.

S.No	Name of Facilities	Name of posts	Number of posts	filled	Vacant
1	DHQ Teaching Hospital Haripur	OT Attendant	1	1	0
2		Blood Bank Attendant	1	1	0
3		Dental Attendant	1	1	0
4		Lab Attendant	2	2	0
5		X-Ray Attendant	2	2	0
6		Dal	3	3	0
7		Ward Orderly	51	51	0
8		Ward Attendant	51	51	0
9		Ward Aya	4	4	0
10		Baheshti	1	1	0
11		Chowkidar	20	20	0
12		Mall	10	10	0
13		Sweeper	53	53	0
14		Laundry Attendant	2	2	0
15		Laundry Operator (Dhobl)	2	2	0
Total			210	210	0

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[Signature]
Medical Superintendent
DHQ Hospital Haripur

- Cc:
1. PS to Minister for Health Khyber Pakhtunkhwa.
 2. PS to Secretary to Govt. Khyber Pakhtunkhwa for information.

[Signature]
Medical Superintendent
DHQ Hospital Haripur

OFFICE OF THE DISTRICT HEALTH OFFICER
HARIPUR

No. 5184
Dated Haripur, the

11/11/2010
11/11/2010
of 104/2010

The Director General Health Services
Khyber Pakhtunkhwa, Peshawar.

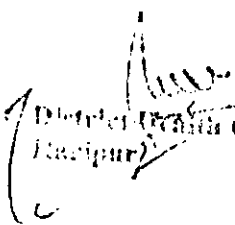
Subject:
Sir,

OFFICE ORDER.

Kindly refer to your office No. 2274/2010 dated 11/11/2010 on
the above cited subject.

In this context it is advised that the subject is to be posted to
the undersigned for further posting vide your office order under reference and to be
accommodated. However, the subject can be arranged in due course.

Kindly issue necessary order/guide line in this regard.


District Health Officer
Haripur

District Health Officer, Haripur
Phone & Fax # 0995-610197
dhoharipur@yahoo.com