



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Annex A

DATED PESH: THE 23RD APRIL 2018

NOTIFICATION

No.SOH-I/HD/3-5/2018 In pursuance of sub-section(5) of Section 8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 and Establishment Department's circular letter No.SOR-VI(E&AD)1-16/2008/Vol.VI dated 26th July 2010, the Competent Authority is pleased to notify joint seniority list of District Specialists all specialities as stood on 1/1/2018 for information of all the concerned.

SECRETARY HEALTH

Endsl No and date even

C.C

1. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar with the remarks to circulate the same to all concerned and also furnish a copy of the seniority list to this department on urgent basis.
2. All DHOs in Khyber Pakhtunkhwa.
3. Director Health Services, FATA, Khyber Pakhtunkhwa, Peshawar.
4. Hospital Director KTH/LRH/HMC, Peshawar/ATH, Abbottabad.
5. Medical Director KTH/LRH/HMC, Peshawar/ATH, Abbottabad.
6. Chief Executive/Principal SGTH/SMC, Swat/ DHQTH/MMMTH/GMC DIKhan
7. Dean PGMI/HMC, Peshawar.
8. Dean KMC/KCD, Peshawar/BKMC, Mardan/Gajju Khan Medical College Swabi/Nowshera Medical College, Nowshera/BMC Bannu.
9. All DHOs in the Health Department, Khyber Pakhtunkhwa.
10. All Medical Supdts DHQs/AHQs in Khyber Pakhtunkhwa.
11. PS to Secretary Health Department.
12. PS to Special Secretary Health Department.
13. PA to Addl. Secretary (Estt) Department.
14. Doctors concerned.


(Hassem Khan)
Section Officer-I

FINAL SENIORITY LIST OF SENIOR DISTRICT SPECIALIST SURGEONS (BPS-19). AS STOOD ON 01.01.2018

SL. NO.	NAME OF OFFICER WITH ACADEMIC QUALIFICATION.	DATE OF BIRTH AND DOMICILE	DATE OF IST: ENTRY INTO GOVT. SERVICE.	REGULAR APPOINTMENT/ PROMOTION TO PRESENT POST.			PRESENT POSTING.
				DATE	BPS	METHOF OF RECRUITMENT	
1.	Dr.Saifur Rehman, MBBS/MCPS.	13.04.1962/ Mardan	11.04.1996/B-18	a) 11.04.1996 b) 07.05.2010	18 19	PSC By Promotion	SGTH, Swat
2.	Dr.Sultan Sikandar Bacha, MBBS/FRCS.	30.06.1962/ Swat	12.02.2000/B-18	a) 12.02.2000 b) 28.06.2010	18 19	PSC By promotion	DHQH: Haripur
3.	Dr.Muhammad Noor S/O Gul Hassan,	12.10.1960/ Bajaur	30.08.2002/B-18	a)30.8.2002 b)02.01.2018	18 19	PSC By Promotion	AHQH, Bajaur.
4.	Dr.Ajmal Shah, MBBS/MS Surgery.	24.02.1958/ Bannu	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014	18 19	PSC By Promotion	KGNTH, BANNU
5.	Dr.Bakht Sarwar, MBBS/FCPS	01.08.1965/ Dir	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014	18 19	PSC By Promotion	DHQ Hospital, Timergara.
6.	Dr.Muhammad Nasir, MBBS/FCPS.	10.04.1970/ Kohat	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014	18 19	PSC By Promotion	DHQ Hospital, Kohat.
7.	Dr.Muhammad Ismail Khan, MBBS /FCPS	13.05.1959/ Swat	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014	18 19	PSC By Promotion	SGTH, Swat.
8.	Dr.Rizwan Ahmad, MBBS/FCPS.	04.04.1971/ Karak.	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014	18 19	PSC By Promotion	DHQ Hospital, Karak.
9.	Dr.Mian Tauseef Uddin, MBBS/FCPS	22.03.1967/ Mardan	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014	18 19	PSC By Promotion	DHQH, Mardan
10.	Dr.Noor Alam, MBBS/FCPS.	01.09.1965/ Charsadda	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014	18 19	PSC By Promotion	ESH, Pabbi (working against the post of PMO(BS-19)
11.	Dr.Muhammad Shafiq, MBBS/FCPS.	12.11.1969/ Swabi	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014	18 19	PSC By Promotion	DHQH, Swabi.
12.	Dr.Ghulam Rasool, MBBS/MCPS.	18.01.1964/ Mardan	17.03.2005/B-18	a)17.03.2005 b)02.01.2018	18 19	PSC By Promotion	Naseerullah Khan Babar hosp, Pesh.
13.	Dr.Hayat Shahzad S/O Khan Shahzada, MBBS	01.04.1971/ Dir	25.10.2007/B-18	a)25.10.2007 b)02.01.2018	18 19	PSC By Promotion	DHQH, Batkhela.

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SO-I

1997 PLC (C.S.) 1210

[Supreme Court of Pakistan]

Present: Zia Mahmood Mirza and Mukhtar Ahmad Junejo, JJ

Ch. MUHAMMAD SIDDIQUE and 4 others

versus

DIRECTOR, SPECIAL EDUCATION and 7 others

Civil Petitions Nos. 993, 998, 1004, 1007 and 1012-L of 1995, decided on 11th December, 1996.

(On appeal from the judgment dated 21-5-1995 passed by the Punjab Service Tribunal, in Service Appeal No. 715 of 1990).

Punjab Civil Servants (Appointment and Conditions of Service) Rules, 1974----

-----R. 11---Constitution of Pakistan (1973), Art. 185(3)---Civil service--Promotion--- Ante-dated pro forma promotion in BS-17---Petitioners challenged respondents ante-dated promotion---Service Tribunal maintained respondent's promotion on the principle that promotee was entitled to promotion from that date when post might have fallen vacant ---Validity--Respondent was admittedly transferred to the cadre in 1984, where to, no objection was taken by petitioners and they also failed to raise any objection when respondent was later promoted---Service Tribunal had, thus, rightly maintained that petitioners were precluded by their own conduct from raising any objection at such belated stage to respondent's claim for pro forma promotion---Respondent was entitled to seek promotion with effect from date when post in question became available and/or the date when her case was deferred by Departmental Promotion Committee---Judgment of Service Tribunal, being quite just and fair, did not suffer from any illegality---Leave to appeal was refused in circumstances.

1985 SCMR 1158 rel

S.M. Tayyab, Senior Advocate Supreme Court with Ch. Mehdi Khan Mehtab, Advocate- on-Record for Petitioners.

Nemo for Respondents

Date of hearing: 11th December, 1996

ORDER

ZIA MAHMOOD MIRZA, J. ---Petitioners in the captioned petitions feel aggrieved of an order of the Punjab Service Tribunal, dated 21-5-1995 whereby service appeal No. 515 of 1990 filed by Mrs. Munawar Bashir respondent No. 7 was allowed and she was declared entitled to be granted pro forma promotion to the post of Audiologist (BS-17) from 23-7-1987 and as also the consequential seniority.

2. Facts giving rise to these petitioners, briefly- stated, are that Mrs. Munawar Bashir Audiologist (BS-17) in the Government Middle High School for Deaf and Defective Hearing Girls, Chauburji, Lahore claimed that she was entitled to be promoted as Audiologist (BS-17) from 1987 after completing three years experience as senior Oral Mistress. Her case for promotion was placed before the D.P.C. on 23-7-1987 but it was deferred by it for "completion of certain deficiencies". She was, however, later promoted as Audiologist (BS-17) on 22-6-1988. She represented for the grant of pro forma promotion with effect from 23-7-1987; the date when the vacancy had become available. It appears that in the meanwhile; Ch. Muhammad Nazir and Mrs. Samina Nasir respondents were directly appointed as Headmaster/Headmistress /Audiologist (BS-17) as initial recruits and they joined the service on 27-3-1988 and 23-4-1988 respectively with the result that Mrs. Munawar Bashir respondent was shown junior to them in the seniority list dated 1-4-1990 to which she had objected but her objections were turned down on 21-4-1990. She made a representation to the next higher authority on 20-6-1990 and after the expiry of the period of 90 days preferred an appeal before the Service Tribunal claiming that she was entitled to get promotion with effect from 23-7-1987 when her case was deferred for the so-called "non-completion and deficiencies". It was urged by her before the Service Tribunal that the delay was not due to any reason attributed to her. On the contrary, it was due to in-efficiency of the staff concerned which failed to make her case free from such deficiencies. She also made a grievance that Mst. Shakeela Yasoob, Mrs. Razia Rana and Mrs. Saeeda Habib Farooqi, petitioners herein though promoted with her by the same Notification dated 22-6-1988 ,were junior to her inasmuch as they joined the posts much later, after their return from deputation. Appeal of respondent No.7 was contested by the petitioners on the ground, inter alia, that she belonged to general cadre as S.S.T. and was transferred to the Special Education Wing on 8-4-1984 due to the influence of her husband who was an officer of District Management Group and that she kept her lien alive in her parent department. She could not, therefore, claim seniority and promotion in the Special Education Wing.

3. The learned Tribunal observed that it was undisputed that respondent

No. 7 was considered for promotion to the post of Audiologist (BS-17) by D.P.C. in its meeting held on 23-7-1987 and her case was deferred because of certain deficiencies and proceeded to hold that "but for this reason she would have been promoted from 23-7-1987 against the post which clearly meant for promotion quota and was then available to be filled on the basis of seniority-cum-fitness by the next eligible officer. The appellant was found entitled to it though she was granted promotion from a later date namely 15-5-1988 because of deferment of this case in the previous meeting of the D.P.C. Since this delay was not caused by her, she could not be held responsible for it, nor could be punishable by deferring her promotion. It was held in 1985 SCMR 1158 that a promotee was entitled to promotion from the date when the post might have fallen vacant. On this principle, the appellant seemed to have a right to have been promoted from 23-7-1987." The learned Tribunal repelled the objections of the respondents and held that in the absence of any order sending respondent No.7 on deputation to the Special Education Wing, "her plea of having been appointed here through transfer under rule II of the Punjab Civil Servants (Appointment and Conditions of Service) Rules, 1974 would be assumed to be correct." It was observed by the Tribunal that respondent No. 7 joined the Special Education Department through transfer in 1984. None objected to it at that time and no objection was raised even when she was promoted on 15-5-1988 through a Notification. At least, no one preferred an appeal before the Service Tribunal. This conduct of the petitioners, according to the learned Tribunal, "Would obviously preclude them from objecting to her getting the promotion ante-dated. " The learned Tribunal also repelled the objection raised on behalf of some of the petitioners herein that the name of Mrs. Munawar Bashir respondent No. 7 was struck off as S.S.T. due to her long absence from duty and as such she could not be appointed through transfer. This plea, the Tribunal held, was not substantiated by any documentary evidence. With these findings/observations, the learned Tribunal accepted the appeal of respondent No. 7 and declared her entitled to be granted pro forma promotion as Audiologist (BS-17) from 23-7-1987 and also consequential seniority.

4. We have heard the learned counsel for the petitioners. He has pointed out that Mrs. Shakeela Yasoob, petitioner in C.P. 998-L of 1995 has died and, therefore, her petition has become infructuous. Civil Petition No.998-L of 1995 is accordingly dismissed as infructuous. In other petitions, learned counsel raised the same objections against the appointment by transfer of respondent No. 7 and her entitlement to promotion as were raised in the appeal before the Service Tribunal. He was, however, unable to controvert the findings recorded by the Service Tribunal that respondent No.7 was transferred to the Special Education Wing in the year 1984. No objection was then taken by any of the present petitioners to the appointment of respondent No. 7. Respondent

was later promoted as Audiologist (BS-17) in 1988 and even then no objection was raised by the petitioners and as rightly observed by the Service Tribunal, they did not agitate the grievance in an appeal before the Service Tribunal. That being so, it has been rightly held by the learned Tribunal that the petitioners are precluded by their own conduct from raising any objection at this belated stage to the respondent's claim for pro forma promotion. It has not been denied that the case of the respondent was placed before the D.P.C. on 23-7-1987 and was deferred due to certain deficiencies but she was later promoted on 15-5-1988. That being so, she was entitled to ask for promotion with effect from the date the post became available and/or the date when her case was deferred by D.P.C. The judgment of the Service Tribunal, in our view, is quite, just and fair and does not suffer from any illegality. It does not, therefore, call for any interference by this Court. All the petitions are accordingly dismissed.

A.A./M-6/S

Leave refused.

TABLE SHOWING SUMMARY OF PROMOTIONS FOR JUSTICE

Dr. Muhammad Noor (Tangh-I-Imbiq)

1	2	3	4	5	6	7	8	9	10	11	12	13	14
Name	Date of Birth	Graduation	Entry into Govt. Service (Medical Officer) (B.S.17)	Post Graduation	Posted as surgeon against the vacant post of surgeon	Date of appointment / promotion to BS-18 (Distt Specialist Surgery)	Required length of service in BS-18 for promotion to BS-19	Served period in BS-18	Promotion to BS-19	Promotion to BS-20	Total service in Health Department	Eligibility for promotion to BS-19	Eligibility for promotion to BS-20
Dr. Noor Muhammad	12-10-1960	1984	02-11-89	August 1997	05-09-1998 (B.S.17)	30-08-2002 <i>up till 2.1.2018 (16 years)</i> <i>B.S. 18 was regularized since 30.8.2002 by P.S.F. but went on 8.10.2018 (Annex A)</i>	07 Years	16 years if we include the services against the vacant post of surgeon than 20 years.	02-01-2018	07-01-2019	Since 02-11-89 (31 years)	In 2009 but promoted in 02-01-2018 but according to Enquiry Report dated 8.2.19 B.S.19 was due in 2012	12 years service in BS-18 & above, so was eligible in 2014 but promoted on 07-01-2019

8.10.2018

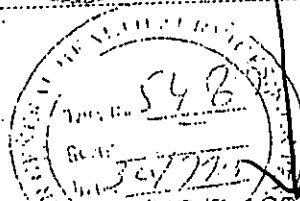
2025
8-13

SHO-1/HD/3-100/86
dated 25.7.2013

Relevant to
para no. 0 of Appendix 6



GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT



NOTIFICATION

Peshawar, dated the 25th July 2013

NO. SOH-1/HD/3-100/86
In exercise of the powers conferred by sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer Rules, 1989, and in supersession of all previous notifications issued in this behalf, the Health Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualifications and other conditions specified in column 3 to 5 of the appendix to this Notification, which shall be applicable to the posts specified in column 2 of the said appendix.

APPENDIX

1 S.No.	2 Nomenclature of the posts	3 Minimum qualification for appointment by initial recruitment	4 Age limit	5 Method of recruitment
1.	Chief District Specialist (all specialities) (BPS-20)			By promotion, on the basis of seniority-cum-fitness, from amongst the Senior District Specialists in BPS-19, having a minimum of 12 years service in BPS-18 and above.
2.	Senior District Specialist (all specialities) (EPS-19)			By promotion, on the basis of seniority-cum-fitness, from amongst the District Specialists in BPS-18, having a minimum of 07 years service in BPS-18.
3.	District Specialist (all specialties) (BPS-18)	a) Postgraduate Degree/ Fellowship in the specialty from a recognized University/ Institute with at least one year's experience in the relevant specialty before or after graduation; or	22 to 40 years	By initial recruitment

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Assistant Director (P-I)
Director General Health Services

b) Diploma in the specialty from a recognized institute with t least three year's service in the relevant specialty.

Note:- Candidates with the qualification at (b) shall be considered only when no suitable candidate with the qualification at (a) above is available.

SECRETARY HEALTH

Endst No and date even

1. C.C
2. Vice Chancellor Khyber Medical University, Peshawar.
3. Chief Executives, KTH/LRH/HMC, Peshawar/AMI, Abbottabad/SGTH, Swat/Group of Teaching Hospital Bannu/MMC, Mardan.
4. All Principals Public Sectors Medical Colleges, Khyber Pakhtunkhwa.
5. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
6. Director Health Services, FATA, Peshawar.
7. Accountant General Khyber Pakhtunkhwa, Peshawar.
8. Director Recruitment, Public Service Commission, Khyber Pakhtunkhwa, Peshawar.
9. All DHOs, Khyber Pakhtunkhwa.
10. All Medical Supdts DHQs/AHQs Khyber Pakhtunkhwa.
11. All Distt: Accounts officers/Agency Accounts Officers Khyber Pakhtunkhwa.
12. Assistant Legal Drafter-I, Law, Parliamentary Affairs and Human Rights Department w/r to his letter No.ALD-I/REG 1(4)81/Vol.V/12263-65 dated 3/7/2013.
13. The Manager Govt. Printing Press, Khyber Pakhtunkhwa Peshawar for publication in the next Govt. Gazettee with the request to provide 100 copies of the notification.
14. The Section Officer (R-II), Establishment Department, Khyber Pakhtunkhwa, Peshawar.
15. The Section Officer (SR-III) Finance Department.
16. The Section Officer-II, Health Department, Khyber Pakhtunkhwa.
17. Dr. Ejaz Hussain Siddiqui, Chairman Coordination Committee Distt: Specialists, Khyber Pakhtunkhwa, Peshawar.
18. Computer Programmer Health Department.
19. P.S to Secretary Health, Khyber Pakhtunkhwa.
20. P.As to Addl., Secretaries/Deputy Secretaries Health Deptt.

M. Jamil
(Muhammad Jamil)
Section Officer-I

Attested
Saleem
Assistant Director (P-I)
Director (P-I) Health
Services Khyber Pakhtunkhwa

GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Annex

DATED PESH: THE 23RD APRIL 2018

NOTIFICATION

No.SOH-1/HD/3-5/2018 . In pursuance of sub-section(5) of Section 8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 and Establishment Department's circular letter No.SOR-VI(E&AD)1-16/2008/Vol.VI dated 26th July 2010, the Competent Authority is pleased to notify joint seniority list of District Specialists all specialities as stood on 1/1/2018 for information of all the concerned.

SECRETARY HEALTH

Endsl No and date even

C.C

1. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar with the remarks to circulate the same to all concerned and also furnish a copy of the seniority list to this department on urgent basis.
2. All DHOs in Khyber Pakhtunkhwa.
3. Director Health Services, FATA, Khyber Pakhtunkhwa, Peshawar.
4. Hospital Director KTH/LRH/HMC, Peshawar/ATH, Abbottabad.
5. Medical Director KTH/LRH/HMC, Peshawar/ATH, Abbottabad.
6. Chief Executive/Principal SGTH/SMC,Swat/ DHQTH/MMMTH/GMC DIKhan
7. Dean PGMI/HMC, Peshawar.
8. Dean KMC/KCD, Peshawar/BKMC, Mardan/Gajju Khan Medical College Swabi/Nowshera Medical College, Nowshera/BMC Bannu.
9. All DHOs in the Health Department, Khyber Pakhtunkhwa.
10. All Medical Supdts DHQHs/AHQHS in Khyber Pakhtunkhwa.
11. PS to Secretary Health Department.
12. PS to Special Secretary Health Department.
13. PA to Addl. Secretary (Estt) Department.
14. Doctors concerned.


(Hasseem Khan)
Section Officer-I



DIRECTORATE GENERAL
KHYBER PAKHTUNKHWA PESHAWAR

All communications should be addressed to the Director General Health Services
Peshawar and not to any official by name. Mail Address: K. J. Road, Peshawar
Office # 091-9210269 Exchange # 091-9210187-9210196 Fax # 091-9210230

NO. 7257 /AE-I

Dated: 21/04/2020

To

The Secretary to Government of
Khyber Pakhtunkhwa Health
Department Peshawar.

SUBJECT:-

GRANT OF BPS-21 ON MERITORIOUS SERVICES TO MOST SENIOR
CHIEF DISTRICT SPECIALIST BPS-20.

Sir,

With reference to your letter No. SOH-1/HD/3-50/2020, dated
21.04.2020, on the subject noted above I have the honour to submit herewith the promotion
case from BS-20 to BS-21 on meritorious service in respect of Dr. Khalid Khan, Chief
District Dermatologist BS-20 Government Naseerullah Khan Babar Memorial Hospital
Kohat Road, Peshawar as desired please

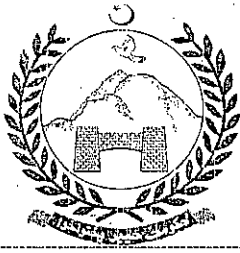
It is stated that the above named officer is serving the Provincial
Health Department since 09.06.1996. He is on the top of Seniority List of All Chief District
Specialists in BS-20.

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

TABLE SHOWING SUMMARY OF PROMOTIONS FOR JUSTICE

IN CASE OF DR. MUHAMMAD NOOR (TAMGH-I-IMTIAZ)

1	2	3	4	5	6	7	8	9	10	11	12	13	14
Name	Date of Birth	Graduation	Entry into Govt. Service (Medical Officer) (B.S-17)	Post Graduation	Posted as surgeon against the vacant post of surgeon	Date of appointment/promotion to BS-18 (Distt Specialist Surgery)	Required length of service in BS-18 for promotion to BS-19	Served period in BS-18	Promotion to BS-19	Promotion to BS-20	Total service in Health Department	Eligibility for promotion to BS-19	Eligibility for promotion to BS-20
Dr. Noor Muhammad	12-10-1960	1984	02-11-89	August 1997	05-09-1998 (B.S-17)	30-08-2002 upto 02-01-2018 (16 years) BS-18 was regularized through PSc on 08-10-2007 but Govt. Notification dated 30-01-2018 (Annex-A)	07 years	16 years if we include the services against the vacant post of surgeon than 20 years.	02-01-2018	07-01-2019	Since 02-11-89 (31 years)	In 2009 but promotion in 02-01-2018 but according to Enquiry Report dated: 08-02-19 B.S-19; was due in 2012	12 years service in BS-18 & above, so was eligible in 2014 but promoted on 07-01-2019



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

DATED PESH: THE 18TH AUG; 2014

NOTIFICATION

No.SOH-I/HD/3-5/06 Sanction is hereby accorded to the grant of three hundred and sixty five (365) days leave encashment in lieu of LPR in favour of Dr. Khalil-ur-Rehman, Chief Distt: Specialist Surgery (BPS-20), DHQTH D.I.Khan.

2. The Distt: Accounts Officer, D.I.Khan has certified that the doctor concerned is entitled for 365 days leave encashment in lieu of LPR under Revised Leave Rules, 1981.

3. He stands retired from Govt. service w.e.f 22/5/2014 (A.N)

SECRETARY HEALTH

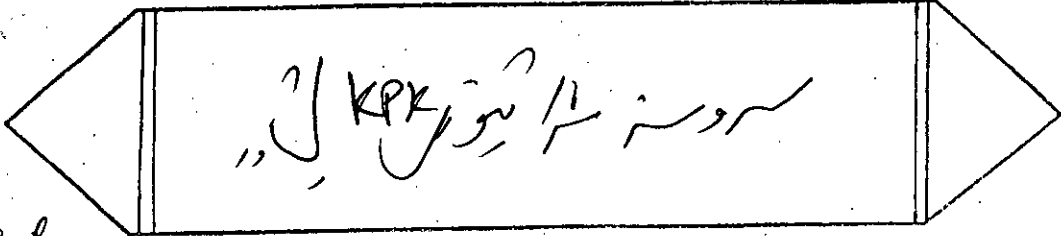
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C.C

1. Chief Executive, DHQTH/MMMTH D.I.Khan.
2. Director General Health Services Khyber Pakhtunkhwa, Peshawar.
3. Medical Supdt; DHQTH, D.I.Khan.
4. Distt: Accounts Officer, D.I.Khan.
5. Doctor concerned.
6. Personal file of the doctor concerned.


(Muhammad Jamil)
Section Officer-I

بعدالت



Respondent
NO. 7-10 2020ء پنجاب

ڈائریکٹر لڈر بنام سرکار لاہور

موزعہ
مقدمہ
دعویٰ
جزم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام کے لئے حرفہ کیلئے سرکار لاہور
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر حالت ہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو کبھی وہی جملہ مذکورہ بااختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا ادکالت نامہ لکھ دیا کہ سند ہے۔

Accepted

Attest
[Signature]

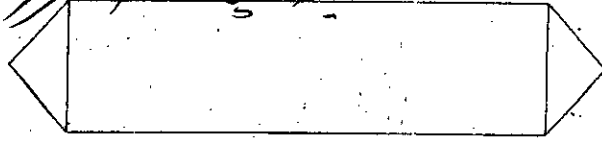
المرقوم 21 ماہ السنت 2020ء 2020ء
واہ العب

بمقام کے لئے منظور ہے۔

ڈائریکٹر لاہور
[Signature]

[Signature]
ڈائریکٹر لاہور

بعدالت حیدر سٹیٹ سپروائزر ٹریڈ یونٹ



Respondent

ڈاکٹر، عنوان کار 10

2، منجانب

مورخہ 15-09-2020

ڈاکٹر محمد نور بنام حکومت وکٹوریا

مقدمہ S And 7241/2020
دعویٰ

جرم

بانٹ تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام لٹاور کیلئے عدالت اللہ محمد ایدو وکیل
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زر میں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے
اور اس کا ساختہ پر داخستہ منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کیلئے
سبب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سندر ہے۔

Accepted
Hidayat
15/9

المرقوم ماہ 20

دستخط ڈاکٹر محمد رحمان احمد واہ
مقام

03339715923

14 203 206 254 77

15/9

بعدالت جناب حیدر علی سرورس ٹریبونل پشاور



2020ء پنجاب ایڈوانس ڈاکٹر محمد نور
ڈاکٹر محمد نور بنام گورنمنٹ آؤ کپی
ومنیہ

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام سرورس ٹریبونل پشاور کیلئے محمد اعجاز خان صاحب، عدنان امان ایڈووکیٹ

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
دیکل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دینے جو اب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سندر ہے۔

Dr. Muhammad Akbar
(Appellant)

المرقوم 15 _____ ماہ ستمبر 2020ء

بہا

کے لئے منظور ہے۔
Attested & Accepted

بمقام پشاور

Dr. Muhammad Akbar

15-09-2020

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

SERVICE APPEAL NO. 7241/2020


Dr. Muhammad Noor Appellant

Versus

Govt. of Khyber Pakhtunkhwa and others..... Respondent

I N D E X

S.No	Description of documents	Annexure	Page
01	Parawise Comments		1 to 4
02	Promotion Notification dated 07-01-2019	Annex-A	5


(HAZRAT SHAH)
Section Officer (Lit-II)
Govt. of Khyber Pakhtunkhwa
Health Department

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

SERVICE APPEAL NO. 7241/2020

Dr. Muhammad Noor Appellant

Versus

Govt. of Khyber Pakhtunkhwa and others..... Respondent

AFFIDAVIT

I Mr. Hazrat Shah, Section Officer (Litigation-II) Govt. of Khyber Pakhtunkhwa Health Department do hereby solemnly affirm and declare that the joint parawise comments in Service Appeal No. 7241/2020 at Page 1-4 is submitted on behalf of respondents No. 1, 2, 3, 4 & 5 is true and correct to the best of my knowledge, belief and that nothing has been concealed from this Hon'ble Court.



**(HAZRAT SHAH)
Section Officer (Lit-II)
Govt. of Khyber Pakhtunkhwa
Health Department**

Identified by:-

**Addl: Advocate General,
Khyber Pakhtunkhwa**

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

SERVICE APPEAL NO. 7241/2020

Dr. Muhammad Noor Appellant

Versus

Govt. of Khyber Pakhtunkhwa and others..... Respondent

RESPECTFULLY SHEWETH:

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

PRELIMINARY OBJECTIONS:-

1. That the Appellant has got neither cause of action nor locus standi to file the instant Appeal.
2. That the Appellant has filed the instant appeal just to pressurize the respondents.
3. That the instant Appeal is against the prevailing Law and Rules.
4. That the Appeal is not maintainable in the present form and also in the present circumstances of the issue.
5. That the Appellant has filed the instant Appeal with mala-fide intention hence liable to be dismissed.
6. That the Appeal is badly time barred.
7. That the Honorable Tribunal has no Jurisdiction to adjudicate upon the matter.
8. That the instant appeal is bad for mis-joinder and non-joinder of the necessary parties.
9. That the Petitioner seeks out of turn promotion which has been declared illegal, unconstitutional and even against the injunction of Islam by Supreme Court of Pakistan.

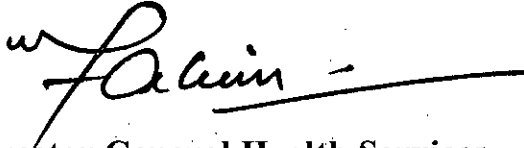
ON FACTS:

1. Correct to the extent that the Appellant has been promoted as Chief District Specialist Surgery (BS-20) vide Notification dated 07-01-2019 (Annex-I).

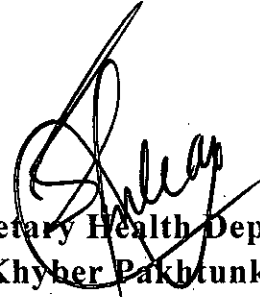
2. Pertains to record.
3. Correct to the extent that the Appellant's services were regularized with effect from the date of his contract appointment (i.e.) 30-08-2002 in BPS-18.
4. Pertains to record. However, promotion from BPS-18 to 19 is always made under the rules, which is based on seniority-cum-fitness subject to availability of post. It is worth to mention that duration of service is not the sole factor for promotion. It is worth mentioning that the Appellant did not mention of promotion of any of his junior or colleagues in this Para nor did the Appellant challenged any such order of promotion of any incumbent; hence the whole para is denied.
5. Correct to the extent of promotion of the Appellant to BPS-19 vide Notification dated 02-01-2018. It is worth mentioning that the impugned Notification has been issued in accordance with Khyber Pakhtunkhwa Promotion Policy, 2009 which provides that, "the promotion shall be made with immediate effect". As the Notification of promotion to BPS-19 was issued on 02-01-2018; however, the Appellant filed Departmental Appeal on 03-04-2020 which is badly time barred.
6. As per Para-4.
7. Pertains to record; however, grievance of the Appellant was redressed by the Department according to law and rules by promoting the Appellant to BPS-20 vide Notification dated 07-01-2019.
8. As per Para-7.
9. As Per Para-7.
10. Pertains to record; however, the Appellant was redressed by promoting him to BPS-20 in accordance with the provision of Promotion Policy, 2009. It is important to mention that the Appellant did not challenge the promotion order dated 09-10-2018 well within time and filed Departmental Appeal on 03-04-2020 which is badly time barred.
11. As per Para-7.
12. Correct to the extent that the Appellant was promoted as Chief District Specialist Surgery (BS-20) vide Notification dated 07-01-2019 in accordance with law, rules and Promotion Policy, 2009.
13. Incorrect. No fraud has been committed by the Department; however, Section-4 of Khyber Pakhtunkhwa Service Tribunal Act, 1974 provides 30-days for filing Departmental Appeal before the Appellate Authority. However, the instant Appeal is in violation of Section-4 of the ibid Act; hence not maintainable.

14. Incorrect. The Appellant has been treated in accordance with law and rules. The grievance of the Appellant has been redressed by promoting him to BSPS-20.
15. As per Para-7.
16. Incorrect. As per preceding Paras.
17. Incorrect. As per Paras above.
18. Incorrect. As per Paras above.
19. Pertain to Para-4.
20. Correct to the extent of Promotion Policy, 2009; however, it is evident from the Policy that promotion is to be made on the basis of seniority-cum-fitness and in the said Policy, it has been mentioned that promotion shall be made with immediate effect.
21. As per Paras above.
22. As per Paras above.
23. Pertain to record; however, the Departmental Appeal annexed with the Appeal is badly time barred. It is worth to mention that the working paper has been prepared for promotion on the basis of seniority-cum-fitness in accordance with law and rules and not on the basis of meritorious services as promotion on the basis of meritorious services, being out of turn has been declared illegal, unconstitutional and even against the injunction of Islam by Supreme Court of Pakistan as reported in 2018 SCMR (1218)
24. Incorrect. The Appellant is not senior and the most senior officer will be promoted to BPS-21 in accordance with law and rules.
25. Incorrect. This Honourable Tribunal has no jurisdiction to declare the Appellant fit for BPS-21 as it is the domain of PSB to declare any officer to be fit for promotion to the next higher grade.
26. Incorrect. As per Para-23.
27. No comments; however, out of turn promotion is not admissible in law.
28. As per Para-27 above.
29. Incorrect as per Paras above.
30. Pertain to record; however, the Departmental Appeal was badly time barred.

It is therefore requested that the Appeal of the Appellant may kindly be dismissed with cost.



**Director General Health Services
Khyber Pakhtunkhwa
Respondent No-5**



**Secretary Health Department
Khyber Pakhtunkhwa
Respondent No-1&3**

قیمت
50 روپے

60699



ایڈووکیٹ: محمد اسحاق
بار کونسل ایسوسی ایشن نمبر: 1766-09-06
رابطہ نمبر: 907065-0314

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: Source: Farhanul Malik Peshawar

Dr. Ismail

مخاتب: Respondent No - 09	دعویٰ:
بنام توڈنٹ منسٹری	علت نمبر:
کالڈ ہڈ لڈ	مورخہ:
	جرم:
	تھانہ:

باعث تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
آن مقام لیسٹریٹ کے لیے خان علی ایجوکیشنل سوسائٹی کو وکیل مقرر
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کرنے و تقررت ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف سے یا اپیل کی برآمدگی اور منسوخی، نیز
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمزاد یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور ان کا ساختہ پرداختہ منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جانہ اتوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے
باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المقوم: 2020-09-21
PESHAWAR BAR ASSOCIATION
KHAYREDDIN ROAD PESHAWAR

مقام لیسٹریٹ کے لیے منظور ہے۔

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

Attested
Accepted

محمد اسحاق

Respondent No - 09
Dr. Muhammad Ismail



25
Annex: H H
GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Pesh: the 07th January, 2019

NOTIFICATION:

No. SOH-I/HD/3-5/2018: On the recommendations of Provincial Selection Board, the Competent Authority is pleased to promote Dr. Muhammad Noor, Senior District Specialist Surgery (BS-19) to the post of Chief District Specialist Surgery (BS-20) on regular basis with immediate effect.

2- The doctor on promotion will remain on probation for a period of one year in terms of Section-6(2) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.

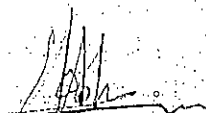
3- Posting / transfer Notifications in respect of the above doctor will be issued later on.

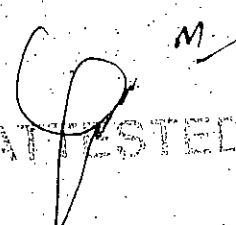
SECRETARY HEALTH DEPARTMENT

Endst: No & date even

Cc:

1. Accountant General Khyber Pakhtunkhwa.
2. Director-General Health Services Khyber Pakhtunkhwa.
3. Director Health Services, FATA, Peshawar.
4. Medical Superintendent DHQH Bajaur.
5. Director Information, Khyber Pakhtunkhwa.
6. Distt. Accounts Officer Bajaur.
7. Coordinator HSRU Health Department.
8. PS to Secretary Health Khyber Pakhtunkhwa.
9. Doctor concerned.
10. Personal file of the doctors concerned.


(Tasfeem Khan)
Section Officer (E-I)


M.
ATTESTED

BEFORE THE HON'BLE CHAIRMAN SERVICE TRIBUNAL
PESHAWAR

Applicatoin in Appeal No. 7242/2020

Muhammad Noor

Versus

Government of Khyber Pakhtunkhwa and others

APPLICATION ON BEHALF OF RESPONDENT
NO.13 I.E DR. MUHAMMAD SHAFIQ S/O
MUHAMMAD ASLAM FOR RELIANCE ON
COMMENTS SUBMITTED BY RESPONDENT
NO. 3 ~~84~~ I.E GOVERNMENT DEPARTMENT
(HEALTH) IN ABOVE TITLE APPEAL NO.7242/2020

Respectfully Sheweth,

The Applicant/Respondant No.13 humbly submits as under

1. That the above tilte appeal No.7242/2020 is pending ad judication before this Hon'ble Tribunal which is fixed for today dated 21.09.2020.
2. That the applicant has been made as proforma respondant No.13 in the captioned appeal.
3. That the applicant/Respondant was directed by this Hon'ble Tribunal to submit the parawise reply comments and now the present respondant No.13 is reliance on parawise comments which has been submitted by government department (Health), hence the respondant has no objection and don't want to submit further comments.
4. That the present applicant/respondant will take other groudns at the time of arguments with the prior permission of this August Tribunal.

It is, therefore, most humbly prayed that on acceptance of this instant application may kindly be accepted and the parawise comments which has been submitted by respondant No. 38/4 i.e Government Department (Health) may kindly be concedered in favour of the present applicant/respondent.

Any other remedy if deems fit by this Hon'ble Tribunal may also be awarded in favour of the present repondnat/applicant.



Applicant/Respondant

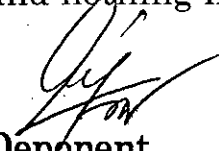
Muhammad Shafiq

CNIC# 16202-0896900-1

Dated: 21/09/2020

AFFIDAVIT

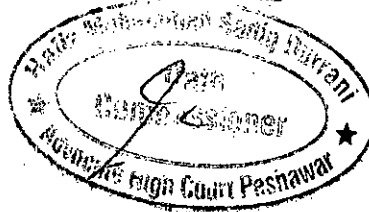
I, Applicant due hereby solmly affirm and declare that all the contents of this application are true and correct and nothing has been concealed from this Hon'ble Tribunal.



Deponent

12 1 SEP 2020

ATTESTED



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

CM No. ____/2020

In

Appeal No.7241/2020

Dr. Muhammad Noor,

(Appellant)

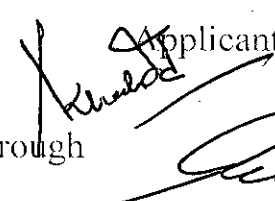

VERSUS

Govt of Khyber Pakhtunkhwa through Secretary Health Khyber
Pakhtunkhwa Civil Secretariat, Peshawar and others.

(Respondents)

INDEX

S #	Description of Documents	Annexure	Page No
1.	Reply with Affidavit		1-4
2.	Copy of certificate	A	5 - 6
3	Copy of the seniority list and extracts of the Esta Code	B & C	16 - 21
4	Other Relevant documents		
5	Other Relevant documents		

Applicant

Through 
ZARTAJ ANWAR
Advocate Peshawar

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

CM No. ____/2020

in

Appeal No.7241/2020

Dr. Muhammad Noor,

(Appellant)

VERSUS

Govt of Khyber Pakhtunkhwa through Secretary Health Khyber
Pakhtunkhwa Civil Secretariat, Peshawar and others.

(Respondents)

REPLY ON BEHALF OF THE RESPONDENT NO 6

Preliminary Objections

1. That the appellant has no locus standi to file the instant Appeal.
2. That the instant Appeal is totally incompetent, misconceived and untenable in its present form.
3. That the appeal is bad for non-joinder of necessary parties.
4. That the instant Appeal is based on Malafide and malice and also did not made the necessary parties of all those doctors since 2002 who been promoted to higher scale and now enjoying the benefits of such scales.
5. That the Appellant has not come to this Honorable Tribunal with clean hands. Moreover the Appeal is also suffered from misstatement and the Appellant has concealed material facts from this Hon'ble Tribunal.
6. That the appellant is junior to the respondent no 6, as the Respondent No 6 was appointed in the year of 1987 MO/Registrar in the health department and the appellant was appointed in 1989, the respondent no 6 was promoted to BPS-18 in 1996 and the appellant was promoted to BPS-18 in 2002, the respondent no 6 was promoted to BPS-19 in 2007 and the appellant was promoted to BPS-19 in 2018, the respondent no 6 was further promoted to BPS-20 in 2016 and the appellant was

promoted to BPS-20 in 2019, so the appellant has concealed this facts from this honourable Tribunal *(Copy of experience certificate is attached as annexure A)*

7. That the seniority in each year according to the their own specialty as well as the joint seniority of all the doctors in particular grade was issued time to time and the appellant had not objected the same at that very time but now at this belated stage the appellant cannot claimed/objected the seniority list issued by the competent authority upon which valuable rights of all categories /doctors and upon such seniority many of them were promoted and got retired since 2002 now presently he cannot claimed allegedly the seniority which he did not object at the relevant time or the Pandora Box can be open if any order passed by this hon'able Tribunal at this very stage.
8. That the seniority list which was issued by the competent authority of each scale at relevant time upon which number of promotions given effect or he has to make them necessary parties while taking any favorable order from this honourable tribunal.

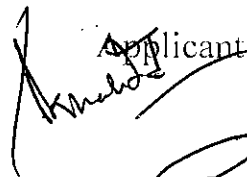
Respectfully Submitted:

1. That the appellant in noted Appeal Praying for set asiding the promotion orders of the respondent no 7 to 13 made vide order dated 09.10.2018, in which his colleagues were promoted to BPS-19 and also his own regularization order made w.e.f 30.08.2002 and also seeking his promotion to BPS-19 which was made vide notification dated 07.01.2019 to be given effect from 2012 and promotion to BPS-20 since 2014 and then seeking his promotion to BPS-21 on the basis of Meritorious Services, and considering himself on the basis of his assumptions the only doctor of BPS-20 who is eligible for BPS-21 Meritorious Position because of TAMGHA-I-IMTIAZ.
2. That the appellant has no standing with the respondent no 6 in seniority because the respondent no 6 was promoted to BPS-18 in the year 1996 while to BPS -19 in the year 2007 and promoted to BPS-20 in the year of 2016 furthermore according to the seniority list of BPS-20 the respondent no 6 stand at serial no 1 while the present appellant stood at serial no 24, which clearly shows that there is no seniority conflict of appellant and respondent no 6, furthermore regarding the promotion to BPS-21 on the basis of meritorious service according to ESTA CODE will be on the basis of in order of seniority, Minimum of 3 years active service in BPS-20 for BPS-21. *(Copy of the seniority list and extracts of the Esta Code are attached as annexure B and C)*

3. That the appellant has no locus standi against the respondent no 6 as the appellant presuming himself to be promoted to BPS-20 from 2014 without challenging his previous seniority which he enjoyed and upon which he was promoted in the year 2019 to BPS-20 and on the other hand Respondent no 6 is the senior post Doctor in his own Specialty as well as in the seniority of BPS-20.
4. That the respondent No. 6 was inadvertently arrayed, was however, not necessary party and his name is required to be deleted from the penal of respondents.
5. That instead the name of respondent No. 6 he can only seek first his seniority in the penal of his colleague's, But in that case he has to challenge the promotion order so made since 2012 by making them necessary party.
6. That making Respondent no 6 party to the noted appeal is with mala fide intention as to harass him and with ulterior motives to stop his promotion case which is recommended for promotion by the competent authority by declaring him most suitable and eligible candidate for the post of meritorious services BPS-21 according to law, rules and policy.

It is therefore most humbly prayed that on acceptance of this Reply the appeal of the appellant may graciously be dismissed with cost.

Through

 Applicant



ZARTAJ ANWAR
Advocate Peshawar

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

CM No. ____/2020

in

Appeal No.7241/2020

Dr. Muhammad Noor,

(Appellant)

VERSUS

Govt of Khyber Pakhtunkhwa through Secretary Health Khyber
Pakhtunkhwa Civil Secretariat, Peshawar and others.

(Respondents)

AFFIDAVIT

I, Dr Khalid Khan S/O Fazli Raheem R/O House No 42A Street No 1 Sector A Sheikhmaltoon Town Mardan, do hereby solemnly affirm and declare on oath at Peshawar that the contents of the above noted reply are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Court.

Identified By



ZARTAJ ANWAR
Advocate Peshawar




Deponent

29-9-20

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FINAL SENIORITY LIST OF CHIEF DISTRICT SPECIALIST SKIN (BPS-20) AS ON 01.01.2020

Individual list of Skin specialists

Sl: No.	NAME OF OFFICER WITH ACADEMIC QUALIFICATION.	DATE OF BIRTH AND DOMICILE	DATE OF IST: ENTRY INTO GOVT: SERVICE.	REGULAR APPOINTMENT/PROMOTION TO PRESENT POST.			PRESENT POSTING.
				DATE	BPS	METHOF OF RECRUITMENT	
1	Dr.Khalid Khan, MBBS/DDV	18.09.1961/Charsadda	09.06.1996/B-18	a) 09.06.1996 b) 09.08.2007 c)17.05.2016	18 19 20	PSC By Promotion. By Promotion.	NKBM Hosp: Kohat Road, Peshawar

FINAL SENIORITY LIST OF CHIEF DISTRICT SPECIALIST PSYCHIATRY (BPS-20), AS ON 01.01.2020

Sl: No.	NAME OF OFFICER WITH ACADEMIC QUALIFICATION.	DATE OF BIRTH AND DOMICILE	DATE OF IST: ENTRY INTO GOVT: SERVICE.	REGULAR APPOINTMENT/PROMOTION TO PRESENT POST.			PRESENT POSTING.
				DATE	BPS	METHOF OF RECRUITMENT	
1	Dr.Ashfaq Ali, MBBS/FCPS.	01.03.1961/Mardan.	16.04.1998/B-18	a) 16.04.1998 b) 27.01.2009 c)22.05.2018	18 19 20	P.S.C. By Promotion By Promotion.	DHQ: Hospital, Mardan.

[Signature]
Deputy Director (HRM)
Directorate General Health Services
Khyber Pakhtunkhwa Peshawar

ATTESTED

13 14

FINAL SENIORITY LIST OF CHIEF DISTRICT SPECIALIST SURGEONS (BPS-20), AS ON-01.01.2020

SL. NO.	NAME OF OFFICER WITH ACADEMIC QUALIFICATION.	DATE OF BIRTH AND DOMICILE	DATE OF IST. ENTRY INTO GOVT. SERVICE.	REGULAR APPOINTMENT/ PROMOTION TO PRESENT POST.			PRESENT POSTING.
				DATE	BPS	METHOF OF RECRUITMENT	
1.	Dr.Saifur Rehman, MBBS/MCPS.	13.04.1962/ Mardan	11.04.1996/B-18	a) 11.04.1996 b) 07.05.2010 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	SGTH, Swat
2.	Dr.Sultan Sikandar Bacha, MBBS/FRCS.	30.06.1962/ Swat	12.02.2000/B-18	a) 12.02.2000 b) 28.06.2010 c) 09.10.2019	18 19 20	PSC By Promotion By Promotion	Attached to DHO Swat
3.	Dr.Muhammad Noor S/O Gul Hassan,	12.10.1960/ Bajaur	30.08.2002/B-18	a) 30.08.2002 b) 02.01.2018 c) 07.01.2019	18 19 20	PSC By Promotion By Promotion.	DHQH, Bajaur.
4.	Dr.Bakht Sarwar, MBBS/FCPS	01.08.1965/ Dir	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	DHQ Hospital, Timergara.
5.	Dr.Muhammad Nasir, MBBS/FCPS.	10.04.1970/ Kohat	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	DHQ Hospital, Kohat.
6.	Dr. Rizwan Ahmad, MBBS/ FCPS.	04.04.1971/ Karak	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	DHQ Hospital, Karak.
7.	Dr.Mian Tauseef Uddin, MBBS/FCPS	22.03.1967/ Mardan	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	DHQH, Mardan
8.	Dr.Noor Alam, MBBS/FCPS.	01.09.1965/ Charsadda	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	ESH, Pabbi, Nowshera
9.	Dr.Muhammad Shafiq, MBBS/FCPS.	12.11.1969/ Swabi	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	DHQH, Swabi.
10.	Dr.Ghulam Rasool, MBBS/MCPS.	18.01.1964/ Mardan	17.03.2005/B-18	a) 17.03.2005 b) 02.01.2018 c) 09.10.2019	18 19 20	PSC By Promotion By Promotion	Naseerullah Khan Babar hosp; Pesh.

In Individual List →

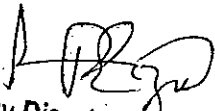
ATTESTED

M. Raza
Deputy Director (HRM)
Directorate General Health Services
Feroze, Pakhtunkhwa Peshawar

12 13

FINAL SENIORITY LIST OF CHIEF DISTRICT SPECIALIST PHYSICIANS (BPS-20), AS ON 01.01.2020

S. NO.	NAME OF OFFICER WITH ACADEMIC QUALIFICATION.	DATE OF BIRTH AND DOMICILE	DATE OF IST. ENTRY INTO GOVT. SERVICE.	REGULAR APPOINTMENT /PROMOTION TO PRESENT POST.			PRESENT POSTING.
				DATE	BPS	METHOF OF RECRUITMENT.	
1.	Dr.Sultan Nawaz, MBBS/FCPS.	01.01.1961/ DIKhan	12.02.2000/B-18	a)12.02.2000 b) 11.6.2007 c)09.10.2018	18 19 20	PSC By Promotion. By Promotion	DHQH, DIKhan
2.	Dr.Javed Sarwar, MBBS/FCPS/FRCP	01.06.1963/ Haripur	25.10.2004/B-18	a) 25.10.2004 b) 16.04.2013 c)09.10.2018	18 19 20	PSC By Promotion. Ey Promotion	BBSTH, Abbottabad.
3.	Dr.Ruknud Din, MBBS/FCPS	12.05.1967/ Chitral	17.03.2005/B-18	a) 17.03.2005 b) 16.04.2013 c)09.10.2018	18 19 20	PSC By Promotion. By Promotion	DHQH, Chitral
4.	Dr.Muhammad Arif Khan, MBBS/FCPS	02.06.1961/ Mardan	17.03.2005/B-18	a) 17.03.2005 b) 16.04.2013 c)09.10.2018	18 19 20	PSC By Promotion. By Promotion	DHQH, Swabi
5.	Dr.Said Muhammad, MBBS/FCPS	10.02.1968/ Mohmand Agy	17.03.2005/B-18	a) 17.03.2005 b) 16.04.2013 c)09.10.2018	18 19 20	PSC By Promotion. By Promotion	DHQH: Charsadda
6.	Dr.Nasir Mahmood, MBBS/FCPS.	16.04.1968/ Haripur	17.03.2005/B-18	a) 17.03.2005 b) 16.04.2013 c)09.10.2018	18 19 20	PSC By Promotion. By Promotion	DHQH Haripur.


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

ATTESTED

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FINAL SENIORITY LIST OF CHIEF DISTRICT SPECIALIST ORTHOPAEDIC SURGEON (BPS-20), AS ON 01.01.2020

Sl. NO.	NAME OF OFFICER WITH ACADEMIC QUALIFICATION.	DATE OF BIRTH AND DOMICILE	DATE OF IST: ENTRY INTO GOVT. SERVICE.	REGULAR APPOINTMENT/PROMOTION TO PRESENT POST.			PRESENT POSTING.
				DATE	BPS	METHOF OF RECRUITMENT.	
1.	Dr.Farmanullah S/O Gul Muhammad, MD/MS Orth;	16.12.1962/ Mohmand A	11.12.2001/B-18	a) 11.12.2001 b) 06.01.2015 c) 22.05.2018	18 19 20	PSC By Promotion. By Promotion.	DHQH, Mardan.

FINAL SENIORITY LIST OF CHIEF DISTRICT SPECIALIST CHILDREN (BPS-20) AS ON 01.01.2020

Sl. NO.	NAME OF OFFICER WITH ACADEMIC QUALIFICATION.	DATE OF BIRTH AND DOMICILE	DATE OF IST: ENTRY INTO GOVT. SERVICE.	REGULAR APPOINTMENT/ PROMOTION TO PRESENT POST.			PRESENT POSTING.
				DATE	BPS	METHOF OF RECRUITMENT	
1	Dr.Gulzar Ahmad, MBBS/FCPS	09.03.1966/ Chitral	08.06.2005/B-18	a) 08.06.2005 b) 15.04.2013 c) 22.05.2018	18 19 20	PSC By promotion. By Promotion	DHQH, Timergara.
2	Dr.Muhammad Saeed, MBBS/DCH	20.12.1960/ Mardan	24.04.1997/B-18	a) 24.04.1997 b) 26.04.2010 c)08.10.2019	18 19 20	PSC By promotion. By Promotion	DHQH, Batkhela.
3	Dr.Muhammad Musa, MBBS/DCH	23.03.1961/ S.W.Agy	08.10.2005/B-18	a) 08.10.2005 b) 22.05.2018 c)08.10.2019	18 19 20	PSC By Promotion By Promotion	AHQH, Wana

ATTESTED

[Signature]
 Deputy Director (HRM)
 General Health Services
 Peshawar, Pakhtunkhwa Peshawar

FINAL SENIORITY LIST OF SENIOR DISTRICT SPECIALIST GYNAECOLOGISTS (BPS-20) AS ON 01.01.2020

S. NO.	NAME OF OFFICER WITH ACADEMIC QUALIFICATION.	DATE OF BIRTH AND DOMICILE	DATE OF IST: ENTRY INTO GOVT: SERVICE.	REGULAR APPOINTMENT /PROMOTION TO PRESENT POST.			PRESENT POSTING.
				DATE	BPS	METHOF OF RECRUITMENT.	
1.	Dr.Nargis Danish, MBBS/FCPS.	10.12.1965/ Mansehra	25.10.2004/B-18	a) 25.10.2004 b)13.01.2017 c) 09.10.2018	18 19 20	PSC By promotion. By Promotion.	DHQH, Haripur.
2.	Dr.Shahzadi Nayab Bilal, MBBS/FC PS.	21.05.1961/ Peshawar	17.03.2005/B-18	a) 17.03.2005 b)13.01.2017 c) 09.10.2018	18 19 20	PSC By promotion. By Promotion.	Govt: Maternity Hosp, Peshawar
3.	Dr.Sabrina Siraj MBBS/FCPS.	03.01.1966/ Chitral.	17.03.2005/B-18	a)17.03.2005 b)13.01.2017 c) 09.10.2018	18 19 20	PSC By promotion. By Promotion.	DHQH, Nowshera.
4.	Dr.Nighat Shaheen, D/O Ghulam Rasool MBBS/MCPS	23.04.1964/ Kohat	17.03.2005/B-18	a)17.03.2005 b)13.01.2017 c) 09.10.2018	18 19 20	PSC By promotion. By Promotion.	NKBM Hosp: Peshawar
5.	Dr. Saeeda Bibi, MBBS/DGO	11.09.1962/ N.W.Agy.	17.03.2005/B-18	a)17.03.2005 b)13.01.2017 c) 09.10.2019	18 19 20	PSC By Promotion By Promotion.	Govt: Maternity Hospital Pesh.

FINAL SENIORITY LIST OF CHIEF DISTRICT SPECIALIST ANAESTHETISTS (BPS-20), AS ON 01.01.2020

SI No	NAME OF OFFICER WITH ACADEMIC QUALIFICATION.	DATE OF BIRTH AND DOMICILE	DATE OF IST: ENTRY INTO GOVT: SERVICE.	REGULAR APPOINTMENT /PROMOTION TO PRESENT POST.			PRESENT POSTING.
				DATE	BPS	METHOF OF RECRUITMENT.	
1	Dr. Wahid Zaman, MBBS/D.A.	16.0-8.1966/ Nowshera	16.04.1998/B-18	a) 16.04.1998 b) 15.04.2013 c) 08.05.2019	18 19 20	PSC By promotion. By promotion.	DHQH, Nowshera

ATTESTED

(Signature)

Deputy Director (HRM)
Directorate General Health Services
Khyber Pakhtunkhwa Peshawar


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FINAL SENIORITY LIST OF CHIEF DISTRICT SPECIALISTS (EYE) (BPS-20) AS ON 01.01.2020

S. NO.	NAME OF OFFICER WITH ACADEMIC QUALIFICATION.	DATE OF BIRTH AND DOMICILE	DATE OF IST: ENTRY INTO GOVT. SERVICE.	REGULAR APPOINTMENT/PROMOTION TO PRESENT POST.			PRESENT POSTING
				DATE	BPS	METHOF OF RECRUITMENT	
1	Dr.Tariq Jalal, MBBS/FCPS.	28.05.1962/ Nowshera	17.03.2005/B-18	a) 17.03.2005 b) 07.04.2015 c) 22.05.2018	18 19 20	PSC By Promotion. By Promotion.	NKBMH, Kohat Road, Peshawar

FINAL SENIORITY LIST OF CHIEF DISTRICT SPECIALIST CARDIOLOGISTS (BPS-20) AS ON 01.01.2020

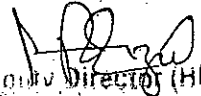
S. NO.	NAME OF OFFICER WITH ACADEMIC QUALIFICATION.	DATE OF BIRTH AND DOMICILE	DATE OF IST: ENTRY INTO GOVT. SERVICE.	REGULAR APPOINTMENT /PROMOTION TO PRESENT POST.			PRESENT POSTING.
				DATE	BPS	METHOF OF RECRUITMENT.	
1.	Dr.Fauzullah Farooq, MBBS/D.Card.	15.04.1962/ Charsadda	09.04.1996/B-18	a) 09.04.1996 b) 30.04.2009 c) 22.05.2018	18 19 20	PSC By Promotion By Promotion.	DHQH, Timergara.


Deputy Director (HRM)
Directorate General Health Services
Ayub, Pakhtunkhwa Peshawar

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29.	Dr.Muhammad Saeed, MBBS/DCH CHILDREN	20.12.1960/ Mardan	24.04.1997/B-18	a) 24.04.1997 b) 26.04.2010 c)08.10.2019	18 19 20	PSC By promotion. By Promotion	DHQH, Batkhela.
30.	Dr.Muhammad Musa, MBBS/DCH CHILDREN	23.03.1961/ S.W.Agy.	08.10.2005/B-18	a) 08.10.2005 b) 22.05.2018 c)08.10.2019	18 19 20	PSC By Promotion By Promotion	AHQH, Wana


Deputy Director (HRM)
Directorate General Health Services
Khyber Pakhtunkhwa Peshawar

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19.	Dr. Muhammad Nasir, MBBS/FCPS. SURGEON	10.04.1970/ Kohat	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	DHQ Hospital, Kohat.
20.	Dr. Rizwan Ahmad, MBBS/ FCPS. SURGEON	04.04.1971/ Karak	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	DHQ Hospital, Karak.
21.	Dr. Mian Tauseef Uddin, MBBS/FCPS. SURGEON	22.03.1967/ Mardan	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	DHQH, Mardan
22.	Dr. Noor Alam, MBBS/FCPS. SURGEON	01.09.1965/ Charsadda	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	ESH, Pabbi, Nowshera
23.	Dr. Muhammad Shafiq, MBBS/FCPS. SURGEON	12.11.1969/ Swabi	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	DHQH, Swabi.
24.	Dr. Muhammad Noor S/O Gul Hassan, SURGEON	12.10.1960/ Bajaur	30.08.2002/B-18	a) 30.08.2002 b) 02.01.2018 c) 07.01.2019	18 19 20	PSC By Promotion By Promotion.	DHQH, Bajaur.
25.	Dr. Wahid Zaman, MBBS/D.A. ANAESTHESIA	16.0-8.1966/ Nowshera	16.04.1998/B-18	a) 16.04.1998 b) 15.04.2013 c) 08.05.2019	18 19 20	PSC By promotion. By promotion	DHQH, Nowshera
26.	Dr. Ghulam Rasool, MBBS/MCPS. SURGEON	18.01.1964/ Mardan	17.03.2005/B-18	a) 17.03.2005 b) 02.01.2018 c) 09.10.2019	18 19 20	PSC By Promotion By Promotion	Naseerullah Khan Babar hosp; Pesh.
27.	Dr. Sultan Sikandar Bacha, MBBS/FRCS. SURGEON	30.06.1962/ Swat	12.02.2000/B-18	a) 12.02.2000 b) 28.06.2010 c) 09.10.2019	18 19 20	PSC By Promotion By Promotion	Attached to DHO Swat.
28.	Dr. Saeeda Bibi, MBBS/DGO GYN&E	11.09.1962/ N.W. Agy.	17.03.2005/B-18	a) 17.03.2005 b) 13.01.2017 c) 09.10.2019	18 19 20	PSC By Promotion By Promotion.	Govt: Maternity Hospital Pesh.

Appellant
Dr. Muhammad Noor

ATTESTED

[Signature]
Deputy Director (SRM)
Directorate General Health Services
Khyber Pakhtunkhwa Peshawar

9.	Dr. Sabrina Siraj MBBS/FCPS. GYNAE	03.01.1966/ Chitral.	17.03.2005/B-18	a)17.03.2005 b)13.01.2017 c) 09.10.2018	18 19 20	PSC By promotion. By Promotion.	DHQH, Nowshera.
10.	Dr.Nightat Shaheen, D/O Ghulam Rasool MBBS /MCPS GYNAE	23.04.1964/ Kohat	17.03.2005/B-18	a)17.03.2005 b)13.01.2017 c) 09.10.2018	18 19 20	PSC By promotion. By Promotion.	NKBM Hosp: Peshawar
11.	Dr.Sultan Nawaz, MBBS/FCPS. PHYSICIAN	01.01.1961/ DIKhan	12.02.2000/B-18	a)12.02.2000 b) 11.6.2007 c)09.10.2018	18 19 20	PSC By Promotion. By Promotion	DHQH, DIKhan
12.	Dr.Javed Sarwar, MBBS/FCPS/FRCP PHYSICIAN	01.06.1963/ Haripur	25.10.2004/B-18	a) 25.10.2004 b) 16.04.2013 c)09.10.2018	18 19 20	PSC By Promotion. By Promotion	BBSTH, Abbottabad.
13.	Dr.Ruknud Din, MBBS/FCPS PHYSICIAN	12.05.1967/ Chitral	17.03.2005/B-18	a) 17.03.2005 b) 16.04.2013 c)09.10.2018	18 19 20	PSC By Promotion. By Promotion	DHQH, Chitral
14.	Dr.Muhammad Arif Khan, MBBS/FCPS PHYSICIAN	02.06.1961/ Mardan	17.03.2005/B-18	a) 17.03.2005 b) 16.04.2013 c)09.10.2018	18 19 20	PSC By Promotion. By Promotion	DHQH, Swabi
15.	Dr.Said Muhammad, MBBS/FCPS PHYSICIAN	10.02.1968/ Mohmand Agy	17.03.2005/B-18	a) 17.03.2005 b) 16.04.2013 c)09.10.2018	18 19 20	PSC By Promotion. By Promotion	DHQH: Charsadda
16.	Dr.Nasir Mahmood, MBBS/FCPS PHYSICIAN.	16.04.1968/ Haripur	17.03.2005/B-18	a) 17.03.2005 b) 16.04.2013 c)09.10.2018	18 19 20	PSC By Promotion. By Promotion	DHQH Haripur.
17.	Dr.Saifur Rehman, MBBS/MCPS. SURGEON	13.04.1962/ Mardan	11.04.1996/B-18	a) 11.04.1996 b) 07.05.2010 c)09.10.2018	18 19 20	PSC By Promotion By Promotion	SGTH,Swat
18.	Dr.Bakht Sarwar, MBBS/FCPS SURGEON	01.08.1965/ Dir	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c)09.10.2018	18 19 20	PSC By Promotion By Promotion	DHQ Hospital, Timergara.

ATTESTED

Deputy Director (HBM)
Directorate General Health Services
Muzaffargarh, Pakhtunkhwa Peshawar

SENIORITY LIST OF ALL CHIEF DISTRICT SPECIALISTS BPS-20

S. NO.	NAME OF OFFICER WITH ACADEMIC QUALIFICATION.	DATE OF BIRTH AND DOMICILE	DATE OF IST: ENTRY INTO GOVT. SERVICE.	REGULAR APPOINTMENT/PROMOTION TO PRESENT POST.			PRESENT POSTING
				DATE	BPS	METHOF OF RECRUITMENT	
1.	Dr. Khalid Khan, MBBS/DDV SKIN	18.09.1961/ Charsadda	09.06.1996/B-18	a) 09.06.1996 b) 09.08.2007 c) 17.05.2016	18 19 20	PSC By Promotion. By Promotion.	NKBM Hosp: Kohat Road, Peshawar
2.	Dr. Tariq Jalal, MBBS/FCPS. EYE	28.05.1962/ Nowshera	17.03.2005/B-18	a) 17.03.2005 b) 07.04.2015 c) 22.05.2018	18 19 20	PSC By Promotion. By Promotion.	NKBMH, Kohat Road, Peshawar
3.	Dr. Fauzullah Farooq, MBBS/D. Card. CARDIOLOGIST.	15.04.1962/ Charsadda	09.04.1996/B-18	a) 09.04.1996 b) 30.04.2009 c) 22.05.2018	18 19 20	PSC By Promotion By Promotion.	DHQH, Timergara.
4.	Dr. Farmanullah S/O Gul Muhammad, MD /MS Orth; ORTHOPAEDIC	16.12.1962/ Mohmand A	11.12.2001/B-18	a) 11.12.2001 b) 06.01.2015 c) 22.05.2018	18 19 20	PSC By Promotion. By Promotion.	DHQH, Mardan.
5.	Dr. Gulzar Ahmad, MBBS/FCPS CHILDREN	09.03.1966/ Chitral	08.06.2005/B-18	a) 08.06.2005 b) 15.04.2013 c) 22.05.2018	18 19 20	PSC By promotion. By Promotion	DHQH, Timergara.
6.	Dr. Ashfaq Ali, MBBS/FCPS. PSYCHIATRY	01.03.1961/ Mardan.	16.04.1998/B-18	a) 16.04.1998 b) 27.01.2009 c) 22.05.2018	18 19 20	P.S.C. By Promotion By Promotion.	DHQ: Hospital, Mardan.
7.	Dr. Nargis Danish, MBBS/FCPS. GYNAE	10.12.1965/ Mansehra	25.10.2004/B-18	a) 25.10.2004 b) 13.01.2017 c) 09.10.2018	18 19 20	PSC By promotion. By Promotion.	DHQH, Haripur.
8.	Dr. Shahzadi Nayab Bilal, MBBS/FC PS. GYNAE	21.05.1961/ Peshawar	17.03.2005/B-18	a) 17.03.2005 b) 13.01.2017 c) 09.10.2018	18 19 20	PSC By promotion. By Promotion.	Govt. Maternity Hosp, Peshawar

Me
Top-x
Senior
of all
grades
of Specialists

all types
of Specialists
1st

ppelant
on No
(24)

ATTESTED

Deputy Director (HKM),
Directorate General Health Services
Khyber Pakhtunkhwa Peshawar

5

ANNEX A

HEALTH DIRECTORATE NWFP PESHAWAR
Experience/Service Certificate

Certified that Dr. Khalid Khan S/O Fazli Rah
Medical Officer, Police/Services Hospital, Peshawar is
serving in the N.W.F.P. Health Department since 2.9.1987
in BPS-17, on adhoc basis and his services have been
regularized by the NWFP Public Service Commission
w.e.from 6.12.1987.

Deputy Director (Admn):
for Director Health Services,
N.W.F.P. Health Services, N.W.F.P.

.....

ATTESTED



ESTA CODE

**ESTABLISHMENT CODE KHYBER PAKHTUNKHWA
(REVISED EDITION) 2011**

**A COMPENDIUM OF LAWS, RULES AND INSTRUCTIONS
RELATING TO THE TERMS AND CONDITIONS
OF PROVINCIAL CIVIL SERVANTS**

**COMPILED BY;
(O&M) SECTION
ESTABLISHMENT & ADMINISTRATION DEPARTMENT**

ATTESTED

17

Revision of the policy for grant of BS-21 and BS-22 to technical and professional officers on the basis of meritorious services.

I am directed to refer to the subject cited above and to state that in consonance with the procedure devised by the Federal Government with the approval of the Prime Minister of Pakistan, criteria for grant of BS-21 and BS-22 on account of meritorious Services to Technical and Professional Officers has been revised as follows:-

- a) Officers be considered for grant of BS-21 & BS-22 on the basis of meritorious service in order of seniority.
- b) P.E.Rs. should be quantified in present and previous scales as per existing promotion policy and assigned a weightage of 70%.
- c) Training from NIPA, Staff College and National Institutes of Management may be given 15% weightage. In case the training information/requirements is not relevant, overall professional competence be judged and notional marks be assigned on the basis of his previous record.
- d) Minimum of 3 years active service in BS-20 for BS-21 & 5 years active service in BS-20 & above including 3 years in BS-21 for BS-22 will be required excluding the period of long leave (4 months or more).
- e) The special Selection Committee shall scrutinize Significant contribution of the Technical and Professional Officers in their relevant fields of specialization, consulting Secretary concerned and Head of Offices/ Organizations about the background, level of competence and general reputation and allocate marks out of 15 to the officers being considered for grant of BS-21 and BS-22 on the basis of meritorious services.
- f) Minimum threshold in this way shall be 75% marks.
- g) The Proforma I, II, III, are also forwarded to be filled in by the Departments with the request to furnish the same along with present sanctioned strength of the officers in BS-20.
- (i) The Departments may also indicate the name, designation & date of availing BS-21 or 22 on meritorious basis (if availed previously).

2. I am further directed to request that working paper may please be prepared as per criteria and procedure of the Federal Govt and endorse Proforma and furnish to this Department alongwith sanctioned strength of the officers in BS-20 please. The above requisite information may also be forwarded to this Department.

(Authority; NO. SO(E-I)E&AD/9-133/09, Dated 3rd November 2009)

ATTESTED

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Proforma-I

GOVERNMENT OF N.W.F.P.

DEPARTMENT _____

**PROFORMA FOR SUBMISSION OF PROPOSALS FOR GRANT
OF BS-21 OR BS-22 TO TECHNICAL AND PROFESSIONAL
OFFICERS.**

Sanctioned Strength of posts

S.No.	Particulars of posts/ officers as on	Department	Attached Department	Provincial Subordinate Offices	Total Col 3,4 & 5
1	2	3	4	5	6
I	Total number of technical/professional posts sanctioned in BS-21.				
II	Total number of technical/professional posts sanctioned in BS-20				
III	Total number of officers holding technical/professional posts in BS-21 on regular basis.				
IV	Total number of officers holding technical/professional posts in BS-20 on regular basis.				
V	Pool posts @ 12.5 of the total number of posts in BS-20 (i.e. of (ii) above)				

To be signed by Head of
Administrative Department

ATTESTED

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IMPORTANT APPOINTMENTS HELD IN THE PRESENT RANK						
S.NO.	POST HELD			S.NO.	POST HELD	
1				2		
Penalties (if any)						
Training courses (other than Mandatory Training, if any)						
Grading of Mandatory Training at NIPA/SMC, if done						
NUMBER OF PERS						
Basic Scale	Outstanding	Very Good	Good	Average Reports	Below Average	Adverse Report/Remarks in BS-19
Awaited Reports(PERs)				Additional Information		
EFFICIENCY INDEX						
Required Threshold	Score of PERs & Training Reports		Marks awarded by SSC		Total	
75						
Recommendations of Special Selection Committee						
Promoted		Deferred			Superseded	

Prepared by
(Section Officer or Equivalent)

Checked by
(Deputy Secretary or Equivalent)

ATTESTED

PROFORMA-III

PER GRADING & QUANTIFICATION FORM

Name :

Year	Post held	Min/Divn/ Deptt	Period of PER		PER's Assessment		Fitness for promotion	Score
			From	To	By RO	By CO		
Previous Scale (Scale BS-19/20)								
								Aggregate score
CALCULATION OF SCORE								
A. PERs Quantified Score 60 : 40 @ 70%	Basic Scale		Aggregate Score		Weightage Factor		Points Obtained	
	Present Scale							
	Previous Scale							
	i. Additions							
	ii. Deletions							
Total (A)								
B. Training: @ 15%	NIPA/NMC							
	LHR	KAR	QTA	PSH				

Checked by
(Section Officer or Equivalent)

Prepared by
(Superintendent or Equivalent)

Countersigned by
(Deputy Secretary or Equivalent)

NOTED

Re-allocation of posts for grant of BS-21 on meritorious service to professionals/technical officers.

I am directed to refer to this Department's letter of even No. dated 3.11.2009 on the subject cited above and to state that the competent authority has desired to re-allocate the posts of BS-21 on meritorious service basis.

2. In view of the above, it is requested to kindly provide the following information with documentary proof for further necessary action:-

- (i) Number of sanctioned posts in BS-20 and occupancy report with necessary clarification.
- (ii) Proposals of the respective department (if any) regarding re-allocation of posts for grant of BS-21 on meritorious services basis.

(Authority: No.SO(E-I)E&AD/9-133/2010, dated 3rd May 2010)

ATTESTED