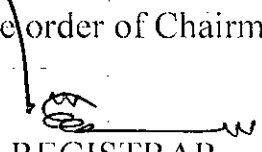


# FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ **508 /2023** \_\_\_\_\_

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge  |
|-------|---------------------------|---|
| 1-    | 2                         | 3   |
| 1-    | 08/03/2023                | <p>The appeal of Dr. Ahmad Ali resubmitted today by Mr. Habib Anwar Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ . Parcha Peshi is given to appellant/counsel for the date fixed.</p> <p>By the order of Chairman</p> <p><br/>REGISTRAR</p> |

Regarding Para-1 as already submitted that services were regularized vide legislation and the defendants/Respondents are even not denying this fact as endorsed in Enquiry Report.

As also separate order is available with appellants, therefore, re-submitted for further process.

*[Signature]*  
8.03.2023.

Siv,

The objection of the office and reply of counsel for the appellant is submitted for appropriate order please.

*[Signature]*  
8/3/2023

Humble Chauhan

PH be filed before  
the Court

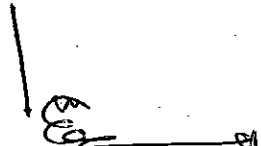
*[Signature]*  
08/03/23

The appeal of Dr. Ahmad Ali son of Karim Khan r/o Village Yaruhussain Tehsil Razar Distt. Swabi received today i.e. on 24.02.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of regularization order mentioned in para-2 of the memo of appeal is not attached with the appeal which may be placed on it.
- 2- Page nos. 19, 44 & 48 of the appeal are illegible which may be replaced by legible/better one.


No. 706 /S.T.

Dt. 27/2 /2023

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

M. Habib Anwar Adv.  
High Court Peshawar.

Para-1, It is stated that service regularization was effected under regularization of services Act, 2018 which fact has been admitted by respondents in their documents. To para-II, re-submitted after compliance.


  
M. Habib Anwar  
20.02.2023.

Objection No. 1, still stand

  
1/3/23

Registrar

Returned again to the counsel for the appellant to remove the objection No-1 within 10 days.

  
1/3/2023

No. 828 /ST

Date: 1.3.2023

# IN THE HON'BLE KP SERVICE TRIBUNAL PESHAWAR

In Re: Service Appeal No. 508 /2023.

Dr. Ahmad Ali Vs. Government of KPK etc.

## INDEX

| S. No. | Description of Documents  | Annex | Page No. |
|--------|---|-------|----------|
| 1.     | <i>Service Appeal</i>   |       | 1-5      |
| 2.     | <i>Affidavit</i>  |       | 6        |
| 3.     | <i>Addresses of the Parties</i>   |       | 7-8      |
| 4.     | Copies of:<br>FCPS Degree   | A     | 9-       |
| 5.     | Copies of:<br>Copies of Exp Certificates at Saudi Arabia<br>& Appointment Notification            | B     | 10-18    |
| 6.     | Copies of:<br>Daily Diary Report  | C     | 19-      |
| 7.     | Copies of:<br>Application for EOL   | D     | 20       |
| 8.     | Copy of:<br>Decision of Islahi Jirga &<br>Letter dated 22/03/2020 regarding arrival               | E     | 21-22    |
| 9.     | Copy of<br>Summary for Approval of Disciplinary action<br>Show Cause Notice & Subsequent Summary  | F     | 23-26    |
| 10.    | Copy of<br>Posting/ Transfer Order dated. 03.05.2021<br>Posting/ Transfer Order dated. 03.05.2021 | G     | 27-28    |
|        | Copy of   | H     | 29-44    |

|     |   |   |  |       |
|-----|---|---|--|-------|
|     | Performance Report<br>Letter for disciplinary action along with<br>Statement of allegations/ Charge Sheet/ questionair<br>Written statement.<br>Enquiry report<br>Notification dated: 05.08.2020<br>Impugned Notification dated: 10.10.2022 |   |  |       |
| 11. | <i>Copy of Departmental Appeal.</i>   | 1 |  | 45-49 |
| 12. | <i>Wakalat nama</i>   |   |  | 50    |

*HABIB ANWAR*

**HABIB ANWAR**

Advocate High Court, Peshawar.

0336-9987282

①

**IN THE HON'BLE KP SERVICE TRIBUNAL PESHAWAR**

In Re: Service Appeal No. 508 /2023.

**Dr. Ahmad Ali S/O Karim Khan**

R/O Village Yarusain, Tehsil Razar, Distt. Swabi.

.....Appellant.

**VERSUS**

1. **Government of Khyber Pakhtunkhwa,  
Through Chief Secretary, Civil Secretariat Peshawar.**
2. **Government of Khyber Pakhtunkhwa,  
Through Secretary Health, Civil Secretariat Peshawar.**
3. **Director General Health Services, Civil Secretariat Peshawar.**
4. **District Health Officer Swabi, Tehsil and Distt. Swabi.**
5. **Mr. Ahmad Zeb, Enquiry Officer,  
Project Director, KP Human Investment Project  
(E & SE) Department, Peshawar.**
6. **Dr. Ikram Ullah Khan, Enquiry Officer  
Chief HSRU, Health Department, Peshawar.**

.....Respondents

**Service Appeal under Section 4 of Khyber Pakhtunkhwa, Service  
Tribunal Act, 1974.**

**Respectfully Sheweth,**

The Appellant humbly craves permission to plead for solace of his grievance while invoking the jurisdiction of this Honorable Tribunal as under:

**Brief but relevant facts warranting this Appeal:**

1. That the Appellant herein is a doctor by profession and after attaining his basic qualification, i.e. MBBS, he completed fellowship from College of Physicians and Surgeons of Pakistan and thus obtained his FCPS degree in April, 2016 Annex-A
  2. After completing his education, the appellant proceeded abroad and served in prestigious health care institutions in the Kingdom of Saudi Arabia. However, after being selected
- Ali*

and appointed as District Specialists by the Respondents vide-Notification dated. 19.07.2017, he relinquished his foreign assignment and in order to serve his native ailing community, the petitioner joined the respondents as District Specialist and therefore, resumed his duties in Cat-C Hospital, Chota Lahore. It is pertinent to mention here that on promulgation of Regularization of Services Act, 2018, the services of the petitioner were regularized. Relevant Documents are Annex-B

3. To understand the background of instant matter, due to some family feud, over some land disputes, spanning over years, one of the younger brother of the appellant while being frustrated from the growing nature of issues, committed suicide and owing to these issues, the appellant in order to ensure safety of his family, decided to shift his family to Lahore so that imminent danger to their life could be avoided. Copy of Report of Suicide is Annex-C

4. Being constrained with these anomalous and awkward situations that boiled up due to feud of the appellant, the appellant submitted an application for grant of Extra Ordinary Leave for a period of two years with effect from 1<sup>st</sup> August, 2018 which was duly entered vide Diary No. 4071 Dated. 03.07.2018. it is pertinent to mentioned here that the imminent apprehension to his life and security were duly mentioned in the said application which is Annex-D

5. As the application was not attended to by the respondents by conveying the fate of his application and keeping in view the imminent nature of security threats to his own-self and his family, the appellant keep on contacting the respondents through their dealing clerk namely Taskeen via his cell phone Nos. 03139901369 & 03139901369 who always assured and keep on conveying the appellant to continue his leave as processing takes time.

6. Owing to this practical and genuine apprehensions, which by the grace of Almighty, culminated into a peaceful settlement on 10.02.2020 through the efforts and interventions of Anjumane Smajee Behbood Yarhussain, a registered charity association. On these developments, the appellant not only shifted his family back to his village but also reported back his duties on 06.03.2020 which was transmitted on 22.03.2020 by the Respondent DG to the competent authority/ respondent No. 2 for necessary advice. True copy of settlement and letter dated. 22.03.2020 is Annex-E

OK

7. the respondents however, instead of considering genuine reasons of the appellant, instead chooses to proceed against the appellant. Therefore, on obtaining proper sanction from the competent authority, the respondents issued Show Cause Notice by dispensing with the enquiry and tentatively decided to withhold two annual increments for a period of two years. Which was adequately responded by the appellant, however, the final outcome of the said enquiry was not communicated to the appellant. Relevant Documents are Annex-F
8. after this long and hectic exercise spanning over more than an year, finally the Respondent No. 2 vide notification dated. 3<sup>rd</sup> May, 2021 issued posting order to the appellant which was modified on 6<sup>th</sup> May, 2021 and the appellant was posted against the vacant post of District Specialist Surgery (BPS-18) in Cat-D Hospital, Yar Hussain. The appellant submitted his joining and assume his charge pursuant to his posting. The relevant documents are Annex-G
9. Though the appellant worked whole-heartedly and remained committed to his duties and his overall performance including improvements in Operation Theater has been acknowledged by head of his institutions, however, to his dismay, after more than one year, once again, the respondents re-agitated the same issue once again by calling the appellant to resubmit his version over the same issue. As a result of this illegal and unlawful exercise of the respondents, the respondent No. 2 vide the impugned Notification dated. 10<sup>th</sup> October 2022, issued a notification by enforcing a major penalty of Removal from Services against the appellant. The relevant documents are Annex-H
10. Constrained with situations as it emerged, the appellant feeling mortally aggrieved, filed Departmental Appeal/ Representation to the respondent for review of the impugned notification on 26.10.2022, however, despite lapse of more than three months, the respondents failed to pass any order. Copy of Departmental Appeal is Annex-I
11. The appellant therefore, being aggrieved for the above unjust, illegal, unlawful, discriminatory, mala fide actions of respondents, having being left with no adequate and alternate remedy except to invoke the jurisdiction of this Hon'ble Tribunal on the grounds inter alia;



4

Grounds warranting this Appeal:

- a. *Because* the respondents have acted illegally, unlawfully, unconstitutionally, mala fide, in arbitrary manner by passing the impugned notification, as the impugned notification on the face of it is corum non judice, illegal, unlawful, mala fide, politically motivated and against the fact on record & law.
- b. *Because* the respondents in order to conceal their own failure and save the skin of their own officials who failed to perform their duties by failing to process the leave application of the appellant and thereby conveying the fate of leave application to the appellant duly highlighted in the impugned enquiry by respondents have been left scotch free and the appellant has been made a scapegoat.
- c. *Because* the appellant posed serious threats to his own life as well as the life of his family which constrained the appellant to avail Extra Ordinary Leave and thereby resuming back earlier than his leave period, soon after the settlement of his family feud that has taken the life of his brother.
- d. *Because* the impugned Notification has been issued without informing the appellant through publication in newspaper and without properly informing the appellant through service at his home address as per law and without providing proper hearing opportunity to the appellant by confronting him with any evidence. Thus, the appellant has been condemn unheard that too mere allegations without any proof/ evidence.
- e. *Because* the exemplary performance of the appellant has been acknowledged by officials of respondents through performance report and the respondents failed to prove allegations against the appellant which are contradictory in nature and are without any evidence.
- f. *Because* the respondents has already culminated their disciplinary proceedings followed by release of pay and issuance of his posting order to the appellant, therefore, the subsequent proceedings that were initiated after lapse of four long years, that too without confronting the appellant without actual facts on record, without examining evidence in his presence at his back are void ab-initio, corum non judice, arbitrary, mala fide, contradictory, vexatious in nature, colorful in nature and politically motivated.

Am

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- g. Because the impugned actions/ orders are against the principles of natural justice, fair play, against the norm of justice and without properly observing the codal formalities as per the application law.
- h. *Because* the appellant seeks leave of this Hon'ble Tribunal to furnish further grounds at the time of final arguments of the instant appeal.

In view of the aforesaid submissions, it is very humbly prayed that on acceptance of this appeal, this Hon'ble Tribunal may graciously be pleased to *Declare* The impugned Notification dated. 10.10.2022, enquiry report that culminated into the impugned order and all the pre and post actions of respondents as corum non iudice, illegal, unlawful, un-constitutional, void ab-initio and of no legal effect; and thereby, set aside and quash the same, and

*Direct* the Respondents re-instate the appellant with all back-benefits.

*Grant:* Any other relief, not specifically prayed, that appears just, necessary and appropriate.

Cost throughout

APPELLANT

Through

HABIB ANWAR

Advocate High Court, Peshawar.

0336-9987282

CERTIFICATE

It is certified that no such writ petition has earlier been filed by the Appellant on this subject matter before this or any other Hon'ble Court.

Counsel

IN THE HON'BLE KP SERVICE TRIBUNAL PESHAWAR

6

In Re: Service Appeal No. \_\_\_\_\_/2023.

Dr. Ahmad Ali Vs. Government of KPK etc.

AFFIDAVIT

I Dr. Ahmad Ali S/O Karim Khan, R/O Yar Hussain, Tehsil Razar, Distt. Swabi, do hereby solemnly affirm on Oath that the contents of this Service Appeal are true and correct to the best of my knowledge and belief and that nothing has been kept concealed from this honorable tribunal.



Deponent

Dr. Ahmad Ali

CNIC No. 10202-9204308-7

Cell No. 0314-6643715.  
0333-4053715.

Identified by:

HABIB ANWAR

Advocate High Court, Peshawar.

0336-9987282

7

## IN THE HON'BLE KP SERVICE TRIBUNAL PESHAWAR

In Re: Service Appeal No. \_\_\_\_\_/2023.

Dr. Ahmad Ali Vs. Government of KPK etc.

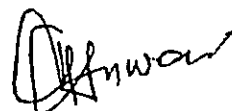
### Addresses of the Parties:

#### A. Appellant:

Dr. Ahmad Ali S/O Karim Khan,  
Village & P.O Yar Hussain, Tehsil Razar, Distt. Swabi.

#### B. Respondents:

1. Government of Khyber Pakhtunkhwa,  
Through Chief Secretary, Civil Secretariat Peshawar.
2. Government of Khyber Pakhtunkhwa,  
Through Secretary Health, Civil Secretariat Peshawar.
3. Director General Health Services, Civil Secretariat Peshawar.
4. District Health Officer Swabi, Tehsil and Distt. Swabi.
5. Mr. Ahmad Zeb, Enquiry Officer,  
Project Director, KP Human Investment Project  
(E & SE) Department, Peshawar.
6. Dr. Ikram Ullah Khan, Enquiry Officer  
Chief HSRU, Health Department, Peshawar.



HABIB ANWAR

Advocate High Court, Peshawar.

0336-9987282

8

## IN THE HON'BLE KP SERVICE TRIBUNAL PESHAWAR

In Re: Service Appeal No. \_\_\_\_\_/2023.

Dr. Ahmad Ali Vs. Government of KPK etc.

Subject: Notice for filling of Appeal

To:

1. Government of Khyber Pakhtunkhwa,  
Through Chief Secretary, Civil Secretariat Peshawar.
2. Government of Khyber Pakhtunkhwa,  
Through Secretary Health, Civil Secretariat Peshawar.
3. Director General Health Services, Civil Secretariat Peshawar.
4. District Health Officer Swabi, Tehsil and Distt. Swabi.
5. Mr. Ahmad Zeb, Enquiry Officer,  
Project Director, KP Human Investment Project  
(E & SE) Department, Peshawar.
6. Dr. Ikram Ullah Khan, Enquiry Officer,  
Chief HSRU, Health Department, Peshawar.

Respected Sir,

Please take notice that I am going to file Service Appeal before the hon'ble KP Service Tribunal,  
Peshawar. You are hereby informed.

APPELLANT

Through

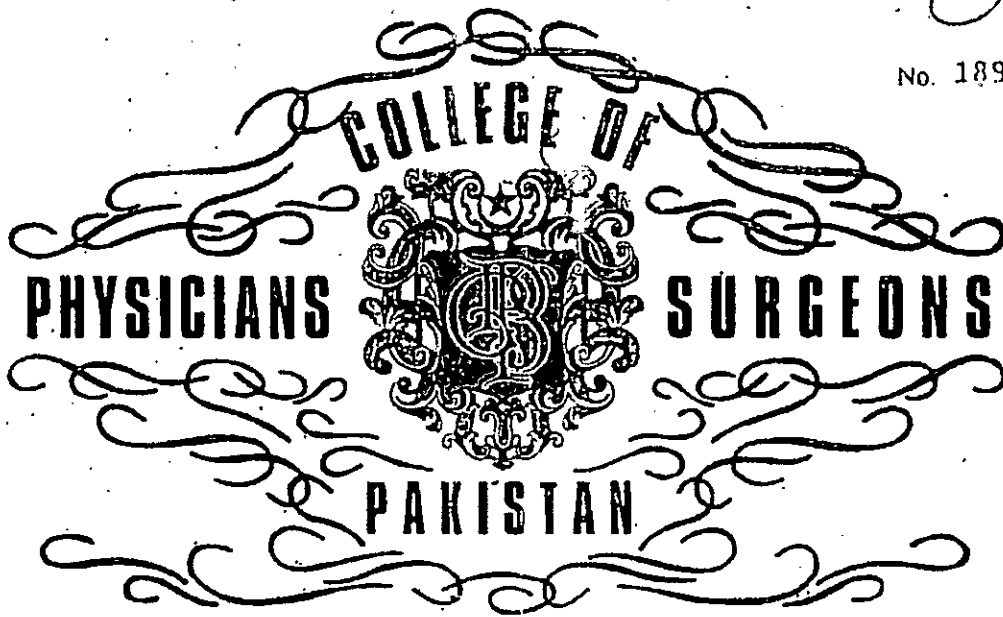
  
HABIB ANWAR

Advocate High Court, Peshawar.

0336-9987282

Annex - A

No. 18906



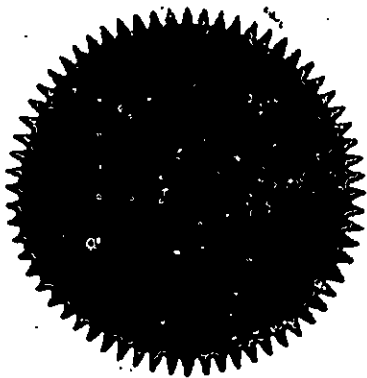
*Know all men by these Presents, that we, the  
President and Council of the College of Physicians  
and Surgeons Pakistan admit*

*Dr. Ahmad Ali*

*a Fellow of the College*

*in the subject of Surgery*

*In witness thereof, we have subscribed our names  
and caused the seal of the College to be hereunto  
affixed this 3rd day of April 2016*



*[Signature] President*

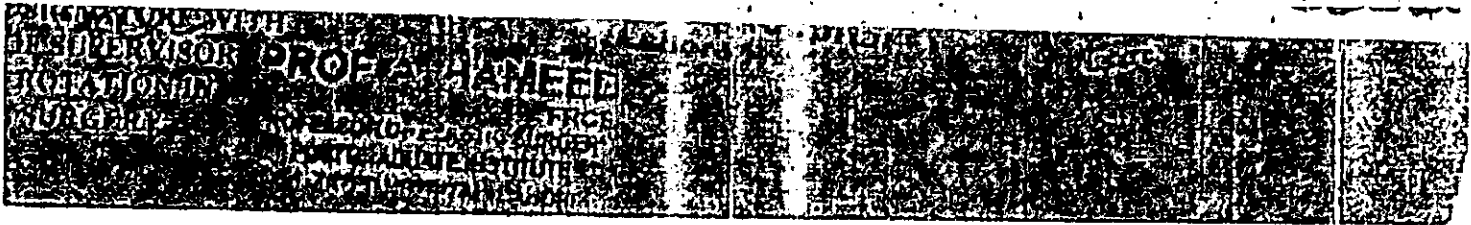
*[Signature] Member*

*[Signature] Executive Committee*

*[Signature] Registrar*

*[Signature] of the College*

*Dr. Ghelkh Sajjad Ahmad  
Medical Superintendent  
Social Security Hospital  
Sh. Shandara*



Annex B

10 9

SAUDI COMMISSION FOR HEALTH SPECIALITIES



الهيئة السعودية للتخصصات الصحية

|                            |  |                                       |   |
|----------------------------|--|---------------------------------------|---|
|                            | Follow Up Card - بطاقة مراجعة  |                                       | Application Date: ٢٠١٧/٠٨/٠١ تاريخ الطلب  |
|                            | Eligibility Number.  | 20170059441                           | رقم الطلب:  |
|                            | - This form is NOT a license to practice.<br>- No action will be initiated unless the receipt of the application fees is paid & meet all requirements. |                                       | - لا يعتبر هذا النموذج رخصة لمزاولة المهنة الصحية<br>- لا يتم البدء في إجراءات الطلب إلا بعد استلام الرسوم المالية واستكمال المتطلبات |
| Saudi Commission Web Site: |  | www.scfhs.org موقع الهيئة الإلكتروني: |   |

|                     |                                     |  |                      |
|---------------------|-------------------------------------|--|----------------------|
| Username            | 17AM0036006                         | 17AM0036006  | اسم المستخدم         |
| Password            | 18713271                            | 18713271   | كلمة السر            |
| Applicant Name      | AHMAD ALI KARIM KHAN                | احمد علي كريم خان  | مقدم الطلب           |
| Service Type        | Registration and Accreditation      | التسجيل و التصنيف  | نوع الخدمة           |
| Req. Classification | Registrar                           | طبيب نائب  | التصنيف المطلوب      |
| Certificate         |                                     | زمالة كلية الأطباء والجراحين الباكستانية في الجراحة العامة | الشهادة              |
| Specialty           | General surgery                     | الجراحة العامة   | التخصص               |
| Work Place          | مستشفى الأمير مشاري بن سعود ببلجرشي | مستشفى الأمير مشاري بن سعود ببلجرشي                        | مقر العمل            |
| Passport / ID       | WQ1793682                           | WQ1793682  | رقم الجواز / البطاقة |
| City                | Albahah                             | الباحة   | المدينة              |

Application Path - مسار الطلب

|                    |                    |  |                  |
|--------------------|--------------------|--|------------------|
| Required Procedure | Pearson Exam Until | امتحان بيرسون في موعد أقصاه ٢٠١٧/١١/٠١ | الإجراء المطلوب: |
|                    | 1/11/2017          |  |                  |

Fees Information - بيانات المالية

| رقم الايصال | نوع السداد      | تاريخ الدفع  | المبلغ | رقم الشيك | تاريخ الشيك | البنك    |
|-------------|-----------------|--------------|--------|-----------|-------------|----------|
| Recite No.  | Payment Method  | Payment Date | Amount | Check No. | Check Date  | Bank     |
| 2017055106  | نقاط بيع - شبكة | ٢٠١٧/٠٨/٠١   | 2100.0 | 100784996 | ٢٠١٧/٠٨/٠١  | نقاط بيع |

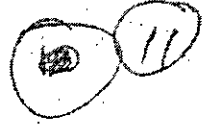
- Visit our website for more information about Accreditation & Registration, Prometric centers and written exam results (2 weeks after the exam).
- You can take Prometric exam in any authorized Prometric testing center around the world.
- Applicant is responsible for any uncompleted application.
- Application path may be changed depending on the commission's needs.
- If Applicant does not make any specific appointment within 5 months after submitting his/her application, his/her request will be discarded and he/she has no right to demand paid fees.
- You should be at exam center at least one hour before starting time.
- You should accompanied by your identification card/Iqama to the exam center.
- Eligibility Number is your setting number.
- Applicant for Prometric exam will be awarded 2 chances during first 3 months of his/her submission. In case of failure or absence he/she will get only an additional chance to attend any Prometric exam in the second 3 months after paying the prescribed fees (submission for exceptional Exam

- للإطلاع على لوائح التصنيف والتسجيل المهني ومراكز امتحانات برومترك ونتائج الامتحانات التحريرية (بعد اسبوعين من تاريخ عقد الامتحان)، الرجاء زيارة الموقع الإلكتروني.
- يمكنك إجراء اختبار التصنيف في أي مركز من مراكز برومترك في أنحاء العالم.
- يتحمل المسارس المتقدم لليلة أي تأخير ينتج عن نواقص في طلب التقديم.
- مسار الطلب قد يتغير بناءً على تقدير الهيئة.
- من مضي على تقديم طلبه مدة تزيد عن 5 أشهر وليس له موعد تقييم محدد دون مراجعته الهيئة فإنه سيتم استبعاد الطلب ولا يحق للمتقدم المطالبة بالرسوم المالية المدفوعة.
- يجب الحضور لمركز الامتحان قبل الموعد المحدد بساعة على الأقل.
- يجب اصطحاب الهوية الشخصية عند الحضور للامتحان.
- رقم الطلب يمثل رقم الجلوس في الامتحان التحريري لمن يلزمه دخول الامتحان.
- يعطى المتقدم لامتحان برومترك فرصتين خلال ثلاثة أشهر قبل لم يجتز الامتحان أو لم يحضره الأولى (التقديم للمحاولة الاستثنائية خلال الشهر الرابع والخامس من تاريخ التقديم حصراً) وذلك بعد دفع الرسوم المقررة وفي حال عدم اجتياز الامتحان أو عدم حضوره أو عدم التقييم يطلب الفرصة الاستثنائية ومرور الثلاث أشهر التالية يحده بحقه قرار عدم تأهيل مباشرة.
- للإستفسار عن معاملات الإستعلاميين للتصنيف المهني الإتصال بعد (3) أليبع من تاريخ التقديم.

ATTACHED  
105 8 2017

will be exclusively in the fourth or fifth month from date of submission. In case of failure or absence, or if he/she did not apply for an additional chance and the second three months passed, then he will be directly considered ineligible.

- Consultants who applied for Professional Accreditation can inquire information about their files after 3 weeks of submitting.



**File No. (Commission internal use):**

1558

17-A-M-0036006

رقم الملف (للاستعمال الداخلي للهيئة):

~~ATTES~~ ED  
to be



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THE KINGDOM OF SAUDI ARABIA  
MINISTRY OF HEALTH  
GENERAL DIRECTORATE OF HEALTH AFFAIRS AL-BAHA  
PRINCE MISHARI BIN SAUD HOSPITAL  
INFECTION CONTROL ADMINISTRATION



# شهادة رخصة BICSL

المملكة العربية السعودية  
وزارة الصحة  
المديرية العامة للشئون الصحية بالباحة  
مستشفى الأمير مشاري بن سعود بلجرشي  
ادارة مكافحة العدوى



تشهد إدارة مكافحة العدوى بمستشفى الأمير مشاري بن سعود

بأن **DR. AHMAD ALI KARIM KHAN**

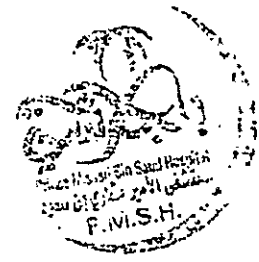
قد حصل على رخصة مهارات مكافحة العدوى الأساسية BICSL بتاريخ ١٤٣٩/١/٢٩ هـ

مع تمنياتنا بالتوفيق،،،

رئيس قسم مكافحة العدوى  
تسهي بتاريخ ١٤٤٠/١/٢٨

د/ عبد الأول أحمد عبد العظيم  
صع- ليلك

د/ عبد الأول أحمد أبو عليم  
طبيب نائب مكافحة العدوى



RECEIVED  
١٤٣٩/١/٢٩  
١٤٣٩/١/٢٩

تمت بتاريخ ١٤٣٩/١/٢٩

13

رقم الترخيص المؤقت: 20170059441  
تاريخ منح الترخيص: ٢٠١٧/٠٨/٠١  
تاريخ إنتهاء الترخيص: ٢٠١٨/٠٢/٠٢



الهيئة السعودية  
للتخصصات الصحية



(إشعار ترخيص مؤقت)

الاسم : احمد علي كريم خان  
الجنسية : باكستان  
رقم الجواز : WQ1793682  
الشهادة : زمالة كلية الاطباء والجراحين الباكستانية في الجراحة العامة  
التخصص : الجراحة العامة  
تاريخ الشهادة : 2016  
مصدر الشهادة : PHYSICIANS COLLEGE OF SURGEONS  
الدولة : باكستان  
إسم المنشأة : مستشفى الأمير مشاري بن سعود ببلجرشي  
رقم ترخيص المنشأة :  
فئة الترخيص : طبيب نائب

هذا للإحاطة واتخاذ اللازم



الموظف المسئول:  
الاسم/ حسن عبدالله حسن الشهري  
التوقيع/

ملاحظات هامة:-

يجب علي جهة عمل الممارس مراجعة إدارة الرخص الطبية خلال أسبوع من تاريخ إصدار الترخيص المؤقت.  
يمنح المتقدم للتخصيص لفئة (إبتشاري - نائب أول) ترخيص مؤقت علي فئة نائب.  
يمنح المتقدم للتخصيص لفئة (نائب) ترخيص مؤقت علي فئة طبيب مقیم.  
يجب مراجعة الهيئة السعودية للتخصصات الصحية لتجديد الترخيص المؤقت قبل أسبوعين من تاريخ انتهائه في حال الحاجة إلى التمديد.

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

Dated Pesh: the 19<sup>th</sup> July 2017

**Notification**

No. SOH-1/(HD)13-5/2015 Consequent upon their appointment as District Specialists (BS-18) in various specialities on adhoc for a period of one year or till the availability of regular selectees of Public Service Commission whichever is earlier vide Notification of even No dated 4<sup>th</sup> July 2017, the Competent Authority is pleased to order the posting of the following District Specialists in the hospital/Health facilities noted against their names with immediate effect:-

**District Specialist Physician (BS-18)**

| S.No. | Name of doctor                                       | Present Place of posting   | Domicile      | Posted against the vacant post of Distt: specialist Physician (BS-18) at |
|-------|--|--|---------------|--|
| 1     | Dr. Zia Ullah S/O Hayat-ul-Haq                       | SGTH Swat  | Swat          | THQH Khawaza Anela Swat  |
| 2     | Dr. Aswar Kamal S/O Haji Azad Khan                   | AGNT Barnu   | Barnu         | THQH Sarai Naurang Lakki Marwat  |
| 3     | Dr. Muzamil Shah S/O Abdul Ghaffar Khan              | Category D Hospital Lal Qila Dir Lower   | Dir Lower     | Category 'D' Hospital Lal Qila Dir Lower                                 |
| 4     | Dr. Durr-e-Sameen D/C Mati Tariq Javed Ahmad Khan    | WMO Molvi G Hospital Peshawar  | Peshawar      | Category 'D' Hospital Garhi Tajik Peshawar                               |
| 5     | Dr. Sahibzada Imtiaz Ahmad S/O Sahibzada Javed Iqbal | MO DHQH Dir Upper  | Dir Upper     | DHQH Dir Upper   |
| 6     | Dr. Alam Zeb S/O Bahadar Said                        | MO KTH Peshawar  | Dir Upper     | THQH Chakdara Dir Lower  |
| 7     | Dr. Murad Ali S/O Amanullah                          | THQH Takht Bai Mardan  | Mardan        | THQH Takht Bai Mardan  |
| 8     | Dr. Usman Gul S/O Faqir                              | BKMC Mardan  | Malakand      | Category 'D' Hospital Thana Malakand                                     |
| 9     | Dr. Alaud Din S/O Badshah Khan                       | DHO Timgara  | Dir Lower     | Category 'D' Hospital Monda Dir Lower                                    |
| 10    | Dr. Salma Zeb D/O Aurangzeb                          | AP Physiology GKMC Swabi   | Peshawar      | DHQH Nowshera  |
| 11    | Dr. Fazal Malik S/O Shah Wali                        | MO SPMK Hospital Puran Shangla   | Buner         | DHQH Buner   |
| 12    | Dr. Sabir Rehman S/O Muhammad Gul                    | MO AHQH Bajaur Agency  | Bajaur Agency | DHQH Dir Lower   |
| 13    | Dr. Muhammad Akram Khan S/O Khan Afasar              | DHQH Haripur   | Haripur       | DHQH Haripur   |
| 14    | Dr. Fazal Rehman S/O Jalal Khan                      | MO adjusted against the post of Distt: specialist in own pay and scale at AHQH Bajaur Agency | Bajaur Agency | AHQH Bajaur  |
| 15    | Dr. Sher Ali Khan S/O Mir Asad Khan                  | BUSTH Abbottabad   | Abbottabad    | Type 'D' Hospital Garhi Habibullah, Mansehra                             |

**District Specialist Gastroenterology (BS-18)**

| S.No. | Name of doctor                   | Present place of posting | Domicile      | Posted against the vacant post of Distt: Specialist Gastroenterology (BS-18) at |
|-------|----------------------------------|--------------------------|---------------|---|
| 1     | Dr. Dilaram Khan S/O Sulman Khan | MO BMC Peshawar          | Bajaur Agency | DHQH Batkhela Malakand  |
| 2     | Dr. Arshad Khan S/O Rangeen Shah | MO THQH Topi Swabi       | Swabi         | DHQH Buner  |

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|----|---|---------------------------|-----------|--------------------------|
| 3  | Dr. Muhammad Umar Khan<br>S/O Resham Khan       | MO DHQH Karaka            | Karak     | DHQH Kohat               |
| 4  | Dr. Muhammad Imran Ullah<br>S/O Muhammad Roslan | THQH Takhti Nasrati Karak | Karak     | DHQH Karak               |
| 5  | Dr. Fakhar-e-Alam S/O Noor<br>Alam Khan         | Fresh                     | Karak     | DHQH Lakki Marwat        |
| 6  | Dr. Waheedullah S/O<br>Muhammad Umar Khan       | MO DHQH Dir Lower         | Lower Dir | DHQH Timergara Dir Lower |
| 7  | Dr. Jawad Khan S/O<br>Inayatullah               | MO RHC Tordhere Mardan    | Swabi     | DHQH Mardan              |
| 8  | Dr. Muhammad Daud S/O<br>Nasrullah              | Fresh                     | Charsadda | DHQH Charsadda           |
| 9  | Dr. Ihsanullah S/O Lal<br>Marjan                | Fresh                     | NW Agency | DHQH Haripur             |
| 10 | Dr. Fazal Manan S/O Sher<br>Afzal               | Fresh                     | Swabi     | DHQH Swabi               |
| 11 | Dr. Naimat Ullah S/O Gul<br>Faraz               | MO AHQH Bajaur            | Bajaur    | DHQH Dir Upper           |

**District Specialist General Surgery (BS-18)**

| S.No | Name of doctor                                  | Present place of posting                       | Domicile         | Posted against the vacant post of Distt: Specialist Surgery (BS-18) at |
|------|---|--|------------------|--|
| 1    | Dr. Asif Mehmood S/O<br>Abdul Khalig            | DHQH Karak                                     | Karak            | THQH Banda Daud Shah Karak   |
| 2    | Dr. Ayesha Khan Afridi D/O<br>Hakim Khan Afridi | WMO Services Hospital<br>Peshawar              | Khyber<br>Agency | At the disposal of Director Health Services FATA                       |
| 3    | Dr. Ahmad Ali S/O Karim<br>Khan                 | Social Security Teaching<br>Hospital Islamabad | Swabi            | Category 'C' Chota Lahore Swabi.                                       |

**District Specialist Radiology (BS-18)**

| S.No. | Name of doctor                                | Present place of posting | Domicile          | Posted against the vacant post of Distt: Specialist Radiology (BS-18) at |
|-------|---|--------------------------|-------------------|--|
| 1     | Dr. Samreen Malik D/O<br>Malik Wasil Khan     | DHQH Mansehra            | Mansehra          | King Abdullah Teaching Hospital Mansehra                                 |
| 2     | Dr. Ayesha Afridi D/O Raza<br>Khan            | Fresh                    | Khyber<br>Agency  | DHQH Charsadda   |
| 3     | Dr. Andaleeb D/O Qazi<br>Kamal ud Din         | Fresh                    | Kohat             | Liaqat Memorial Hospital Kohat   |
| 4     | Dr. Shamsah Khan S/O<br>Saadullah Khan Afridi | HMC Peshawar             | Khyber<br>Agency  | Category 'D' Shabqadar Charsadda   |
| 5     | Dr. Rabia Afridi D/O Sardar<br>Mir Afridi     | Fresh                    | FR Kohat          | W&C Hospital Kohat   |
| 6     | Dr. Muhammad Iqbal S/O<br>Aziz Ullah Khan     | AP LRH, Peshawar         | Buner             | DHQH Daggar Buner  |
| 7     | Dr. Mir Raza Shah S/O Khaj<br>Badshah         | DHQH Hangu               | Orakzai<br>Agency | DHQH Hangu   |

**District Specialist Psychiatry (BS-18)**

| S.No. | Name of doctor                               | Present place of posting | Domicile          | Posted against the vacant post of Distt: Specialist Psychiatry (BS-18) at |
|-------|--|--------------------------|-------------------|---|
| 1.    | Dr. Muhammad Younas<br>Khari S/O Yaqoob Khan | Fresh                    | Kurram<br>Agency  | DHQH Charsadda  |
| 2.    | Dr. Muhammad Riaz S/O<br>Muhammad Shoab      | Fresh                    | Orakzai<br>Agency | DHQH Nowshera   |

**District Specialist Pathology (BS-18)**

| S.No. | Name of doctor                   | Present place of posting | Domicile | Posted against the vacant post of Distt: Specialist Pathology (BS-18) at |
|-------|----------------------------------|--------------------------|----------|--|
| 1     | Taqim ul Haq S/O Fazle<br>Subhan | LRH Peshawar             | Nowshera | DHQH Charsadda   |

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|    |                                       |                         |                |  |
|----|---------------------------------------|-------------------------|----------------|--|
| 2  | Salva Shah D/O Mian Ajmal Shah        | Fresh                   | Peshawar       | THQH Shabqadar Charsadda                   |
| 3  | Muhammad Ali S/O Wazir Gul            | MO Malakand             | Malakand       | DHQH Batkhela                              |
| 4  | Sher Badshah S/O Behramand Khan       | Dental Surgeon Buner    | Buner          | DHQH Shangla                               |
| 5  | Azhar Yaqoob S/O Muhammad Yaqoob      | LRH Peshawar            | Peshawar       | Molvi Amir Shah Memorial Hospital Peshawar |
| 6  | Muhammad Asif S/O Khair Ullah         | SMC Swat                | Karak          | DHQH Karak                                 |
| 7  | Rafiq Ahmad S/O Haji Gul              | Fresh                   | Kohat          | Category 'D' Chota Lahore Swabhi           |
| 8  | Maria Kamran D/O Abdur Rasheed        | Fresh                   | Peshawar       | DHQH Nowshera                              |
| 9  | Dr. Ammar Bin Saad S/O Qazi Saad      | MO THQH Khanpur Haripur | Haripur        | DHQH Haripur                               |
| 10 | Mahwish Nowshad D/O Nowshad           | Fresh                   | Nowshera       | THQH Dargai, Malakand                      |
| 11 | Tabassum Imran D/O Hazrat Imran       | SMC Swat                | Swat           | THQH Matta Swat                            |
| 12 | Waseem Khan S/O Fazal Ghafoor         | SMC Swat                | Swat           | Nawaz Sharif Kidney Hospital Swat          |
| 13 | Shahid Hussain S/O Muhammad Farooq    | NSKH Swat               | Swat           | Nawaz Sharif Kidney Hospital Swat          |
| 14 | Salimullah S/O Hidayatullah           | NSKH Swat               | Swat           | DHQH Batkhela                              |
| 15 | Waheed Alam S/O Zahir Ullah           | MO Charsadda            | Charsadda      | DHQH Karak                                 |
| 16 | Humaira Khan D/O Asfandyar Khan       | Fresh                   | Malakand       | DHQH Charsadda                             |
| 17 | Asim Muhammad S/O Qamar Zaman         | MO Adhor Peshawar       | Peshawar       | W&C Hospital Karak                         |
| 18 | Shabir Ahmad Khan S/O Noor Ahmad Khan | Fresh                   | Prakzar Agency | At the disposal of Director FATA           |

**District Specialist Nephrology (BS-18)**

| S.No | Name of doctor                 | Present place of posting | Domicile | Posted against the vacant post of Distt: Specialist Nephrology (BS-18) at |
|------|--------------------------------|--------------------------|----------|---|
| 1    | Rehmat Ali Khan S/O Waris Khan | MO NSKH Swat             | Swat     | Nawaz Sharif Kidney Hospital Swat   |

**District Specialist Paeds Surgery (BS-18)**

| S.No | Name of doctor                      | Present place of posting | Domicile    | Posted against the vacant post of Distt: Specialist Paeds Surgery (BS-18) at |
|------|-------------------------------------|--------------------------|-------------|--|
| 1    | Muhammad Javed Khan S/O Inayat Shah | MO THQH Timergara        | FR Peshawar | DHQH Timergara Dir Lower   |

**District Specialist Dentistry (BS-18)**

| S.No | Name of doctor                               | Present place of posting           | Domicile  | Posted against the vacant post of Distt: Specialist Dentistry (BS-18) at |
|------|--|------------------------------------|-----------|--|
| 1    | Dr. Nadia Ashraf D/O Muhammad Ashraf         | Dental Surgeon HMC Peshawar        | Charsadda | DHQH Charsadda   |
| 2    | Dr. Zubair Badshah S/O Saad Badshah          | Dental Surgeon Talash Dir Lower    | Dir Lower | DHQH Dir Lower   |
| 3    | Dr. Zafar Ali Khan S/O Asghar Ali Khan       | Fresh                              | Peshawar  | DHQS Swabi   |
| 4    | Dr. Muhammad Masood Khan S/O Mumtaz Ali Khan | LRH Peshawar                       | Peshawar  | DHQH Kohat   |
| 5    | Dr. Bushra Mehboob D/O Mehboob Elahi         | Dental Surgeon RHC Putwar Peshawar | Peshawar  | DHQH Mardan  |

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|----|--|--|---------------|------------------------|
| 6  | Dr. Rozi Afsar S/O Hamim Gul                           | Fresh  | Shangla       | DHQH Shangla           |
| 7  | Dr. Muhammad Halim Khan S/O Abdul Hakim                | Cat. D Hospital Lal Qilla Dir Lower            | Dir Lower     | DHQH Dir Upper         |
| 8  | Dr. Sohail Shahzad S/O Bakht Rawan                     | Fresh  | Dir Lower     | DHQH Batkhela Malakand |
| 9  | Dr. Ajmal Khan S/O Bakht Zamin Khan                    | SGTH Swat                                      | Swat          | DHQH Abbottabad        |
| 10 | Dr. Muhammad Farooq S/O Fateh Gul                      | BMC, Bannu                                     | Bannu         | DHQH Lakki Marwat      |
| 11 | Dr. Sajid Ali S/O Shehzad Khan                         | KCD Peshawar                                   | Peshawar      | DHQH Karak             |
| 12 | Dr. Hidayatullah S/O Malanag Jan                       | Fresh  | Bajaur Agency | DHQH Chitral           |
| 13 | Dr. Tanveer Hussain Bangash S/O Yousef Hussain Bangash | Dental Surgeon Type D Hospital Lora Abbottabad | Kurrām Agency | DHQH Manserha          |
| 14 | Tariq Mehmood S/O Shah Jehan                           | Fresh  | SW Agency     | DHQH Buner             |

**District Specialist Skin (BS-18)**

| S.No. | Name of doctor                             | Present place of posting | Domicile | Posted against the vacant post of Distt: Specialist Skin (BS-18) at |
|-------|--|--------------------------|----------|---|
| 1     | Dr. Usman Rafiq S/O Muhammad Rafiq         | Fresh                    | Mansehra | DHQH Mansehra   |
| 2     | Dr. Jamal Ahmad Khan S/O Pervez Ahmad Khan | DHQH Nowshera            | Nowshera | DHQH Haripur  |
| 3     | Dr. Niaz Akbar Afridi S/O Muhammad Akbar   | AMC Abbottabad           | FR Kohat | DHQH Battagram  |

**District Specialist Anaesthesia (BS-18)**

| S.No. | Name of doctor                               | Present place of posting | Domicile      | Posted against the vacant post of Distt: Specialist Anaesthesia (BS-18) at |
|-------|--|--------------------------|---------------|--|
| 1     | Dr. Abdur Rahman S/O Muhammad Gul            | Fresh                    | Bajaur        | DHQH Timergara   |
| 2     | Dr. Muhammad Ali S/O Muhammad Ibrahim        | Fresh                    | Malakand      | DHQBatkhele, Malakand  |
| 3     | Dr. Salman Malik S/O Shahriyar Khan          | KTH Peshawar             | Charsadda     | DHQH Charsadda   |
| 4     | Dr. Saira Ehsan D/O Qazi Ehsan Ullah Qureshi | WMO LRH Peshawar         | Peshawar      | Molvi Amir Shah Memorial Hospital Peshawar                                 |
| 5     | Dr. Sibghatullah S/O Malik Mehboob Khan      | KTH Peshawar             | NW Agency     | W&C Hospital Bannu   |
| 6     | Dr. Abdul Rahman S/O Mir Gul Khan            | Fresh                    | FR Peshawar   | RHC Nahaqi Peshawar  |
| 7     | Dr. Jawad Khan S/O Muhammad Rafiq            | Fresh                    | Peshawar      | Category 'D' Shabqadar Charsadda   |
| 8     | Dr. Abdul Haq S/O Haji Nawaz                 | HMC Peshawar             | Khyber Agency | At the disposal of Director Health Services FATA                           |
| 9     | Dr. Waqar ul Mulk S/O Mukhtar ul Mulk        | MO DHQH Batkhela         | Malakand      | DHQH Batkhela, Malakand  |
| 10    | Dr. Aaqila Khan D/O Ghulam Muhammad          | WMO LRH Peshawar         | Peshawar      | Naseerullah Khan Babar Hospital Peshawar                                   |

**District Specialist Anaesthesia (BS-18)**

| S.No. | Name of doctor                      | Present place of posting          | Domicile     | Posted against the vacant post of Distt: Specialist Anaesthesia (BS-18) at |
|-------|-------------------------------------|-----------------------------------|--------------|--|
| 1     | Dr. Ismat Ullah Khan S/O Nawaz Khan | Retired as from Health Deptt: KPK | Lakki Marwat | DHQH Lakki Marwat  |
| 2     | Dr. Khalid Asif D/O Muhammad Baksh  | Retired as from Health Deptt: KPK | Haripur      | DHQH Abbottabad  |

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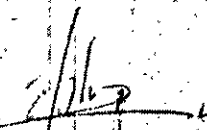
They are directed to assume charge within 30 days after the issuance of this notification failing which their appointment shall be treated as cancelled.

18

SECRETARY HEALTH

Endst No and date even

- C C
1. Hospital Director HMC/LRH/KTH, Peshawar/ATH, Abbottabad, MMC, Mardan/DHQTH/MMMTH D.I.Khan/KGNTH, Bannu/NMC, Nowshera.
  2. Accountant General Khyber Pakhtunkhwa Peshawar.
  3. Director General, Health Services, Khyber Pakhtunkhwa.
  4. Chief Executive/Principal SGTH/SMC Swat/GKMC Swabi.
  5. Dean KMG/KCD, Peshawar, AMC, Abbottabad/GMC, D.I.Khan/BMC, Bannu/NMC, Nowshera.
  6. Director Health Services FATA, Peshawar.
  7. DHOs concerned.
  8. Medical Supdt./Incharge DHQTHs/DHQHs/THQHs concerned.
  9. Distt; Accounts Officers/Agency Accounts Officers concerned.
  10. Director Information, Khyber Pakhtunkhwa.
  11. Computer Programmer Health Department.
  12. P.S to Minister Health, Khyber Pakhtunkhwa.
  13. P.S to Secretary Health Department.
  14. Doctors concerned.
  15. Personal files of the doctors concerned.

  
(Tasleem Khan)  
Section Officer-I

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Advocate





ضلع صوابی

بحوالہ مد 12 روزنامہ 20.12.14

تھانہ ہرمولی

دفعات Cr.PC 174

بذریعہ صابر خان ولد کرم خان سکنہ اسوٹا غریب آباد

نام

مد 12

رپورٹ سجاد علی بوقت 9:50 مورخہ 20.12.14 اس وقت ایک تحریری رپورٹ متن اندراج روزنامہ پنجانب جاوید اقبال خان ASI تھانہ کالو خان بوقت کنسٹیبل اسد 1115 موصول ہو کر ذیل ہے تاریخ وقت وقوعہ 10.08.19 وقت 8:21 بجے تاریخ وقت رپورٹ 21.06.19 وقت 09:0 بجے جائے وقوعہ مکان نازاں متوفی ارشد واقع دیہہ اسوٹا غریب آباد تھانہ ہرمولی حسب اطلاع ہسپتال کالو خان آیا مسخی صابر خان ولد کریم خان بمر 40/41 سال حال ساکن اسوٹا محلہ غریب آباد بہ امداد رشتہ داران بسواری سوزو کی ہسپتال کالو خان نعش برادر خود ارشد خان ولد کریم خان سکنہ اسوٹا محلہ غریب آباد با امداد رشتہ داران بسواری سوزو کی موقع ہسپتال کالو خان لاکر بمودگی CMO صاحب خان صابر خان یوں رپورٹ کرتا ہے میں بیٹھک میں موجود تھا کہ بچوں سے اطلاع ملی کے چچا ارشد علی نے اپنے پر با ارادہ خود کشی کا مرتکب ہو کر قتل ہوا پڑا ہے میں فوری طور پر مکان خود آیا تو برادر ام ارشد علی خون میں لت پت قتل شدہ پڑا تھا وجہ یہ ہے کہ برادر ام اور بھابی ام عذرہ دختر واصل خان ساکن پنج پیر گاؤں کے مابین گھریلو ناچاقی تھی۔ واقع طرز ادیگر اہل خانہ کا چشم دید ہے۔ میں برادر ام کی جان بحق ہونے کا کسی پر دعویٰ داری نہیں کرتا البتہ برادران ام بھابی مسماة عذرہ کی آئے روز جھگڑوں سے تنگ آ کر زندگی سے دلبرداشتہ ہو کر اپنے آپ پر بہ ارادہ خود کشی کی خاطر فائرنگ کی ہے جس کی رپورٹ کرتا ہوں۔

العبد

جناب عالی!

نقل بمطابق اصل ہے

Annex-D

40-71-  
3-7-18  
Secretary Health

19

The Health Secretary,  
Health Department,  
Islamabad

Subject: Request for extra Ordinary Leave

Respected Sir,

It is stated with due respect that I am facing domestic emity and security threats and having difficulty in continuing my duties. Therefore it is humbly requested to your honor to kindly give me EOL for two years from 1st-August-2018 onward & ably.

I will be very thankful for your act of kindness.

Thanking you in anticipation,

Dr. Akhmal R. S.

Distt. Surgeon TMO - Hospital,  
Chota Lahore - Punjab.

A/E  
S.O.II

ATTN:  
to be  
Adv.

*[Signature]*

02/07/18

Dated: 02/07/2018

Necessary documents attached herewith

# ANJUMAN SMAJEE BEHBOOD YAR HUSSAIN (SWABI)



Annex - E

21

Reg No. DSW/NW/P1629  
Enrolled with Ministry of Youth Affairs Government of Pakistan Islamabad

Ref: ASB/4-301-

Dated: 10-2-2024

ڈاکٹر امجد علی + ڈاکٹر اختر علی + وقار علی لہرن کریم خان سائنس ٹریننگ ایجوکیشنل سوسائٹی (زین ایل)  
قین ڈیڑ ڈیڑ ٹیچنگ سوسائٹی (زین ایل)  
ایس ایل لہرن ایمران سائنس ٹریننگ ایجوکیشنل سوسائٹی ڈیڑ ڈیڑ ٹیچنگ سوسائٹی (زین ایل)

Handwritten notes in Urdu, including "Time" and "Date".

ضمیمہ مابین زمین  
انجمن سماجی بہبود یار حسین نے اپنی رزولوشن کے تحت سال 1992ء سے خرابی نکالنے کے لئے زمینوں کو  
لوٹنے مابین اصلاحی کرنے سے شروع کیا ہے۔ زمین آج بھی ایک دو ایک اکر اور اور ایک ایک  
خدا مابین کی سالوں کے گزرتے ہوئے حالات آج بھی وہی ہیں۔ جس کی وجہ سے زمینوں کی  
مائی اور لکھنؤ کی حالت سے شک اگر ہو گئی ہے۔ جس کا نتیجہ ہے کہ زمینوں کی حالت  
بروز 17 مارچ 2024ء کو ثابت ہے۔ اس حالت سے زمینوں کی حالت کو دیکھ کر خود ہی کہیں۔ یا زمینوں کی  
کہ جائے۔ اور زمینوں کی حالت سے زمینوں کی حالت کو دیکھ کر خود ہی کہیں۔ یا زمینوں کی  
یا زمینوں کی حالت سے زمینوں کی حالت کو دیکھ کر خود ہی کہیں۔ یا زمینوں کی  
مستقل ہے۔ زمینوں کی حالت سے زمینوں کی حالت کو دیکھ کر خود ہی کہیں۔ یا زمینوں کی  
نہ زمینوں کی حالت سے زمینوں کی حالت کو دیکھ کر خود ہی کہیں۔ یا زمینوں کی  
دوسرے زمینوں کی حالت سے زمینوں کی حالت کو دیکھ کر خود ہی کہیں۔ یا زمینوں کی  
ایک زمینوں کی حالت سے زمینوں کی حالت کو دیکھ کر خود ہی کہیں۔ یا زمینوں کی  
دور مابین زمینوں کی حالت سے زمینوں کی حالت کو دیکھ کر خود ہی کہیں۔ یا زمینوں کی  
ہم کر رہے۔ زمینوں کی حالت سے زمینوں کی حالت کو دیکھ کر خود ہی کہیں۔ یا زمینوں کی  
آج کی حالت سے زمینوں کی حالت کو دیکھ کر خود ہی کہیں۔ یا زمینوں کی  
میں زمینوں کی حالت سے زمینوں کی حالت کو دیکھ کر خود ہی کہیں۔ یا زمینوں کی  
ہم کر رہے۔ زمینوں کی حالت سے زمینوں کی حالت کو دیکھ کر خود ہی کہیں۔ یا زمینوں کی  
آج کی حالت سے زمینوں کی حالت کو دیکھ کر خود ہی کہیں۔ یا زمینوں کی  
میں زمینوں کی حالت سے زمینوں کی حالت کو دیکھ کر خود ہی کہیں۔ یا زمینوں کی

General Secretary  
Anjuman Smajee  
Behbood Yar Hussain  
(Swabi) Reg No. 029

Address: Village & Post Office Yar Hussain, Office Chola Yar Hussain, Tehsil Lahor Distt: Swabi  
Phone: 0938-461372-460918-460368 Email: aqil004@yahoo.com

ATTESTED  
to be true & correct  
AC



DIRECTOR GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR  
All communications should be addressed to The Director General  
Health Services Peshawar and not to any official by name

22  
24  
[Handwritten marks]

No. 4875 /E.I

Dated: 22/03/2020

To

The Secretary to Govt. of Khyber Pakhtunkhwa,  
Health Department Peshawar.

Subject: - ABSENCE FROM DUTY/ACCEPTANCE OF ARRIVAL REPORT

Dear Sir,

I am forwarding herewith a copy of application dated 06.03.2020 in respect of Dr. Ahmad Ali Ex-District Surgeon (BS-18) attached to THQ Hospital Lahor District Swabi wherein he has stated that due to some unavoidable circumstances i.e. serious security risk to his life and long standing family dispute, he forced to shift his family to Lahore and was unable to attend his duty. The doctor concerned further stated that he was continuously struggling to settle the dispute and for this purpose he had involved elders of the family/area, however, resolution of the dispute proved to be an arduous task and took more than a year. He further stated that now the issue has been settled down and he shifted his family back to Swabi and he is now able to join his duty at Swabi.

According to the doctor concerned he could not attend his duty since 04.07.2018 till date due to the reasons mentioned above and requested that disciplinary proceedings may not be taken against him and the intervening period i.e. 04.07.2018 till date may be treated as leave from duty with half pay/quarter pay.

In this regard it is stated that on receipt of absence report for DHO Swabi vide his letter No. 8228/PF dated 23.07.2018, this Directorate sent a detailed case to Govt. for initiation of strict disciplinary action against the doctor concerned for his willful absence since 07/2018 vide letter No. 11558-59/E.I dated 15.08.2018. (Copy attached), however decision of the competent authority is still awaited.

He was appointed as District Specialist Surgery (BS-18) during 07/2017 on adhoc basis for a period of one year vide Govt. Notification No. SOH-1/(HD)3-5/2015 dated 04.07.2017.

In the light of foregoing necessary advice regarding acceptance of his arrival report of the competent authority may please be conveyed.

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22/4/20  
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DIRECTOR GENERAL HEALTH  
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

HEALTH DEPARTMENT

Annex-F

23

SUMMARY FOR CHIEF MINISTER, KHYBER PAKHTUNKHWA

Subject: DISCIPLINARY ACTION AGAINST DR. AHMAD ALI,  
DISTRICT SPECIALIST SURGERY, DISTRICT SWABI

Dr. Ahmad Ali, District Specialist General Surgery (BS-18), Cat-C Hospital Chota Lahore, Swabi was appointed on 04.07.2017 on ad-hoc basis till the arrival of the recommendee of the Public Service Commission (Annex-I). His services were, later on, regularized under the Khyber Pakhtunkhwa, Health Employees Regularization of Services Act, 2018 on 27.03.2018 (Annex-II). After regularization, the doctor concerned requested for 730 days Extraordinary Leave on 02.07.2018 (Annex-III) which was regretted by the Competent Authority.

2. Instead of assuming duty at the hospital, the doctor concerned remained absent from the duty station for 740 days as reported by the Director General Health Services, Khyber Pakhtunkhwa (Annex-IV).

3. Since willful absence from duty for 740 days is a sufficient ground to proceed against the accused doctor under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, therefore, Health Department proposes to serve a direct Show Cause Notice upon Dr. Ahmad Ali, District Specialist, General Surgery Cat-C Hospital Chota Lahore, Swabi while dispensing with the inquiry in terms of Rule-7 of the Rules ibid (Annex-V).

4. In view of the above, the Chief Minister, Khyber Pakhtunkhwa, being the competent authority, is kindly requested to sign the Show Cause Notice placed at (Annex-VI) and also insert penalty(ies) from the list of penalties at (Annex-VII).

(SYED IMTIAZ HUSSAIN) (SH)  
Secretary Health

Minister for Health, Khyber Pakhtunkhwa

Chief Secretary, Khyber Pakhtunkhwa

Taimur Salim Khan Jhagra  
Minister Finance / Health  
Govt. of Khyber Pakhtunkhwa  
Peshawar

18.9.20

ATTN: [Signature]


N.P.P.

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5. The Administrative Department has proposed to initiate disciplinary action against Dr. Ahmad Ali, District Specialist Surgery (BS-18) on account of wilful absence from duty for 740 days w.e.f 04.07.2018, issuing him direct show cause notice and dispensing with inquiry process under Rule 5(1)(b)(ii) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

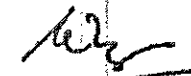
6. The accused remained absent from duty for more than two years. The Administrative Department may, therefore, fix responsibility for the negligence on the part of the dealing staff, which failed to point out the absence of the accused.

7. The proposal of Administrative Department contained in Pra-4 read with Para-6 of the summary is endorsed. Chief Minister, Khyber-Pakhtunkhwa, being competent authority in terms of Rule-2(1)(f) (ii) of the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011 (Annex-VIII) may sign the Show Cause Notice (Annex-VI) and insert penalty /penalties in the spaces left blank in the Show Cause Notice from the list of penalties (Annex-VII) to be served upon the accused officer.

  
(M. ZAHER ZED)  
Secretary Establishment  
27, October, 2020


Chief Secretary Khyber Pakhtunkhwa


Chief Minister

  
27/10  
Chief Secretary  
Govt. of Khyber Pakhtunkhwa

Para 07 approved.  
Needful done.

@S

  
5-11-2020  
Chief Minister  
Khyber Pakhtunkhwa

ATTESTED  


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### SHOW CAUSE NOTICE

I Mahmood Khan, Chief Minister, Khyber Pakhtunkhwa as Competent Authority, under Rule-5 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules-2011, do hereby serve you, Dr. Ahmad Ali, District Specialist General Surgery (BS-18) Cat-C Hospital, Chota Lahore, Swabi as follows:

F/A

"That you were found guilty for being wilfully absent from duties for 740 days with effect from 04.07.2018, a conduct prejudicial to good order or service discipline."

I am satisfied that you have committed the above omission and commission which constitutes the act of Misconduct and has thus, rendered yourself for disciplinary proceedings under Rules-3 of the said rules.

2. In terms of Rule-5 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules-2011, I as Competent Authority, dispense with the inquiry and serve you with a show cause notice under Rule-7 of the rules ibid.

3. As a result thereof, I as competent authority, have tentatively decided to impose upon you the following penalty/penalties under Rule-4 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011:-

a. Withholding of (02) annual increments  
x For a period of (02) years.

4. You are, therefore required to show cause as to why the aforesaid penalty/penalties should not be imposed upon you and also intimate whether you desire to be heard in person.

5. If no reply to this notice is received within seven (07) days or not more than fifteen days of its issuance in the normal course of circumstances, it shall be presumed that you have no defense to put in, and in that case, an ex-parte action shall be taken against you.

  
(MAHMOOD KHAN)  
Chief Minister/Competent Authority

Dr. Ahmad Ali,  
District Specialist General Surgery (BS-18)  
C/O DHO District Swabi

ATTESTED

to be a copy  
Advised

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

(25) (26)

SUMMARY FOR CHIEF MINISTER, KHYBER PAKHTUNKHWA

Subject: DISCIPLINARY ACTION AGAINST DR. AHMAD ALI,  
DISTRICT SPECIALIST SURGERY, DISTRICT SWABI

Reference Para-09 of the Summary:

10. In furtherance of approval by the Hon'ble Chief Minister, Khyber Pakhtunkhwa, conveyed vide para-9 of the Summary, the accused doctor was served with Show Cause Notice for stoppage of (02) annual increments for 02 years tentatively (Annex- IX).

11. The accused doctor in his reply to the show cause notice has stated that he had old enmity/dispute and he was being chased by his enemy. He and his family had constant threats to their life by the enemies; therefore, he went on hiding to Lahore to protect his life and the lives of the family. In the meanwhile he engaged the elders of the locality for the resolution of the dispute/enmity and it took two years for the settlement of the dispute.

12. On the above explanation to the show cause notice, the accused doctor has requested to the competent authority for exonerating him from the proposed penalty and has further requested for closure of inquiry against him (Annex-X)

13. Foregoing in view, the Chief Minister Khyber Pakhtunkhwa, being the competent authority, may kindly like to consider reply of the accused Doctor contained in para-11 & 12 above or otherwise.

  
(SYED IMTIAZ HUSSAIN)  
Secretary Health

MINISTER FOR HEALTH KHYBER PAKHTUNKHWA

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SECRETARY

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

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Dated Peshawar, the 03<sup>rd</sup> May, 2021

17

Annex - G.

NOTIFICATION

SOH-I/HD/7-53/Misc/2021: The Competent Authority is pleased to order posting/transfer of Dr. Ahmad Ali, District Specialist Surgery (BS-18) is hereby posted against the vacant post of District Specialist Surgery (BS-18) at Type-D Hospital Shivi Adda District Swabi, with immediate effect, in the best public interest.

-SD-  
Secretary to Govt. of Khyber Pakhtunkhwa  
Health Department

Endst: of even No. & date:-

Copy forwarded to the:-

1. Director General Health Services, Khyber Pakhtunkhwa.
2. District Health Officer, Swabi
3. District Accounts Officer, Swabi.
4. Deputy Director (IT) to upload the notification on official website.
5. PS to the Secretary Health Govt. of Khyber Pakhtunkhwa.
6. PS to the Special Secretary (E&A) Health Department.
7. The Doctor concerned

03/5/21  
Section Officer (Etab-I)

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to be true copy  
Advocate



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GOVERNMENT OF KHYBER PAKHT  
HEALTH DEPARTMENT

Dated Peshawar, the 06th May, 2021

28

**NOTIFICATION**

SOH/JHD/7-63/Misc/2021: In partial modification of this Department's Notification of even number dated 03<sup>rd</sup> May, 2021; Dr. Ahmad Ali District Specialist Surgery (BS-18) is hereby transferred and posted against the vacant post of District Specialist Surgery (BS-18) in Cat-D Hospital, Yar Hussain instead of Cat-D Hospital Shivi Adda District Swabi with immediate effect, in the best public interest.

-SD-

Secretary to Govt. of Khyber Pakhtunkhwa  
Health Department

Endst. of even No. & date:-

Copy forwarded to the -

1. Director General Health Services, Khyber Pakhtunkhwa.
2. District Health Officer, Swabi
3. District Accounts Officer, Swabi.
4. Deputy Director (IT) to upload the notification on official website.
5. PS to the Secretary Health Govt. of Khyber Pakhtunkhwa.
6. PS to the Special Secretary (E&A) Health Department.
7. The Doctor concerned

  
Section Officer (Estab-I)

**ATTESTED**

to be [Handwritten signature]



OFFICE OF THE MEDICAL SUPERINTENDENT  
CAT-D HOSPITAL YARHUSSAIN DISTRICT SWABI

Annex-11

29/10/22

NO. 116 /MS

Dated: 19/10/2022

Annex-11

Subject: Performance Report.

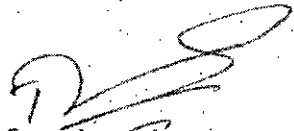
Reference to the subject cited above it is stated that Dr. Ahmad Ali District Surgeon worked at Cat-D hospital Yarhussain since May 06, 2021 to October 17, 2022.


As a district surgeon he is performed his duty regularly and efficiently.

It is pertinent to mentioned that due to his availability overall performance of the hospital, including Operation Theater has been improved.

Copy forwarded:

1. Office file

  
Medical Superintendent  
Cat -D Hospital Yarhussain  
Medical Superintendent  
Cat-D Hospital  
Yar Hussain (Swabi)

  
Medical Superintendent  
Cat -D Hospital Yarhussain  
Medical Superintendent  
Cat-D Hospital  
Yar Hussain (Swabi)



FINANCE INVESTMENT PROJECT  
KP-Human Capital Investment Project (KP-HCIP)  
ELEMENTARY AND SECONDARY EDUCATION  
DEPARTMENT  
Government of Khyber Pakhtunkhwa  
Phone 091-9224270



29/30

No PMU/PD/KP-HCIP/2021-22/054

Dated: Jun. 06, 2022

To

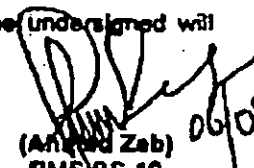
Mr. Dr. Ahmad Ali,  
District Specialist Surgery (BS-18)  
Category "D" Hospital, Shivi Adda  
Swabi

Subject

**DISCIPLINARY ACTION AGAINST DR. AHMAD ALI, DISTRICT  
SPECIALIST SURGERY (BS-18) CATEGORY "D" HOSPITAL  
SHIVI ADDA, DISTRICT SWABI.**

The undersigned has been appointed as Chairman of the Inquiry Committee to probe into the allegations levelled against you in the enclosed Charge Sheet and Statement of Allegations. You are therefore directed to submit written reply to the Charge Sheet and Statement of allegations within the prescribed period of 07 days to the undersigned after receipt of this communication.

In case of non-submission of written reply to the charge sheet and statement of allegations within the stipulated time period, the undersigned will proceed in the matter on the basis of available record.

  
(Ahmad Zeb)  
PMS BS-18  
Chairman of the  
Inquiry committee

06/05/2022

Encs: as stated.

Copy to:

1. Dr. Iqram Ullah, Chief HSRU Health Department.
2. Section Officer (E-I) Health Department w/r to his letter No.SOH/HD/3-27/2018 dated 24.5.2022.

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Associate

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**DISCIPLINARY ACTION**

1. Dr. Shahzad Khan Bangash, Chief Secretary, Khyber Pakhtunkhwa as competent authority, am of the opinion that Dr. Ahmad Ali, District Specialist Surgery (BS-18) Category 'D' Hospital Yar Hussain District Swabi has rendered himself liable to be proceeded against as he committed the following act/omission within the meaning of rule-3 (b) of the Khyber Pakhtunkhwa Govt. Servants Efficiency and Discipline Rules 2011.

**STATEMENT OF ALLEGATION**

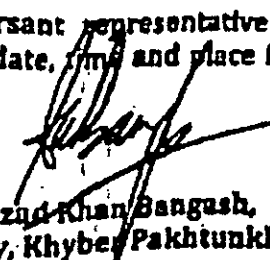
"After regularization your contract services, you had requested for 730-days extra ordinary leave (without pay) which was regretted by the competent authority instead of assuming duty you remained absent from duty station w.e.f 04.07.2018 i.e. 740-days".

2. For the purpose of enquiry against the said accused with reference to the above allegation, an enquiry officer/enquiry committee consisting of the following is constituted under Rule 10 (1) (a) of the Ibid rules.

- i. Mr. Ahmad Zeb (PMS-BS-19)
- ii. Dr. Iqbalullah Chief HSRU,
- iii. Health Deptt.

3. The enquiry officer/committee shall, in accordance with the provisions of the rules, provide reasonable opportunity of hearing to the accused, record its findings and make within 60 days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused.

4. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the enquiry officer/enquiry committee.

  
Dr. Shahzad Khan Bangash,  
Chief Secretary, Khyber Pakhtunkhwa



39

**CHARGE SHEET**

I, Dr. Shahzad Khan Bangash, Chief Secretary, Khyber Pakhtunkhwa as competent authority, hereby charge you, Dr. Ahmad Ali, District Specialist Surgery (BS-18) attached to Category 'D' Hospital, Yur Hussain, District Swabi as follows:-

"After regularization your contract services, you had requested for 730-days extra ordinary leave (without pay) which was regretted by the competent authority instead of assuming duty you remained absent from duty station w.e.f 04.07.2018 Le. 740-days".

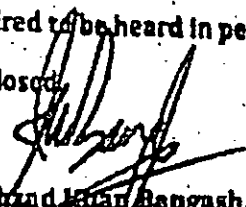
2. For the above reason you appear to be guilty of misconduct under Rule-3 (b) of the Khyber Pakhtunkhwa Govt. Servants Efficiency and Discipline Rule 2011 and have rendered yourself to all or any of the penalty specified in Rule 4 of the rules (bid).

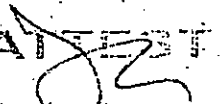
3. You are therefore required to submit your written defence within 07-days of the receipt of this charge sheet to the enquiry officer/committee as the case may be.

4. Your written defence if any, should reach to enquiry officer/enquiry committee within the specified period, failing which, it shall be presumed that you have no defence to put it and in that case ex-parte action shall follow against you.

5. Intimate as to whether you desired to be heard in person.

6. A statement of allegation is enclosed.

  
Dr. Shahzad Khan Bangash,  
Chief Secretary, Khyber Pakhtunkhwa

  
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to soft copy  
Advocate

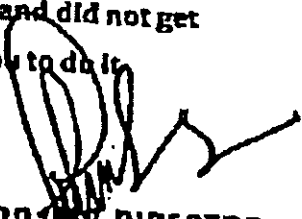
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**QUESTIONNAIRE REGARDING ABSENTEEISM**

1. How long you remained absent? Mention exact date.
2. Have you applied for leave through proper channel? If yes, provide documentary proof.
3. When you received no response from the department, did you pursue your case or get it pursued by someone else?
4. Have you received any notice; or notices to join your place of duty?
5. What were the circumstances that necessitated your stay away from your place of duty? Provide documentary proof.
6. Was your reporting officer aware of the circumstances you narrated; did you apprise him of your situation and what was the response of your reporting officer?
7. Being a civil servant are you aware of the fact that unless your leave is sanctioned you are not supposed to leave your place of duty?
8. Do you admit that there has been lapse on your part?
9. When did you come to know that you have been charged with staying away from your place of duty through unauthorized leave?
10. What was your response when you received statement of allegation / notice?
11. When did you join your place of duty after prolong absenteeism?
12. Did you receive salary during the period of your absenteeism?
13. How can this be possible that you remained absent for so long and did not get your case pursued by someone else if it was not possible for you to do it personally?

APPROVED  
 to be signed by  
 Adm. Secy

  
**PROJECT DIRECTOR**  
**PMU. KP-HCIP**  
**E&SD Peshawar**



PAKISTAN GOVERNMENT  
KP-Human Capital Investment Project (KP- HCIP)  
ELEMENTARY AND SECONDARY EDUCATION  
DEPARTMENT  
Government of Khyber Pakhtunkhwa  
Phone 091-9224270



No PMU/PD/KP-HCIP/2021-22/1054

Dated: Juno, 06, 2022

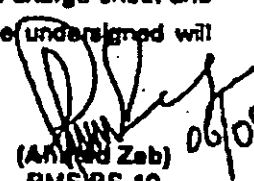
To

Mr. Dr. Ahmad Ali,  
District Specialist Surgery (DS-18)  
Category "D" Hospital, Shivi Adda  
Swabi

Subject: **DISCIPLINARY ACTION AGAINST DR. AHMAD ALI, DISTRICT  
SPECIALIST SURGERY (DS-18) CATEGORY "D" HOSPITAL  
SHIVI ADDA, DISTRICT SWABI.**

The undersigned has been appointed as Chairman of the Inquiry Committee to probe into the allegations levelled against you in the enclosed Charge Sheet and Statement of Allegations. You are therefore directed to submit written reply to the Charge Sheet and Statement of allegations within the prescribed period of 07 days to the undersigned after receipt of this communication.

In case of non-submission of written reply to the charge sheet and statement of allegations within the stipulated time period, the undersigned will proceed in the matter on the basis of available record.

  
(Ahmad Zeb)  
PMS BS-19  
Chairman of the  
Inquiry committee

06/05/2022

Encls: as stated.

Copy to:

1. Dr. Iqram Ullah, Chief HSRU Health Department.
2. Section Officer (E-I) Health Department wr to his letter No.SOH/HD/3-27/2018 dated 24.5.2022.

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BY

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Dated: July 09, 2022

To

Mr. Ahmad Zeb (PMS BS-19)  
Chairman of the Inquiry Committee.

**SUBJECT: DISCIPLINARY ACTION AGAINST DR. AHMAD ALI,  
DISTRICT SPECIALIST SURGERY (BS-18) CATEGORY-D  
HOSPITAL YAR HUSSAIN, DISTRICT SWABI**

Dear Sir,

Kindly refer to the subject noted above and to state that in the matter under reference a show cause notice was served to the undersigned (F/A) in which the Competent Authority (The Chief Minister, Khyber Pakhtunkhwa) had tentatively decided to impose the penalty i.e. withholding of two (02) annual increments for a period of two (02) years under Rule 4 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Disciplinary) Rules, 2011.

2. In response to the aforesaid show cause notice, the undersigned had submitted his reply which was placed before the Competent Authority for consideration.

3. Recently, another notice along with Charge Sheet and Statement of Allegations has been received to the undersigned from your goodself with directions to submit the written reply to the Charge Sheet and Statement of Allegations within a period of Seven (07) days.

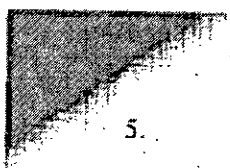
4. In this regard, it is submitted that the undersigned is a dedicated professional and believe in the performance of my official responsibilities to the best of my capabilities, however, due to some unavoidable circumstances i.e. serious security risk to my life and family due to a long standing family dispute, the undersigned was forced to shift my family to Lahore and was unable to attend my duty. At the same time I submitted my application to the Competent Authority for long leave but neither it was regretted nor accepted. The undersigned was continuously struggling to settle the dispute and for this purpose I involved elders of the family/area. However, resolution of the dispute proved to be an arduous task and it took more than a year. Once the threat to my life got settled I shifted back to my district.

ATTESTED

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Advocate

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5. Further, it is pertinent to mention that the undersigned then submitted a report to Director General, Health Services, Khyber Pakhtunkhwa bearing Diary No. 7510, dated 06.03.2020 (F/B) with the request that since the security threat to my life has been settled and that I have shifted my family to District Swabi and that he is available for the duty. Finally I assumed the charge of the post of District Surgeon, Yar Hussain, District Swabi on 07.05.2021 and performing my duty with great zeal and zest since then.

6. Furthermore, the undersigned is a dedicated Government employee who believes in providing the greatest possible health service to the public; hence, it is requested that (605) days absentee period may be treated as leave without pay.

7. In light of the foregoing, it is requested that the disciplinary proceedings against the undersigned be cancelled and response to the effect be considered on humanitarian grounds and in the best interest of health services being provided to the public, please.

Yours sincerely,  
*[Signature]* 09/06/2022

Ahmad Ali (Surgeon),  
District Surgeon,  
District Swabi.

Reviewed on  
9/06/2022


*[Signature]*

ATTESTED  
to be Deputy  
Advocate

To

The Secretary Health,  
Health Department,  
Khyber Pakhtunkhwa,  
Peshawar.



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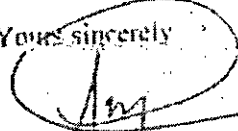


Subject: ABSENCE FROM DUTY

Kindly refer to the District Health officer, Swabi letter No.7921/PF/  
DHO Swabi dated 5-07-2018 and letter No. 8228 /PF/DHO office Swabi dated  
23-07-2018 on the subject matter

2. In this regard it is submitted that the undersigned is a dedicated professional and believe in performance of one's official responsibilities to the best of one's capabilities, however, due to some unavoidable circumstances i.e. serious security risk to my life and family due to long standing family dispute, the undersigned was forced to shift my family to Lahore and was unable to attend my duty. The undersigned was continuously struggling to settle the dispute and for this purpose I had involved elders of the family/area. However, resolution of the dispute proved to be an arduous task and took more than a year.
3. Since the security threat to the life of the undersigned has thwarted due to resolution of the dispute, therefore, now the undersigned shifted my family back to Swabi and now I am able to join my duty at district Swabi and is in a comfortable position to continue dispensing public services to the masses.
4. It is further added that the undersigned is a committed Government servant and believe in provision of services to the masses to the best of his abilities; however, he could not attend his duty from 4<sup>th</sup> July 2018 till date due to unavoidable circumstances as dwelt upon above
5. Foregoing in view, it is requested that the disciplinary proceedings against the undersigned may kindly be terminated and intervening absence period (from 4<sup>th</sup> July-2018 till date) may kindly be treated as duty with half/quarter pay enabling me to serve the public once again with great zeal and zest, please

Yours sincerely

  
Ahmad Ali (Surgeon)  
District Surgeon  
District Swabi

ATTESTED

  
2018

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(Handwritten initials) (Handwritten initials)

INQUIRY REPORT IN RESPECT OF DR. AHMAD ALI, DISTRICT SPECIALIST SURGERY, (BS-18)  
CATEGORY-D HOSPITAL YAR HUSSAIN, DISTRICT SWABI

Authorization

In order to conduct a de novo enquiry against an accused doctor namely Dr. Ahmad Ali, District Specialist Surgery (BS-18), Cat-D Hospital Yar Hussain, Swabi for his willful absence, an enquiry committee has been ordered by the Competent Authority (the Chief Minister Khyber Pakhtunkhwa) as received vide Health Department's letter dated 24<sup>th</sup> May 2022 consisting of the following officers (Annex-I).

1. Mr. Ahmad Zeb, PMS-(BS-19), Project Director Khyber Pakhtunkhwa Human Investment Project (E&SE) Department Peshawar.
2. Dr. Ikram Ullah Khan Chief HRSU, Health Department.

Background of the Case

Dr. Ahmad, District Specialist General Surgery (BS-18), currently posted at Type-D Hospital, Yar Hussain Swabi was appointed on 04.07.2017 on ad hoc basis and posted at Cat-C Hospital Chota Lahore, Swabi. Later, his services were regularized under the Khyber Pakhtunkhwa, Health Employees Regularization of Services Act, 2018. After his regularization, the doctor concerned applied for 730 days Extra Ordinary Leave on 02-07-2018 which was regretted by the Competent Authority. Instead of assuming duty, the doctor concerned remained absent from the duty station for 740 days as reported by the Director General Health Services.

Accordingly, the accused doctor was proceeded against for his willful absence under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011 by Health Department through a Summary thereby proposing to serve a direct Show Cause Notice upon the accused doctor while dispensing with the inquiry in terms of Rule-7 of the Rules ibid (Annex-II).

Consequential to that the accused Dr. was served with a Show Cause Notice by the Competent Authority (the Chief Minister Khyber Pakhtunkhwa), thereby imposing upon him a penalty of withholding of 02 annual increments for a period of 02 years tentatively (Annex-III).

(Handwritten initials)

**ATTESTED**  
to be a true copy  
Attorneys

(39)

Prior to confirmation of the said penalty as proposed by Health Department, the Competent Authority ordered a de novo Inquiry in the instant case in hand. Charge Sheet and Statement of Allegation are attached (Annex-IV).

Proceedings

Vide letter dated 06-06-2022, the accused doctor was served with the Charge Sheet and Statement of Allegation and was directed to submit written reply within seven (07) days (Annex-V). In response, the accused officer submitted his written defence on 09-06-2022 (Annex-VI). Formal proceedings of the inquiry were fixed on June 16, 2022, at 1100 hours in the office of PD-HCIP 7 Park Avenue University Town Peshawar (Office of Inquiry Officer) wherein the accused Doctor was directed to appear for personal hearing (Annex-VII). Dr. Ikram Ullhah Khan, Chief HSRU, joined the proceedings as Co Inquiry Officer while Mr. Israr Ahmad, Personal Assistant, attended the same as Departmental representative of Health Department.

During the proceedings, the accused doctor, Mr. Ahmad Ali, District Specialist maintained that he is a dedicated professional and believe in the performance of his official responsibilities to the best of his capabilities. However, due to some unavoidable circumstances i.e., serious security risk to his family and his life due to long standing family dispute he was compelled to shift his family to Lahore and was unable to attend his duty. He further maintained that at the same time he submitted an application to the Competent Authority for long leave but that was neither regretted nor accepted. He has been continuously struggling to settle the dispute for which he involved elders of the family/area. However, the resolution of the dispute proved to be an arduous task and took more than a year.

The accused officer was also served with questionnaire covering various aspect of the case (Annex-VIII). His reply to the said questionnaire is also attached (Annex-IX).

During inquiry proceedings and personal hearing of the accused officer his rebuttal revolved around family feud that necessitated his stay away from his place of duty as he was confronted with life threat, but he could not provide documentary proof regarding the family feud and secondly, he kept on saying that he applied for Extra Ordinary leave which was neither accepted nor regretted.

~~ATTESTED~~  
to the true copy  
Advocate

Findings:

Perusal of the available records, written defence of the accused officer and his replies to various questions during inquiry proceedings and personal hearing, the inquiry committee arrived at the following findings:

1. The accused officer did remain absent from duty station for 740 days with effect from 04-07-2018 as evident from letters of Director General Health Services (DGHS) and the written replies of the accused officer.
2. Available record also revealed that Absent Report in respect of the accused officer was timely forwarded to the administrative department vide DGHS letter dated 15-08-2018 but no action was taken by Health Department (Annex-X).
3. The said letter of DGHS does contain mention of a notice delivered at the home address of the officer concerned but in terms of Rule-9 of E & D Rules if such notice is received back as undelivered or no response is received from the absentee within stipulated time of 15 days, a notice shall be published in at least two leading newspapers directing the official to resume duty. No such notice through newspaper(s) is available on record.
4. Even disciplinary proceedings were initiated after the span of two years following the absent report against the accused doctor.
5. Health department did issue a notification on 05-08-2020 appointing Mr. Irfan Usman, Section Officer(E-V), Health Department as inquiry officer to probe the matter of not processing a letter (absent report against the accused doctor) dated 15-08-2018 received from DGHS and fix responsibility upon the officers/officials (Annex-XI) but no record of the said inquiry is available. So, it is not possible to ascertain as to whether the said inquiry was conducted at all or not.
6. While the accused doctor was still under inquiry for his willful absence, that is too for a period 740 days, he was posted at Type-D Hospital Shivi Adda District Swabi as District Specialist Surgery (BS-18) vide Health Department's notification dated 03-5-2021 (Annex-XII); afterwards within three days he was again transferred and posted as District Specialist Surgery (BS-18) in Cat-D Hospital, Yar Hussain through partial modification of the same notification.

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to be true copy  
Advocate

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(scribble)

Analysis of Findings

Despite compelling circumstances as narrated by the accused doctor there is no denying to the fact that the accused doctor did remain absent for 740 days with effect from 04-07-2018 as evident from the report of Directorate General Health Services and his own written defence. He could not produce any documentary proof regarding the family feud that forced him to shift his family to Lahore in the face of life-threatening situation as claimed by the doctor. His argument of not receiving any response from the department regarding his leave application too does not hold water as how can this be possible that he remained absent for a period of almost two years waiting for such a response without pursuing his leave case or for that matter getting it pursued by someone else. Nor procedural lapse like non issuance of notice(s) in two leading newspapers by the Department concerned absolve him from accusation of willful absence as remaining absent for almost two years squarely puts him within the meaning of misconduct.

Secondly, inordinate delay in processing the disciplinary proceedings against the accused officer under E & D Rules and Department's negligence in his posting/transfer despite ongoing proceedings show how his case has been managed by the dealing hands warranting stern disciplinary action against all those who had been involved in the whole affairs.

Conclusion

In view of the above, the Inquiry Committee is of the considered opinion that the accused officer has committed misconduct by absenting himself for 740 days with effect from 04-07-2018.

Recommendations

1. Whereas Dr. Ahmad Ali, District Specialist Surgery (BS-18) Category -D Hospital Yar Hussain, District Swabi has committed misconduct by absenting himself for 740 days therefore, penalty may be imposed in terms of Rule-9 of Government of the Khyber Pakhtunkhwa Efficiency and Discipline Rules, 2011 while 740 days absence period of the accused may be treated as unauthorized absence (without pay).

(Signature)

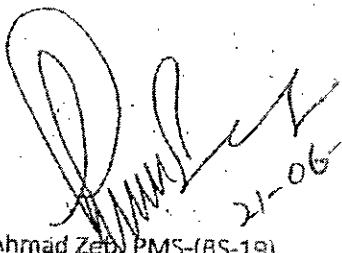
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to be true copy  
A. Yousaf

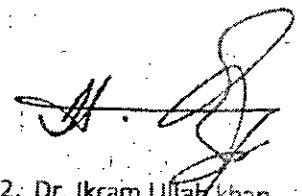
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2. Stern action/disciplinary proceedings may also be initiated against all those officers/officials of Health Department who showed gross negligence in processing disciplinary proceedings against the accused officer that caused inordinate delay of more than two years and also those officials who were some ways or the other involved in managing the said disciplinary proceedings.

  
21-06-2022

1. Mr. Ahmad Zeb, PMS-(BS-19)  
Project Director  
Khyber Pakhtunkhwa Human  
Investment Project (E&SE) Department  
Peshawar.



2. Dr. Ikram Ullah Khan  
Chief HRSU  
Health Department.

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admitted



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GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

Main Diary No. 6785  
661 of 20

Date..... Dated Peshawar the August 5, 2020

Directorate General Health Services,  
Khyber Pakhtunkhwa

NOTIFICATION

No. SOH-I/HD/1-5/2019/481; Mr. Irfan Usman, Section Officer (E-V), Health Department is hereby appointed as an Inquiry Officer to probe the matter of not processing a letter dated 15.08.2018 received from Director General Health Services, Khyber Pakhtunkhwa regarding wilful absence of Dr. Ahmad Ali, District Specialist, General Surgery (BPS-18), Swabi from duty.

2. The inquiry officer shall fix responsibility upon the officers/officials and shall submit report within 15 days positively.

SECRETARY HEALTH

ENDST NO AND DATE EVEN:

C C

1. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. Dean, Lady Reading Hospital, Peshawar
- ✓ 4. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
5. MS, Services Hospital, Peshawar.
6. P.S to Minister Health, Khyber Pakhtunkhwa.
7. P.S to Secretary Health, Khyber Pakhtunkhwa.
8. Doctor Concerned.

ATTESTED  
to be true copy

Section Officer (E-I)

GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

Dated Pesh: the 10<sup>th</sup> October, 2022

**NOTIFICATION**

No. SOH-I/HD/3-27/2018/5765 WHEREAS Dr. Ahmad Ali, District Specialist Surgery (BS-18) attached to Type-D Hospital, Shiva Adda District Swabi was proceeded under the Khyber Pakhtunkhwa Government (E&D) Rules, 2011 on account of wilful absence w.e.f 04.07.2018.

2. AND WHEREAS a Show Cause Notice was served upon the accused and a tentative penalty of "Removal from Service" was imposed upon him.

3. AND WHEREAS the opportunity of personal hearing was given to the accused but failed to defend himself.

4. NOW THEREFORE, in exercise of powers conferred under Rule 4(b)(iii) of the Khyber Pakhtunkhwa, Govt. Servants (Efficiency and Discipline) Rules 2011, the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) is pleased to impose major penalty of "Removal from Service" upon Dr. Ahmad Ali, District Specialist Surgery (BS-18) Type-D Hospital Shiva Adda District Swabi

Secretary to Govt. of Khyber Pakhtunkhwa  
Health Department

Enlist: No and date even:

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
3. District Health Officer, Swabi.
4. District Account Officer, Swabi.
5. PS to Secretary Health Department Govt. of Khyber Pakhtunkhwa.
6. PS to Special Secretary (E&A, Govt. of Khyber Pakhtunkhwa Health Department.
7. PA to the Deputy Secretary (ESIOB) Govt. of Khyber Pakhtunkhwa Health Department.
8. Doctors concerned
9. Personal file of the doctors concerned.

10/10/22  
Section Officer (E-1)



**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**HEALTH DEPARTMENT**

Dated Pesh: the 10<sup>th</sup> October 2022

**NOTIFICATION:**

No. SOH-I/HD/3-27/2018/15465: WHEREAS Dr. Ahmad Ali, District Specialist Surgery (BS-18) attached to type-D Hospital Shiva Adda District Swabi was proceeded under the Khyber Pakhtunkhwa Government (E & D) Rule, 2011 on account of willful absence w.e.f. 04.07.2018.

2 AND WHEREAS a show cause notice was served upon the accused and a tentative penalty of "Removal from Service" was imposed upon him.

3 AND WHEREAS the opportunity of personal hearing was given to the accused but failed to defend himself.

4 NOW THEREFORE in exercise of powers conferring under Rule 4(b)(iii) of the Khyber Pakhtunkhwa Govt Servants (Efficiency and Discipline) Rules 2011, the Competent Authority / Chief Minister, Khyber Pakhtunkhwa) is pleased to impose major penalty of Removal from Service" upon Dr. Ahmad Ali District Specialist Surgery (BS-18) Type D Hospital Shiva Adda District Swabi.

Secretary to Govt of Khyber Pakhtunkhwa

Health Department

Endst No and date even:

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar
2. Director General Health Services, Khyber Pakhtunkhwa, Peshawar
3. District Health Officer, Swabi
4. District Account Officer, Swabi
5. PS to Secretary Health Department Govt of Khyber Pakhtunkhwa
6. PS to Special Secretary (E&A) Govt. of Khyber Pakhtunkhwa, Health Department.
7. PA to the Deputy Secretary (Estab) Govt. of Khyber Pakhtunkhwa, Health Department
8. Doctors concerned
9. Personal file of the doctors concerned.

-sd-

Section Officer (E-I)

To

Annex - I

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The Honourable Chief Minister,  
Khyber Pakhtunkhwa.

Subject: REVIEW PETITION AGAINST HEALTH DEPARTMENT NOTIFICATION NO. SOH.1/HD/3-27/2018/5465 DATED 10<sup>TH</sup> OCTOBER, 2022 WHEREBY MAJOR PENALTY OF REMOVAL FROM SERVICE WAS IMPOSED UPON ME.

Respected Sir,

I Dr. Ahmad Ali, District Specialist Surgery, Health Department submit the following facts of the case for consideration:

- i) That I joined Health Department as District Specialist Surgery on 4.7.2017.
- ii) That due to a protracted enmity and the impending threat to my person and family, I applied for grant of 730 days extra-ordinary leave (leave without pay) with effect from 1<sup>st</sup> August, 2018 on 3.7.2018 (Copy of an application bearing Secretary Health Office diary No.4071 dated 3.7. 2018 enclosed). Evidence with regard to enmity is enclosed for worth perusal.
- iii) That with hope and surety by the dealing hand in Health Department that my leave request will be accepted, I relinquished the charge of the post of District Specialist Surgery, THQ Hospital, Chota Lahore on 1<sup>st</sup> August, 2018 and shifted to Lahore for the reasons cited above.
- iv) That no such information whatsoever was conveyed to me about the acceptance of my leave request or otherwise.
- v) That after resolution of the old enmity and expiry of the leave period (for which I had applied), I approached to Health Department for my posting. On this I was informed that I had been reported absent by the DHO, Swabi vide letter No.8228/PF dated 23.07.2018 addressed to DG Health Services (Copy enclosed). In response I explained my position to DG, Health and Secretary Health vide my application dated 6.3.2020 (copy enclosed).
- vi) That after detailed correspondence between the DG, Health Services and Health Department, I was posted at Type "D" Hospital Shiv. Adda District Swabi vide Health Department notification No. SOH-I/HD/7-53/Misc/2021 dated 3.5.2021 which was partially modified on 6.5.2021 whereunder I was posted in

APPROVED  
10/11/2022

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- vii) That I was served with a Show Cause Notice wherein a penalty of "withholding of two increments for two years was imposed upon me". I submitted my reply to the Show Cause notice, thereafter neither I was granted an opportunity of personal hearing nor final orders were passed by the competent authority.
- viii) Surprisingly again I was served with charge sheet and statement of allegation by appointing an inquiry committee consisting of Mr. Ahmad Zeb (PMS BS-19), PD, Human Investment Project, E&SE Department and Dr Ikramullah Khan, Chief HSRU Health Department
- ix) That I fully cooperated with the Inquiry Committee and pleaded my case by personally appearing before the inquiry committee. However, all of a sudden, I was removed from service vide Health Department notification NO. SOH.1/HD/3-27/2018/5465 DATED 10<sup>TH</sup> OCTOBER, 2022.

2. In view of the foregoing submission, I pray for acceptance of my review petition on the following grounds

- a) That a tentative penalty of "withholding of two increments for two years was imposed upon me" by serving show notice (copy enclosed). According to the rules on the subject, once tentative penalty is imposed upon any accused, the competent authority is required to afford an opportunity of personal hearing as provided in Rule-15 of the Khyber Pakhtunkhwa Government Servant (E&D) Rules, 2011 but I was deprived of my legal right.
- b) That the competent authority was supposed to pass final orders on the basis of show cause already served upon me after affording an opportunity of personal hearing.
- c) That after serving show cause, there is no scope of any inquiry under the aforesaid rules
- d) That after conducting inquiry, I was not served with any show cause notice by the competent authority and there is no provision in the above cited rules which empower the competent authority to pass final orders without serving show cause notice and affording an opportunity of personal hearing to the accused civil servant.
- e) That the Department in the Notification NO. SOH.1/HD/3-27/2018/5465 DATED 10<sup>TH</sup> OCTOBER, 2022 mis-stated that I was served with a show cause notice wherein a tentative penalty of "Removal from Service" was conveyed to me and that I was also afforded an opportunity of personal hearing as provided in Rule-15 of E&D Rules, 2011.

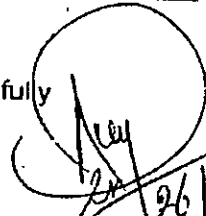
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3. In addition to the above, I am performing my duties at Type-D Hospital Yar Hussain, Swabi as is evident from the certificate issued by the Medical Superintendent of the said Hospital (Copy enclosed).

4. In view of the above-mentioned grounds and my devoted commitment to serving the patients, your honour is earnestly requested to consider my request in the best interest of health service and set aside the penalty of "Removal from Service" imposed upon me vide Health Department's Notification NO. SOH.1/HD/3-27/2018/5465 DATED 10<sup>TH</sup> OCTOBER, 2022 and re -instate the undersigned into service as District Specialist (Surgery) (BS-18).

Yours faithfully

  
26/10/2022

(Dr, Ahmad Ali)  
Ex-District Specialist Surgery  
Type "D" Hospital, Yar Hussain  
Swabi

ATTESTED

  
18/10/2022





**OFFICE OF THE DISTRICT HEALTH OFFICER SWABI**

(3)

Dated 5-07-2018

No. 190/2018

(48)

To: **Dr. Ahmad Ali Singora** IHC Hospital Fater  
Home Address: Mohallah Amir Khan Khal village Ghareeb, Abad Asara  
Tehsil Razza District Swabi

**SUBJECT: ABSENCE FROM DUTY**

As reported by IHC Hospital Fater that you were absent from duty without any intimation on 04 and 05 July 2018

You are hereby directed to join your duty immediately and explain your position otherwise department will be requested to take disciplinary action against you

*[Signature]*  
District Health Officer  
Swabi

Dated 5-7-2018

No. 190/2018 IHC Swabi

- i) Copy forwarded to the:
- ii) Director General Health Services Khyber Pakhtunkhwa Peshawar
- iii) PS to Secretary Health Govt. of Khyber Pakhtunkhwa Peshawar
- iv) IHC Hospital Fater
- v) Accountant to stop salary

*[Signature]*  
District Health Officer  
Swabi

Not received

ATTESTED  
to be true COPY  
Advocate

**OFFICE OF THE DISTRICT HEALTH OFFICER SWABI**

No. \_\_\_\_\_/BHQ/Swabi

Dated 05.7.2018

To

Dr. Ahmad Ali ..... BHQ Hospital Lahor,

House Address Mohallah Anu Khan Khail Village Ghareeb Abad  
Asota Tehsil Lahor District Swabi.Subject: **ABSENCE FROM DUTY.**

As reported to the BHQ Hospital Lahore that you were absent from duty without any permission on 04 and 05 July 2015.

You are hereby directed to join your duty immediately and explain your problem, otherwise department will be reported to take disciplinary action against you.

-sd-

District Health Officer,  
Swabi

No. \_\_\_\_\_/BHQ/Swabi

Dated 05.07.2018

Copy forwarded to the :-

1. Director General Health Services Khyber Pakhtunkhwa Peshawar
2. PS to Services Health Govt of Khyber Pakhtunkhwa Peshawar
3. PC BHQ Hospital
4. Accountant .....

-sd-

District Health Officer,  
Swabi



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District Health Officer  
Suva

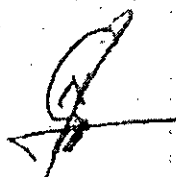
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Subject: Absentee Report

Sir,

Dr. Ahmed Ali District Surgeon has been absent since last two days. Furthermore today, he sent his Medical Photocopy through Dr. Hammingen hand, which is attached with this letter.

u/7/2018

  
05/7/18.

RECEIVED  
10/7/2018

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**POWER OF ATTORNEY/VAKALATNAMA**  
**IN THE HON'BLE KP SERVICE TRIBUNAL PESHAWAR**

In Re: Service Appeal No. \_\_\_\_\_/2023.

**Dr. Ahmad Ali** Vs. **Government of KPK etc.**

On behalf of Appellant

I/ We the Appellant hereby appoint **Mr. Habib Anwar** Advocate in the above-mentioned case, to do all or any of the following acts, deeds things.

1. To appear, act, sign, record Statement and plead for me/us in the above-mentioned case in this court /Tribunal or any other Court /Tribunal in which the same may be tried or heard, and other proceedings arising out of or connected therewith.
2. To sign, verify compromise and file or withdraw all proceedings, petitions, appeals, affidavits, and any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defense of the said case at its stages.
3. To receive payments of, and issue receipts for, all money that may be or become due and payable to us during the course or on the conclusion of the proceedings.
4. To do all other acts and things which may be deemed necessary or advisable during the proceedings.

**AND HEREBY AGREE:**

- a. To ratify whatever the said advocate may do in the proceedings.
- b. Not to hold the Advocate responsible if the said case be proceeded ex-parte or dismissed in default in consequence of absence from the Court/Tribunal when it is called for hearing.
- c. That the Advocate shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fees remains unpaid.

In witness whereof, I/We have signed this power of Attorney/ Vakalatnama hereunder, the contents of which have been read/ explained to me us and fully understood by me/ us this 23<sup>rd</sup> day of February 2023, at Peshawar.

*Accepted & Attested*

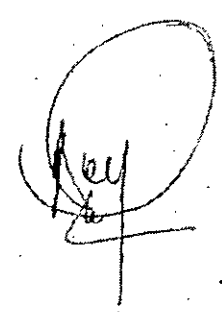
*Habib Anwar*

*Advocate Peshawar High Court, Peshawar*

**Terms Accepted**

**Signatures**

**Dr. Ahmad Ali**



BC-10-6353

CNIC No. 16201-1280869-9

Cell. 0336-9987282