

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 1242/2015

Date of Institution... 06.11.2015

Date of decision... 03.08.2017


Mst. Alima Ghani, Charge Nurse (BPS-16)
Hayatabad Medical Complex Hayatabad, Peshawar.
Under transfer to Director General Officer, Peshawar.

(Appellant)

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Health Department, Khyber Pakhtunkhwa Peshawar.
2. The Director General Health Services Department, Khyber Pakhtunkhwa, Peshawar.
3. The Hospital Director Hayatabad Medical Complex, Hayatabad Peshawar.

(Respondents)

 MR. NOOR MUHAMMAD KHATTAK,
Advocate
MR. MUHAMMAD JAN,
Deputy District Attorney

... For appellant.

... For respondents.

MR. GUL ZEB KHAN,
MR. MUHAMMAD HAMID MUGHAL,

... MEMBER (EXECUTIVE)
... MEMBER (JUDICIAL)

JUDGMENT

GUL ZEB KHAN, MEMBER: - The appellant Mst. Alima Ghani, through instant appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 has impugned the order dated 25.07.2015 and subsequent order dated 08.10.2015 whereby the appellant was transferred from Hayatabad Medical Complex Peshawar to DHQ Hospital Charsadda. The appellant filed a departmental appeal but

the same was not responded within the statutory period of 90 days and hence the instant service appeal.

2. Facts of the present appeal are that the appellant was inducted as Charge Nurse (BPS-16) on the recommendation of Public Service Commission. That vide order dated 24.01.2015 the appellant was transferred on disciplinary grounds from Hayatabad Medical Complex Peshawar and her services placed at the disposal of Director General Health Services Department, Khyber Pakhtunkhwa, Peshawar. Subsequently the following administrative/disciplinary grounds were conveyed to Director General Health Services vide impugned letter dated 25.07.2015:-

- i. Willful absence from duties since 4th June, 2015.
- ii. Loss to Govt. / Public property (breakage of valuable items of the hospital worth Rs. 6,39,000/-
- iii. Report by the DMS (Admn) about the incident in his office on 11.07.2015)
- iv. FIR registered against her.

3. Half of her salary up to January 2015 was also stopped by the Hayatabad Medical Complex authorities. That feeling aggrieved from the impugned order dated 25.07.2015 the appellant filed departmental appeal vide letter dated 27.07.2015 to respondent No. 1 which was not responded. That during the pendency of the said appeal another order was issued whereby the appellant was further transferred to DHQ Hospital Charsadda vide order dated 08.10.2015.

4. The learned counsel for the appellant argued that the impugned orders dated 25.07.2015 and 08.10.2015 are against the law, facts, norms of natural justice and material on the record hence not tenable in the eyes of law and liable to be set-aside. Learned counsel for the appellant further argued that the impugned orders dated 25.07.2015 and 08.10.2015 is also against clause I of the Posting/Transfer policy of the Government of Khyber Pakhtunkhwa dated 24.06.2003 and that the impugned

orders have not been issued in the public interest. Learned counsel for the appellant further argued that the appellant has not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 & 25 of the Constitution of Islamic Republic of Pakistan 1973. Learned counsel for the appellant further argued that the appellant applied for accommodation in Nursing Hostel Hayatabad Peshawar but the respondents refused the same and as a punishment passed the impugned orders. Learned counsel for the appellant prayed that on acceptance of the instant appeal, the impugned orders dated 25.07.2015 and 08.10.2015 may be set-aside and the respondents may be directed not to transfer their appellant from Hayatabad Medical Complex Peshawar.

5. On the other hand, learned Deputy District Attorney for the Respondents argued that the appellant has been relieved from Hayatabad Medical Complex Peshawar on account of her willful absence from duty with effect from 04.06.2015 and breaking of valuable items of the hospital worth Rs. 6,39,000/- which has been proved by the inquiry committee. He further argued that the appellant has not filed departmental appeal against the impugned order dated 08.10.2015 therefore, the instant appeal of the appellant is not maintainable under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974. He further argued that sister of the appellant namely Shamin Akhtar is also serving in Hayatabad Medical Complex Peshawar and she was allotted Room No. 14 in old Nursing Hostel vide order dated 04.03.2015 but both the sister refused to occupy the same, rather they insisted for allotment of rooms of their own choice. Learned Deputy District Attorney prayed for dismissal of service appeal with costs.


6. We have heard the arguments of learned counsel for the appellant as well as learned Deputy District Attorney for the respondents and have gone through the record available on file.

7. Perusal of the record reveals that the appellant was inducted in respondent-department as Charge Nurse (BPS-16) on the recommendation of Khyber Pakhtunkhwa Public Service Commission. The record further reveals that the sister of the appellant namely Shamin Akhtar is also serving in Hayatabad Medical Complex Peshawar and was allotted Room No. 14 in old Nursing Hostel vide order dated 04.03.2015 but both the sisters refused to occupy the same, rather they insisted for allotment of rooms of their choice. The record also reveals that the appellant was relieved from Hayatabad Medical Complex Peshawar on account of her willful absence from duty with effect from 04.06.2015. She has been held responsible for giving loss and breaking of valuable items of the hospital worth Rs. 6,39,000/- as already proved by the inquiry committee. Moreover according to Section-10 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 a civil servant could be transferred anywhere in the province as it is the prerogative of the Government to transfer a civil servant to a place where his/her services were mostly required and no civil servant is permitted to work at his/her own choice of station. Furthermore, by now, the appellant has also completed the tenure due to status-quo position.

8. In view of the foregoing, this Tribunal holds that the appellant has failed to make out any cogent reason justifying the Tribunal's interference in the matter. The appeal in hand is accordingly dismissed, with no order as to cost. File be consigned to the record room.

ANNOUNCED

03.08.2017



(MUHAMMAD HAMID MUGHAL)
MEMBER



(GUL ZEB KHAN)
MEMBER

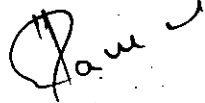
03.08.2017

Appellant with counsel present. Mr. Yar Gul, Senior Clerk
alongwith Mr. Muhammad Jan, Deputy District Attorney for the
respondents present. Arguments heard and record perused.

Vide our separate judgment of today of this Tribunal placed on file.
This Tribunal holds that the appellant has failed to make out any cogent
reason justifying the Tribunal's interference in the matter. The appeal in
hand is accordingly dismissed, with no order as to cost. File be consigned to
the record room.

ANNOUNCED

03.08.2017



(MUHAMMAD HAMID MUGHAL)
MEMBER (J)



(GUL ZEB KHAN)
MEMBER (E)

1242/2015

09.06.2017

Appellant alongwith his counsel present. Mr. Muhamad Adeel Butt, Additional AG for the respondents also present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 04.07.2017 before D.B. Status-quo is extended till the date fixed.

(GUL ZEB KHAN)
MEMBER

(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

18. 04.07.2017 Counsel for the appellant and Mr. Usman Ghani, District Attorney for the respondent present. No one present on behalf of respondent No. 2. Notice be issued to the respondents No. 2 for attendance. To come up for arguments on 01.08.2017 before D.B. Status-quo is extended till the date fixed.

(Gul Zeb Khan)
Member

(Muhammad Hamid Mughal)
Member

01.08.2017


Appellant with counsel and Mr. Muhammad Jan, Deputy District Attorney for respondents present. Arguments heard. To come up for order on 3/8/2017.

(Gul Zeb Khan)
Member

(Muhammad Hamid Mughal)
Member

28.02.2017

Appellant with counsel and Mr. Muhammad Jan, GP for respondents No. 1 and 2 present. None present on behalf of respondent No.3. Notice be issued to respondent No.3 and his counsel. To come up for arguments on 22.03.2017 before D.B. Status-quo is extended till the date fixed.


(AHMAD HASSAN)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMER

22.03.2017

Clerk to counsel for the appellant and Addl. AG for respondents present. Arguments could not be heard due to incomplete bench. Adjourned. To come up for arguments on 28.04.2017 before D.B. Status-quo is extended till the date fixed.


(AHMAD HASSAN)
MEMBER

28.04.2017

Appellant with counsel and Mr. Muhammad Jan, Government Pleader for respondents 1 and 2 present. Counsel for respondent No. 3 is not in attendance. Last opportunity granted. To come up for arguments on 09.06.2017 before D.B. Status-quo is extended till the date fixed.


Member


Chairman

1242/2015

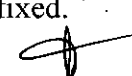
05.01.2017

Appellant with counsel and Mr. Muhammad Jan, GP for the respondents present. One of the learned Member Judicial Mr. Ashfaque Taj is on leave therefore, bench is incomplete. To come up for arguments on 19.01.2017 before D.B. Status-quo is extended till the date fixed.


MUHAMMAD AAMIR NAZIR
MEMBER

19.01.2017

Appellant alongwith junior counsel and Mr. Yar Gul, Senior Clerk with Mr. Kabirullah Khattak, Assistant AG for respondents No. 1 & 2 present. Respondent No. 3 is not in attendance so, notice be issued to him. Junior counsel requested that senior counsel is not in attendance today due to death of his relative and requested for adjournment. Adjourned. To come up for arguments on 06.02.2017 before D.B. Status-quo is extended till the date fixed.


(AHMAD HASSAN)
MEMBER


(ASHFAQUE TAJ)
MEMBER

06.02.2017

Appellant with counsel, Mr. Muhammad Adeel Butt, Additional AG for respondents No. 1 & 2 and Mr. Shakeel Ahmed, Advocate for respondent No. 3 present. Learned counsel for appellant requested for adjournment. Adjourned. To come up for arguments on 28.02.2017 before D.B. Status-quo is extended till the date fixed.


(ASHFAQUE TAJ)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER

24.08.2016

Appellant with counsel and Dr. Asadullah, Asstt: Director alongwith Mr. Muhammad Jan, GP for respondents present. Rejoinder submitted, copy of which is placed on file. To come up for arguments on 26.09.2016. Status-quo is extended till the date fixed.

Member

Abdul Latif

Member

Pir Bakht Gul

26.09.2016

Appellant in person and Mr. Usman Ghani, Sr. GP for respondents present. Appellant requested for adjournment. Request accepted. To come up for arguments on 24.11.2016 before D.B. Status- quo is extended till the date fixed.

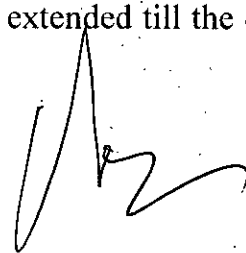
Member

Pir Bakht Gul

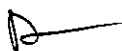
Chairman

24.11.2016

Clerk to counsel for the appellant and Assistant AG for respondents present. Clerk to counsel for the appellant requested for adjournment. Request accepted. To come up for arguments on 05.01.2017. Status-quo is extended till the date fixed.



(MUHAMMAD AAMIR NAZIR)
MEMBER



(ABDUL LATIF)
MEMBER

10.02.2016

Counsel for the appellant, M/S Muhammad Arshed, SO and Yar Gul, Senior Clerk alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 21.3.2016 before S.B. Status-quo be maintained.

Chairman

21.03.2016

Agent of counsel for the appellant, M/S Muhammad Arshed, SO and Yar Gul, Senior Clerk alongwith Addl: A.G for respondents No. 1 and 2 and Mr. Muhammad Adil, Advocate on behalf of respondent No. 3 present. Written statement on behalf of respondents No. 1 and 2 submitted while request for further adjournment was made on behalf of respondent No. 3. Last opportunity is extended subject to payment of cost of Rs. 1000/- which shall be borne by the respondent No. 3 from his own pocket. To come up for written reply/comments and cost on behalf of respondent No. 3 on 9.5.2016 before S.B.

Chairman

09.05.2016

Clerk of counsel for the appellant and Mr. Ihsan Gul, Litigation Asstt. alongwith Asstt. AG for the respondents present. Written reply by respondent No. 3 submitted. Written reply by respondents No. 1 & 2 already submitted. Cost ^{of Rs. 1000/-} paid and receipt thereof be obtained from the learned counsel for the appellant. The appeal is assigned to D.B for rejoinder and final hearing for 24.08.2016.

Chairman

23.11.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant is serving as Charge Nurse at Hayat Abad Medical Complex Peshawar and vide impugned order dated 25.7.2015 she was transferred from the said hospital to Directorate of Health Department Peshawar on administrative grounds and certain allegations mentioned in the said order where against the appellant preferred departmental appeal on 27.7.2015 which was not responded and hence the instant service appeal on 6.11.2015.

Appellant Deposited
Security & Process Fee



That under E & D Rules transfer order cannot be made as a punishment and as such the same is a nullity in the eye of law.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 5.1.2016 before S.B. Notice of stay application be also issued for the date fixed. Status-quo be maintained.


Chairman

05.01.2016



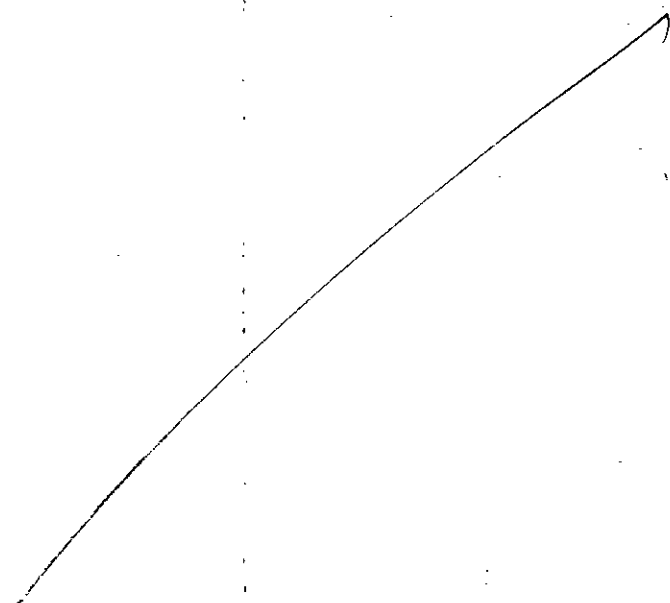
Counsel for the appellant and Mr. Muhammad Arshed, SO alongwith Addl: A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 10.2.2016 before S.B. Status-quo be maintained.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1242/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	06.11.2015	<p>The appeal of Mst. Alima Ghani presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2		<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>23-11-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> 

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1242 /2015

ALIMA GHANI

VS

GOVT: OF KPK

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8.	Application	G	15.
9.	Forwarding letter	H	16.
10.	Impugned order	I	17.
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APPELLANT

THROUGH:


NOOR MOAHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1242 /2015

Mst: Alima Ghani, Charge Nurse (BPS-16),
Hayatabad Medical Complex Hayatabad, Peshawar,
Under transfer to Director General Office, Peshawar

**N.W.F. Province
Service Tribunal**

Diary No. 1327

Dated 06-11-2015

..... **APPELLANT**

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Secretary Health Department, Khyber Pakhtunkhwa Peshawar.
- 2- The Director General Health Services Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Hospital Director Hayatabad medical Complex, Hayatabad, Peshawar.

..... **RESPONDENTS**

**APPEAL UNDER SECTION- 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974
AGAINST THE IMPUGNED ORDER DATED 25.7.2015
AND SUBSEQUENT ORDER DATED 8.10.2015
WHEREBY THE APPELLANT WAS TRANSFERRED
FROM HAYATABAD MEDICAL COMPLEX PESHAWAR
IN VIOALTION OF RULES AND POLICY AND AGAINST
NOT TAKING ACTION ON THE DEPARTMENTAL
APPEAL OF APPELLANT WITHIN THE STATUTORY
PERIOD OF NINETY DAYS**

PRAYER: That on acceptance of this appeal the impugned orders dated 25.7.2015 and 8.10.2015 may kindly be set aside and the respondents may kindly be directed not to transfer the appellant from Hayatabad Medical Complex Peshawar. Any other remedy which th9is august Tribunal deems fit that may also be awarded in favor of the appellant.

R.SHEWETH:
ON FACTS:

- 1- That appellant was initially inducted in the respondent Department as Charge Nurse (BPS-16) on the proper recommendation of Khyber Pakhtunkhwa public service commission. That after appointment the appellant was posted at Hayatabad Medical Complex Peshawar wherein she started her duty quite efficiently and up to the entire satisfaction of her superiors.

*Filed to the
Registrar
6/11/15*

- 2- That appellant being unmarried female charge Nurse applied for allotment of accommodation in nursing hostel Hayatabad Peshawar in the year 2010. That the respondent No.3 paid no heed to the said request of appellant. That then after the appellant time and again requested the respondents for allotment of accommodation in nursing Hostel Hayatabad Peshawar but the respondent No.3 one way or the other refused the same though the respondent No.3 accommodated many married nurses in the bachelor Hostel illegally. Copies of the applications and other record are attached as annexure **A and B.**
- 3- That the respondent No.3 on malafide basis harassed the appellant on one way or the other just to side on from her stance and for that purpose the respondent No.3 transferred the appellant and placed her services at the disposal of respondent No.2 vide order dated 24.1.2015 and also withheld the half salaries of the appellant for the month of December 2014 and January 2015. Copies of the order and pay slips are attached as annexure **C and D.**
- 4- That vide orders dated 6.2.2015 and 16.2.2015 the said order dated 24.1.2015 was withdrawn by the respondent No.2. That the appellant also knocked the door of the respondent No.2 for allotment of accommodation at nursing hostel Hayatabad Peshawar but in vain. Copies of the orders, application and forwarding letter are attached as annexure **E, F, G and H.**
- 5- That astonishingly the respondent No.3 issued another order dated 25.7.2015 whereby the appellant was transferred to Directorate of Health Department on administrative grounds. That the stance of the respondent No.3 in the said impugned order is that of the absence of appellant from duty though the appellant has regularly performed her duty. Copies of the impugned order, pay slips and duty rota are attached as annexure **I, J and K.**
- 6- That feeling aggrieved the appellant prefer Departmental appeal before the respondent No.1 but no reply has been received so far. That during the pendency of the said appeal another order was issued whereby the appellant was further transferred to DHQ Hospital Charsadda vide order dated 8.10.2015. Copies of the departmental appeal and order is attached as annexure **L and M.**
- 7- That having no other remedy the appellant prefer the instant appeal inter alia on the following grounds.

GROUND:

- A- That the impugned orders dated 25.7.2015 and 8.10.2015 are against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the impugned orders dated 25.7.2015 and 8.10.2015 are against the clause I of the transfer/ Posting policy of the Government of Khyber Pakhtunkhwa. (Copy of Transfer/Posting policy is attached as annexure N.
- D- That the impugned orders dated 25.7.2015 and 8.10.2015 has not been issued in the public interest nor in exigencies of service.
- E- That the transfer of the appellant is void ab initio on the ground that transfer can not be awarded as punishment as the same has not been mentioned in any of the penalty list of E&D amended Rules 2011.
- F- That the respondents acted in arbitrary and malafide manner while issuing the impugned orders dated 25.7.2015 and 8.10.2015.
- G- That the impugned orders has been issued by the respondents on malafide basis just to side on the appellant from her stance of accommodation in nursing hostel Hayatabad Peshawar.
- H- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

DATED: 30.10.2015

APPELLANT



ALIMA GHANI

THROUGH:



**NOOR MOHAMMAD KHATTAK
ADVOCATE**

BEFORE THE KHYBER PAKHTUNKHEWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO _____/2015

ALIMA GHANI

VS

GOVT: OF KPK

APPLICATION FOR SUSPESION OF OPERATION
OF IMPUGNED ORDERS DATED 25-7-2015 AND
8.10.2015 TILL THE DISPOSAL OF THIS APPEAL

R/SHEWETH:

- 1- That the appellant filed above mentioned appeal along with this application before this august service Tribunal in which no date has been fixed so for.
- 2- That all the three ingredients necessary for the stay is in favor of the appellant.
- 3- That the transfer of the appellant is against the transfer policy of the Government of Khyber Pakhtunkhwa and the impugned transfer orders are also not issued in the public interest nor exigencies of public service.
- 4- That the grounds of main appeal is also be considered as integral part of this application.

It is therefore humbly prayed that on acceptance of this application the orders dated 25.7.2015 and 8.10.2015 may very kindly be suspended till disposal of this appeal.

APPELLANT


ALIMA GHANI

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE

A-5

To

The Medical Superintendent
HMC, Peshawar.

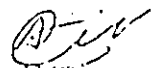
Subject:
Sir,

ACCOMMODATION IN NURSING HOSTEL

Respect fully it is stated that I am working in HMC as staff nurse since I belong to Distt; Charsadda and I have facing problems to come from charsadda daily. Therefore it is requested that keeping in view my problems to consider me sympathetic for allotment of room in Nursing Hostel.

Dated. 20/10/2010

Yours Sincerely

C/N 
C/N Haleema D/O Abdul Ghani

6834

23-10-10 ATTESTED



6

To

Provost Nurses Hostel,
HMC Peshawar

Subject: ALLOTMENT OF NURSING FLAT

Sir/madam,

Respectfully it is stated that we are working as Charge Nurses in HMC and residing in the rented accommodation outside the hospital as I have no personal accommodation in Peshawar and residing in rented accommodation outside the hospital. I belong to Charsadda which creates great difficulties in performing my duties satisfactorily. I am a senior nurse with 09 years of service. I have already submitted application previously but no action has been done.

It is most humbly requested to kindly allot me Flat in the HMC.

I shall be very thankful to you.

Yours Faithfully,

CIN
Shamim Ghani
Charge Nurse HMC

CIN
Alima Ghani
Charge Nurse HMC

Dated: 10/8/2011

CH. S. KHAN
7218
21/9/11

HS/Provost House

[Handwritten signature]

Alloted, at priority
basis

AYED ZAKIR ALI SHAR
1411/10/11
1411/10/11

ATTESTED

[Handwritten signature]

[Handwritten signature]

210

7

The Resident Medical Officer,
Hayatabad Medical Complex
Peshawar.

Subject: ACCOMMODATION IN NURSING HOSTEL ON PRIORITY BASIS
Sir,

It is with honour to state that I am working as C/Nurse in this hospital since 2005 and belonging from Charsadda.

Sir, being a female it is very difficult for me to perform my duties smoothly without accommodation here because it is impossible for me to come from my village on daily basis.

Therefore, it is humbly requested that accommodate me in nursing hostel and oblige.

I'll be very thankful to you till the existence for this act of kindness.

Thanks in anticipation.

Dated: 5 /05/2014.

Your's Sincerely

Alima Ghani C/Nurse
Peads Cardiology Unit HMC,
Peshawar.

Housekeeper for Command

17.01.15

ATTESTED

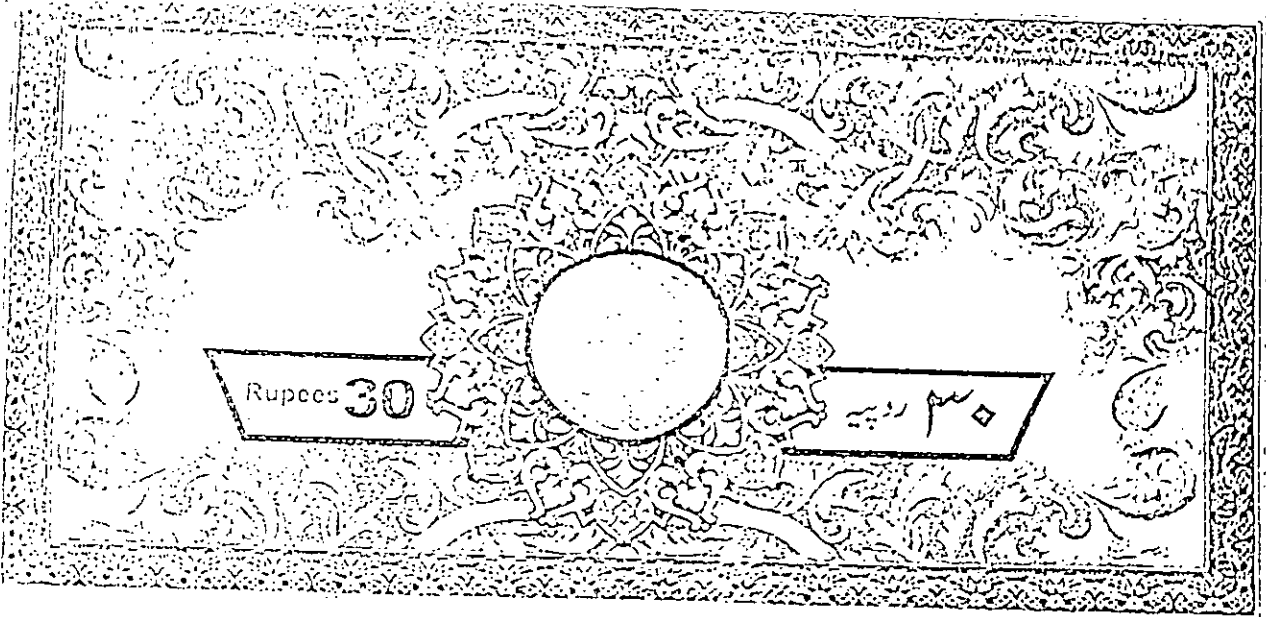
PROVOST / OMS
urgent arrangement

Received the applicant's letter today by hand from the Housekeeping (showing) room as the rooms are not available, they will be given in a minute.

PROVOST

Hayatabad Medical Complex
Peshawar

23.12.14

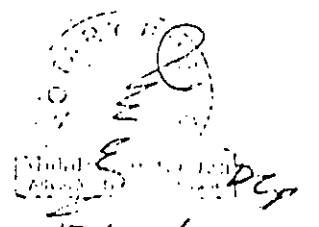


بیروت ہفت روزہ / روزنامہ بیروت ہفت روزہ

مفتی اعظم پاکستان کے دفتر میں
 شہداء و شہیدوں کے حق میں
 کئی روزوں سے جاری ہے۔
 بعض ممالک میں بھی
 تیس دنوں سے جاری ہے۔
 یہ سب چیزیں ہفت روزہ
 کے ذریعے پوری دنیا
 تک پہنچا رہی ہیں۔
 ہفت روزہ کے مدیر
 صاحب نے اس سلسلے میں
 بڑی کامیابی حاصل
 کی ہے۔

ATTESTED

ATTESTED



17/01/2015

محمد علی بیگ
 2758961-17101
 273548-17101

B-9

D.M.S (ADMINISTRATION)
Hayatabad Medical Complex,
Peshawar, Khyber Pakhtunkhwa
PAKISTAN



Tel: Off: 92 (0) 91-9217188
Fax: No: 92 (0) 91-9217189
Tel: Exch: 092- 91-9217140-47
www.hmcpeshawar.com.pk
No. _____ /HMC/Admn
Dated ____/____/2015

To,

Miss. Naeema, Student of KMU
Room No.28, Block-A
Nursing Hostel, HMC

Subject: NOTICE.

Memo;

As an illegal occupant of Room No,28, you are hereby directed to vacate the room allotted to you within 03 days positively.

(DR.MUHAMMAD RAZAQ)
Chairman Accomodation Committee/
DMS (Admn)
Hayatabad Medical Complex, Peshawar
Dated: 26/2/2015

No. 8181-85 /HMC/Admn
Copy forwarded to the:-

1. Chief Executive, HMC
2. Medical Superintendent, HMC
3. Director (Admn), HMC
4. Provost, HMC
5. Warden, Nursing Hostel, HMC

(DR.MUHAMMAD RAZAQ)
Chairman Accomodation Committee/
DMS (Admn)
Hayatabad Medical Complex, Peshawar

ATTESTED

(بقیہ 75 صفحہ 10) (بقیہ 80 صفحہ 10)

ڈاکٹر زاہد اور زمر سہاسل میں غیر متعلقہ افراد کے داخلہ پر پابندی

پشاور (نیوز رپورٹ) خیبر پختونخوا حکومت نے اس پر پابندی برپا کرنے سے قبل وفاقی ہدایت کی ہے اور اسے
وہاں کی صورتحال کے باعث سرکاری ہسپتالوں کے بھی تاخیر شکار واقعہ کی صورت میں ذمہ داری منتقلی
ڈاکٹر زاہد اور زمر سہاسل میں غیر متعلقہ افراد کے داخلے

(بقیہ 76 صفحہ 10)

CHIEF EXECUTIVE

Hayatabad Medical Complex,
Khyber Girls Medical College,
Institute of Kidney Diseases,
Pakistan Institute of Community Ophthalmology
Khyber Institute of Child Health
Peshawar, Khyber Pakhtunkhwa
PAKISTAN



C-10
Tel Off: 92 (0) 91-9217188
Fax: No: 92 (0) 91-9217189
Tel: Exch: 092-91-9217140-47
www.hmcpehshawar.com.pk

Ref 1115 /HMC

Dated 24/11 /2015

OFFICE ORDER:

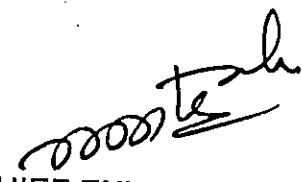
In continuation to this office order No. 833-36/HMC, dated: 21/01/2015, is hereby amended and replaced as "As reported by DMS (Admin) Miss. Alima Ghani, Charge Nurse (BPS-16) of this institution is hereby relieved from her duties on disciplinary ground with immediate effect and placed her services on the disposal of Director General Health Services, Khyber Pakhtunkhwa for further posting.

CHIEF EXECUTIVE
HMC/KGMC/IKD/PICO/KICH
Peshawar.

No. 1115-20 /HMC

Copy of the above is forwarded to the:

1. Director General Health Services, Khyber Pakhtunkhwa.
2. Medical Superintendent, HMC, Peshawar.
3. DMS (Admin), HMC, Peshawar.
4. Director Finance, HMC with the direction to stop her salary.
5. Chief Nursing Superintendent, HMC, Peshawar.
6. Concerned staff nurse.


CHIEF EXECUTIVE
HMC/KGMC/IKD/PICO/KICH
Peshawar

ATTESTED



P.NO 777-77-000083

NAME: ALEEMA GHANI

D - (11)

DESIGNA Charge Nurse

Allowances

5002	Adj House Allowance	1,847
5011	Adj. Conveyance Allowance	3,387
5012	Adj. Medical Allowances	806
5026	Adj. Dress(Uniform) Allo	406
5054	Adj. Ration Allowance	338
5309	Adj. Adhoc Relief(2013)	1,666
5801	Adj. Substantive Pay	11,110
5810	Adj. Adhoc Relief(2014)	1,110
5898	Adj. Adhoc Relief(2010)	2,689
5911	Adj. Adhoc Relief(2011)	806
5938	Adj. Adhoc Relief(2012)	2,222

TOTAL

26,387

Deductions

3609	Incometax	781
6003	Adj Electric Charges	0

TOTAL

781

NET AMOUNT PAYABLE

25,606

BANK Allied Bank

BRANCH 0865

ACCOUNT 4231-6

QUALIFYING SERVICE

11 YRS 11 MON

نوٹ: جھولوں میں غلطی کی صورت میں 15 دنوں کے اندر ریکارڈنگ سے راپڈ کریں!
 بصورت دیگر جھولوں اور دست آویزوں کی جانچنی
 جی پی فنڈ بیلنس کے معلومات اے جی آفس سے حاصل کریں۔

ATTESTED

15 days salary

P.NO 777-77-000083

NAME: ALEEMA GHANI

(12)

DESIGNA Charge Nurse

Allowances

0001	Pay of Officer	16,400
1001	House Allowance	2,727
1210	Conveyance Allowance	5,000
1516	Dress(Uniform) Allowance	600
1592	Mess Allowance	500
1947	Medical Allowance	1,191
1948	Adhoc Relief(2010)	3,970
1970	Adhoc Relief(2011)	1,191
2118	Adhoc Relief(2012)	3,280
2148	Adhoc Relief(2013)	2,460
2149	Adhoc Relief(2014)	1,640

TOTAL 38,959

Deductions

3015	G.P Fund	28,160	1,760
3501	Benevolent Fund		250
3511	Accident Group Insuarance		19
3604	Group Insuarance		173
3609	Income Tax		257

TOTAL 2,459

NET AMOUNT PAYABLE 36,500

BANK Allied Bank

BRANCH 0865

ACCOUNT 4231-6

QUALIFYING SERVICE

11 YRS 10 MON

نوٹ: تمہاری غلطی کی صورت میں 10 ایوم کے اندر اکاؤنٹ یکیشن سے رابطہ کریں!

بجوررت دیگر تمہارا درست تصور کی جائے گی

جی پی نیڈ بیلائنس کے معلومات اے جی آفس سے حاصل کریں۔

ATTESTED

(Handwritten signature)



DIRECTORATE
GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

No. 745 /E-II,
Dated 06/02/2015.

E-13

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

E-Mail Address: mw@ghs.kpk.gov.pk
Office Ph# 001-9210209
Exchange# 001-9210137, 0210140

To:-

The Chief Executive
HMC/KGMC/IKD/KICH
Peshawar.

Subject: OFFICE ORDER.
Memo:-

I am directed to refer to your Endst. No. 833-36/HMC, dated 21-01-2015, on the subject noted above and to state to withdraw relieving order of Miss. Alina D/O Abdul Ghani, Charge Nurse BPS-10 and Miss. Shamim Ghani D/O Abdul Ghani, Charge Nurse BPS-16 (Institutional employee) and retained them in HMC Peshawar.

[Signature]
6/2/15
DIRECTOR GENERAL HEALTH
SERVICES, KPK, PESHAWAR.

[Signature]
6/2/15
ATTESTED

*Recd
for
D. no 1093
07/2/2015*

F-14

DIRECTORATE
GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR.

No. 938-39 /E-II.
Dated 16/2 /2015.

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

E-Mail Address: nwpgdghs@yahoo.com

Office Ph# 091-9210269


Exchange# 091-9210187, 9210196


To:-
The Medical Superintendent,
HMC Peshawar


Subject:- OFFICE ORDER.
Memo :-

This Directorate letter No. 745/E-II, dated 06-02-2015, regarding retention of Mrs. Alima D/O Abdul Ghani, Charge Nurse BPS-16 HMC Peshawar stands withdrawn.

She may be relieved and directed to report for duty to the Principal PGCN Hayatabad Peshawar as already ordered vide this Directorate office order bearing Endst. No. 6571-76/E-II, dated 27-10-2014 (Copy enclosed for ready reference).


FOR DIRECTOR GENERAL HEALTH
SERVICES, KPK, PESHAWAR.


MD
13/12/15

ATTESTED


G-15

To :-

The Director General Health
Services, KPK Peshawar.

Subject: COMPLAINT.

Dear Sir,

I have the honour to state that I Miss. Alima Ghani D/O Abdul Ghani is working as Charge Nurse under your kind jurisdiction in Hayatabad Medical Complex, (Health Department) Khyber Pakhtunkhwa since 2003 till date. Sir, I am dutiful and regular employee of this department and want to draw your attention regarding subject matter. That Dr. Razza DMS (Admn) of HMC Peshawar is creating hurdles for me in my duties and he tease me all the time for his illegal demands.

Sir, he deducted/ stopped my salary only for that I refused his offer and mentally tourchering me.

Sir, I have severally informed the higher-ups regarding the above situation, but no positive response given on their behalf.

Therefore, it is humbly requested that :-

01. May take necessary action against him and save my future on humanitarian bais.
02. Direct the quarter concerned to release my salary as early as possible.
03. Also adjust/increase my mess allowance and uniform allowance from 500 and 600 to 8000 and 3100.
04. The Salary of December is 36,500/- but in the month of January in my pay slip the salary is 25,606, the different in December and January 2015 is about 10894.

Dated 16-02-2015.

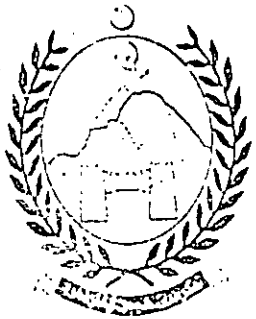
Yours obediently,

ATTESTED



Mrs. Alima Ghani D/O Abdul Ghani
Charge Nurse HMC Peshawar.

H-16



DIRECTORATE
GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR.

No. 2222 /E.II.
Dated 13/3 /2015.

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

E-Mail Address: nwlpdghs@yahoo.com
Office Ph# 091-9210769
Exchange# 091-9210187, 9210196

To:-

The Medical Superintendent,
HMC Peshawar.

Subject: COMPLAINT

Memo:-

I am directed to refer to the subject noted above and to enclose a copy of application alongwith its enclosure in r/o Miss Alima Ghani D/O Abdul Ghani Charge Nurse HMC Peshawar which is self explanatory.

Please furnish your detailed report in the matter.

ATTESTED

For

DIRECTOR GENERAL HEALTH
SERVICES KPK PESHAWAR

12/3/15

I-(17)

HAYATABAD MEDICAL COMPLEX
PESHAWAR

No. _____/HMC/E-II

Dated: ____/____/2015

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

Subject RELIEVING OF MST. ALEEMA GHANI D/O ABDUL GHANI,
CHARGE NURSE, HMC ON ADMINISTRATIVE GROUNDS

Mst. Aleema Ghani D/O Abdul Ghani, Charge Nurse, HMC is hereby relieved from this institute on administrative grounds on following charges with immediate effect :-

- Willful absence from duties since 4th June, 2015 (*biometric attendance report is attached*)
- Loss to Govt. / Public property (breakage of valuable items of the hospital worth Rs. 6,39,000/- (*list attached*))
- Report by the DMS (Admn.) about the incident in his office on 11-07-2015 (*copy attached*)
- FIR registered against her (*copy attached*)

Her services are hereby placed at the disposal of Director General Health Service, Peshawar for further posting anywhere else. Moreover disciplinary action should be taken against her and recovery of Rs. 6,39,000/- may be made from her for loss to Govt. / Public property.

HOSPITAL DIRECTOR
HAYATABAD MEDICAL COMPLEX
PESHAWAR

No. 10157-66 /HMC/E-II

Dated: 25/7 /2015

Copy forwarded for information and necessary action to the:-

1. Chairman Board of Governors, HMC Peshawar.
2. Medical Director, HMC Peshawar.
3. Director Administration, HMC Peshawar.
4. Director Finance, HMC Peshawar to stop her pay.
5. Incharge I.T Department, HMC Peshawar.
6. CNS, HMC Peshawar.
7. Senior Warden, Nursing Hostel HMC for n/action.
8. P.A to Secretary Health, Govt. of Khyber Pakhtunkhwa, Peshawar.
9. Charge Nurse Concerned.
10. Establishment Section, HMC.

ATTESTED

HOSPITAL DIRECTOR
HAYATABAD MEDICAL COMPLEX
PESHAWAR

P NO 777-77-000033

NAME: ALEEMA GHANI

J-18

DESIGNA Charge Nurse

Allowances

0001	Pay of Officer		18,400
1001	House Allowance		2,727
1210	Conveyance Allowance		5,000
1516	Dress(Uniform) Allowance		3,100
1592	Mess Allowance		8,000
1647	Medical Allowance		1,191
1648	Adhoc Relief(2010)		3,970
1670	Adhoc Relief(2011)		1,191
2118	Adhoc Relief(2012)		3,280
2148	Adhoc Relief(2013)		2,480
2149	Adhoc Relief(2014)		1,640
5002	Adj House Allowance		9,061
5011	Adj. Conveyance Allowance		16,613
5012	Adj. Medical Allowances		3,959
5026	Adj. Dress(Uniform) Allo		11,984
5054	Adj. Ration Allowance		31,662
5109	Adj. Adhoc Relief(2013)		8,174
5601	Adj. Substantive Pay		54,490
5610	Adj. Adhoc Relief(2014)		5,450
5633	Adj. Adhoc Relief(2010)		13,191
5611	Adj. Adhoc Relief(2011)		3,858
5633	Adj. Adhoc Relief(2012)		10,898
TOTAL			218,410
Deductions			
3016	G P Fund	38,960	1,760
3591	Benevolent Fund		250
3511	Accident Group Insurance		18
3604	Group Insurance		173
3609	Income tax		781
425	Adj. GP Fund		7,040
6001	Adj. Benevolent Fund		1,000
6008	Adj. Group insurance		692
6011	Adj. Tax Monthly		3,124
6145	Adj. Accident Group Insur		76
TOTAL			14,815

ATTESTED



NET AMOUNT PAYABLE

203,495

BANK Allied Bank

BRANCH 0365

ACCOUNT 4231-6

QUALIFYING SERVICE

12 YRS 3 MON

نوٹ: حکومت کی ملازمت میں ایسے کے لئے اور حکومت کی ملازمت میں
بھرتی ہوئے اور اس وقت سے ملازمت میں
میں پندرہ سالوں کے معاملات اسے ہی ملازمت میں شامل کریں۔

Feb - March - April - May

pay slip

ATTESTED



20

P.NO 777-77-000083

NAME: ALEEMA GHANI

DESIGNA Charge Nurse

Allowances

0001	Pay of Officer	16,400
1001	House Allowance	2,727
1210	Conveyance Allowance	5,000
1516	Dress(Uniform) Allowance	3,100
1592	Mess Allowance	8,000
1947	Medical Allowance	1,191
1948	Adhoc Relief(2010)	3,970
1970	Adhoc Relief(2011)	1,191
2118	Adhoc Relief(2012)	3,280
2148	Adhoc Relief(2013)	2,460
2149	Adhoc Relief(2014)	1,640

TOTAL

48,959

Deductions

3016	G.P Fund	38,720	1,760
3501	Benevolent Fund		250
3511	Accident Group Insurance		19
3604	Group Insurance		173
3609	Incometax		781

TOTAL

2,983

NET AMOUNT PAYABLE

45,976

BANK Allied Bank
BRANCH 0865
ACCOUNT 4231-6

QUALIFYING SERVICE

12 YRS 4 MON

نوٹ: تنخواہ میں غلطی کی صورت میں ۱۰ ایوم کے اندر اکاؤنٹ نیکشن سے رابطہ کریں!
بھرت و دیگر تنخواہ اور دست آسور کی جانے کی
جی پی فنڈ بیلنس کے معلومات اسے جی آفس سے حاصل کریں۔

ATTESTED

(Handwritten signature)



<p><u>CASUALTY 262</u> I/H/N Nasreen Khurshid A/H/N Dilshad N/Manager Niaz Marjan C/N Yasmin Bibi C/N Samia C/N Bushra Dauood C/N Nazia Shaheen C/N Saira Denial C/N Arif Shah M/N Ibrani Amin C/N Shahla Gul S/N S/N S/N S/N S/N Night Duty C/N Humaira Shabeir C/N Humaira Farid S/N S/N TBC OPD C/N Sadia Safdar</p>	<p><u>CASUALTY PHARM 328</u> C/N Sadia Wali C/N Mehar Sultana C/N Mumtaz Begum C/N Yasman Night Duty C/N Fouzia Ajab <u>CHILDREN A 231</u> N/Manager Rani Jan C/N Afsheen Awan C/N Zehat Nisa C/N Shabnum Bibi C/N Ajmal Shaheen S/N S/N S/N S/N ST/N Night Duty C/N Rafiq Ghulam ST/N <u>ANTENATAL ROOM</u> ST/N ST/N <u>FAMILY CARE CENTER</u> <u>NUSRAT BUTTO COUNTER</u> C/N Mussarat Karamat C/N Parveen Samial</p>	<p><u>CHILDREN B 234</u> I/H/N Robina Khanum C/N Zubaida Begum C/N Sidra Jahangir C/N Tahira Shoukat C/N Alima Ghani ST/N ST/N S/N S/N Night Duty C/N Bakht Santa ST/N ST/N S/N <u>CCU WARD 224</u> N/Manager Razia Iqbal C/N Sadaf Rahman C/N Memoona C/N Toushiba C/N Asia Fatima C/N Shakeela Naz ST/N ST/N Night Duty C/N Musarrat Jhon ST/N ST/N <u>DIALYSIS ROOM</u> A/H/N Sheela Salamant C/N Shazia Bibi</p>
<p><u>MEDICAL A 317</u> I/H/N Sadia Ashfaq C/N Sumaira Khan C/N Nadia Rahmat C/N Ismat Wali C/N Naveeda amriz C/N Heera ST/N Night Duty C/N Fouzia Bibi ST/N ST/N <u>NURSERY UNIT 260</u> I/H/N Jun Parus C/N Shaista Noz C/N Robina Bibi C/N Naheed Qamar C/N Shabana Yasmin ST/N ST/N Night Duty C/N Tahira Bibi ST/N ST/N</p>	<p><u>PEAD CARDIOLOGY 268</u> A/H/N Mehtab C/N Kousar Shaheen C/N Yasmin C/N Rozina Bibi ST/N S/N Night Duty C/N Shaista Zaidi <u>ONCOLOGY UNIT</u> N/Manager Khurshid Akhtar C/N Shaheen Nawaz C/N Shazia Bibi C/N Humaira Singh C/N Sajida Sher ST/N ST/N Night Duty C/N Noreen Kaptan S/N <u>ONCOLOGY SECTION</u> C/N Elishba Noor</p>	<p><u>PRIVATE ROOMS 221</u> N/Manager Robina Shaheen C/N Nasrin Amir C/N Bibi Asia C/N Hina Gul ST/N ST/N Night Duty C/N Divishwar S/N <u>EYE A 223</u> A/H/N Shaheen Gul C/N Ghazala Aziz C/N Ghazal Gul C/N Naheed Fazal S/N ST/N Night Duty C/N Shahnaz Akhtar ST/N <u>Medical Pharmacy</u> A/H/N Angileena Nargis JCT Sadia Nazar</p> <p><u>ISOLATION UNIT</u> I/H/N Shamim Shafi C/N Najeeba Khattak C/N Mushtaq Begum Night Duty M/N Waheed</p>
<p><u>ORTHOPEDIC A 32</u> A/H/N Nasim Shahnid C/N Fazilat un Nisa C/N Safia Sulaiman C/N Kalsoom bibi ST/N ST/N ST/N Night Duty C/N Bibi Haj S/N <u>ORTHOPEDIC B 325</u> A/N Khulida Yasmin C/N Fouzia Ghazal C/N Sara Gulzar C/N Ghazala Multan ST/N ST/N Night Duty C/N Shabana Nazir ST/N <u>SPINE UNIT</u> C/N Nosi Andalceb C/N Robina Muqadar</p>	<p><u>LOWER OT 275/227</u> N/Manager Parveen Umer C/N Joice Jalal C/N Anum C/N Khatija C/N Shaista Jabeen C/N Faryal C/N Fouzia Rahman C/N Rashida Syed C/N Niaz Begum C/N Robi Hameed M/N Waheed Noor Night Duty C/N Sonam <u>PSYCHIATRY UNIT</u> Nurse Manager Nasrin Jalal C/N Badshahat C/N Refat Saeed C/N Waheeda Umer ST/N ST/N Night Duty C/N Azra Tahasum</p>	<p><u>CRC (Heart Failure Centre) 281</u> N.S Parveen Bukhari N/Manager Saira Anjum C/N Naseem Baramosh C/N Fouzia Karim C/N Ambreena Shaheen C/N Nazma C/N Nosheen C/N Aisha Sadiqa M/N Ibrar M/N Ahsanullah M/N Naveed Ali M/N M Younas M/N Fatih ur rahman C/N Fozia Sajad Night Duty C/N Hameeda C/N Roheen Gohar C/N Nigat Seema <u>MORNING SUPERVISOR</u> M/N Kocub Naheed</p>

ATTESTED

Duty Rota for the month of June 2015 ZONE 2

<p><u>MEDICAL B 364</u> A/H/N Noreen Naseem C/N Asma gul C/N Kalsoom C/N Haseena C/N Nizakat Bibi C/N Sadia Bangish ST/N ST/N ST/N Night Duty C/N Tahmina Gul ST/N ST/N <u>GASTRO WARD 358</u> N/ Manager Agatha C/N Shahina C/N Falak Raiz C/N Kousar Gulshad C/N Nadia Zulain C/N Noorreen Jan ST/N ST/N ST/N Night Duty C/N Kalsoom Bibi ST/N ST/N</p>	<p><u>EYE B 237</u> A/H/N Naz Parwar C/N Rukhsana C/N Samina Ajab C/N Shola Shabnam ST/N ST/N Night Duty C/N Waheeda Begum ST/N <u>E.N.T OT</u> H/N Rashida Varo A/H/N Ishrat Saeed C/N Nosheen Iftikhar M/N Nasir ud din C/N Faizelal Begum C/N Aneela C/N Sheryya ST/N <u>Endoscopy</u> A/H/N Bilqees Nazir C/N Sitara C/N Suraya Shahab C/N Naila</p>	<p><u>ENT A 348</u> H/N Nasreen Gulab C/N Basmeen Zia C/N Basmin aimal C/N Razia Farman ST/N ST/N Night Duty C/N Shaista Gull <u>E.N.T B 352</u> N/ Manager Naheed Sarwar C/N Sania Rehman C/N Nargis Zubir C/N Humaira Jabeen ST/N ST/N Night Duty C/N Zainab Bibi ST/N</p>
<p><u>GYNAE B 207</u> A/H/N Razia Shaheen C/N Shamim Ghani C/N Sumaira Gul C/N Noor un Nisa ST/N ST/N Night Duty C/N Shamia Habib ST/N <u>GYNAE C 374</u> H/N Roshin Zari C/N Anjuman Bibi C/N Zahida C/N Tahira Nawaz ST/N ST/N NIGHT DUTY C/N Nusrat begum</p>	<p><u>PLASTIC SURGERY 243</u> H/N Caroline Anwar C/N Anisa Rehman C/N Nusrat Bais C/N Rozina ST/N ST/N Night Duty C/N Shahnaz Gulab <u>M.I.C.U. 250</u> H/N Shahnaz Zakira C/N Shahida Naz C/N Shahida Ilano C/N Nafeesa M/N Waleed Iqbal C/N Shahida Sayed ST/N ST/N ST/N NIGHT DUTY C/N Shahida Rashid ST/N ST/N</p>	<p><u>UPPER O.T 235</u> A/H/N Neelam Pari C/N Fardus Begum C/N Zainab C/N Hurmat Ghani C/N Naseem Iftikhar C/N Nihayat C/N Nadra Khan C/N Shakeela Husam ST/N ST/N Night Duty C/N Bibi Faraj <u>Cardiology Unit 322</u> H/N Tabassam C/N Bilqees Begum C/N Nazreen C/N Farmina C/N Sana bibi ST/N ST/N Night Duty C/N Abida Akbar ST/N</p>
<p><u>L ROOM/GYNAE B & C 246</u> A/H/N Saloomi Saleem C/N Naheed Nawaz C/N Nasira Batool C/N Hameeda C/N Khalida C/N Ishrat Wahid Ali Shah ST/N ST/N ST/N Night Duty C/N Parveen Nihar ST/N ST/N</p>	<p><u>SKIN UNIT-307</u> H/N Nargis Habib C/N Shahnaz Barkat C/N Kousar Nazli C/N Noor Jahan ST/N Night Duty C/N Nancy Gull Morning Supervisor H/N Zainab Shah</p>	<p><u>OT Pharmacy 323</u> N/ Manager Mumtaz Mehtab C/N Bibi Nasima C/N Naheed Zulamin NIGHT DUTY JCT Sadia Haidar <u>ICU Pharmacy</u> C/N Rubeeqa JCT Shagufta</p>

ATTESTED

Handwritten signature

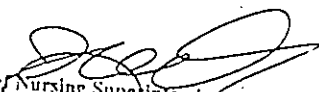
Zone 3 June 2015

<p>NEURO SURGERY 384 A/H/N Shaheen K B C/N Farid un Nisa C/N Zeenat Khalil C/N Shama Wadood ST/N ST/N <u>Night Duty</u> C/N Afshan Naz ST/N CL PHARMACY A/H/N Farzana Shamroz JCT Sadaf</p>	<p>PATHOLOGY A/H/N Sabiha Ulfat C/N Afshan Awal Khan C/N Basreen NEW SURGICAL ICU A/H/N Iqbal Ghulam M/N Amanullah C/N Laila Wazir C/N Riffat shaheen C/N Hina Ajmal S/N S/N <u>Night Duty</u> C/N Abida Jamal ST/N</p>	<p>NEW SURGICAL OT 270 N/ Manager Shakeela Zeh C/N Nasim Akhtar C/N Darajat C/N Wajahat C/N Tahira Dilhar Emergency Surgical OT H/N Gul Mira (both side) A/H/N Mehal Jan M/N M Aurang Zeb C/N Shabana Liaqat C/N Lubna Yasmeen <u>Night Duty</u> C/N Shahnaz Shafi Maxillofacial unit 283 C/N Sama Noreen C/N Gulnaz C/N Sabiha Akhtar S/N ST/N <u>Night Duty</u> C/N Samana Rahman</p>
<p>FEMALE SURGICAL 216 N/ Manager Humna Naz C/N Zakira C/N Jabeen C/N Summer Sabir ST/N ST/N <u>Night Duty</u> C/N Shahida Parveen S/N</p>	<p>MALE SURGICAL A 361 N/ Manager Bano Rani C/N Nusrat Begum C/N Basmin Mumtaz C/N Qurban Nisa ST/N ST/N <u>Night Duty</u> C/N Sadia Bulbal ST/N</p>	<p>MALE SURGICAL B 361 N/ Manager Shaheen Umer C/N Aniq C/N Gul Bibi C/N Sumaira Rafiq ST/N ST/N <u>Night Duty</u> C/N Noreen Bibi ST/N</p>
<p>GYNAE A 202 A/H/N Zeenat Nawab C/N Samina bibi C/N Shamim Dais C/N Tehmeeda Gul S/N S/N <u>Night Duty</u> C/N Shabana Muzafar ST/N</p>	<p>L ROOM GYNAE A 282 N/ Manager Cecilia Suba C/N Ume Kulsum C/N Gul Fatima C/N Nargis Iqbal ST/N ST/N ST/N <u>Night Duty</u> C/N Asma Ishaq ST/N ST/N MORNING SUPERVISOR A/H/N Abida Rahim</p>	<p>ENDOCRINOLOGY 284 A/H/N Yasmin Faqir C/N Bibi Safia C/N Baseerat C/N Jabeen Gul C/N Naeema Naheed (D F) ST/N ST/N <u>Night Duty</u> C/N Mussarat Gill ST/N</p>

ATTESTED




<p>CNS OFFICE CNS Sadaat Iqbal OFFICE MANAGER AH/N Sheeraz C/N Saima Wahab</p> <p>1. Morning Supervisor AH/N Abida Rahim Zone 3 H/N Zainab Shah Zone 2 H/N Kocab Naheed Zone 1</p> <p>2. Evening Supervisor M/N Nasurullah H/N Farkhanda Jabeen</p> <p>3. Night Supervisor AH/N Awal badshah C/N Lubna Rafiq</p> <p>Infection Control Nurse C/N Rashida Bibi</p>	<p>EARNED LEAVE C/N Kalsoom Akhtar 365 D (from 31/12) C/N Shush Begum (F 25/6 T 24/7) AH/N Samina Yaqoob (05 May to 04 June 2015) C/N Ramim C/N Meena Gul</p> <p>Maternity leave C/N Robina Usman C/N Robina Mira Khan (to 20/06/2015) C/N Nagina Shamshad C/N Kousar Shahzad</p> <p>DAY RELIEVER C/N Farzana Bibi C/N Samina Naz</p>	<p>College of nursing & KMC Ex/Pakistan = 01 Maternity leave = 01 E/LEAVE = 02</p> <p>Total staff Nurses: Total Nurses in duty: Total Head Nurses:</p> <p>Transfer</p> <p>Absent: C/N Sadaf Rafiq ✓ C/N Shabana Rahman ✓</p>
<p>COLLEGE OF NURSING</p> <ol style="list-style-type: none"> C/N Shanila C/N Noreen Sher C/N Farhat Akbar C/N Tahira C/N Bibi Nazia C/N Farzana Qasim C/N Nasim Waker C/N Asifa C/N Nazia Ghafoor C/N Bibi Ayesha C/N Fahmēda C/N Tahmina C/N Dilshad Zabardast M/N Awal Khan C/N Shaista Parveez 	<p>HOSTEL DUTY S/N Hanifa 4th year S/N Sadia Bibi 4th year</p> <p>MESS DUTY ST/N Humaira 4th ST/N Shenaz 4th</p>	


 Chief Nursing Superintendent
 Hayatabad Medical Complex
 Peshawar

Vice Principal
 Hayatabad Medical Complex
 Peshawar

- Copy to the:
- Director Hospital HMC Peshawar
 - Director Medical HMC Peshawar
 - Director Admin HMC Peshawar
 - DMS (Admin), HMC Peshawar
 - DMS Night Shift, HMC Peshawar
 - Hostel Notice Board, HMC Peshawar
 - IT Section, HMC Peshawar

ATTESTED


July

11 2021

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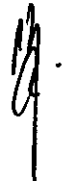
<p><u>CASUALTY 262</u> I/I/N Nasreen Khurshid A/I/I/N Dilshad N/Manager Niaz Marjan C/N Yasmin Bibi C/N Samia C/N Humaira Farid C/N Humaira Shabeir C/N Sumaira Gul C/N Tehmeeda Gul M/N Arif Shah M/N Ibni Amin C/N Farzana Bibi S/N <u>Night Duty</u> C/N Samina Naz C/N Dushra Daood S/N S/N <u>TBC OPD</u> C/N Sadia Safdar</p>	<p><u>CASUALTY PHARM 228</u> C/N Sadia Wali C/N Mehar Sultana C/N Muntaz Begum C/N Yaman <u>Night Duty</u> C/N Fouzia Ajab <u>CHILDRENA 231</u> N/Manager Rani Jan C/N Nagina Shamshad C/N Zenat Nisa C/N Shabnum Bibi C/N Ajmal Shaheen S/N S/N S/N S/N <u>Night Duty</u> C/N Afsheen Awan S/N <u>ANTENATAL ROOM</u> S/N S/N <u>FAMILY CARE CENTER</u> C/N Lubna Yasmeen <u>MUSHRAT BUTTO COUNTER</u> C/N Mussarat Karamat C/N Parveen Samial</p>	<p><u>CHILDREN II 234</u> I/I/N Robina Khanum C/N Samina Rahman C/N Afshan Naz C/N Tahira Shoukat M/N Awel Sher S/N S/N <u>Night Duty</u> C/N Zubaida Begum S/N S/N S/N <u>CCU WARD 224</u> N/Manager Razia Bano C/N Sadaf Rahman C/N Memoona C/N Asia Fatima C/N Musarrat Jhon M/N Waheed Noor S/N <u>Night Duty</u> C/N Shakeela Naz S/N S/N <u>DIALYSIS ROOM</u> A/I/I/N Sheela Sultanat C/N Shazia Bibi</p>
<p><u>MEDICAL A 317</u> A I/I/N Farkhanda Jabeen C/N Sumaira Khan C/N Nadia Rahmat C/N Fouzia Bibi C/N Naveeda Amiriz C/N Heera Jahan S/N <u>Night Duty</u> C/N Ismat Wali S/N S/N <u>NURSERY UNIT 260</u> I/I/N Jan Paras C/N Shaista Naz C/N Tahira Bibi C/N Naheed Qamar C/N Shabana Yasmin M/N Altaf ullah S/N S/N <u>Night Duty</u> C/N Robina Bibi S/N S/N</p>	<p><u>PEAD CARDIOLOGY 268</u> A/I/I/N Mehtab C/N Kousar Shaheen C/N Yasmin C/N Shaista Zaidi S/N S/N <u>Night Duty</u> C/N Rozina Bibi <u>ONCOLOGY 304</u> N Manager Khurshid Akhtar C/N Shaheen Nawaz C/N Bakht Saia C/N Noreen Kaptan C/N Hira Saqib M/N Asad Ahmed Khan S/N <u>Night Duty</u> C/N Shazia Bibi S/N <u>ONCOLOGY SECTION</u> C/N Elishba Noor</p>	<p><u>PRIVATE ROOMS 221</u> N/Manager Robina Shaheen C/N Nasrin Amir C/N Drwishwar C/N Hina Gul S/N S/N <u>Night Duty</u> C/N Bibi Asia S/N <u>EYE A 223</u> A/I/I/N Shaheen Gul C/N Ghazala Aziz C/N Sajida Sher C/N Shahnaz Akhtar S/N S/N <u>Night Duty</u> C/N Naheed Fazal S/N <u>Medical Pharmacy</u> A/I/I/N Angileena Nurgis JCT Sadia Nazar</p> <p><u>ISOLATION UNIT</u> I/I/N Shamim Shafi A/I/N Najeeba Khattak C/N Mushtaq Begum M/N Waheed <u>Night Duty</u> C/N Naheed Akhtar</p>
<p><u>ORTHOPEDIC A 32</u> A/I/I/N Nasim Shahid C/N Safia Sulaiman C/N Kalsoom bibi M/N Mohd Shafiq M/N Shah Fahad S/N <u>Night Duty</u> C/N Robina Muqadar S/N <u>ORTHOPEDIC B 325</u> A/N Khalida Yasmin C/N Fouzia Ghazal C/N Shabana Nazir C/N Ghazala Multan S/N <u>Night Duty</u> C/N Sara Gultzar S/N <u>SPINE UNIT</u> C/N Nosi Andaleeb C/N Bibi Haj</p>	<p><u>LOWER OT 275/227</u> N/Manager Parveen Umer C/N Joice Jalal C/N Anum C/N Khatija C/N Shaista Jabeen C/N Faryal C/N Fouzia Rahman C/N Rashida Syed C/N Niaz Begum C/N Shahla Gul C/N Tahira Dilbar M/N Mohd Nabi <u>Night Duty</u> C/N Sonam <u>PSYCHIATRY UNIT</u> Nurse Manager Nasrin Jalal C/N Badshahat C/N Reffat Saeed C/N Azra Tabasum S/N S/N <u>Night Duty</u> C/N Waheeda Umer</p>	<p><u>CRC (Heart Failure Centre) 281</u> N.S Parveen Bukhari N/Manager Saira Anjum C/N Naseem Baramosh C/N Roheen Gohar C/N Ambreena Shaheen C/N Nazma C/N Nosheen C/N Aisha Sadiqa M/N Ibrar M/N Ahsanullah M/N Naveed Ali M/N M. Younas M/N Fatih ur rahman C/N Hameeda C/N Nigat Seema <u>Night Duty</u> C/N Fozia Sajad C/N Fouzia Karim C/N Naseem M/N Samuallah <u>MORNING SUPERVISOR</u> I/I/N Najeeba Khattak</p>

ATTESTED

[Signature]

<p><u>MEDICAL B 364</u> A/H/N Noreen Naseem C/N Asma gul C/N Kalsoom C/N Tahmina Gul C/N Nizakat Bibi C/N Sadia Bangish ST/N ST/N ST/N <u>Night Duty</u> C/N Haseena ST/N ST/N <u>GASTRO WARD 358</u> N/ Manager Agatha C/N Shabina C/N Kalsoom Bibi C/N Kousar Gulshad C/N Nadia Zulan C/N Noreen Jan M/N Hazrat Husain ST/N ST/N <u>Night Duty</u> C/N Falak Raiz ST/N ST/N</p>	<p><u>EYE B 237</u> A/H/N Naz Parvar C/N Rukhsana C/N Samina Ajab C/N Waheeda Begum ST/N ST/N <u>Night Duty</u> C/N Shola Shabnam ST/N <u>E.N.T OT</u> H/N Rashida Varo A/H/N Ishrat Saeed C/N Nosheen Itikhar M/N Nasir ud din C/N Fazeelat Begum C/N Anceela C/N Sheriya ST/N <u>Endoscopy</u> A/H/N Bilqees Nazir C/N Sitara C/N Suraya Shahab C/N Naila</p>	<p style="text-align: right;">26</p> <p><u>E.N.T A 348</u> H/N Nasreen Gulab C/N Basmeen Zia C/N Basmin gmal C/N Razia Farman ST/N ST/N <u>Night Duty</u> C/N Shaista Gull <u>E.N.T II 352</u> N/ Manager Naheed Surwar C/N Sania Rehman C/N Zainab Bibi C/N Humaira Jabeen ST/N ST/N <u>Night Duty</u> C/N Nargis Zubir ST/N</p>
<p><u>GYNAE B 207</u> A H/N Razia Shaheen C/N Shamim Ghani C/N Noor un Nisa C/N Shamia Habib ST/N ST/N <u>Night Duty</u> C/N Robina Mira Khan ST/N <u>GYNAE C 374</u> H/N Roshin Zari C/N Shazia Gul C/N Zahida C/N Nusrat begum ST/N ST/N <u>NIGHT DUTY</u> C/N Tahira Nawaz</p>	<p><u>PLASTIC SURGERY 243</u> H/N Caroline Anwar C/N Anisa Rehman C/N Nusrat Bais C/N Anjuman Bibi ST/N ST/N <u>Night Duty</u> C/N Shahnaz Gulab <u>M.I.C.U 250</u> H/N Shahnaz Zakira C/N Shahida Naz C/N Shahida Bano C/N Nafeesa M/N Waleed Iqbal C/N Shahida Sayed ST/N ST/N <u>NIGHT DUTY</u> C/N Shahida Rashid ST/N ST/N</p>	<p><u>UPPER O.T 235</u> A/H/N Neelam Pari C/N Bibi Firaj C/N Hurmat Ghani C/N Naseem Itikhar C/N Nihayat C/N Nadia Khan C/N Shakeela Hukam C/N Nazia Shaheen ST/N ST/N <u>Night Duty</u> C/N Fardus Begum <u>Cardiology Unit 322</u> H/N Tabassam C/N Bilqees Begum C/N Nazreen C/N Farmina C/N Abida Akbar ST/N ST/N <u>Night Duty</u> C/N Sana bibi ST/N</p>
<p><u>L ROOM/GYNAE B & C 246</u> A/H/N Saloomi Saleem C/N Nahced Nawaz C/N Parveen Nihar C/N Hameeda C/N Khalida C/N Ishrat Wahid Ali Shah ST/N ST/N ST/N <u>Night Duty</u> C/N Nasira Batool ST/N ST/N</p>	<p><u>SKIN UNIT-307</u> H/N Nargis Habib C/N Nancy Gull C/N Kousar Nazli C/N Noor Jahan ST/N <u>Night Duty</u> C/N Shahnaz Barkat <u>Morning Supervisor</u> H/N Zainab Shah</p>	<p><u>OT Pharmacy 323</u> N/ Manager Mumtaz Mehtab C/N Bibi Nasima C/N Naheed Zulamin <u>NIGHT DUTY</u> JCT Sadia Haidar <u>ICU Pharmacy</u> CH/N Rubeca JCT Shagulta</p>

ATTESTED




<p><u>NEURO SURGERY 384</u> A/H/N Shaheen K B C/N Sidra Jahangir C/N Zeenat Khalil C/N Shamia Wadood M/N Sadam Husain ST/N <u>Night Duty</u> C/N Farid un Nisa ST/N <u>CI PHARMACY</u> A/H/N Farzana Shamroz JCT Sadaf</p>	<p><u>PATHALOGY</u> A/H/N Sabiha Ulfat C/N Afshan Awal Khan C/N Basreen <u>NEW SURGICAL ICU</u> A/H/N Ishrat Ghulam M/N Amanullah C/N Laila Wazir C/N Abida Jamal C/N Hina Ajmal M/N Syed Haider Ali shah S/N <u>Night Duty</u> C/N Rifat shaheen ST/N</p>	<p><u>NEW SURGICAL OT 270</u> N/ Manager Shakeela Zehi C/N Nasim Akhtar C/N Darajat C/N Wajahat C/N Robi Hamid <u>Emergency Surgical OT</u> H/N Gul MIRA(both side) M/N M.Aurang Zeb C/N Shahnaz Shafi C/N Kousar Shahzad M/N Izhar Ali M.N Shams Ur Rehman <u>Night Duty</u> C/N Shabana Liaqat <u>Metoficial unit 283</u> C/N Saima Noreen C/N Gulnaz C/N Rifat Ghulam S/N ST/N <u>Night Duty</u> C/N Sabiha Akhtar</p>
<p><u>FEMALE SURGICAL 216</u> N/ Manager Huma Naz C/N Zakira C/N Shahida Parveen C/N Summer Sabir ST/N ST/N <u>Night Duty</u> C/N Jabeen S/N</p>	<p><u>MALE SURGICAL A 361</u> N/ Manager Bano Rani C/N Sadia Bulbal C/N Basmin Mumtaz C/N Qurban Nisa ST/N ST/N <u>Night Duty</u> C/N Nusrat Begum ST/N</p>	<p><u>MALE SURGICAL B 361</u> N/Manager Shaheen Umer C/N Noreen Bibi C/N Aniq C/N Sumaira Ratiq ST/N ST/N <u>Night Duty</u> C/N Gul Bibi ST/N</p>
<p><u>GYNAE A 202</u> A/H/N Zeenat Nawab C/N Samina bibi C/N Shamim Bais C/N Shabana Muzafar S/N S/N <u>Night Duty</u> C/N Shush Begum ST/N</p>	<p><u>L ROOM GYNAE A 282</u> N/ Manager Samina Yaqoob C/N Meena Gul C/N Asma Ishaq C/N Fazilat un Nisa ST/N ST/N ST/N <u>Night Duty</u> C/N Gul Fatima ST/N ST/N <u>MORNING SUPERVISOR</u> A/H/N Abida Rahim</p>	<p><u>ENDOCRINOLOGY 284</u> A/H/N Yasmin Faqir C/N Bibi Safia C/N Baserat C/N Mussarat Gill C/N Naeema Naheed [D F] M/N Fazel Hayat ST/N ST/N <u>Night Duty</u> C/N Jabeen Gul ST/N</p>

ATTESTED



<p><u>CNS OFFICE</u> CNS Sadaat Iqbal OFFICE MANAGER A/I/N Sheeraz C/N Saima Wahab</p> <p>1. <u>Morning Supervisor</u> A/I/N Abida Rahim Zone 3 H/N Zainab Shah Zone 2 Zone 1</p> <p>2. <u>Evening Supervisor</u> M/N Nasurullah I/I/N Awal badshah C/N Aleema Ghani ✓</p> <p>3. <u>Night Supervisor</u> C/N Lubna Rafiq A/H/N Cicilia Suba</p> <p><u>Infection Control Nurse</u> C/N Rashida Bibi</p> <p><u>WARDEN</u> A/H/N Mebal Jan</p>	<p><u>EARNED LEAVE</u> C/N Kaisoom Akhtar 365 D (from 31/12) C/N Zainab (from 01/07/2015)</p> <p><u>Maternity leave</u> C/N Robina Usman C/N Nargis Iqbal C/N Ume Kulsum (From 16/06/15)</p> <p><u>DAY RELIVER</u> Kocab Naheed</p>	<p>College of nursing & KMU: Ex/Pakistan = 01 Maternity leave = 01 E/LEAVE = 02</p> <p>(28)</p> <p>Total staff Nurses: Total Nurses In duty: Total Head Nurses:</p> <p>Transfer</p> <p>Absent: C/N Sadaf Rafiq ✓ C/N Shabana Rahman ✓ C/N Tushiba</p>
<p><u>COLLEGE OF NURSING</u></p> <ol style="list-style-type: none"> C/N Shanila C/N Norcen Sher C/N Farhat Akbar C/N Tahira C/N Bibi Nazia C/N Farzana Qasim C/N Nasim Waker C/N Asifa C/N Nazia Ghafoor C/N Bibi Ayesha C/N Fahmeeda C/N Tahmina C/N Dilshad Zabardast M/N Awal Khan C/N Shaista Parveez 	<p><u>HOSTEL DUTY</u> S/N Hanifa 4th year S/N Sadia Bibi 4th year</p> <p><u>MESS DUTY</u> S/N Humaira 4th S/N Shenaz 4th</p>	



Chief Nursing Superintendent
Hayatabad Medical Complex
Peshawar

Vice Principal
Hayatabad Medical Complex
Peshawar

Copy to the:

- Director Hospital HMC Peshawar
- Director Medical HMC Peshawar
- Director Admin HMC Peshawar
- DMS (Admin), HMC Peshawar
- DMS Night Shift, HMC Peshawar
- Hostel Notice Board, HMC Peshawar
- IT Section, HMC Peshawar

ATTESTED



To,

The secretary Health Department,
Khyber Pakhtunkhwa, Peshawar.

Subject:

**DEPARTMENTAL APPEAL AGAINST THE ORDER
DATED 25.7.2015 WHEREBY THE APPELLANT WAS
TRANSFERRED FROM HAYATABAD MEDICAL
COMPLEX PESHAWAR IN VIOLATION OF RULES AND
POLICY**

R.SHEWETH:**ON FACTS:**

- 1- That appellant was initially inducted in the Health Department as Charge Nurse (BPS-16) on the proper recommendation of Khyber Pakhtunkhwa public service commission. That after appointment the appellant was posted at Hayatabad Medical Complex Peshawar wherein she started her duty quite efficiently and up to the entire satisfaction of her superiors.
- 2- That appellant being unmarried female charge Nurse applied for allotment of accommodation in nursing hostel Hayatabad Peshawar in the year 2010. That the authority paid no heed to the said request of appellant. That then after the appellant time and again requested the authorities for allotment of accommodation in nursing Hostel Hayatabad Peshawar but the concerned authority one way or the other refused the same though the said authority accommodated many married nurses in the bachelor Hostel illegally.
- 3- That the authority on malafide basis harassed the appellant on one way or the other just to side on from her stance and for that purpose the authority transferred the appellant and placed her services at the disposal of Director General Health vide order dated 24.1.2015 and also withheld the half salaries of the appellant for the month of December 2014 and January 2015.
- 4- That vide orders dated 6.2.2015 and 16.2.2015 the said order dated 24.1.2015 was withdrawn by the D.G Health. That the appellant also knocked the door of the D.G Health for allotment of accommodation at nursing hostel Hayatabad Peshawar but in vain.
- 5- That astonishingly the D.G Health issued another order dated 25.7.2015 whereby the appellant was transferred to Directorate of Health Department on administrative grounds.

Attested
g.

That the stance of the authority in the said impugned order is that of the absence of appellant from duty though the appellant has regularly performed her duty.

6- That feeling aggrieved the appellant prefer this Departmental appeal on the following grounds amongst the others.

GROUND:

- A- That the impugned order dated 25.7.2015 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the authorities in accordance with law and rules on the subject noted above and as such the authorities violated article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the impugned order dated 25.7.2015 is against the clause I of the transfer/ Posting policy of the Government of Khyber Pakhtunkhwa.
- D- That the impugned order dated 25.7.2015 has not been issued in the public interest nor in exigencies of service.
- E- That the transfer of the appellant is void ab initio on the ground that transfer can not be awarded as punishment as the same has not been mentioned in any of the penalty list of E&D amended Rules 2011.
- F- That the authorities acted in arbitrary and malafide manner while issuing the impugned order dated 25.7.2015.

That on acceptance of this Departmental appeal the impugned order dated 25.7.2015 may kindly be set aside and the appellant may not be transfer from Hayatabad Medical Complex Peshawar.

DATED: 27.7.2015

Attested
[Signature]

APPELLANT
[Signature]
ALIMA GHANI
Charge Nurse, HMC Hayatabad
Peshawar



**DIRECTORATE
GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

M - 31
All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.

OFFICE ORDER.

E-Mail Address: nwfpghs@yahoo.com
Office Ph# 091-9210269
Exchange# 091-9210187, 9210198

On her relieving from Hayatabad Medical Complex, Peshawar, Miss. Alima D/O Abdul Ghani, Charge Nurse BPS-16, is hereby posted to DHQ Hospital Charsadda against the vacant post of Charge Nurse BPS-16), in the interest of public service.

NB: - Arrival / Departure report should be submitted to this Directorate for record purpose.

Sd/-
DIRECTOR GENERAL HEALTH
SERVICES, KPK, PESHAWAR.

No. **5899 - 5903** /E.II, Dated Pesh. The **08 / 10 /** /2015.

Copy forwarded to the:-

01. Hospital Director, HMC, Peshawar.
02. Medical Supdt. DHQ Hospital Charsadda.
03. DAO, Charsadda.
04. Miss. Alima D/O Abdul Ghani, Charge Nurse, Village Utmanzai, Mohallah Sultan Abad District Charsadda.
05. DA-concerned, DGHS KPK Peshawar.

For information and necessary action.

Saeed
DEPUTY DIRECTRESS (NURSING)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P.K, PESHAWAR

ATTESTED

[Signature]

08/10



**GOVERNMENT OF NWFP
ESTABLISHMENT & ADMINISTRATION
DEPARTMENT
(Regulation Wing)**

POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT.

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posing/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
- v) {
- vi) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, NWFP needs to be obtained
- ²While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP needs to be obtained. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor NWFP shall be obtained.
- vi (a) All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for atleast eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.
- viii) No posting/transfers of the officer's/officials on detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- x) All the posting/transferring authorities may facilitate the posting/transfer of the unmarried female government Servants at the station of the residence of their parents.

1 Para-1(v) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No: SOR-VI (E&AD) 1-4/2008/Vol-VI, dated 3-6-2008. Consequently authorities competent under the NWFP Government Rules of Business, 1985, District Government Rules of Business 2001, Posting/Transfer Policy and other rules for the time being in force, allowed to make posting/transfer subject to observance of the policy and rules.

2 Added vide Urdu circular letter No. SOR-VI(E&AD)1-4/2003, dated 21-09-2004

ATTEST

1

- xi) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement
¹DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales;
- xii) In terms of Rule-17(1) and (2) read with Schedule-III of the NWFP Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column 2 thereof:

Outside the Secretariat		
1.	Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above.	Chief Secretary in consultation with Establishment Department and Department concerned with the approval of the Chief Minister.
2.	Other officers in BPS-17 and above to be posted against scheduled posts, or posts normally held by the APUG, PCS(EG) and PCS(SG).	-do-
3.	Heads of Attached Departments and other Officers in B-19 & above in all the Departments.	-do-
In the Secretariat		
1.	Secretaries	Chief Secretary with the approval of the Chief Minister.
2.	Other Officers of and above the rank of Section Officers: a) Within the Same Department b) Within the Secretariat from one Department to another.	Secretary of the Department concerned. Chief secretary/Secretary Establishment.
3.	Officials up to the rank of Superintendent: a) Within the same Department b) To and from an Attached Department c) Within the Secretariat from one Department to another	Secretary of the Department concerned. Secretary of the Dept in consultation with Head of Attached Department concerned. Secretary (Establishment)

- xiii) While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:
- To ensure the posting of proper persons on proper posts, the Performance Evaluation Report/annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered.
 - Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.

¹ Added vide Urdu circular letter No: SOR-VI (E&AD)/1-4/2005, dated 9-9-2005.

ATTESTED

xiv) Government servants including District Govt. employees feeling aggrieved due to the orders of posting/transfer authorities may seek remedy from the next higher authority / the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/ transfer orders could be exercised only in the following cases.

- i) Pre-mature posing/transfer or posting transfer in violation of the provisions of this policy.
- ii) Serious and grave personal (humanitarian) grounds.

2. To streamline the postings/transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the North West Frontier Province District Government Rules of Business 2001 read with schedule – IV thereof is referred. As per schedule-IV the posting/transferring authorities for the officers/officials shown against each are as under:-

S. No.	Officers	Authority
1.	Posting of District Coordination Officer and Executive District Officer in a District.	Provincial Government.
2.	Posting of District Police Officer.	Provincial Government
3.	Other Officers in BPS-17 and above posted in the District.	Provincial Government
4.	Official in BPS-16 and below	Executive District Officer in consultation with District Coordination Officer.

3. As per Rule 25(2) of the Rules mentioned above the District Coordination Department shall consult the Government if it is proposed to:

- a) Transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure.
- b) Require an officer to hold charge of more than one post for a period exceeding two months.

4. I am further directed to request that the above noted policy may be strictly observed /implemented.

.....

All concerned are requested to ensure that tenures of the concerned officers/officials are invariably mentioned in summaries submitted to the Competent Authorities for Posting/Transfer.
{Authority: Letter No: SOR-VI/E&AD/1-4/2003 dated 24-6-2003}.

.....

It has been decided by the Provincial Government that posting/transfer orders of all the officers up to BS-19 except Heads of Attached Departments irrespective of grades will be notified by the concerned Administrative Departments with prior approval of the Competent Authority obtained on the Summary. The Notifications/orders should be issued as per specimen given below for guidance.

All posting/transfer orders of BS-20 and above and Heads of Attached Departments (HAD) shall be issued by the Establishment Department and the Administrative Departments shall send approved Summaries to E&A Department for issuance of Notifications.

ATTESTED

VAKALATNAMA

IN THE COURT OF KPK Service Tribunal Peshawar
OF 2015

Alima Ghani (APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Govt: of KPK (RESPONDENT)
(DEFENDANT)

I/We Alima Ghani

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. 25 / 10 / 2015

Alima Ghani
CLIENT

Noor Mohammad Khattak
ACCEPTED

**NOOR MOHAMMAD KHATTAK
(ADVOCATE)**

OFFICE:

Room No.1, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.

Phone: 091-2211391

Mobile No.0345-9383141

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____ /2015

Mst. Aleema Ghani.....**Appellant**

VERSUS

Government of Khyber Pakhtunkhwa,
Through Secretary Health & others.....**Respondents**

APPEAL U/S 4 OF THE KPK SERVICE
TRIBUNAL ACT, 1974.

Comments Of The Respondent's No.3

Respectfully Sheweth:

Preliminary Objections:

1. That the appellant has got no locus standi to file the present appeal.
2. That appellant is estopped by her own conduct to bring the appeal in hand.
3. That the appellant has come to the Tribunal with in clean hands, she has suppressed the material facts from the hon'ble Court & tried to mis lead, her petition deserves dismissal on this score alone.

4. That appeal in hand is miserably and hopelessly time barred.
5. That no departmental has been filed against order dated 08-10-2015 impugned herein, hence the appeal in hand is not maintainable.
6. That appeal is bad due to mis-joinder of two distinct orders.
7. That with due respect the Honourable Court lacks Jurisdiction to adjudicate upon the mater.

ON FACTS:

- A. In reply to the content of Para No 1 of the appeal it is submitted that the appellant is an unwilling worker obstinate by nature never worked with due diligence, scuffles with the hospital staff disturbs the peace and tranquility of the hospital always shows disrespect of the surmises.
- B. Misleading incorrect and false. The appellant's sister namely Shamin Akhter is also serving in HMC she was allotted room No 14 in old Nursing Hostel vide order dated 04-03-2015 but both the sisters refused to occupy the same, rather they insisted for allotment of rooms of their choice.

C. That in reply to the contents of Para No 3 of the appeal it is stated that the appellant and her sister (Miss Sharmin Akhter posted at HMC) are in the habit of making false accusation against senior staff & Hospital administration earlier they had brought a complaint before the Directorate of Human Rights leveling therein frivolous accusation against the senior staff of hospital subsequently, they did not persue the same, the appellant has constantly scuffly with the administrative staff of the hospital, insulted and disgraced Dr. Abdur Razzaq DMS, caused damage to hospital property, thereof visited his house, Physically abused his wife. FIR was also lodged against her, she was relieved from hospital on 25-07-2015 thereafter she was posted at charsadda vide order dated 08-10-2015 by D.G Health services K.P.K. she has been paid for the work done. Denied with vehemence.

D. Misleading & perverse her sister was allotted a room in the old nursing hostel to be resided by both.


- E. In reply to the contents of Para No 5 of the appeal it is stated that the appellant is an unwilling & disobedient worker. She was relieved from duty on the reasons stated in the order dated 25-07-2015, which is just & legal. She failed to perform her duty.
- F. In reply to the contents of Para No 6 of the appeal it is stated that the appellant was relieved from hospital on the grounds stated that order dated 25-07-2015 thereafter she was posted at charsadda vide order dated 08-10-2015 where disciplinary action is being taken against her by DG health services.
- G. Incorrect the appellant has not filed any departmental appeal against the order dated 08-10-2015, she has impugned two distinct order through this appeal, which is not maintainable.

GROUND S.

- A. That both the orders distinct for each others proved by different authorities & are legal.
- B. Incorrect & false appellant has been treated in accordance with law, no legal fundamental or accrued right of the appellant has been infringed to warrant interference.

- C. Incorrect & false both the orders were issued by the competent authorities in exercise of powers confirmed under the law.
- D. Incorrect both the orders were issued in public interest.
- E. Incorrect and misleading the appellant was not transferred as punishment, however disciplinary action is being taken against her in accordance with law.
- F. Incorrect & false the impugned order were issued in good faith fact & are not arbitrary .
- G. Incorrect & false detailed reply has been given in the above paras.

It is therefore, prayed that on acceptance of this comments the appeal in hand being devoid of force be dismissed with cost. .

Respondent No.3
Through 
Shakeel Ahmad
Advocate, Peshawar

Dated __/02/2016

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____ /2015

Mst. Aleema Ghani.....**Appellant**

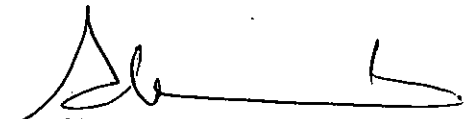
VERSUS

Government of Khyber Pakhtunkhwa,
Through Secretary Health & others.....**Respondents**

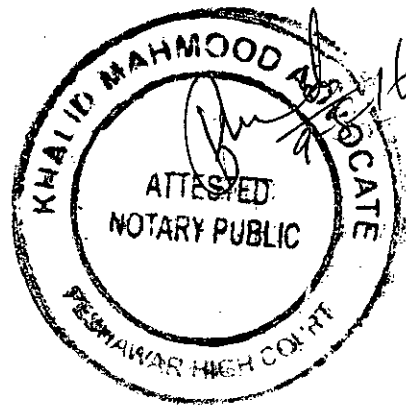
AFFIDAVIT

I, Sami ud Din, Litigation Assistant, HMC, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Comments** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Identified by:


Shakeel Ahmad
Advocate, Peshawar


DEPONENT
CNIC No.17301-2896474-9



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. 1242/2015

Mst. Alima Ghani Charge Nurse..... Appellant

Versus

Government of KPK, through Secretary Health Department KPK, Peshawar &
Others..... Respondents.

Parawise comments on behalf of respondent No.1.2.

Preliminary Objections:-

1. That the appellant has no cause of action.
2. That the appeal is not maintainable and also time barred.
3. That the appeal is bad for mis joinder and non joinder of necessary parties.
4. That the appellant has no locus standi and also estopped by his own conduct.
5. That the appellant has not come to the Tribunal with the clean hands.

FACTS

1. Correct, the appellant is serving as Charge Nurse (BS-16) in the Health department KPK since 23.08.2013 on regular basis.
2. Relates to Hospital Director HMC, Peshawar.
3. Relates to Hospital Director HMC, Peshawar.
4. Relates to Hospital Director HMC, Peshawar.
5. Relates to Hospital Director HMC, Peshawar.
6. The appellant was relieved by the Hospital Director HMC, Peshawar on account of her absence from duty etc and her service were placed at the disposal of DGHS KPK so she has been posted to District Charsadda being her home District.

GROUND.

- (a) The appellant has been relieved from HMC Peshawar on account of her willful absence from duty w.e.from 04.06.2015 and given a loss of breaking of valuable items of the Hospital of worth Rs-6,39000/- which has been proved by the enquiry committee.
- (b) No violation of the rules has been done as the appellant herself violated the rules and absented herself from Govt. duty and damaged public property in HMC Peshawar.
- (c) Not correct, the appellant has been relieved from HMC Peshawar on administrative grounds.
- (d) Not correct, the appellant has been transferred in the Public interest being absent from duty.

(e) Not correct, the HMC, Peshawar is an autonomous body and all the Civil Servant working over there and the Hospital authority can relieve Civil servant any time on poor performance.

(f) As in Para (d) above.

(g) Not correct, the appellant has been transferred on the grounds mentioned in Para 06 above.

In view of the above, the service appeal filed by the appellant is not containing on facts and may be dismissed.



Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No.02)

Handwritten notes:
17/3/16



Secretary to
Government of Khyber Pakhtunkhwa
Health Department, Peshawar.
(Respondent No.01).

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL No.1242/2015

ALIMA GHANI

VS

HEALTH DEPTT:

**REJOINDER ON BEHALF OF APPELLANT IN RESPONSE
TO THE REPLY SUBMITTED BY THE RESPONDENTS**

R/SHEWETH:

All the preliminary objections raised by the respondents are incorrect and baseless and not in accordance with law and rules rather the respondents are estopped due to their own conduct to raise any objection at this stage of the appeal.

ON FACTS:

- 1- Admitted correct by the respondents hence need no comments.
- 2- Incorrect and not replied accordingly. That the appellant being unmarried female charge Nurse applied for accommodation in the year 2010 but no heed was paid to her request. That the appellant visited respondent No.3 time and again but respondent No.3 refused to allot her accommodation on one way or other. That it is very pertinent to mention that respondent No.3 accommodated some married Nurses in the bachelor Hostel.
- 3- Incorrect and not replied accordingly. That respondent No.3 on malafide basis harassed the appellant on one way or the other just to side on from her stance and for that purpose the respondent No.3 transferred the appellant and placed her services at the disposal of respondent No.2 vide order dated 24-01-2015 and also withheld the half salaries of the appellant.
- 4- Incorrect and not replied accordingly. That vide orders dated 06-02-2015 and 16-02-2015 the said order dated 24-01-2015 was withdrawn by the respondent No.2. That the appellant also knocked the door of respondent No.2 for allotment of accommodation at Bachelor Nursing Hostel at Hayat Abad Medical Complex Peshawar but in vain.
- 5- That astonishingly the respondent No.3 issued another order dated 25-07-2015 whereby the appellant was transferred to Directorate of Health Department on administrative grounds. That the stance of the respondent No.3 in the said

impugned order is absence of the appellant from duty though the appellant has regularly performed her duty.

- 6- Incorrect and not replied accordingly. That appellant feeling aggrieved from the impugned order dated 25-07-2015 the appellant prefers Departmental appeal before the respondent No.1 but no reply has been received so far. That during the pendency of the said appeal another order was issued vide dated 08-10-2015 whereby the appellant was further transferred to DHQ Hospital Charsadda.

GROUND:
(A to E):

All the grounds of main appeal are correct and in accordance with law and prevailing rules and that of the respondent are incorrect, baseless and not in accordance with law and Rules hence denied. That the impugned orders dated 25-07-2015 and 08-10-2015 issued by the respondents are against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside. That the impugned orders dated 25-07-2015 and 08-10-2015 has not been issued in the public interest nor in exigencies of service. That the transfer of the appellant is void ab initio on the ground that transfer can not be awarded as punishment as the same has not been mentioned in any of the penalty list of E & D amended Rules 2011. That respondents acted in arbitrary and malafide manner while issuing the impugned orders dated 25-07-2015 and 08-10-2015. That the impugned orders has been issued by the respondents on malafide basis just to side on the appellant from her stance of accommodation in Nursing Hostel HMC.

It is therefore most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may be accepted in favor of the appellant.

APPELLANT



ALIMA GHANI

THROUGH:

NOOR MOHAMMAD KHATTAK

&

**SYED IMDAD HUSSAIN
ADVOCATES**

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR



COC NO. 75 /2016

IN

Appeal NO.1242/2015

M. W. P. Peshawar
Service Tribunal

Diary No. 311

Date 22-4-16

Mst: Alima Ghani, Charge Nurse (BPS-16),
Hayatabad Medical Complex Hayatabad, Peshawar,
Under transfer to Director General Office, Peshawar

..... **APPLICANT/ PETITIONER**

VERSUS

- 1- Mr. Parveez Kamal, Director General Health Services Department, Khyber Pakhtunkhwa, Peshawar.
- 2- Mr. Shehzad Akbar, Hospital Director Hayatabad medical Complex, Hayatabad, Peshawar.

..... **RESPONDENTS/ CONTEMNORS**

APPLICATION INITIATING CONTEMPT
OF COURT PROCEEDINGS AGAINST THE
RESPONDENTS/CONTEMNORS

RESPECTFULLY SHEWETH:

- 1- That the applicant/ petitioner had filed service appeal No.1242/2015 in this august Tribunal in which status quo was granted by this august Tribunal vide order dated 23.11.2015. Copy of the order sheet is attached as annexure

..... **A.**

- 2- That after obtaining the attested copy of the order/Judgment, the applicant/petitioner submitted the said order of this august Tribunal before the respondents/contemnors for implementation but the same has been ignored by the respondents and till date the order has not been implemented in spite of repeated requests.

That the acts and actions of the Respondents/Contemnors squarely fall within the ambit of the Contempt of the Court and as such they are liable to be proceeded for the Contempt and for the punishment under the law.

It is therefore, humbly prayed that on acceptance of this application, the Contempt of Court proceedings may graciously be initiated against the Respondents/Contemnors and they may be punished accordingly.

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

C.O.C No. 75/2016
Mst. Alima Ghani vs Govt



28.02.2017

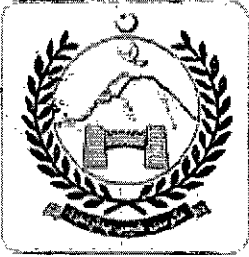
Petitioner with counsel and Mr. Muhammad Jan, GP for respondents No. 1 and 2 present. None present on behalf of respondent No.3. Notice be issued to respondent No.3 and his counsel. Respondents are directed to implement the order of Status-quo of this Tribunal in latter in spirit. To come up for further proceedings on 22.03.2017 before D.B alongwith main appeal.

Certified to be true copy

MEMBER
Peshawar Pakhtunkhwa
Service Tribunal
Peshawar

Self
(Ahmad Hassan) (M. Amir Nader)
Member Member

Date of Presentation of Application 01-03-17
Number of Words 800
Copying Fee ---
Urgent ---
Total ---
Name of Copyist ---
Date of Completion of Copy 01-03-17
Date of Delivery of Copy 01-03-17



KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

No. 1977 /ST Dated: 3rd / 8 / 2017

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262


To,

The Hospital Director Hayatabad Medical Complex,
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: - **JUDGMENT IN APPEAL NO. 1242/2015, MST. ALIMA GHANI**

I am directed to forward herewith a certified copy of judgment dated 03/08/2017 passed by this tribunal on the above subject for strict compliance.

Encl: as above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR