

Member I

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 5758

Dated 1/6/2023

IN THE KP Service tribunal , PESHAWAR.

Service Appeal \_266/2023

Dr Bakhtiar Alam -----Vs----- Secretary Health and others

INDEX

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Through

Petitioner

Nazir. Ahmad. advocate.  
High Court Peshawar

①

**Before the KP Service Tribunal, Peshawar.**

Appeal No 266/2023

Dr Bakhtiara Alam S/O Shah Zamir.....**Appellant**

**Versus**

Secretary Health KP and two others .....**Respondents**

**Reply on behalf of the Respondent No 3 Dr Jamshed  
KhanSherani MS District Head Quarter Hospital Landi Kotal**

**Respectfully Sheweth:**

**Preliminary Objection:**

1. That the Appellant has got no cause of action.
2. That the Appeal is not maintainable and is pre – mature. The Appellant has not filed any departmental Appeal as envisage from his Memo of Appeal.
3. That the Appellant is stopped by his own conduct.
4. That the Respondent No 3 has acted in accordance with law and service rules in force and in the light of KP Finance Department (Regulation wing) notification dated 16.12.2014 in good faith for service discipline by considering it his responsibility.

**( Copy of the notification is attached)**

5. That the Appellant is habitual absentee and is always prefer his own interest over the public interest by preferring his private practice over attending patient in hospital OPD with a conduct of coming late for duty and leaving the hospital before time and so may explanations are called from him.  
**( Copies of explanation are attached .**
  
6. That only that civil servant is entitled to pay who work. No work No pay is the principle recognized by all. The appellant is consistently remaining absent and particularly after the grant of interim relief from this court he little bothered to attend hospital.  
**( Complete record of non thumbing the bio metric and absentee is attached )**
  
7. That the Appellant has not come with clean hands which transpire by making the Respondent No 3 by name. The arrogant behavior of the appellant demands not to forgive him and deserve to be treated as per law.
  
8. That the continuous and intention absence from duty is misconduct and is liable to punishment so the appellant is given minor punishment and his absence is treated as leave without pay.

**On Facts:**

1. Incorrect. The Appellant by claiming it must be punctual and dutiful whereas he is absent all the time, the detail is given above.
  
2. Pertains to record and require proof.



3. Correct and is bound to act according by supervising the subordinate.
4. Incorrect. The record is attached which is a cogent evidence of the fact.
5. As per rule two days casual leave is allowed but the Appellant is in the habit of exceeding limit every month to flourish his own private clinic. In the month of September, 2022 he was allowed to avail three casual leaves but he exceeded it detail is given above.
6. The application was accepted for 7<sup>th</sup> and 8<sup>th</sup> October 2022 but the salary is deducted for the month of September which was intentional absence and without any authority.
7. Incorrect. No departmental appeal through proper channel is processed.
8. And 9. Incorrect. The Respondent is bound to maintain discipline and act in accordance with law.

**Grounds: -**

**A. To E.**

All the grounds are base less and against the principle of law. The record of the Appellant is attached which transpires the conduct of the Appellant and his performance of duty. None of the ground is genuine and reasonable in the circumstances.

It is therefore humbly prayed that the record of the Appellant may be considered judiciously and on acceptance of this reply the Appeal of the Appellant be dismissed with cost.

**Respondent no 3**  
**Dr Jamshed Medical Superintendent**

Through

*[Signature]*  
Nazir Ahmad  
Advocate. Peshawar.

**Affidavit**

I Dr Jamshed Ahmad Sherani the Respondent no-3 do hereby affirm and declare on oath that contents of this Reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

*[Signature]*  
Deponent  
*[Signature]*  
11/6/23

**ATTESTED**  
Gul Daraz Khan  
Oath  
Commissioner  
Advocate High Court Peshawar  
*[Signature]*  
11/6/23

5

Employee ID	1153
First Name	Dr. Bakhtiar Alam
Position	District Specialist

Sep-22			Oct-22		
Thursday	01		Saturday	01	
Friday	02		Sunday	02	
Saturday	03		Monday	03	
Sunday	04		Tuesday	04	
Monday	05		Wednesday	05	
Tuesday	06		Thursday	06	
Wednesday	07		Friday	07	Leave
Thursday	08		Saturday	08	leave
Friday	09		Sunday	09	
Saturday	10		Monday	10	08:39
Sunday	11		Tuesday	11	
Monday	12		Wednesday	12	08:35-13:48
Tuesday	13		Thursday	13	08:12-13:48
Wednesday	14		Friday	14	08:26
Thursday	15		Saturday	15	08:13-13:33
Friday	16		Sunday	16	
Saturday	17		Monday	17	08:07
Sunday	18		Tuesday	18	08:32
Monday	19		Wednesday	19	08:17
Tuesday	20		Thursday	20	08:23
Wednesday	21		Friday	21	
Thursday	22		Saturday	22	08:23
Friday	23		Sunday	23	
Saturday	24		Monday	24	08:14
Sunday	25		Tuesday	25	08:41
Monday	26		Wednesday	26	
Tuesday	27		Thursday	27	
Wednesday	28	12:07	Friday	28	08:38
Thursday	29	11:55	Saturday	29	08:36
Friday	30	11:54	Sunday	30	
			Monday	31	

Verified  
Bakhtiar Alam

DR JAMSHED ALAM  
Medical Superintendent  
DHA Uke

6



OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT H.Q. HOSPITAL LANDIKOTAL.  
Phone/Fax No. 0924-210901 Email mskhyber5@gmail.com  
No. 1507 / Dated 01/19 /2022.

AB

\*\*\*\*\*

To,

Dr. Bakhtiar, District Specialist  
General surgery department DHQ,  
Hospital Landikotal.

02/19

Subject: - EARLY LEFT OF DUTY PLACE  
Memo:

During surprise round of undersign at 1.15 PM dated 29.08.2022, you and your Medical Officers were found absent from the duty place and many patients were waiting there. the undersign feel very displeasure, about your approach towards your duty and patient care.

You are hereby directed to explain your position within 24-hours after the receipt of this letter and hoping for performing duty in OPD till 2.00 PM for the best of public interest.

↓

Medical superintendent  
District Headquarter Hospital,  
Landikotal.

*Attested  
Muz*

7

Medical Superintendent  
DHA Hospital  
Landi Kotah.

Sir,

Respectfully it is stated that I  
have an urgent piece of work at  
home due to which I cannot attend  
my today's OPD duty. Kindly grant  
me one day leave.

Thanks  
Regards  
Dr. Bakhshyar Khan  
Surgical ward

Amir  
MS/PhD  
2

Date 21/09/2022.



8

un

Office of Medical Superintendent (MS)  
DHO Hospital LA.

08/09/22

Subject: One day medical leave.

Dear MS,, i'm a doctor appointed  
at peshawar tomorrow.

I'll not be available tomorrow  
Surgical Services will run according  
to the rota.

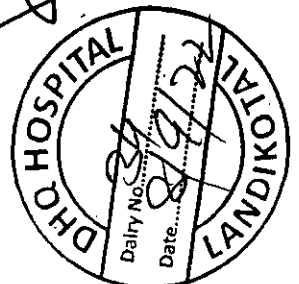
Attested  
[Signature]

Booran

Dr. Bakhtiar A Khan,  
Surgical Specialist.

Please check  
the register

will be  
duly off work  
[Signature]



15/09/22

MS,

DHQ Hospital IAI.

Subject: One day Casual Leave.

Dear MS, i've a family commitment tomorrow  
on 16/09/2022.

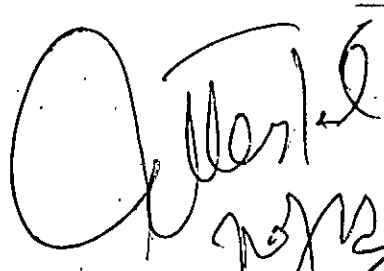
I'll not be available tomorrow. Surgical  
unit will function smoothly and i'll be  
on call.

Regards!

Bakht

Dr. Bakhtiar Alan.

G-Surgem, DHQ Hospital, IAI,



10

26



OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT HQ. HOSPITAL LANDIKOTAL.  
Phone No.0924-210901 Email mskhyber5@gmail.com  
No. \_\_\_\_\_ / \_\_\_\_\_ / 2022

\*\*\*\*\*

To  
Dr. Bakhtiyar Alam  
Surgical Specialist,  
DHQ Hospital Landikotal.

27

Subject: **Displeasure Letter**

During the routine round of undersign you were found absent from your duty  
On 15/07/2022, without any information or prior permission of the competent  
authority.

You are requested to be regular in your duty and the undersign feel  
displeasure due to lack of your interest in duty and patient care.

Medical Superintendent,  
District Headquarter Hospital,  
Landikotal.

Dated 15/7 /2022.

No. 250-52

Copy forwarded to:

1. Director General Health services KPK Peshawar.
2. DMS DHQ Hospital Landikotal.
3. Addl: Medical Superintendent DHQ Hospital Landikotal

Medical Superintendent,  
District Headquarter Hospital,  
Landikotal.

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OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT DHQ. HOSPITAL LANDIKOTAL.

Phone No.0924-210901 Email mskhyber5@gmail.com

No/1036-39/DHQ H LKL Dated 15/8/2022

\*\*\*\*\*

To

District Specialist.

Dr. Rasim Shah, (Peads Specialist)  
Dr. Bakhtyar Afridi (General surgeon)  
Dr. Khial Wali (Orthopedic Surgeon)  
Dr. Muneeb (ENT Specialist)

District Headquarters Hospital  
LandiKotal, Khyber


Subject: EXPLANATION

You are hereby directed to provide your explanation to the undersigned within 72 hours of receiving this correspondence.

On 13/08/2022, you were found to be participating in an illegal strike which was instigated by two staff members named Mr Fazal rehman and Mr. Khail Madar, who had called for this strike against the Public Private Partnership policy of the Provincial Health Department.

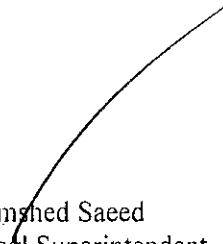
This is also to remind in the same context, that you have taken the Hippocratic Oath of being sincere to the cause of the ailing community, and hence by participating in such an uncalled for, illegal strike, is violation of your sacred oath, which puts you in the category of questionable integrity and hence not fit to practice, on this basis. This is also the violation of the Civil Servants Efficiency and Disciplinary Rules Act and the Essential Services Act of West Pakistan, and calls for recommendation of major penalty against you.

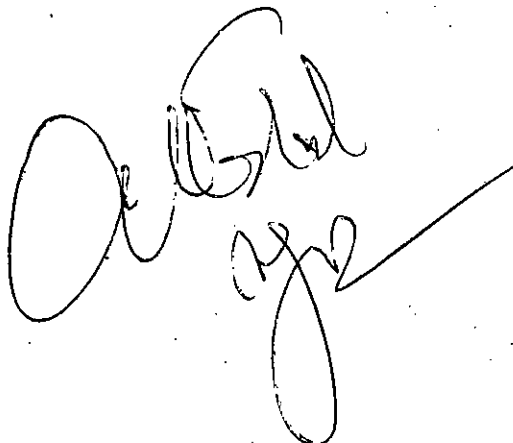
Therefore you are given 72 hours to explain your position, as to why a very strict disciplinary action may not be recommended against you including major penalty of dismissal from service

  
Dr Jamshed Saeed  
Medical Superintendent  
District Headquarters  
Hospital LandiKotal, District  
Khyber

CC.

Secretary to Government Health Khyber Pakhtunkhwa Peshawar.  
Director General Health Services KPK Peshawar  
Deputy Commissioner Khyber.  
Assistant Commissioner Landikotal.

  
Dr Jamshed Saeed  
Medical Superintendent  
District Headquarters  
Hospital LandiKotal, District  
Khyber



12

29



**OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT HEADQUARTER HOSPITAL  
LANDIKOTAL**

No. 1290-97/DHQ/LKL Phone No.0924-210901 Date 24/8 /2022

To,

- Dr.Rasim Shah.
- Dr.Bakhtiyar Alam
- Dr.Khial Wali
- Dr.Muneeb
- Dr.Abdul Hameed
- Dr.Khial Khan
- Dr.Muhammad Khan
- Dr.Hidayat Shah

Subject: **DISPLEASURE WITH WARNING**

Regretted to say that the written reply you submitted vide D.No 25 dated 17.08.2022 in reference to our office letter No.1040-43/ 1032-35 DHQ/LKL, Dated 15.08.2022 has been found baseless and do not base on facts.

It has come to notice of the undersigned that no one has announced the strike & no one has closed the OPDs & other services forcefully on the day of scanty strike instead you re-in forced the diminish slogans against public private partnership of the hospital by closing OPDs etc by yourself with malafide intentions, thereby creating panic situation and stoppage of smooth delivery of services.

Moreover, evidence from social media and CCTV footage of the hospital has clearly revealed your active participation in strike activities. Also the written reply of lower staff shows that no one has called on strike on that day thereby making your involvement in strike further suspicious & created severe hurdle for administration and patient care.

Therefore, your written reply is un-satisfactory and directed to re-submit proper reply within 48 hours. Otherwise the matter is subject to further probing by concerned authority. Also you are strictly warned to abstain from involvement in such illegal activities in future.

Medical Superintendent  
DHQ.Hospital  
Landikotal

No. 1298-1302/DHQ/LKL Date 24/8 /2022

Cc

- Director General Health Services, Khyber Pakhtunkhwa
- PS to Secretary Health, Khyber Pakhtunkhwa.
- Deputy Commissioner, Khyber.
- DMS for urgent necessary actions and follow up.
- Personal files concerned officers.

13



**OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT HEADQUARTER HOSPITAL  
LANDIKOTAL.**

No. 01 /DHQH-LKL


Dated. 02/01/2023

\*\*\*\*\*

**Caution:**

Reference to the inquiry committee report submitted to this office on 28-12-2022 regarding an inquiry that was conducted on 13-12-2022 alleging you in charging patients in OPD hours, you are hereby officially warned to refrain from such activities in future and be more cautious as this not only brings bad name to the institution but also to this noble profession.

In future, the competent authority will be requested to initiate disciplinary action against you with recommendation of relieving from this institution.

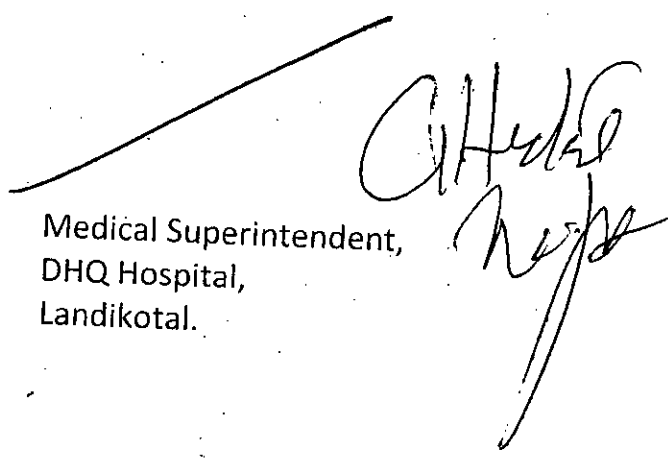
  
Medical Superintendent,  
DHQ Hospital,  
Landikotal.

No. \_\_\_\_\_ /DHQH-LKL

Dated. \_\_\_\_ / \_\_\_\_ /2023

**C/C:**

1. PS to Secretary Health, Peshawar.
2. PS to DGHS, Peshawar.
3. Officer Concerned.
4. Office record.

  
Medical Superintendent,  
DHQ Hospital,  
Landikotal.

14



OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT H.Q. HOSPITAL LANDIKOTAL.  
Phone/Fax No. 0924-210901 Email mskhyber5@gmail.com  
No. 139 /DHQH-LKL Dated 09/01/2023.

\*\*\*\*\*

Dr. Bakhtyar Alam,  
District Surgeon.

*af*

**Subject: - Explanation**

It has come to the notice of the undersigned that you were served a caution letter as a result of an inquiry proceedings against you. The letter was officially dispatched and was brought to you by Mr. Arshad (class IV) with official dak book on 09-01-2023.

You not only refused to receive the letter but also torn the official letter at his face. This attitude is not only unbecoming of a government servant but also bringing a bad name to this noble profession.

You are hereby directed to explain your position in 48 hours positively that why strict disciplinary action shall not be taken against you.

*9*  
*[Signature]*

Medical Superintendent,  
District Headquarter Hospital,  
Landikotal.

Dated: \_\_\_/\_\_\_/2023

NO. \_\_\_\_\_/DHQH-LKL

C/C

- 1-PS to Secretary Health Khyber Pakhtunkhwa, Peshawar.
- 2-PS to Direct General Health Services KPK, Peshawar.
- 3-Deputy Commissioner Khyber

*[Signature]*

Medical Superintendent,  
District Headquarter Hospital,  
Landikotal.

15

17



**OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT HEADQUARTER HOSPITAL  
LANDIKOTAL.**

No. \_\_\_\_\_ / DHQH-LKL

Dated. \_\_\_/\_\_\_/2023

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act

**Caution:**

Reference to the inquiry committee report submitted to this office on 28-12-2022 regarding an inquiry that was conducted on 13-12-2022 alleging you in charging patients in OPD hours, you are hereby officially warned to refrain from such activities in future and be more cautious as this not only brings bad name to the institution but also to this noble profession.

In future, the competent authority will be requested to initiate disciplinary action against you with recommendation of relieving from this institution.

*Attested  
my*



16



**OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT HEADQUARTER HOSPITAL  
LANDIKOTAL.**

No. 341 /DHQ-LKL

Dated. 17/01/2023

\*\*\*\*\*

Secretary to Govt. of Khyber Pakhtunkhwa

Health Department, Peshawar.

21

**Subject: Reporting of District Surgeon Dr. Bakhtyar Alam (BS-18) working in DHQ Hospital, Landikotal District Khyber.**

It's a matter of grave concern that Dr. Bakhtyar Alam (BS-18) who is deputed as district surgeon in the said hospital is least interested in his official duties. He has been allotted official residence inside the hospital premises but despite all the facilitation from administration, his performance is continuously disappointing. He miserably failed to fulfill his professional duties but also as an in charge of the surgical unit, though he was reprimanded about it multiple times by the administration. He has not conducted a single evening or night round or attended an emergency patient when needed. Due to lack of interest on his part, his sub ordinate Medical Officers were usually absent in ER and he failed to provide substitute putting human lives in danger, leading the administration to take over surgical unit roster. His managerial ability as an in charge of surgical unit is also below par as his staff (MOs and Class-IV) remained absent from OPD and ward duties halting service delivery. He did not report a single absentee of his sub ordinates to the administration in time.

His performance on the basis of general anesthesia/major cases has also been a complete disappointment. The said district surgeon owns a private hospital near the DHQ and is involved in diverting the poor patients to his private hospital and prefer to perform surgeries there, and was reported to the administration on more than one occasion in the form of patient complaints.

He has been involved in all the illegal activities like strike, instigating staff against the administration and healthcare facility, and failing to comply to the administration policies in service delivery to the masses. He is on the front line of every action that compromises the institution name and trust which the government is trying very hard to improve. His overall behavior, attitude and going about his business of patient care is totally un-ethical, non-professional and unbecoming of a government servant. Recently when he received a warning

*[Handwritten signature]*

17

9

19/01/23

Medical Superintendent. Ms.  
DHQ Hospital LK.

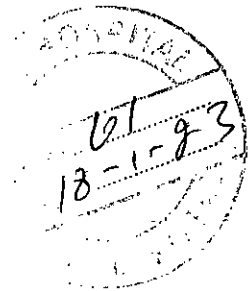
Subject: Casual leave on 21/01/23.

Dear Ms., in some commitments at postance  
on 21/01/23 - I may not come to hospital on  
the said date. Time: 9:00 A.

Regards!  
Bhawan

*[Handwritten signature]*

Dr. Bakhtiar Alam  
DHQ hospital LK.



*[Handwritten signature]*

18

23rd Jan 2023.

Medical Superintendent (MS)  
DHO Hospital, Landikotal.

Subject: One day casual leave on 25th Jan 2023.

Dear MS, I've an urgent piece of work  
at peshawar on the said date.

I'll not be available, my team will  
work according to the ROTA.

*[Handwritten signature]*



Regards!

BACU

Dr. Bakhtai Akbar

Surgical Specialist

DHO H. LK.

*[Handwritten signature]*

19

To

The ms,  
DHO Lal

Subject:- 2 days leave

*Allowed*  
*By*

Sir,

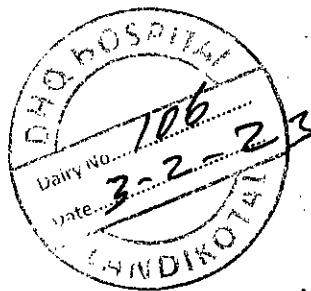
With great regret it is stated that

I have an urgent work at home.

Kindly grant me leave for two days

on 3 and 4th February.

Dated 3/2/23.



Yours obedient,  
Dr. Bakhtin Alam,

District Surgeon,  
DHO Lal.

*EST*  
*Allowed*

*Buel*

*4/2/23*

26

23rd Feb, 2023.

Medical Superintendent,  
DHO, Hospital, LKI.

Subject: Two days leave on Friday & Saturday.

Dear MS, I've got a medical issue for which  
I'll visit my doctor.

I'll not be available on 24 & 25 Feb 2023.

Surgical unit with work in a aided

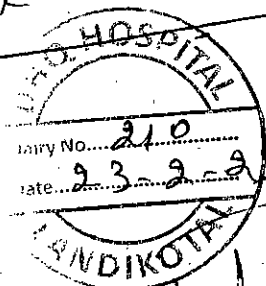
Regards!

B.A.C.V.

Dr. Bakhtai Ali

Surgical Specialist

DHO, LKI



Attested by

\_\_\_\_\_  
over etc

\_\_\_\_\_  
otherwise

\_\_\_\_\_  
Regmt of

Sin 3, 14 Feb 2023  
② c/d

21

To the MS DHA  
Hospital W/L

Subject: Casual leave for one day

Sir, It is stated that, Today the  
road was blocked, I can't reach  
to my duty, so I request you  
kindly grant me casual leave  
for one day.

Thanks

Dated 03-03-23

Dr. Bahadur Alam  
Surgical specialist  
DHA W/L



Attest  
[Signature]

[Signature]  
[Signature]

22

The Medical Superintendent,  
D. H. Q. Hospital,  
Landikotal.

SUBJECT:- Two days sick leave.

Albert  
M/R

Sir, It is stated I have fallen ill due to  
which I will not be able to attend duties for  
two days i.e. Friday and Saturday.

I shall be very thankful to you if  
you grant me leave for 2 days.

Thanking you,

March 10, 2023

294  
10-3-23

Sincerely yours,

Dr. Bakhtyar Afzal  
District Specialist,  
Surgery, D.H.Q.

heles ell  
1-day 3-3-2023

23

To

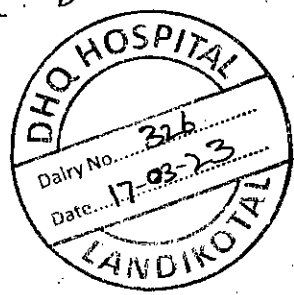
The Medical Superintendent,  
DHO Landikotal

Subject: Application for casual leave. *Wjm*

Sir,

It is stated - that I have  
an urgent piece of work, due  
to which I cannot come to  
duty today, kindly grant me leave  
today, as shall be really thankful to  
you

Dated 17 March 23.



Yours sincerely,  
Dr. Balchitra

*[Signature]*

*Receipt of  
Deduction etc  
w/ Release*



Attended  
myr

24

To, The MS DHO  
Hospital UCC

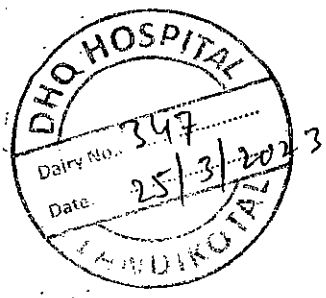
Subject: Casual leave for one day.

It is stated that, I have an urgent piece of work at Peshawar and I am unable to perform my duty, so I request you grant me casual leave for one day.

Thanks

Signed:  
25-03-23

Dr. Baluchian Alam  
Surgical Specialist  
DHO Hospital UCC



Approved  
\_\_\_\_\_

25

9:10 AM

Medical Superintendent,  
DHO - Hospital,  
Landikotal Khyber

Subj. leave urgent piece of work (casual leave)

Sir,  
Respectfully It is stated that due to an urgent piece of work I am unable to attend my today's OPD duty. It therefore Requested to grant me one day leave

Thanks

Dr. Bakhtyar Alam,  
Incharge Surgical  
DHO Hospital



Handwritten signature of Dr. Bakhtyar Alam

Date. 31/03/2023

Handwritten signature and initials (e/c) at the bottom right of the page.

NT

28

The medical superintendent  
DHA Hospital Landirotap  
District Muzaffargarh.

Subject: Application for one day leave.

Respected sir:  
It is stated that I Dr. Barkhane Alam  
was working as District surgeon at DHA Hospital  
Landirotap.

I have an urgent piece of work  
today at Peshawar so I will be unable to  
come to hospital today, so accept my  
one day leave application for today.

Check  
Casual leave

mf  
Thanks

Dated: 14-4-2023

Altaf  
Muz

Dr. Barkhane Alam  
District surgeon  
DHA Hospital Landirotap.

To

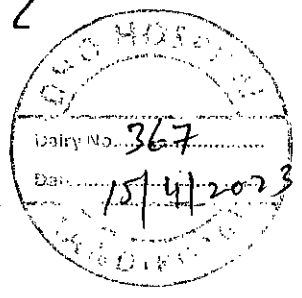
The MS  
DHO Hospital  
Indiatal

Subject: Application for one day  
leave on 15/4/2023

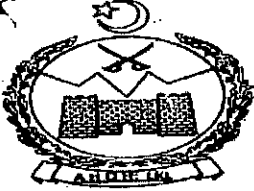
Respected Sir,  
It is stated that I  
have an urgent piece of work  
and I want  
one day away for that

Regretted, I have to  
leave for one day.  
Kindly grant

Yours sincerely,  
Dr. Bichyan Alam  
District Specialist (Surgeon)  
Date 15/4/2023



24



OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT HEADQUARTER HOSPITAL  
LANDIKOTAL KHYBER.

Email: [mshkyber5@gmail.com](mailto:mshkyber5@gmail.com)

Phone No. 0924-210211

No 1642/DHQH/LKL

Dated, 15 / 04 / 2023

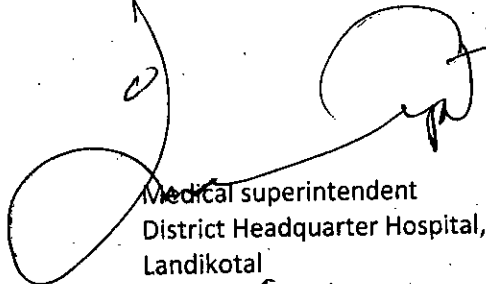
To,

Dr. Bakhtiar District Specialist

**Subject: - Warning Letter**

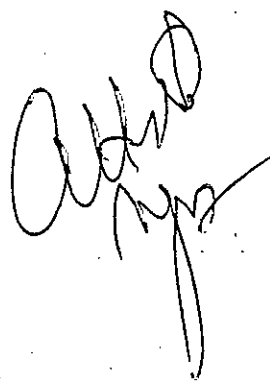
As you have availed all of your casual leaves in April 2023 therefore you are warned that no more casual leaves are allowed and after this your applications will be regretted and disciplinary action will be initiated against you.

No \_\_\_\_\_/DHQH/LKL

  
Medical superintendent  
District Headquarter Hospital,  
Landikotal  
Dated. 15 / 04 / 2022.

C/C:

1. PS to Director General Health Services, KPK, Peshawar.
2. PS to Secretary Health Khyber Pakhtunkhwa Peshawar.
3. Deputy Commissioner Khyber.
4. Personal file



Medical superintendent  
District Headquarter Hospital,  
Landikotal.

(24)

To, The MS DHO  
Hospital UCC

Subject : Casual leave for one day

It is stated that, I have an  
urgent piece of work at Peshawar  
I am unable to perform my  
duty, so I request you kindly  
grant me casual leave for one day

Thanks

Dated  
20-04-23

Dr. Bahadur Alam  
Surgical Specialist  
DHO UCC

Alam  
ms

Rasool

26/4/23

30



GOVERNMENT OF KHYBER PAKHTUNKHWA  
OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT HQ HOSPITAL LANDIKOTAL

No. 1763 /DHQH/ LKL

Dated 27/7 /2023

To

Dr. Bakhtiar Alam (General Surgeon)

Subject:

Explanation

It has been observed that you failed to register your exit via Biometric system throughout the Holy month of Ramadan. This act of yours is highly unprofessional as you are an Incharge of General Surgery Department.

You are hereby directed to explain your position within 48 hours that why strict disciplinary action shall not be taken against you.

Medical Superintendent,  
District Headquarter Hospital,  
Landikotal.

Dated: 27/7 /2023.

No. 1764-66 /DHQH/ LKL

C/C:-

- 1) PA to Director General Health Services Khyber Pakhtunkhwa
- 2) PS to Secretary Health, Khyber Pakhtunkhwa
- 3) Office Record

Medical Superintendent  
District Headquarter Hospital,  
Landikotal

39

OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT HEADQUARTER HOSPITAL  
LANDIKOTAL.

No. 1929 /DHQH: LKL

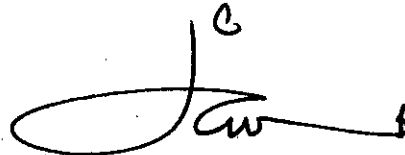
Dated 08/05/2023

Dr. Bakhtyar Alam  
District Surgeon

**Subject: - WARNING**

On verbal complaint of patient, the undersigned visited your OPD at 10:20 am today on 08-05-2023. You along with your staff were found absent. Your absence caused inconvenience and hindrance in patients seeking medical care from far flung areas. This act of yours shows extreme negligence on your part as being an incharge of surgical unit you failed to fulfil your responsibilities.

It is also pertinent to mention that you have sought relief from salary deduction in a writ petition submitted in service tribunal. You are hereby directed for the last time not to leave the OPD without prior permission. In future, your case will be forwarded to health department to initiate disciplinary action against you.



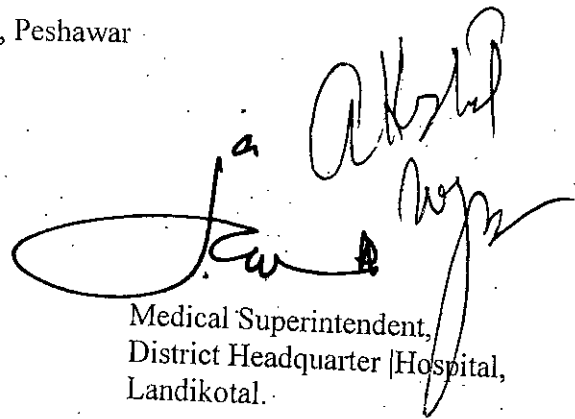
Medical Superintendent,  
District Headquarter Hospital,  
Landikotal.

Dated: 8/5/2023

No. 1930-33 DHQH-LKL

C/c:-

1. PS to Secretary Health Khyber Pakhtunkhwa, Peshawar
2. PA to DGHS, Peshawar
3. Registrar Service Tribunal, Peshawar
4. Personal File



Medical Superintendent,  
District Headquarter Hospital,  
Landikotal.



(32)

The medical superintendent  
Dera Hospital Landi Kot  
District Muzir.

Subject's Application for 1 day leave

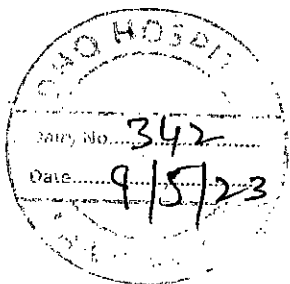
Respected Sir, it is stated in your kind  
honour that I Dr. Bahthia Alam working  
as District Surgeon at Dera Hospital Landi Kot.  
I have an urgent piece of work at Peshawar  
therefore I will not be able to come today  
so grant me with one day leave for today.

Thanks.

Dated: 9-5-2023.

Dr. Bahthia Alam.  
District Surgeon  
Dera Hospital  
Landi Kot.

*Dr. Bahthia Alam*



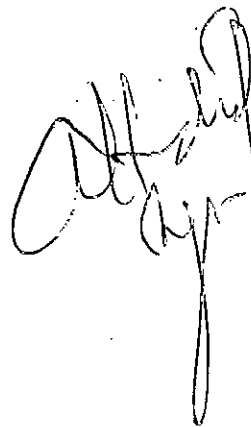
(33)

The medical Superintendent  
Dhce Hospital Ludhiana  
District Jalandhar

Subject: Application for one day leave

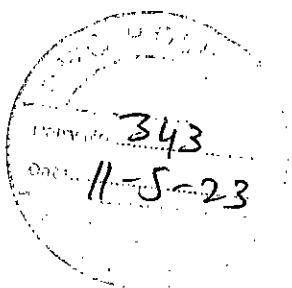
Respected Sir, it is stated in your kind  
honour that I have an urgent piece  
of work to do at Poshawan, therefore  
I will not be able to come today for  
duty, kindly accept my application  
for one day today's leave.

Thanks.



Dated 11-5-2023.

Dr. Basant Singh Alam  
District Surgeon  
Dhce Hospital  
Ludhiana



Dr.  
32

(27)

The Medical Superintendent  
DHO Hospital LRL  
District Peshawar.

Subject:- Application for one day leave

Respected Sir, it is stated in your kind letter that I have an urgent piece of work today at Peshawar, therefore I will be unable to come today. Kindly accept my application for today's one day leave.

Thanks,  
*[Signature]*

*[Signature]*  
Dr. Bahadar Alam  
District Surgeon  
DHO Hospital LRL

Dated: 16-5-2023

358  
16/5/2023

*[Signature]*  
Wahid Karim  
DHO - Boda

35

To, The MS DHQ Hospital Uel

Subject Casual leave for one day  
As stated that, I have an urgent  
piece of work at Peshawar  
I am unable to perform my  
duties, so I request you kindly  
grant me casual leave for one  
day.

Thanks  
Bhim Singh

Dr. Balantyar Alam  
Surgical specialist  
DHQ Hospital Uel

360  
17-5-23

Dated

17-05-23

Dr. Balantyar Alam

17/5/23

(36)


To, The MS DHO  
Hospital Uae

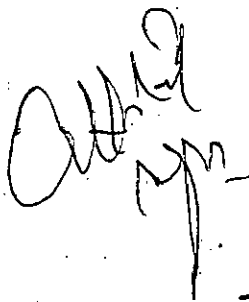
Subject: Sick leave for one day

Sir,  
it is stated that, I am  
not well and unable to perform  
my duty, so I request you  
kindly grant me leave for  
one day.

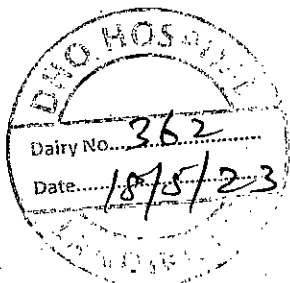
Yours  
truly

dated:  
18-05-23

  
Dr. Bahattiar Alam  
Surgical specialist  
DHO Hospital Uae



Dr. Bahattiar Alam





OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT HEADQUARTER HOSPITAL  
LANDIKOTAL.

No. 2070 /DHQH: LKL

Dated. 20/9 /2022

To,

Dr. Bakhtyar Alam District Specialist (Surgery)  
DHQ Hospital Landikotal.

Subject: -

LETTER OF DISPLEASURE

You were found absent from duty place during undersign surprise visit to Operation theater without application and prior permission of the competent authority.

The undersign has a serious concern and feels very displeasure regarding your non-serious attitude towards your duty as you are holding a very responsible post in the hospital.

Medical Superintendent,  
District Headquarter Hospital,  
Landikotal.

Date: \_\_\_/\_\_\_/2022

No. \_\_\_\_\_ /DHQH:PF/LKL

C/C: -

1. PS to Secretary Health Khyber Pakhtunkhwa, Peshawar.
2. PS to Direct General Health Services KPK, Peshawar.
3. Deputy Commissioner Khyber

Medical Superintendent,  
District Headquarter Hospital,  
Landikotal.



OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT HEADQUARTER HOSPITAL  
LANDIKOTAL.

No. 2223 /DHQH: LKL

Dated. 24/9 /2022

(7)

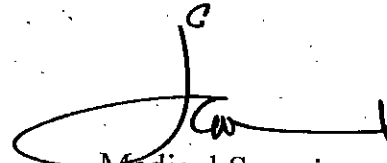
Dr. Bakhtyar Alam  
District Surgical Specialist

38

**Subject: - EXPLANATION**

During morning round of the undersign on 24-09-2022, you were found absent at your duty place. Your absence caused inconvenience and hindrance in patient care. You also failed to provide a substitute or inform the administration beforehand via application.

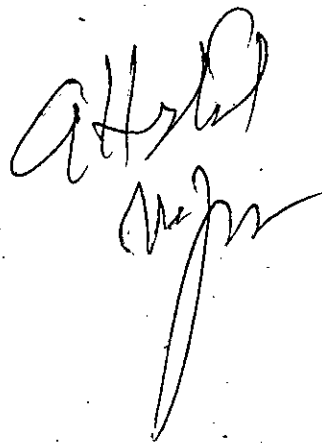
You are hereby directed to explain your position within 48 hours that why strict disciplinary action should not be initiated against you.

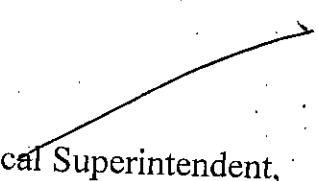
  
Medical Superintendent,  
District Headquarter Hospital,  
Landikotal.  
Dated:    /    /2022

No.        /DHQH:PF-LKL

C/C: -

1. PS to Secretary Health Khyber Pakhtunkhwa, Peshawar
2. PS to Direct General Health Services KPK, Peshawar
3. Personal file



  
Medical Superintendent,  
District Headquarter Hospital,  
Landikotal.



**OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT HEADQUARTER HOSPITAL  
LANDIKOTAL.**

No. 2775 /DHQH: LKL

Dated. 27/9 /2022

(8)

Dr. Bakhtyar Alam  
District Surgical Specialist

39

**Subject: - EXPLANATION**

During morning round of the undersign on 26-09-2022, you were found absent at your duty place. Your absence caused inconvenience and hindrance in patient care. You also failed to provide a substitute or inform the administration beforehand via application.

You are hereby directed to explain your position within 48 hours that why strict disciplinary action should not be initiated against you.

Medical Superintendent,  
District Headquarter Hospital,  
Landikotal.

No. \_\_\_\_\_ /DHQH:PF-LKL

C/C: -

1. PS to Secretary Health Khyber Pakhtunkhwa, Peshawar
2. PS to Direct General Health Services KPK, Peshawar
3. Personal file

Dated: \_\_\_ / \_\_\_ /2022

Medical Superintendent,  
District Headquarter Hospital,  
Landikotal.



(ANNEX - I)

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GOVT. OF KHYBER PAKHTUNKHWA  
OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT HQ HOSPITAL LANDIKOTAL.

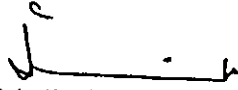
Ph.No.0924210901 Email No.mskhyber5@gmail.com  
No. 931 Dated 11/8/2022

CIRCULAR

As discussed in meeting between Director General Health Services and undersign on dated 25<sup>th</sup> July 2022 bio-metric system has been installed in the hospital to regularized/digitalized the staff attendance and absentees.

Therefore, all the employees of DHQ Hospital Landikotal is directed to submit their bio-data for service card (bio-metric) and personally visit to the administration office for bio-metric face verification till 20/08/2022.

Absentee of the staff marked by bio-metric system after the due date will be considered absent and pay deduction will be made accordingly.

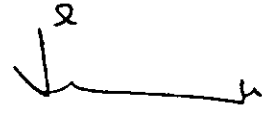
  
Medical Superintendent,  
District Headquarter Hospital,  
Landikotal

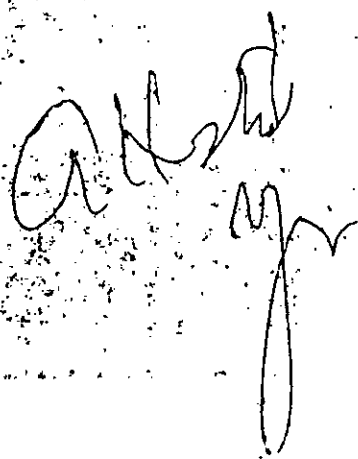
Dated. 11/8/2022.

No. 930-341

Copy forwarded to:

1. Director General Health Services, Peshawar
2. District Monitoring Officer IMO at Jamrud
3. Account Section Khyber for information
4. Ps to DC Khyber at Peshawar.
5. DMS Admin DHQ Hospital Landikotal.

  
Medical Superintendent,  
District Headquarter Hospital,  
Landikotal



Wakalat nama

6/6  
47

**In the KP Service Tribunal , Peshawar**

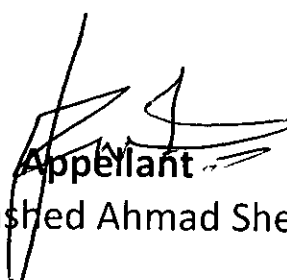
Service Appeal No 266/2023

Dr Bakhtiar Alam ..... **Appellant**

**VS**

Secretary health and two others..... **Respondents**

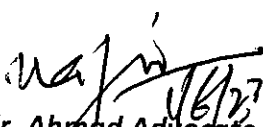
I Dr. Jamshed Ahmad Sherani Ms District Head Quarter Hospital Landi Kotal , do hereby appoint **Mr. Nazir Ahmad Advocate, High Court at Peshawar** as my Counsel in subject proceedings and authorize him to appear, plead, compromise, withdraw or refer the matter for arbitration for me without any liability for his default and with the authority to engage/appoint any other advocate/counsel at my expense if necessary and receive all sums and amounts payable to me and to all such acts which he may deem necessary for protecting my interests in the matter. He is authorized to file Appeal, Revision, Review and Application for restoration or Application for setting-aside ex-parte decree proceedings on my behalf.

  
**Appellant**

Dr Jamshed Ahmad Sherani

**Dated: 1.6.2023**

**Accepted and Attested**

  
**Nazir. Ahmad Advocate**  
**High Court**  
**Cell: 0301-8571879**  
**: 0332-8540783**  
**bc-18-7897**  
**CNIC 17301-1585525-9**