


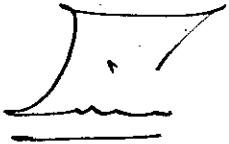
13.02.2023

Junior of learned counsel for the appellant present.
Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Supreme Court of Pakistan. Adjourned. To come up for arguments on 24.03.2023 before the D.B.

SCANNED
PESHAWAR


(Fareeha Paul)
Member (E)


(Salah-ud-Din)
Member (J)

24.03.2023

Junior to counsel for the appellant present. Mr. Fazal Shah Mohmand, Addl. A.G for the respondents present.

The Worthy Chairman is on leave today, the bench is, therefore incomplete. To come up for arguments on 1.06.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED
PESHAWAR


(FAREEHA PAUL)
Member (E)


07.11.2022


Appellant present in person.

Asif Masood Ali Shah learned Additional Advocate General for the respondents present.

Former requested for adjournment on the ground that his learned counsel is busy before hon'ble Peshawar High Court Peshawar. Adjourned. To come up for arguments on 03.01.2023 before D.B.

SCANNED
KPST
Peshawar


(Fareeha Paul)
Member (E)

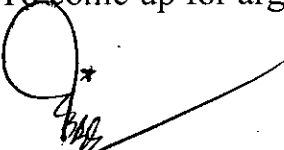

(Rozina Rehman)
Member (J)


03.01.2023

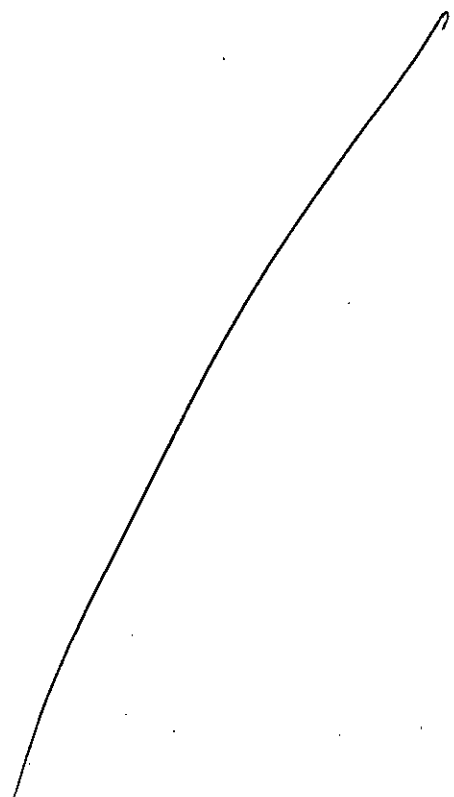
Appellant alongwith his counsel present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Due to paucity of time arguments could not be heard. Adjourned. To come up for arguments on 12.02.2023 before the D.B.

SCANNED
KPST
Peshawar


(Mian Muhammad)
Member (E)


(Salah-Ud-Din)
Member (J)



29.03.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

Written reply/comments have already been submitted by respondent No. 1 to 3 whereas notices also issued to respondent NO.4 (Medical Director, Hayatabad Medical Complex Peshawar) and last opportunity granted as reflected in order sheet dated 27.01.2022. Today neither representative of respondent No.4 appeared nor reply/comments submitted. As such the right of defense in respect of respondent No.4 stands struck off. To come up for rejoinder/arguments on 10.06.2022 before D.B.


(MIAN MUHAMMAD)
MEMBER(E)


10.6.2022 Bench is incomplete. Therefore the case is adjourned to 30.8.2022 before the same.


READER

30.08.2022

Appellant in person present. Mr. Naseer Ud Din Shah, Assistant Advocate General for the respondents present.

Learned Member (Judicial) Mrs. Rozina Rehman is on leave, therefore, arguments could not be heard. Adjourned. To come up for arguments on 07.11.2022 before the D.B.


(Salah-Ud-Din)
Member(J)

06.12.2021

Appellant in person present. Mr. Kabirullah Khattak, Addl: AG
for respondents present.

Written reply on behalf of respondents No. 1 to 3 have already
been submitted through office. Notice be issued to respondents
No.4 for submission of written reply/comments. To come up for
written reply/comments of respondent No.4 on 27.01.2022 before
S.B.


(MIAN MUHAMMAD)
MEMBER (E)

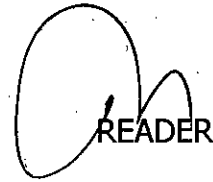
27.01.2022

Appellant in person present. Mr. Kabirullah Khattak,
learned Addl. AG alongwith Mr. Jaffar Ali, Assistant on
behalf of respondents No. 1 to 3 present. None present
on behalf of respondent No. 4, therefore, notice be issued
to respondent No. 4 for submission of reply/comments.
Last opportunity is granted. To come up for
reply/comments before the S.B on 29.03.222.


(Atiq-Ur-Rehman Wazir)
Member (E)

07.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 15.07.2021 for the same as before.


READER

15.07.2021

Appellant in person and Jaffar Ali, Assistant for respondents No. 2 & 3 alongwith Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Respondents have not submitted written reply/comments. Learned AAG is directed to contact them for submission of written reply/comments in office within 10 days, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 06.12.2021 before the D.B.

Stipulated period has passed and reply has not been submitted


Chairman

P.S

28.07.2021

Learned Addl. A.G be reminded about the omission and for submission of Reply/comments within extended time of 10 days.


Chairman



27.11.2020

Appellant in person and Mr. Nasir Mahmood, Advocate, are present.

The gist of what has been agitated at the bar by the learned counsel representing appellant is that relief has been sought to set at naught the impugned notification no. SOH(E-V)2-2/2020 dated 21.09.2020 passed by respondent No. 2 against which appeal regarding actualization of promotion to BPS-19 with effect from 13.05.2016 from the date of promotion to BPS-19 with all consequential back benefits was regretted/filed.

The points so agitated at the bar need consideration. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 22.02.2021 before S.B.

Appellant Deposited
Security & Process Fee
27/11/20

(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

22.02.2021

Junior to senior counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents is also present.

Neither written reply on behalf of respondents submitted nor representative of the department is present, therefore, learned Additional Advocate General is directed to contact the respondents and furnish written reply/comments on the next date of hearing. Adjourned to 07.04.2021 on which date file to come up for written reply/comments before S.B.

SCANNED
KPST
Peshawar


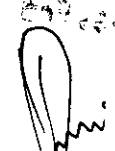
(Muhammad Jamal Khan)
Member

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 12100 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/10/2020 SCANNED FOR ST WAR	<p>The appeal of Dr. Abdullah presented today by Mr. Nasir Mahmood Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR - 15/10/2020</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>27/11/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

IN RE; Service Appeal NO. 12/00/2020

Dr. Abdullah.....Appellant

Versus

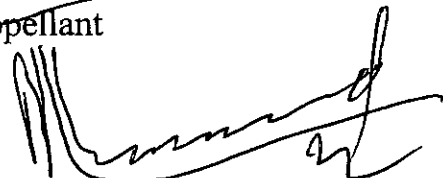
Govt. of KPK and others.....Respondents

INDEX

S.NO	Description of Documents	Annexure	Pages
1.	Appeal with affidavit		1-7
2.	Letter dated 07.05.2016	A	8
3.	Order dated 13.05.2016	B	9-16
4.	Letter dated 29.11.2017	C	17
5.	Copies of the Orders	D	18-20
6.	Letter dated 08.03.2018	E	21
7.	Letter dated 10.05.2018	F	22
8.	Notification dated 30.11.2018	G	23
9.	Letter dated 10.12.2018	H	24
10.	Notification dated 13.05.2019 & Pay Slip	I	25
11.	Pay Slip	J	26
12.	Departmental Appeal dated 09.03.2020	K	27
13.	Order DT.21.04.2020 in W.P NO.2047/2020	L	28-32
14.	Application for Retirement dt.19.09.2020	M	33
15.	Impugned Order dt. 21.09.2020	O	34
16.	Seniority List	P	35-41
17.	Orders	Q	42-43
18.	Letter dated 10.09.2020	R	44
19.	Copy of the Budget Book	S	45-46
20.	Wakalat Nama		47


Appellant

Through


Nasir Mahmood Advocate,
Supreme Court of Pakistan
6th Floor, Off. No.622, Pak
Medical Centre Peshawar.
Mob No.0333-9176275

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

IN RE; Service Appeal NO.....\2020

Dr. Abdullah S/O Luqman Shah Ex-(PMO\SMO) Hayatabad Medical Complex Peshawar.....Appellant

Versus

1. Govt. of KPK through Chief Secretary KPK Civil Secretariat Peshawar.
2. Secretary Health Govt. of KPK Attached Department Complex, Khyber Road Peshawar.
3. Director General Health Services, Khyber Road Peshawar.
4. Medical Director, Hayatabad Medical Complex Peshawar.....Respondents

Service Appeal U\Section 4 of the KPK Service Tribunal Act, 1974 against the Notification No.SOH(E-V)2-2\2020 dated 21-09-2020 passed by the respondent NO.2 whereby appellant appeal regarding actualization of promotion to BPS-19 w. e. f 13.05.2016. i.e from the date of promotion to BPS-19 with all back benefits was filed\regretted hence the instant appeal.

Prayer in Appeal; on acceptance of the instant appeal set-aside Notification No.SOH(E-V)2-2\2020 dated 21-09-2020 passed by the respondent NO.2 whereby appellant appeal regarding actualization of promotion to BPS-19 w. e. f 13.05.2016. i.e from the date of promotion to BPS-19 with all back benefits was filed\regretted.

Respectfully Sheweth;

1. That the appellant as per recommendations of KPK Public Service Commission Peshawar was appointed as Medical Officer BPS-17 on adhoc basis vide notification No. SO(H) IV /1-5/72, dated 02/8/1987 and posted at BHU Suma Karagah district Abbot Abad. Later on his services were regularized on 06.12.1987.
2. That since then the appellant was performing his duty to the best of his ability and with dedication and perhaps earned good reputation in short span of time. He did his job with zeal and zest and left no stone unturned in discharge of his duties.

3. That it was due to good performance of the appellant that he was promoted to the post of Senior Medical Officer (SMO) PBS-18 on 21.09.1998 and post at Lady Reading Hospital Peshawar. Afterwards the appellant services were transferred to Hayatabad Medical Peshawar in the year 1999.
4. That while serving in Hayatabad Medical Complex Peshawar the appellant selflessly served the patients and it was due to this reason that when promotion case of the appellant to PBS-19 as Principal Medical Officer was going to be put before the promotion Board then respondent no.4 through letter dated 07.05.2016 requested respondent no.2 for retention of the appellant as Principal Medical Officer BPS-19 against vacant post. Copy of the letter is attached as annexure-A.
5. That vide notification dated 13.05.2016 on the recommendations of the Provincial Selection Board appellant was promoted to PBS-19 and posted \ transferred to DHQ Hospital Charsadda as Principal Medical Officer but since respondent no.4 has not relived the appellant therefore he was unable to join his new place of posting. (Copy of the order dated 13.05.2016 is attached as annexure-B).
6. That Incharge Department of Gastroenterology KGMC, HMC, Peshawar has also requested the Chairman BOG MTI/HMC, Peshawar through letter dated 29.11.2017 for adjustment of appellant in HMC due to appellant being experienced Gastroenterologist and work load of patients on the Hospital. Copy of the letter is attached as annexure-C.
7. That malafidies of respondent no.2 towards appellant is clear from the fact that in the year 2017-2018 he has retained \ adjusted so many Doctors in HMC against the vacant posts but the same benefit was not extended to the appellant which is absolutely illegal act on behalf of respondent no.2 and sheer discrimination. Copy of the orders is attached as annexure-D.
8. That in the year 2018 when promotion case of the appellant to PBS-19 as Principal Medical Officer was going to be put again before the promotion Board then respondent no.4 again through letter dated 08.03.2018 requested respondent no.2 for retention of the appellant as Principal Medical Officer BPS-19 against vacant post. It may be noted here that Chief Minister KPK has also issued directive through letter dated 10.05.2018 for retention of the appellant against the vacant post of PMO BPS-19 in the Gastroenterology Unit of HMC. Copies of the letter dated 08.03.2018 and 10.05.2018 are attached herewith as annexure E&F respectively.
9. That on recommendations of the Provincial Selection Board appellant was promoted to BPS-19 as Principal Medical Officer but respondent n.2 again ignoring the NOC of the respondent no.4 and directive of the Chief Executive of the Province and posted \ transferred appellant to DHQ Hospital Charsadda vide notification dated 30.11.2018. Copy of the notification is attached as annexure- G.

10. That Incharge Department of Gastroenterology KGMC, HMC, Peshawar this time requested the respondent no.2 through letter dated 10.12.2018 for adjustment of appellant in HMC due to appellant being experienced Gastroenterologist and work load of patients on the Hospital. Copy of the letter is attached as annexure-H.
11. That even after transfer \ adjustment order of the appellant in DHQ Hospital Charsadda through order dated 30.11.2018 respondent no.2 through order dated 13.05.2019 transferred one Dr.Mukhlis Raza SMO HMC to DHQ Hospital Malakand as PMO but afterwards retained his services as PMO HMC. Copy of the order and Pay Slip is attached as annexure-I&J respectively.
12. That in the light of above scenario the appellant submitted departmental appeal dated 09.03.2020 to respondent no.2 for actualization of appellant promotion which was pending undecided and thus the appellant was constrained to file writ petition no.2047\2020 whereby the Hon'ble High Court directed respondent no.2 on 21.04.2020 to decide appeal of the appellant within 30 days. It may be noted here that on 28.09.2020 appellant moved application to respondent no.4 for retirement on reaching the age of superannuation for forwarding the same through proper channel because the appellant on 01.04.2020 attained the age of sixty years. Copy of the departmental appeal, order in writ petition and application for retirement is attached as annexure-K, L and M respectively.
- 13 That respondent no.2 vide order dated 21.09.2020 filed \ regretted the appeal of appellant (Annex-O) hence the appellant being seriously aggrieved wherefrom assails the same before this honorable tribunal inter alia on the following grounds;

Grounds

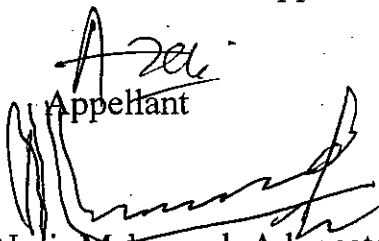
- A. That the respondents have not treated the Appellant in accordance with law and rules on the subject and acted in violation of article-4 and 25 of the constitution of Islamic republic of Pakistan, 1973 and unlawfully not retained the services of the appellant which is unjust, unfair hence not sustainable in the eye of law although others doctors were extended the same benefits.
- B. That in the seniority issued by respondents the appellant was shown as Principal Medical Officer BPS-19 and even he was treated as such by respondent no.4 but again actualization of promotion of the appellant has not been done for the reasons best known to the respondents. Copy of the seniority list and orders are attached as annexure-P&Q respectively.
- C. That respondent no.4 has also requested to respondent no.2 for actualization of promotion of the appellant through letter dated 10.09.2020 due to the reason that the Gastroenterology department was in dire need of the appellant services therefore he was not allowed to join his place of posting i.e DHQ Hospital Charsadda. Copy of the letter is attached as annexure-R.

- D. That issuance of LPC by the relieving department is very much necessary for joining new place of posting but since the appellant was not relieved by HMC therefore he cannot be punished for no fault of his own.
- E. That it is admitted fact that there was vacant post of PMO in HMC thus the respondent cannot take the plea that there was no vacant post. Copy of the Budget Book is attached as annexure-S.
- F. That under service laws if a civil servant on promotion cannot join promoted post then in such a situation he will not be entitled to the allowances i.e T.A etc.
- G. That the impugned Notification passed by the respondent is highly illegal, malafide, arbitrary, discriminatory, and whimsical untenable, without jurisdiction and without lawful authority and is thus liable to set-aside.
- H. That the fundamental rights of the appellant have been badly violated because he has been punished for no faults of his own thus the impugned order is liable to set aside.
- I. That the appellant seeks leave of this honorable tribunal to argue additional grounds at the time of final hearing of this appeal.

It is therefore respectfully prayed that on accept of this appeal prayer sought in the heading of the appeal may be allowed in favor of the appellant.

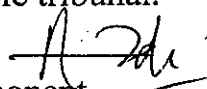
Any other remedy not specifically asked for but appropriate in the circumstances of the case may also be awarded to the appellant.

Through

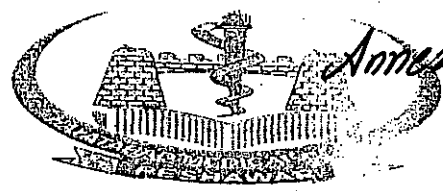

Appellant
Nasir Mahmood Advocate,
Supreme Court of Pakistan
6th Floor, Off. No.622, Pak
Medical Centre Peshawar.
Mob No.0333-9176275

Affidavit

I, do hereby declare, and affirm on oath that the contents of the appeal are true and correct to the best my knowledge and belief and nothing has been concealed from this hon'ble tribunal.


Deponent

HAYATABAD MEDICAL COMPLEX PESHAWAR



Ammed = A
1/18

11231
20/5/16

NO. 8115 /HMC/GENERAL/E.I
To, The Secretary to Government
Health department
Khyber Pakhtunkhwa,
Peshawar.

DATED 07/5 2016

Subject: REQUEST FOR RETENTION AS PAO BPS 19
Sir,

Enclosed please find herewith an application on subject noted above along with necessary papers in respect of Dr. Abdulla SMO BPS-18 working in MTI/HMC for kind perusal and necessary action.

It is further added that vacant post of PAO BPS-19 is available.

[Signature]
MEDICAL DIRECTOR
HAYATABAD MEDICAL COMPLEX
PESHAWAR. *[Signature]*

Recommended & forwarded

[Signature]
1/18
[Signature]

Secy health Dept P
Forwarded for
[Signature]

MEDICAL DIRECTOR
Hayatabad Medical Complex
Peshawar.

[Signature]
Shahram Khan Sarakai
Senior Minister for Health
Information Technology
Khyber Pakhtunkhwa
20/5/16

OS-HMC
General Letter



Annex B
GOVERNMENT OF KHYBER PAKHTUNKHWA

HEALTH DEPARTMENT

Dated Peshawar, the 13th May, 2016,

NOTIFICATION

SOH(E-V) 4-22/2016 On the recommendations of the Provincial Selection Board, the Chief Minister Khyber Pakhtunkhwa is pleased to promote the following doctors of the General Cadre of Health Department from BS-18 to BS-19, on regular basis with immediate effect:-

S.No.	Name of Doctor	S No	Name of Doctor
1.	Dr. Muhammad Mukhtiar	13	Dr.Gul Muhammad Khan
2.	Dr.Nizakat Begum	14	Dr.Abdul Wadood Khan
3.	Dr.Shazia Hafiz	15	Dr.Abdul Wali Khan
4.	Dr.Bushra Halimi	16	Dr.Khola Jabeen
5.	Dr.Farhat Saeed	17	Dr.Fauzia Shahzada
6.	Dr.Arshadul Islam	18	Dr.Bibi Hajira
7.	Dr.Mubarak Khan	19	Dr.Zeenat Wadood
8.	Dr.Shazia Begum	20	Dr.Nighat Yasmin
9.	Dr.Yasmin Orakzai	21.	Dr.Rashida Parveen
10	Dr.Abdullah ✓	22	Dr.Rehana Zuhra
11.	Dr.Shah Jehan	23	Dr.Muhammad Azam Khan
12	Dr.Syed Asghar Ali	24	Dr.Ikramullah Khan

Section Officer (EV)
Health Department
Khyber Pakhtunkhwa

10

25	Dr.Muhammad Sohail	42	Dr.Muhammad Salim Khan
26	Dr.Umar Nawaz Khan	43	Dr.Hafizullah
27	Dr.Muhammad Zafar Iqbal	44.	Dr.Nasrullah Khan
28	Dr.Safdar Muhammad	45	Dr.Aftab Ahmad
29	Dr.Ishfaq Jan	46	Dr.Salamatullah Khan
30	Dr.Aziz Muhammad	47	Dr.Riaz Ahmad
31	Dr.Ghulam Hussain	48	Dr.Javid S/O Gul Said
32	Dr.Sultan Aziz	49	Dr.Riaz Akbar
33	Dr.Nasir Khan	50	Dr.Azizullah Jan
34	Dr.Abdul Ghaffar	51	Dr.Ghulam Nabi
35	Dr.Shahzada	52	Dr.Murad Ali
36	Dr.Ghulam Muhammad	53	Dr.Qudrat Shah
37	Dr.Muhammad Saleem	54	Dr.Sher Zada
38	Dr.Syed Kamal Hussain	55	Dr Malik .Iqbal Javed
39	Dr.Hanifullah	56	Dr.Gul Sanat shah
40.	Dr.Shahi Dawran	57	Dr.Ahmad Gul
41.	Dr.Luqman Khan	58	Dr.Safdar Ali Khan

Section Officer (EV)
Health Department
Khyber Pakhtunkhwa

(11)

59	Dr.Kiramatullah	71	Dr.Habibur Rehman
60	Dr.Qabil Khan	72	Dr.Sadiqullah
61	Dr.Zafar Ahmad Khan	73	Dr. Wali Rehman
62	Dr.Sultan Khan	74	Dr.Tariq Khan
63	Dr.Shafiullah	75	Dr.Basharat Rehman
64	Dr.Qazi-ur-Rehman	76	Dr.Shaukat Ali
65	Dr.Muhammad Salim Khan	77	Dr.Himayatullah
66	Dr.Sajjad Muhammad		
67	Dr.Khalid Hussain		
68.	Dr.Israr Hussain		
69	Dr.Muhammad Ikram		
70	Dr.Nisar Muhammad		

2. The Officers on promotion shall remain on probation for a period of one year in terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-15(1) of Khyber Pakhtunkhwa, Civil Servant (Appointment, Promotion & Transfer) Rules, 1989.

Section Officer (EV)
Health Department
Khyber Pakhtunkhwa

3. Consequent upon above, the following postings/transfers orders are issued with immediate effect in the public interest:-

S#	Name of Doctor	FROM	TO
1	Dr. Muhammad Mukhtiar PMO (BS-19)	AHQ Hospital Landikotal Khyber Agency	DHQ Hospital Nowshera
2	Dr.Nizakat Begum PMO (BS-19)	THQ Hospital Dargai Malakand	DHQ Hospital Batkhela
3	Dr.Shazia Hafiz PMO (BS-19)	Lady Reading Hospital Peshawar	DHQ Hospital Charsadda

4	Dr. Bushra Halimi PMO (BS-19)	Khyber Teaching Hospital Peshawar	DHQ Hospital Mardan
5	Dr. Farhat Saeed PMO (BS-19)	Khalifa Gulnawaz Teaching Hospital Bannu	DHQ Hospital Bannu
6	Dr. Arshadul Islam PMO (BS-19)	THQ Hospital Topi Swabi	THQ Hospital Kalu Khan Swabi
7	Dr. Mubarak Khan PMO (BS-19)	AHQ Hospital Miranshah	DHQ Hospital Hangu
8	Dr. Shazia Begum PMO (BS-19)	Khyber Teaching Hospital Peshawar	DHQ Hospital Mardan
9	Dr. Yasmin Orakzai PMO (BS-19)	Demonstrator Khyber Medical College Peshawar	DHQ Hospital Charsadda
10	Dr. Abdullah PMO (BS-19)	Hayatabad Medical Complex, Peshawar	DHQ Hospital Charsadda
11	Dr. Shah Jehan PMO (BS-19)	MMM Teaching Hospital DIKhan	THQ Hospital Paharpur DIKhan
12	Dr. Syed Asghar Ali PMO (BS-19)	RHC Ambar Kunda Swabi	RHC Ambar Kunda Swabi
13	Dr. Gul Muhammad Khan PMO (BS-19)	DHQ Hospital DIKhan	DHQ Hospital Tank
14	Dr. Abdul Wadood Khan PMO (BS-19)	Demonstrator Bannu Medical College Bannu	DHQ Hospital Kohat
15	Dr. Abdul Wali Khan PMO (BS-19)n	RHC Putwar Peshawar	DHQ Hospital Charsadda
16	Dr. Kholi Jabeen PMO (BS-19)	Khyber Teaching Hospital Peshawar	DHQ Hospital Nowshera
17	Dr. Fauzia Shahzada PMO (BS-19)	Hayatabad Medical Complex, Peshawar	DHQ Hospital Batkhela
18	Dr. Bibi Hajira PMO (BS-19)	Civil Hospital Madyan Swat	Saidu Group of Teaching Hospital Swat
19	Dr. Zeenat Wadood PMO (BS-19)	Lady Reading Hospital Peshawar	THQ Hospital Shabqadar Charsadda
20	Dr. Nighat Yasmin PMO (BS-19)	Instructor Public Health School Abbottabad	DHQ Hospital Abbottabad

Section Officer (EV)
Health Department
Khyber Pakhtunkhwa

13

21	Dr.Rashida Parveen PMO (BS-19)	Ayub Teaching Hospital Abbottabad	DHQ Hospital Abbottabad
22	Dr.Rehana Zuhra PMO (BS-19)	THQ Hospital Chakdarra Dir (lower)	Saidu Group of Teaching Hospital Swat
23	Dr.Muhammad Azam Khan PMO (BS-19)	Attached to Provincial Health Services Academy Peshawar	Cateogry-D Hospital Shahbaz Garhi Mardan
24	Dr.Ikramullah Khan PMO (BS-19)	Attached to DHO Peshawar	DHQ Hospital DIKhan
25	Dr.Muhammad Sohail PMO (BS-19)	Civil Hospital Besham Shangla	Saidu Group of Teaching Hospital Swat
26	Dr.Umar Nawaz Khan PMO (BS-19)	Khalifa Gulnawaz Teaching Hospital Bannu	DHQ Hospital Tank
27	Dr.Muhammad Zafar Iqbal PMO (BS-19)	Lady Reading Hospital Peshawar	DHQ Hospital Charsadda
28	Dr.Safdar Muhammad PMO (BS-19)	DHQ Hospital Kohat	Civil Hospital Shakardara Kohat
29	Dr.Ishfaq Jan PMO (BS-19)	RHC Dak Ismail Khel Nowshera	DHQ Hospital Charsadda
30	Dr.Aziz Muhammad PMO (BS-19)	THQ Hospital Dargai Malakand Agency	DHQ Hospital Dir (lower)
31	Dr.Ghulam Hussain PMO (BS-19)	Civil Hospital Thana Malakand Agency	DHQ Hospital Batkhela
32	Dr.Sultan Aziz PMO (BS-19)	Sifwat Ghayur Memorial Hospital Peshawar	DHQ Hospital Dir (upper)
33	Dr.Nasir Khan PMO (BS-19)	DHQ Hospital Abbottabad	DHQ Hospital Abbottabad
34	Dr.Abdul Ghaffar PMO (BS-19)	Attached to DHO Lakki Marwat	DHQ Hospital Bannu
35	Dr.Shahzada PMO (BS-19)	AHQ Hospital Bajaur Agency	DHQ Hospital Dir (lower)
36	Dr.Ghulam Muhammad PMO (BS-19)	Demonstrator Bannu Medical College Bannu	DHQ Hospital Tank

Section Officer (EV)
Health Department
Khyber Pakhtunkhwa

37	Dr. Muhammad Saleem PMO (BS-19)	DHQ Hospital DIKhan	DHQ Hospital DIKhan
38	Dr. Syed Kamal Hussain PMO (BS-19)	AHQ Hospital Parachinar Kurram Agency.	DHQ Hospital Hangu
39	Dr. Hanifullah PMO (BS-19)	Moulvi Ameer Shah Memorial Hospital Peshawar	DHQ Hospital Dir (lower)
40	Dr. Shahi Dawran PMO (BS-19)	Attached to Nawaz Sharif Kidney Hospital Swat	Civil Hospital Madyan Swat
41	Dr. Luqman Khan PMO (BS-19)	DHQ Hospital Kohat	DHQ Hospital Kohat
42	Dr. Muhammad Saleem Khan PMO (BS-19)	IKD Hayatabad Medical Complex, Peshawar	DHQ Hospital Batkhela
43	Dr. Hafeezullah PMO (BS-19)	Demonstrator Bannu Medical College Bannu	DHQ Hospital Bannu
44	Dr. Nasrullah Khan PMO (BS-19)	RHC Kaki Bannu	DHQ Hospital Bannu
45	Dr. Aftab Ahmad PMO (BS-19)	DHQ Hospital Abbottabad	Civil Hospital Havelian Abbottabad
46	Dr. Salamatullah Khan PMO (BS-19)	DHQ Hospital Hangu	DHQ Hospital Hangu
47	Dr. Riaz Ahmad PMO (BS-19)	RHC Gara Tajik Peshawar	Services placed at the disposal of DHO Charsadda.
48	Dr. Javed PMO (BS-19)	DHQ Hospital Charsadda	DHQ Hospital Charsadda
49	Dr. Riaz Akbar PMO (BS-19)	DHQ Hospital Swabi	THQ Hospital Topi Swabi
50	Dr. Azizullah Jan PMO (BS-19)	AHQ Hospital Bajaur Agency	Category-D Hospital Wari Dir (Upper)
51	Dr. Ghulam Nabi PMO (BS-19)	City Hospital Lakki Marwat	DHQ Hospital Bannu
52	Dr. Murad Ali PMO (BS-19)	DHQ Hospital Charsadda	DHQ Hospital Charsadda
53	Dr. Qudrat Shah PMO (BS-19)	RHC Dak Ismail Khel Nowshera	DHQ Hospital Hangu

Section Officer (SO) Health Dept. Khyber Pakhtunkhwa

(15)

54	Dr.Sher Zada PMO (BS-19)	AHQ Hospital Bajaur Agency	DHQ Hospital Timargara Dir (lower)
55	Dr Malik .Iqbal Javed PMO (BS- 19)	MMM Teaching Hospital DIKhan	Civil Hospital Chowdawan DIKhan
56	Dr.Gul Sanat shah PMO (BS-19)	Civil Hospital Takhti Nasrati Karak	Civil Hospital Takhti Nasrati Karak
57	Dr.Ahmad Gul PMO (BS-19)	Attached to DHO DIKhan	Attached to DHO DIKhan
58	Dr.Safdar Ali Khan PMO (BS- 19)	RHC Akofa Khattak Nowshera	THQ Hospital Takhtbai Mardan
59	Dr.Kiramatullah PMO (BS-19)	DHQ Hospital DIKhan	DHQ Hospital DIKhan
60	Dr.Qabil Khan PMO (BS-19)	RHC Katlung Mardan	DHQ Hospital Mardan
61	Dr.Zafar Ahmad Khan PMO (BS- 19)	Ayub Teaching Hospital Abbottabad	DHQ Hospital Mardan
62	Dr.Sultan Khan PMO (BS-19)	DHQ Hospital Karak	DHQ Hospital Karak
63	Dr.Shafiullah PMO (BS-19)	Khalifa Gulnawaz Teaching Hospital Bannu	DHQ Hospital Tank
64	Dr.Qazi-ur- Rehman PMO (BS-19)	Police Hospital Abbottabad	RHC Lora Abbottabad
65	Dr.Muhammad Saleem PMO (BS- 19)	Naseerullah Babar Memorial Hospital Peshawar	DHQ Hospital Tank
66	Dr.Sajjad Muhammad PMO (BS-19)	Demonstrator Khyber Girls Medical College Peshawar	DHQ Hospital Kohat
67	Dr.Khalid Hussain PMO (BS-19)	Attached to DHO Mardan	Civil Hospital Kabgani Swabr
68	Dr.Israr Hussain PMO (BS-19)	AHQ Hospital Parachinar Kurram Agency	THQ Hospital Thal Hangu
69	Dr.Muhammad Ikram PMO (BS- 19)	DHQ Hospital Batkhela	DHQ Hospital Batkhela
70	Dr.Nisar Muhammad PMO (BS-19)	Demonstrator Bacha Khan Medical College Mardan	DHQ Hospital Mardan

Section Officer (M)
Health Department
Khyber Pakhtunkhwa

(16)

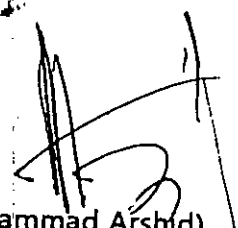
71	Dr.Habibur Rehman PMO (BS-19)	Hayatabad Medical Complex, Peshawar	Civil Hospital Sharkar darra Kohat
72	Dr.Sadiqullah PMO (BS-19)	Sifwat Ghayur Memorial Hospital Peshawar	DHQ Hospital Charsadda
73	Dr.Wali Rehman PMO (BS-19)	Hayatabad Medical Complex, Peshawar	DHQ Hospital Lakki Marwat
74	Dr.Tariq Khan PMO (BS-19)	RHC Manki Sharif Nowshera	DHQ Hospital Nowshera
75	Dr.Basharat Rehman PMO (BS-19)	King Abdullah Teaching Hospital Mansehra	King Abdullah Teaching Hospital Mansehra
76	Dr.Shaukat Ali PMO (BS-19)	DHQ Hospital Haripur	DHQ Hospital Haripur
77	Dr.Himayatullah PMO (BS-19)	Attached to DHO Peshawar.	DHQ Hospital Kohat

SECRETARY HEALTH
Govt of Khyber Pakhtunkhwa

Endst.No & Date Even.

Copy to the:-

1. Secretary to Governor Khyber Pakhtunkhwa, Peshawar.
2. Principal Secretary to Chief Minister Khyber Pakhtunkhwa.
3. Accountant General Khyber Pakhtunkhwa, Peshawar.
4. Director General Health Services, Khyber Pakhtunkhwa
5. Director Health Services FATA Peshawar.
6. Hospital Directors LRH/KTH/HMC/Peshawar
7. Medical Director LRH/KTH/HMC/ Peshawar.
8. Hospital Director Ayub Teaching Hospital Abbottabad.
9. Medical Director Ayub Teaching Hospital Abbottabad.
10. PSO to Chief Secretary Khyber Pakhtunkhwa.
11. Medical Superintendents of all concerned Hospitals mentioned above.
12. District Health Officers, of all concerned Districts mentioned above
13. District Accounts Officers of all concerned Districts mentioned above
14. Agency Accounts officers of all concerned Agencies mentioned above.
15. PS to Secretary Establishment Department.
16. PS to Secretary Health Department
17. PS to Minister for Health Khyber Pakhtunkhwa.
18. Computer Programmer Health Department.
19. Doctors concerned.


(Muhammad Arshid)
SECTION OFFICER (E-V)
Section Officer (EV)
Health Department
Khyber Pakhtunkhwa

To

The Chairman BOG
MTI/HMC, Peshawar

Amended
17

Subject: - Adjustment of Dr Abdullah in HMC Against the post of grade 19

Sir,

It is respectfully stated that Dr Abdullah is working in Gastroenterology Department and he is qualified gastroenterologist. On promotion to grade 19 he was posted in DHQ Hospital Charsadda.

Since gastroenterology is tertiary care unit and providing health care facility to almost whole of the province. The department has forty in-patients facility, twice weekly OPD and annually around 4000 upper & lower GI endoscopic procedures including ERCP.

Dr Abdullah has done post-graduation in gastroenterology and an experienced gastroenterologist. He provides useful health services to the patients and actively involved in teaching to the post-graduated Trainee Medical officers (TMO's) and House officers (Ho's). Therefore he may be adjusted in HMC which would be beneficial for the smooth running of department and public interest.

I shall be grateful

Regards



Professor & Head
Deptt of Gastroenterology/Hepatology, PGM/HMC
Dr. Ijaz Mohammad Khan
MBS (Pash), FRCG (UK)
Diplomate American Board of Int-Gest (USA)
Diplomate American Board of Gastroenterology (USA)
Fellow American College of Gastroenterology (USA)

Prof Dr. Ijaz Mohammad Khan
Incharge Department of Gastroenterology
KGMC, HMC, Peshawar

22/11/17

Amir D
18

17



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar, the 28th November, 2017

NOTIFICATION

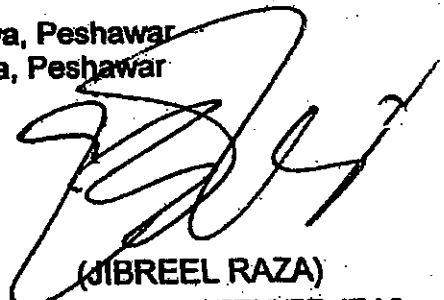
NO. SOH/E-VII/22/2017 Upon promotion to BS-19 in the General Cadre vide Notification of even number dated 14.11.2017, the competent authority is pleased to retain Dr. Nisar Muhammad PMO BS-19 at S.No.107 attached to Hayatabad Medical Complex Peshawar against the vacant post of BS-19 in the said Hospital with immediate effect in the public interest.

SECRETARY HEALTH
Govt. of Khyber Pakhtunkhwa

Endst. No. & Date Even

Copy to the:-

1. Accountant General, Khyber Pakhtunkhwa
2. Director General Health Services, Khyber Pakhtunkhwa.
3. Hospital/Medical Director HMC, Peshawar
4. PS to Minister Health, Khyber Pakhtunkhwa, Peshawar
5. PS Secretary Health, Khyber Pakhtunkhwa, Peshawar
6. Officer/doctor concerned.


(JIBREEL RAZA)
SECTION OFFICER (E-V)

19

18

163



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 1st March, 2018

NOTIFICATION

NO.SOH(E-V)4-22/2017

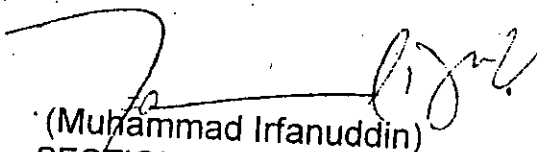
Upon promotion to BS-19 vide this Department Notification of even number dated 25.09.2017, the competent authority is pleased to retain Dr. Muhammad Nazir Khan PMO (BS-19) at S.No.29 attached to Hayatabad Medical Complex Peshawar (under transfer to THQ Hospital Sammar Bagh Dir (lower) in the said Hospital in the light of NOC granted vide No.2170/HMC dated 26.02.2018 in the public interest.

SECRETARY HEALTH
Govt. of Khyber Pakhtunkhwa

Endst. No. & Date Even

Copy to the:-

1. Accountant General Khyber Pakhtunkhwa, Peshawar
2. Director General, Health Services, Peshawar.
3. Hospital Director Hayatabad Medical Complex Peshawar
4. Medical Director Hayatabad Medical Complex Peshawar
5. District Health Officer Dir (lower).
6. MS THQ Hospital Sammar Bagh Dir lower.
7. District Accounts Officer Dir (lower)
8. PS to Secretary Health Department.
9. PS to Minister for Health Khyber Pakhtunkhwa.
10. Computer Programmer Health Department
11. DHIS Cell DGHS Office, Peshawar
12. Doctor concerned.


(Muhammad Irfanuddin)
SECTION OFFICER (E-V)

Secretary

20

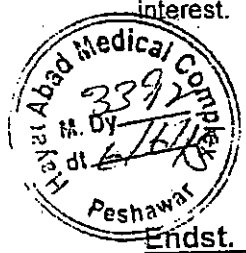


GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 22nd May, 2018

NOTIFICATION

NO.SOH(E-V)7-538/2017 The Competent Authority is pleased to order posting/transfer Dr.Muhammad Irfan PMO BS-19 attached to CBD No.02 Peshawar to Hayatabad Medical Complex Peshawar against the vacant post of BS-19 in the light of NOC granted vide No.2288/HMC dated 7.05.2018 with immediate effect in the public interest.




SECRETARY HEALTH
Govt. of Khyber Pakhtunkhwa

Endst. No. & Date Even

Copy to the:-

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director General, Health Services, Khyber Pakhtunkhwa.
3. Hospital Director HMC Peshawar
4. Medical Director HMC Peshawar
5. District Health Officer Peshawar
6. PS to Minister for Health Khyber Pakhtunkhwa.
7. PS to Secretary Health Department.
8. Computer Programmer Health Department
9. DHIS Cell DGHS Office, Peshawar:
10. Doctor concerned.


(MUHAMMAD IRFANUDDIN)
SECTION OFFICER (E-V)

MEDICAL DIRECTOR

Hayatabad Medical Complex,
Peshawar, Khyber Pakhtunkhwa
Peshawar.



Tel Off: 92 (0) 91-9217188
Fax: No: 92 (0) 91-9217189
Tel: Exch: 092-91-9217140-47,
www.hmckp.gov.pk

Ref 2196 /HMC

Dated 8 10 3 /2018

To,


Secretary
Health Department
Government of Khyber Pakhtunkhwa

Sl. No. 4325
Date 12.3.18
Secretary Health

SUBJECT: NO OBJECTION CERTIFICATE (NOC)

Dear Sir,


Reference request by Dr. Abdullah. This institution has no objection on his transfer as Principal Medical Officer (BPS-19) to MTI-HMC Peshawar. Upon arrival he will work in gastroenterology department of this institution.


MEDICAL DIRECTOR
HAYATABAD MEDICAL COMPLEX
PESHAWAR

No. _____ /MD/HMC Dated: _____ / _____ /2018

Copy forwarded to:-

1. HoD Gastroenterology-MTI/HMC
2. Administrative Coordinator, MTI/HMC
3. Senior Manager HR, MTI/HMC
4. Secretary BoG, MTI/HMC


MEDICAL DIRECTOR
HAYATABAD MEDICAL COMPLEX
PESHAWAR

P. u. Surg. D. J.

ASE



Amroze F
CHIEF MINISTER'S SECRETARIAT
KHYBER PAKHTUNKHWA PESHAWAR

No. SO-II/CMS/KPK/1-1/2018/Abdullah/12207
Dated Peshawar the 10th May, 2018

To

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

Subject:- CHIEF MINISTER'S DIRECTIVE (RETENTION OF DR. ABDULLAH AGAINST THE VACANT POST OF BPS-19 IN HMC).

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of self-explanatory application dated 09.03.2018 received from Dr. Abdullah SMO Gastroenterology Unit HMC, Peshawar regarding retention of Dr. Abdullah against the vacant post of BPS-19 in HMC. The Hon'ble Chief Minister has been pleased to record the following remarks thereon:-

Sec Health

"May be retained"

---SD/HCM---

2. It is therefore requested that necessary action as per policy on the above remarks of the Chief Minister Khyber Pakhtunkhwa may kindly be taken in the matter at the earliest, please.

Yours Faithfully,

E-J Urgent
20/05
(Abdul Wahab Khalil)
SECTION OFFICER-II

Copy for Information is Forwarded to:-

1. PS to Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
2. A.D (IT), Chief Minister's Secretariat, Khyber Pakhtunkhwa.

SECTION OFFICER-II



Annex-9
23

GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar, the 30th November, 2018

NOTIFICATION

NO.SOH(E-V) 4-22/2018

Consequent upon his promotion to BS-19 in the General Cadre vide Notification of even number dated 01.10.2018, the Competent Authority (Chief Minister Khyber Pakhtunkhwa) is pleased to order posting/transfer of Dr. Abdullah Principal Medical Officer (BS-19) attached to Hayatabad Medical Complex Peshawar to DHQ Hospital Charsadda against the vacant post of PMO BS-19, with immediate effect in the public interest.

SECRETARY HEALTH
Govt of Khyber Pakhtunkhwa

Endst.No & Date Even.

Copy to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. Director General Health Services, Khyber Pakhtunkhwa.
3. Hospital/Medical Director HMC Peshawar
4. District Health Officer Charsadda
5. MS DHQ Hospital Charsadda
6. District Accounts Officer Charsadda
7. Director Finance Hayatabad Medical Complex Peshawar
8. PS to Minister Health, Khyber Pakhtunkhwa
9. PS Secretary Health, Khyber Pakhtunkhwa
10. Officer/doctor concerned.


(MUHAMMAD NAZAKAT)
SECTION OFFICER (E-V)

Annex H
(24)

To

The secretary
Health department
Govt of Khyber Pukhtonkhwa

SUBJECT: RETENTION OF DR ABDULLAH IN HMC AGAINST THE VACANT POST OF BPS -19

Sir,

It is respectfully stated that Dr. Abdullah is working in Gastroenterology department MTI/HMC and he is a qualified Gastroenterologist. He has been promoted to BPS-19 and NOC has been issued to him by the competent authority (Medical Director) of HMC for the subject noted above, (copy attached).

Gastroenterology department HMC is a tertiary care unit and providing health care facilities to almost whole of the province. The department has 38 beds capacity for in-patients facility, twice weekly OPD and performs annually around 4000 upper and lower GI endoscopic procedure including ERCP.

Dr. Abdullah has done Post graduation in Gastroenterology and is an experienced Gastroenterologist. He provides useful health services to the patients suffering from gastrointestinal and hepatobiliary diseases. It is therefore requested that he may be retained in HMC which would be beneficial for the smooth running of the department and in public interest at large.

~~Dr. (S) ASG~~
Please process
SH, KP
To retain against
the vacant post in HMC.
You would be obliged if
concerned immediate
authority. Thank you.
Best Regards,
10/12/2018

Dr. Ijaz Mohammad Khan
Incharge Department of Gastroenterology
PGMI, HMC, Peshawar

Minister for Health
Khyber Pakhtunkhwa
10/12/2018

Amna H
(24)

To

The secretary
Health department
Govt of Khyber Pukhtonkwa

SUBJECT: RETENTION OF DR ABDULLAH IN HMC AGAINST THE VACANT POST OF BPS -19

Sir,

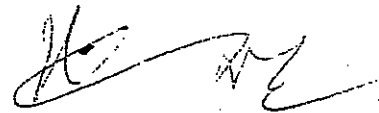
It is respectfully stated that Dr. Abdullah is working in Gastroenterology department MTI/HMC and he is a qualified Gastroenterologist. He has been promoted to BPS-19 and NOC has been issued to him by the competent authority (Medical Director) of HMC for the subject noted above, (copy attached).

Gastroenterology department HMC is a tertiary care unit and providing health care facilities to almost whole of the province. The department has 38 beds capacity for in-patients facility, twice weekly OPD and performs annually around 4000 upper and lower GI endoscopic procedure including ERCP.

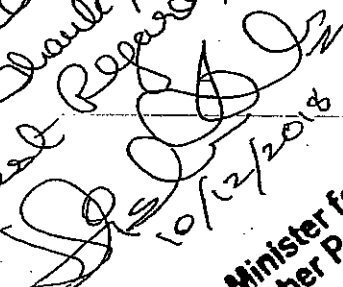
Dr. Abdullah has done Post graduation in Gastroenterology and is an experienced Gastroenterologist. He provides useful health services to the patients suffering from gastrointestinal and hepatobiliary diseases. It is therefore requested that he may be retained in HMC which would be beneficial for the smooth running of the department and in public interest at large.

A (S) 150-✓
SH, KP
Please process
10/12/2018

To retain against the vacant post in HMC. you would be obliged if concerned immediate authority. Thank you.
Best Regards,



Dr. Ijaz Mohammad Khan
Incharge Department of Gastroenterology
PGMI, HMC, Peshawar


10/12/2018

Minister for Health
Khyber Pakhtunkhwa

Amir

25



**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

Dated Peshawar the May 13, 2019

NOTIFICATION

No.SOH(E-V)/4-20/2010 (DHQ Malakand)

In order to fill the maximum vacant posts of Doctor and the health facilities for providing quality health services to the patients at their home Districts, the competent authority is pleased to transfer Dr. Mukhlis Raza s/o Muhammad Ali Senior Medical Officer (BS-18) attached Hayatabad Medical Complex (HMC) Peshawar to DHQ Hospital Malakand against the vacant post of PMO (B-19) on rationalization basis with immediate effect in the best public interest.

**SECRETARY HEALTH
KHYBER PAKHTUNKHWA**

Endst. of even No. & Date.

Copy to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
3. MS DHQ Hospital Malakand
4. Hospital Director HMC Peshawar
5. District Health Officer Malakand
6. District Accounts Officer Malakand
7. Deputy Director (IT) Health Department.
8. DHIS Cell DG Health Office Peshawar
9. PSO to Minister for Health, Khyber Pakhtunkhwa.
10. PS to Secretary Health Khyber Pakhtunkhwa
11. Doctor concerned.

Section Officer (E-V)

Amir J
26

Hayatabad Medical Complex

Hayatabad, Peshawar, Pakistan. Phone: 091-9217140-48, Fax: --
Email: pathoff@hmckp.gov.pk, Website: www.hmckp.gov.pk



Salary Slip for the Month of DECEMBER, 2019

Employee Code : 70000000348
Personal NO :
Employee Name : DR MUKHLIS RAZA AYUB
Designation : Principal Medical Officer
Grade : BPS-19
CNIC : 17301-1510882-9

Payment Mode : Bank
DOJ : 11-DEC-98
Bank : MCB - 3017
Account # : 0527379961001966
NTN Number :

Allowances

Code	Description	Amount
0001	Basic Salary	89,710
1001	House Allowance	13,284
1210	Conveyance Allowance	5,000
2148	Adhoc Relief(2013)	1,760
1947	Medical Allowance	3,690
2150	Adhoc Relief (2015)	1,177
2152	Adhoc Relief(2016)	6,018
2155	Adhoc Relief(2017)	8,971
2157	Adhoc 10% 2018	8,971
1985	Health Professional Allowance	42,000
1538	Non Practising Allowance	4,000
1518	Entertainment Allowance	500

Deductions

Code	Description	Amount
2156	Rbdc Allowance	1,600
3501	Benevolent Fund	800
385	G.P Fund	7,180
3809	Income Tax	13,529

Recovery

Total : 185,081 23,109

Total Payable : 161,972

GP Fund Balance 417,122

نوٹ: تنخواہ کی صورت میں اس (۱۰) ایوم کے اندر اظہارِ بخشش سے راہ جو کریں، بصورت دیگر تنخواہ اور سہ تسویلی جائیں۔
- ترقی یافتہ پیشوں کے عوارض اس کی قیاس سے حاصل کریں۔

To

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

Amir R
(27)

S. H 3315
9.3.2020

Subject: PERMISSION FOR ACTUALIZATION AND CONSIDERATION OF NOCS

Sir,

It is to state that I have been working as SMO BPS-18 in HMC Hayatabad Peshawar. I was promoted as PMO BPS-19 on regular basis on 13-05-2016 and was posted to DHQ Hospital Charsadda but I could not join there due to NOC granted by the HMC authorities and that NOC was duly submitted to the concerned office in time. I was again promoted as PMO BPS-19 vide order dated 01-10-2018 and posted again to DHQ Charsadda vide order dated 30-11-2018, that time again I was not relived by the HMC authorities and they issued NOC in my favour to be remained /posted at HMC being in dire need there at that time. The NOC of the HMC authorities was again submitted to the concerned office in time. But either the concerned office has misplaced those NOCs or not forwarded to the concerned authority onward and due to that reason I am still getting my salaries in BPS-18. It is also worth to mention here that many doctors /PMOs have been ordered to remain at previous station (HMC) by considering NOCs granted to them. In those doctors Dr. Nisar Muhammad PMO, Dr Muhammad Nazir Khan PMO, Dr. Mukhlis Raza PMO and Dr. Muhammad Imran PMO are included, the orders of whom are attached as ready reference.

As I am in my last leg of service, and going to retire in next month on superannuation. Being at the verge of retirement, I will sustain huge financial loss in shape of pensionary benefits.

Therefore it is requested that I may be allowed for actualization of my promotion at nearby station in Peshawar being District Peshawar Domicile holder OR I may be ordered to remain /posted at HMC Peshawar in light of the already submitted NOCs and orders mentioned above of the others doctors to avoid future financial losses in shape of pensionary benefits from 13-05-2016 with all back benefits.

An urgent action in this regard will be highly appreciated.

Yours Sincerely,

A. Amir
09.03.2020

Dr. Abdullah
PMO/SMO
Hayatabad Medical Complex,
Peshawar

IN THE PESHAWAR HIGH COURT,
PESHAWAR.

Final

Annex L
(18)

W.P. No. _____ / 2020

Dr. Abdullah son of Luqman Shah, (PMO./SMO) at Hayat Abad Medical Complex, Phase IV, Peshawar.

Versus



1. Government of Khyber Pakhtunkhwa through the Chief Secretary, Khyber Pakhtunkhwa at Civil Secretariat, Peshawar.
2. Government of Khyber Pakhtunkhwa through the Secretary Health at Khyber road, Peshawar.
3. The Medical Director, Hayat Abad Medical Complex Hospital, Phase IV, Peshawar.

..... Respondents

WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF THE ISLAMIC REPUBLIC OF
PAKISTAN, 1973.

RESPECTFULLY SHEWETH :-

BRIEF FACTS OF THE CASE ARE AS UNDER:

1. That the Petitioner was initially appointed on adhoc basis as Medical Officer BPS-17 through the NWFP Public Service Commission on 19.08.1987 and regularized on 06.12.1987 and posted at B.H.U, Suma Karagah, district Abbottabad.

(Copy of the appointment order attached as annexed "A").

2. That the petitioner was then promoted to the post of Senior Medical Officer (S.M.O) BPS-18 in year 21/09/1998 and retained at Lady Reading Hospital, Peshawar. Furthermore, the petitioner services was transferred to the Hayat Abad Medical Complex Hospital, Peshawar in the year 1999.

ATTESTED

EXAMINER
Peshawar High Court

29

3. That the Petitioner was promoted to the post of Principal Medical Officer (P.M.O) BPS-19 through respondent no. 2 the Secretary Health, Khyber Pakhtunkhwa notification no. SOH(E-V) 4-22/2016 on dated: 13/05/2016 and transferred to District Headquarter Hospital, Charsadda but due to dire need of the petitioner's services at Hayat Abad Medical Complex, Peshawar, respondent no. 03 (Medical Director, HMC Hospital, Peshawar) did not relinquish his services and issued N.O.C to the petitioner for retention in the H.M.C Hospital, Peshawar.
(Copy of the N.O.C and notification no. SOH (E-V)4-22/2016, attached as Annex "B" and Annex "C").
4. That other colleagues, i.e. Dr. Nisar Muhammad, Dr. Muhammad Nazir Khan, Dr. Muhammad Imran and Dr. Mukhlis Raza (PMOs) were adjusted at BPS-19 in their same desired stations/Hospitals and respondent no. 02 adjusted them accordingly.
(Copies of the adjustment orders of the above mentioned doctors (PMOs), attached as Annex "D").
5. That the petitioner is still drawing financial benefits of BPS-18, while he is entitled of BPS-19; further more the petitioner is at last stage of his services and is going to be retired at the end of March, 2020.
6. That feeling aggrieved from the discrimination of the respondent no.2, the Petitioner having no other adequate remedy to approach this Hon'ble Court in its writ jurisdiction on the following grounds inter-alia:-

GROUNDS:-

- A. That the other colleagues of the petitioner were adjusted at their desired stations / Hospitals with promoted pay scales.

ATTESTED
EXAMINER
Peshawar High Court

30


- B. That, the petitioner filed an application at respondent no.2, for actualization of his post BPS-19 or adjustment at Hayat Abad Medical Complex Hospital, Phase-V, Peshawar.
(Copy of the application attached as Annex "E").
- C. That the Petitioners/ Defendants have got good prima facie case and the balance of convenience also lies in favour of Petitioner, hence, directions be issued to Respondent no. 02 for considering the petitioner for retention as PMO (BPS-19) in HMC Hospital, Peshawar.
- D. That the Petitioner is at last verge of his services and this discrimination would affect his life due to financial losses.

PRAYER:


It is, therefore, humbly prayed that on acceptance of this instant Writ Petition the respondent 02, (The Secretary Health, Khyber Pakhtunkhwa), may graciously be directed to consider the notification no SOH(E-V) 4-22/2016, dated: 13/05/2016 for actualization of petitioner's promotion at nearby station in Peshawar being the district domicile holder with all back benefits.

OR

The petitioner may please be retained in BPS-19 against the vacant post at Hayat Abad Medical Complex Hospital, Peshawar alongwith all back benefits

Petitioner: 
Dr. Abdullah

THROUGH:


(MAFKHAR HALEEM KAKAKHEL)
Advocate High Court,
Peshawar.

Dated: 11/03/2020.

ATTESTED
EXAMINER
Peshawar High Court

CERTIFICATE:

(31)

It is clarify that no such like writ petition has earlier been filed by the Petitioner in this Hon'ble Court. Further stated that being Writ Petition on the score that since there is no adequate and alternate legal remedy is available, or previously avail or approach lower forum, this case may be fixed before the Worthy Division Bench (D.B) of this Hon'ble Court.

M. Z. Khan

ADVOCATE

LIST OF BOOKS:

1. Constitution of Islamic Republic of Pakistan, 1973.
2. Medical Teaching Institution Act, 2015.
3. Any other law books according to need.

M. Z. Khan

ADVOCATE

ATTESTED


EXAMINER
Peshawar High Court

[Signature]

(32)

PESHAWAR HIGH COURT, PESHAWAR

FORM OF ORDER SHEET

Date of Order or Proceedings	3
21.04.2020	2
WP No.2047-P/2020,	<p>Present: Mr. Masfkar Haleem Kakakhel, Advocate, for the petitioner.</p> <p>Mr. Rab Nawaz Khan, Addl: AG for respondents.</p> <p style="text-align: center;">*****</p> <p>IKRAMULLAH KHAN, J.- Through the instant writ petition, petitioner has prayed for the following relief:</p> <p style="text-align: center;">“It is, therefore, humbly prayed that on acceptance of the instant writ petition, the respondent No.2, (The Secretary Health Khyber Pakhtunkhwa), may graciously be directed to consider the notification No.SOH(E-V) 4-22/2016, dated 13.05.2016 for actualization of petitioner's promotion at nearby station in Peshawar being the district domicile holder with all back benefits or the petitioner may lease be retained in BPS-19 against the vacant post at Hayat Abad Medical Complex, Peshawar along with all back benefits.”</p> <p>2. At the very outset of arguments, learned AAG stated at the bar that the representation/appeal filed by the petitioner is still pending before the Worthy Secretary Health, Khyber Pakhtunkhwa, which is required to be decided. Therefore, this writ petition is disposed of with direction to the Secretary Health to decide the representation/appeal of the petitioner in accordance with rules within 30 days positively.</p> <p>Announced: 21.04.2020</p> <div style="text-align: right; margin-top: 20px;">  JUDGE JUDGE </div>



Ihsan (DB) Hon'ble Mr. Justice Ikramullah Khan & Hon'ble Mr. Justice Ijaz Anwar

CERTIFIED TO BE TRUE COPY

EXAMINED
Peshawar High Court, Peshawar
Under Article 67 of
The Constitution of Pakistan Order 1984

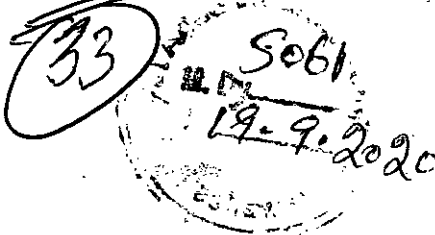
27 APR 2020

Dispatch No to
D.G Health

Amir M

To

The Medical Director
MTI/HMC, Peshawar



13776 D.G W.P
28/9/2020

Through Proper channel

Subject: APPLICATION FOR RETIREMENT ON SUPERANNUATION / LEAVE
ENCASHMENT

Sir,

The applicant was appointed as Medical Officer on 19-08-1987 in Health Department, and has date of birth 02-04-1960 as per CNIC and service record.

Now on 1st April 2020 the applicant reached to superannuation, therefore it is requested to kindly forward my application to the quarter concerned for issuance of my retirement order and start my pension related process.

An urgent action in this regard will be highly appreciated.

Yours Sincerely,

Dr. Abdullah
Senior Medical Officer
Hayatabad Medical Complex,
Peshawar

Dated 19/09/2020

Supann- for 19 P/12

27/8/20
KWA
(MR-1) 22/9/2020



Amroli
34
GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

NO. SOH(E-V)2-2/2020
Dated Peshawar the September 21, 2020

To,

The Director General Health Services,
Khyber Pakhtunkhwa,
Peshawar

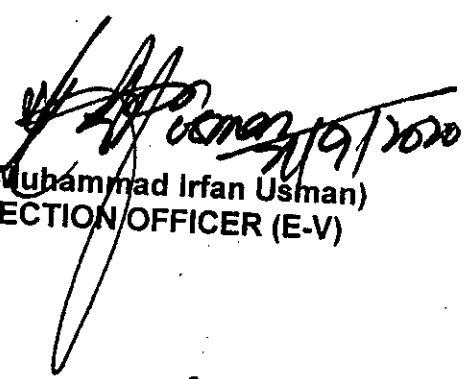
Subject: **WRIT PETITION NO.2047-P/2020 TITLE DR. ABDULLAH SMO HMC
VS. GOVT. OF KHYBER PAKHTUNKHWA ETC.**

I am directed to refer to your letter No. 10024-25/E.I dated 14.07.2020 on the above captioned subject and to inform you that the request of Dr. Abdullah, SMO, BS-18, HMC Peshawar regarding actualization of promotion to BS-19 w.e.f. 13.05.2016, i.e. from the date of his first promotion in BS-19 with all back benefits has been considered and filed/ regretted, please.

Endst. No. & Date Even

Copy to the:-

1. Section Officer (Lit-I), Health Department.
2. P.S to Secretary Health, Khyber Pakhtunkhwa.


(Muhammad Irfan Usman)
SECTION OFFICER (E-V)


SECTION OFFICER (E-V)



Amud
GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

NO. SOH(E-V)2-2/2020
Dated Peshawar the September 21, 2020

To,

The Director General Health Services,
Khyber Pakhtunkhwa,
Peshawar

Subject: **WRIT PETITION NO.2047-P/2020 TITLE DR. ABDULLAH SMO HMC
VS. GOVT. OF KHYBER PAKHTUNKHWA ETC.**

I am directed to refer to your letter No. 10024-25/E.I dated 14.07.2020 on the above captioned subject and to inform you that the request of Dr. Abdullah, SMO, BS-18, HMC Peshawar regarding actualization of promotion to BS-19 w.e.f. 13.05.2016, i.e. from the date of his first promotion in BS-19 with all back benefits has been considered and filed/ regretted, please.

Endst. No. & Date Even

Copy to the:-

1. Section Officer (Lit-I), Health Department.
2. P.S to Secretary Health, Khyber Pakhtunkhwa.

Muhammad Irfan Usman
(Muhammad Irfan Usman)
SECTION OFFICER (E-V)

Muhammad Irfan Usman
SECTION OFFICER (E-V)

Annex P 34

PROVISIONAL SENIORITY LIST OF PRINCIPAL MEDICAL OFFICERS (BPS-19) OF THE HEALTH DEPARTMENT ON 01-01-2019
TOTAL SANCTIONED POSTS = 713

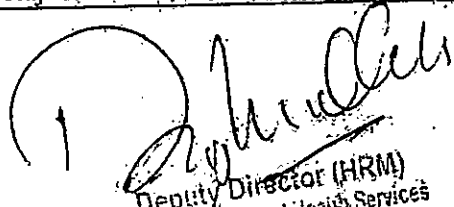
Sl: No.	Name of Officer/Official with Academic qualification.	Date of Birth and Domicile	Date of Ist entry into Govt: Service	Regular appointment/promotion to the present post.			Present Appointment with date.
				Date of promotion	BPS	Method of Recruitment/ Appointment	
	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1.	Dr. Iqbalattullah s/o Ghulam Khan, MBBS	04.04.1959/ N.W. Agency	19.08.1984/B-17	i) 08.05.1993 ii) 27.02.2008 iii) 14.11.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, EDO(H) Office Bannu. (Promoted to BS-20 on Acting Charge Basis)
2.	Dr. Tariq Nawaz s/o Malik Maizullah, MBBS	29.01.1960/ Bannu	16.04.1986/B-17	i) 03.04.1995 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion.	PMO, DHQH, Bannu
3.	Dr. Javed Iqbal s/o Amanullah Khan, MBBS	20.04.1960/ Mardan	16.04.1986/B-17	i) 03.04.1995 ii) 06.12.2008 iii) 14.11.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, THQH, Takhtbai, Mardan (Promoted to BS-20 on Acting Charge Basis)
4.	Dr. Sirajullah s/o Zakir Ullah, MBBS	01.04.1959/ Mkd. Agy	16.04.1986/B-17	i) 03.04.1995 ii) 06.12.2008 iii) 14.11.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	PMO, DHQH, Batkhela. (Promoted to BS-20 on Acting Charge Basis)
5.	Dr. Muhammad Faiq s/o Muhammad Siddique.	17.05.1960/ Mardan	16.04.1986/B-17	i) 03.04.1995 ii) 06.12.2008 iii) 14.11.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	PMO, DHQH, Swabi (Promoted to BS-20 on Acting Charge Basis)
6.	Dr. Farhat Jabeen D/O Matiullah, MBBS	04.04.1962 DI Khan	15.8.1987/B-17	i) 20.9.1995 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	PMO, DHQH, DI Khan
7.	Dr. Shazia Hafiz D/O Syed Yousaf Ali Shah,	19.12.1961 Peshawar	15.8.1987/B-17	i) 20.9.1995 ii) 13.05.2016	BS-18 BS-19	By Promotion By Promotion	PMO, DHQH, Charsadda
8.	Dr. Parveen Akhtar D/O Behramind, MBBS	05.04.1960/ Dir	15.8.1987/B-17	i) 20.9.1995 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	PMO, DHQH, Shah Mansoor Swabi.
9.	Dr. Mueen Begum D/O Wazir Ali, MBBS	20.12.1960/ Kurram	15.8.1987/B-17	i) 20.9.1995 ii) 02.10.2013	BS-18 BS-19	By Promotion By Promotion.	PMO, AHQH, Parachinar.
10.	Dr. Naeema Saadia D/O Muhammad Hanif, MBBS	27.10.1961 DI Khan	15.8.1987/B-17	i) 20.9.1995 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, DHO Office, DI Khan

R. J. Khan

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

30

11.	Dr.Javed Shah, MBBS	10.09.1961 Mardan	6.12.1987/B-17	i) 18.9.97 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	Attached DHO, Nowsh
12.	Dr.Muhammad Shahid Khan s/o Muhd Firdos, MBBS	01.04.1960 Mardan	06.12.1987/B-17	i) 18.9.97 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	PMO, DHQH, Mardan.
13.	Dr.Nawab Hussain s/o Hussain Ghulam.	12.2.1960/ Kurram	06.12.1987/B-17	i) 21.09.1998 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	PMO, DHQH, Hangu
14.	Dr.Mushtaq Ahmad s/o Roshan Hilal, MBBS	6.1.1959/ Swat	06.12.1987/B-17	i) 21.09.1998 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	RETIRED
15.	Dr.Mahabat Noor s/o Sahib Noor, MBBS	15.03.1959/ Bannu	06.12.1987/B-17	i) 21.09.1998 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	Attached DHO, DIKhan.
16.	Dr.Jamal Nasir Roghani s/o Saqib Shah Roghani, MBBS	Mardan 29-04-1960	6.12.1987/B-17	i) 12.08.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	PMO, HMC, Peshawar.
17.	Dr.Muhammad Ajmal Khan s/o Muhammad Afzal Khan	15.03.1961 DI Khan	6.12.1987/B-17	i) 12.08.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	At the disposal of DHO, DIKhan.
18.	Dr.Muhammad Tahir Khan s/o Abdur Rehman Khan,	Mardan 10-05-1962	6.12.1987/B-17	i) 12.08.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	PMO, ATH, Abbottabad.
19.	Dr.Hussain Ahmad s/o Ghulam Yaseen, MBBS	4.11.1959/ Bannu	6.12.1987/B-17	i) 12.08.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	Attached to DHO Peshawar
20.	Dr.Amjad Qayyum Babar s/o Abdul Qayyum-Babar,	29.3.1960/ Peshawar	6.12.1987/B-17	i) 12.08.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	At the disposal of DHO, Abbottabad.
21.	Dr.Arshad-ul-Islam s/o Sahib Din, MBBS	19.08.1961 Peshawar	06.12.1987/B-17	i) 18.09.1997 ii) 13.05.2016	BS-18 BS-19	By Promotion By Promotion	PMO, Ziarat Kaka Sahib, Nowshera.
22.	Dr.Shah Jehan s/o Ghulam Nabi, MBBS	09.09.1960/ D.I.Khan	06.12.1987/B-17	i) 21.09.1998 ii) 13.05.2016	BS-18 BS-19	By Promotion By Promotion	PMO, THQH Parowa DIKhan
23.	Dr.Syed Asghar Ali s/o Syed Quresh, MBBS	15.07.1961/ Mardan	06.12.1987/B-17	i) 21.09.1998 ii) 13.05.2016	BS-18 BS-19	By Promotion By Promotion	PMO, RHQ, Ambar Kunda, Swabi.
24.	Dr.Abdul Wali Khan Rustam s/o Malik Abdur Rehman.	17.05.1959/ Peshawar	06.12.1987/B-17	i) 21.09.1998 ii) 13.05.2016	BS-18 BS-19	By Promotion By Promotion	PMO, ESH, Gara Tajik, Peshawar.
25.	Dr.Dawood Khan s/o Haji Haider Khan, MBBS	12.5.1959/ Mohmand	06.12.1987	i) 21.09.1998 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion	PMO, DHO, Office, Charsadda


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

31

26.	Dr. Muhammad Khalid Khan s/o Abdul Hamid Khan;	29.01.1961 Peshawar	06.12.1987	18.09.1997 22.05.2018	BS-18 BS-19	By Promotion By Promotion	SMO, Sarhad Hosp: for Psy, Pesh (Mental)
27.	Dr. Abdullah s/o Luqman Shah, MBBS	02.04.1960/ FR Pesh:	06.12.1987	21.09.1998 01.10.2018	BS-18 BS-19	By Promotion By Promotion	PMO, HMC, Peshawar
28.	Dr. Yasmin Orakzai D/O Abdul Malik Orakzai, MBBS	20.10.1959 Peshawar	21.12.1987/B-17	i) 18.9.97 ii) 13.05.2016	BS-18 BS-19	By Promotion By Promotion	PMO DHQH Charsadda (one year leave) w.e.f 9.9.16
29.	Dr. Huma Sherin, MBBS	5.4.1961	23.1.1988/B-17	i) 12.8.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	PWMO, LRH, Peshawar
30.	Dr. Nagina Parveen, MBBS.	15.2.1961	23.1.1988/B-17	i) 12.8.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	PWMO, DHQH, Haripur
31.	Dr. Shamim Ara d/o Mir Badshah, MBBS	15.1.1960	23.1.1988/B-17	i) 12.8.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	Public Health School DIKhan.
32.	Dr. Sher Ali s/o Faqir Khan, MBBS	10.1.1959/ Dir	23.1.1988/B-17	i) 12.8.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	RETIRED.
33.	Dr. Nacem Akhtar s/o Abdul Qayyum, MBBS	15.9.1959/ Mansehra	23.1.1988/B-17	i) 12.8.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	At to DHO, Mansehra
34.	Dr. Shamim Afzal s/o Amir Afzal, MBBS	1.6.1961/ Dir	23.1.1988/B-17	i) 12.8.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	At to DHO, Mansehra
35.	Dr. Abdul Qadeer s/o Abdul Latif, MBBS	25.4.1960/ DI Khan.	23.1.1988/B-17	i) 12.8.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	At the disposal of DHO, DIKhan
36.	Dr. Amjad Ghias s/o Rab Nawaz Khan, MBBS	1.5.1960/ DI Khan	23.1.1988/B-17	i) 16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion	Principal, Public School, DIKhan.
37.	Dr. Muhammad Sharif s/o Said Afzal, MBBS	1.4.1959/ Mkd. Ay	23.1.1988/B-17	i) 12.8.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	At the disposal of DHO, L/Dir.
38.	Dr. Umar Nawaz Khan s/o Mir Alam Khan,	10.10.1959/ Barnu	23.1.1988/B-17	i) 20.8.2001 ii) 13.05.2016	BS-18 BS-19	By Promotion By Promotion	PMO, DHQH Tank

(Signature)

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

38

39.	Dr. Muhammad Zaffar Iqbal S/O A. Ghani	14.04.1960/ Peshawar	23.01.1988/B-17	i) 20.8.2001 ii) 13.05.2016	BS-18 BS-19	By Promotion By Promotion	PMO, DHQH Charsadda.
40.	Dr. Safdar Muhammad s/o Ali Muhammad Khan.	25.9.1960/ Kohat	23.1.1988/B-17	i) 20.8.2001 ii) 13.05.2016	BS-18 BS-19	By Promotion By Promotion	PMO CH Shakardara Kohat
41.	Dr. Ishfaq Jan s/o Wali Muhammad.	5.11.1960/ Peshawar	23.1.1988/B-17	i) 20.8.2001 ii) 13.05.2016	BS-18 BS-19	By Promotion By Promotion	PMO, DHQH Charsadda.
42.	Dr. Aziz Muhammad s/o Syed Afzal, MBBS	1.10.1960/ Bajaur Agy:	23.1.1988/B-17	i) 20.8.2001 ii) 13.05.2016	BS-18 BS-19	By Promotion By Promotion	PMO, DHQH, Dir Lower.
43.	Dr. Sultan Aziz s/o Muhammad Jan,	10.6.1959/ Dir	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	ID Children Hosp Peshawar
44.	Dr. Nasir Khan s/o Ali Asghar, MBBS	25.5.1959/ Abbottabad	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion. By Promotion	DHQH, Abbottabad.
45.	Dr. Abdul Ghaffar s/o Ghulam Sardar Khan,	2.1.1961/ Bannu	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	DHQH Lakki Marwat
46.	Dr. Shahzada s/o Qazi Muhd Akbar.	4.2.1959/ Bajaur Agy:	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	DHQH Dir Lower
47.	Dr. Hanifullah s/o Shah Gulab, MBBS	19.5.1960/ Dir	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO DHQH Dir (Lower)
48.	Dr. Riaz Ahmad s/o Sahib-e-Haq, MBBS	13.5.1962/ Peshawar	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	Attached DHO Nowshera.
49.	Dr. Riaz Akbar s/o Fazli Akbar, MBBS	17.6.1960/ Mardan	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO THQH Topi Swabi
50.	Dr. Ghulam Nabi s/o H. Abdul Karim, MBBS	10.4.1959/ Bannu	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	DHQH Bannu
51.	Dr. Safdar Ali Khan s/o Bakht Ali Khan MBBS	27.4.1959/ Mardan	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO THQH Takhtbai Mardan.
52.	Dr. Kiramatullah s/o Inayatullah MBBS	25.4.1962/ DI Khan	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO, DHQH, DI Khan
53.	Dr. Shafiullah s/o Asari Gul, MBBS	12.12.1960/ Bannu	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO DHQH Lakki
54.	Dr. Sajjad Muhammad s/o Ghulam Muhammad, MBBS	22.4.1961 /Bannu	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO DHQH Kohat.

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

39

55.	Dr. Israr Hussain s/o Mukhtiar Ali, MBBS	10.2.1960/ Kurram Agy	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO THQH Thal Hangu
56.	Dr. Nisar Muhammad s/o Mir Zaman, MBBS	1.11.1961/ Mardan	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO BKMC Mardan
57.	Dr. Habibur Rehman s/o Sarwar Khan, MBBS	7.5.1959/ Kohat	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	Services Hospital, Peshawar.
58.	Dr. Sadiqullah s/o Tehsinullah, MBBS	12.2.1959/ Mohmand	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	THQH: Shabqadar, Charsadda
59.	Dr. Wali Rehman s/o Gul Payo Khan, MBBS	1.8.1959/ Bannu	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO DHQH Lakki Marwat
60.	Dr. Tariq Khan s/o Abdul Ghafar Khan, MBBS	10.3.1960/ Peshawar	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	Attached to DHO, Nowshera.
61.	Dr. Basharat Rehman s/o Abdul Ghani, MBBS	15.5.1960/ Mansehra	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO KATH Mansehra
62.	Dr. Himayatullah s/o Hafiz Muhd Ayub, MBBS	1.11.1960/ Bannu	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO, ESH, Badaber, Peshawar.
63.	Dr. Muhammad Rauf s/o Gul Jan, MBBS	25.9.1959/ NW Ag	23.1.1988/B-17	i) 20.8.2001 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, DHO, Office, Peshawar
64.	Dr. Zaffar Ali Shah s/o Muhammad Amin Shah,	20.4.1961/ SW Agency	23.1.1988/B-17	i) 20.8.2001 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, DHO, Office, DIKhan
65.	Dr. Nassar Ali, S/O Shundi Gul, MBBS.	14.8.1959/ Kurram Agy	23.1.1988/B-17	i) 16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, DHQH, Hangu
66.	Dr. Muhammad Hasham Khan s/o Mukarram Khan, MBBS	18.9.1959/ Peshawar	23.1.1988/B-17	16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, DHO, Office, Charsadda
67.	Dr. Qamar Iqbal S/O Malik Abdul Karim, MBBS	15.11.1959/ DIKhan	23.1.1988/B-17	i) 24.06.2014 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, DHO, Office, DIKhan
68.	Dr. Binyamin s/o Muhammad Yaqub, MBBS	6.8.1959/ Mansehra	23.1.1988/B-17	i) 16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, KATH Mansehra
69.	Dr. Ghulam Hadi Khan s/o Hakim Gul Khan, MBBS	15.6.1960/ Bannu	23.1.1988/B-17	i) 16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, SGTH, Swat
70.	Dr. Sajjad Ahmad Malik s/o Muhd Ihsan Malik, MBBS	4.6.1961/ Peshawar	23.1.1988/B-17	i) 16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, LRH, Peshawar

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

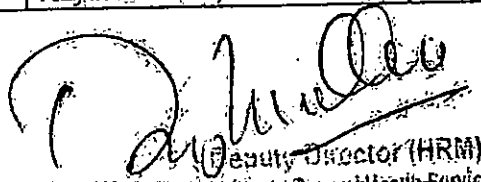
81/40

71.	Dr. Hasham Jan s/o Syed Alam Khan, MBBS	20.1.1960/ Peshawar	23.1.1988/B-17	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, DHO, Office, Peshawar
72.	Dr. Muhammad Nawaz Khan s/o Malik Syed Nazir, MBBS	9.3.1960/ Orakzai Agy	23.1.1988/B-17	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, City Hosp: Peshawar
73.	Dr. Zawar Hussain s/o Tajir Hussain, MBBS	12.5.1960/ Kurram Agy	23.1.1988/B-17	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, DHO, Office, Haripur.
74.	Dr. Muhammad Imran s/o Shamal Khan, MBBS	3.7.1960/ Dir	23.1.1988/B-17	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, DHO, Office, Peshawar
75.	Dr. Abdur Rashid s/o Karim Khan, MBBS	15.2.1961/ DI Khan	23.1.1988/B-17	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, DHO, Office, DI Khan
76.	Dr. Naeqebur Rehman s/o Muhammad Yar, MBBS	12.2.1960/ SW Agency	23.1.1988/B-17	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, DHO, Office, DI Khan
77.	Dr. Tajul Haq s/o Shah Rasool, MBBS	10.12.1962/ Mardan	23.1.1988/B-17	16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, DHO, Office, Peshawar
78.	Dr. Khair Muhammad s/o Khanon Khan, MBBS	14.5.1959/ SW Agency	23.1.1988/B-17	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, DHQH, Tank.
79.	Dr. Durre Afshan, MBBS	31.1.63/ Peshawar	23.1.1988/B-17	18.9.1997 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PWMO, CH Bisham
80.	Dr. Sajawal Khan s/o Faqir Muhammad, MBBS	10.2.1960/ Abbottabad	23.1.1988/B-17	20.8.2001 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO, CH, Sherwan, Abbottabad.
81.	Dr. Shabir Ahmad s/o Abdul Sattar, MBBS	03.01.1961/ Khy: Agy	23.1.1988/B-17	16.04.2008 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	Under control DHO, Peshawar
82.	Dr. Sardar Raheel Alam s/o Sardar Fakhre Alam, MBBS	3.2.1960/ Abbottabad	23.1.1988/B-17	16.04.2008 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	KMC, Peshawar
83.	Dr. Azmatullah s/o Muhd Hasham Khan,	15.01.1960/ SW Agency	23.1.1988/B-17	16.04.2008 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	I/C, PMO, CH, Chamla, Buner.
84.	Dr. Gul Ber s/o Mehtar Khan, MBBS	10.11.1959/ Kohistan	24.10.1988/B-17	16.04.2008 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO SGTH Swat
85.	Dr. Inayatullah s/o Daulat Khan, MBBS	22.8.1962/ Kohistan	27.10.1988/B-17	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO, DHO, Office, Kohistan

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

4.

86.	Dr. Nasim Akhtar, MBBS	30.09.1960 NW Agency	12.4.1989/B-17	i) 12.8.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	PWMO, DHQH, Charsadda
87.	Dr. Kausar Bahadar, MBBS	10.03.1964 Mansehra	12.4.1989/B-17	i) 12.8.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	At the disposal of DHO, Battagram
88.	Dr. Fauzia Shahdaza, D/O Shahzada, MBBS	25.02.1963/ Makd. Agy.	12.4.1989/B-17	i) 12.8.2000 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO, DHQH Batakhiela
89.	Dr. Bibi Hajira, MBBS	01.06.1964 Swat	12.4.1989/B-17	i) 12.8.2000 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	SGTH Swat
90.	Dr. Muhammad Essa Khan s/o Shah Afzal, MBBS	Mkd. Agency/ 21-04-1963	12.4.1989	i) 16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion	PMO, DHQH, Batakhiela
91.	Dr. Awal Yas Khan s/o Abdul Haq Khan, MBBS	FRBannu/ 1.4.1959	12.4.1989	i) 16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion	PMO, DHO, Office, Bannu.
92.	Dr. Jehanzeb s/o Shah Baroz Khan, MBBS	28.10.1961 NW Agency	12.4.1989	10.09.2009 22.05.2018	BS-18 BS-19	By Promotion By Promotion	SMO, AHQH, Miranshah
93.	Dr. Mir Alam Khan Afridi s/o Akbar Hussain Afridi, MBBS	Khyber Agy/ 06-09-1960	12.4.1989	i) 16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion	PMO, SGTH, Swat
94.	Dr. Muhammad Shakoor s/o Farid Khan, MBBS	20.04.1963/ Swat	12.4.1989	i) 16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion	PMO, SGTH, Swat
95.	Dr. Ibrar Ali s/o Ghulam Mustafa, MBBS	Abbottabad/ 24-02-1961	12.4.1989	i) 16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion	PMO, BBTH, Abbottabad
96.	Dr. Muhammad Tahir s/o Gul Jabbar, MBBS	02.12.1962/ Swat	12.4.1989	i) 16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion	PMO, DHQH, Daggar Buner.
97.	Dr. Faizul Mulk Jilani s/o S.G. Jilani, MBBS	Chitral/ 1.11.1960	12.4.1989	i) 16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion	PMO Category-D Hos: Boni, Chitral
98.	Dr. Khalilur Rehman s/o Abdur Rehman, MBBS	02.08.1960/ Mkd. Agency	12.4.1989	i) 16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion	PMO, DHQH, Mardan.
99.	Dr. Azizur Rehman s/o Nadir Khan, MBBS	S.W. Agency/ 2-2-61	12.4.1989	i) 16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion	PMO, DHO, Office, DI Khan
100.	Dr. Sahib Dad Khan s/o Hayatad Khan, MBBS	01.12.1961 Khyber Agy	12.4.1989	i) 16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion	PMO, DHO, Office, Peshawar



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

Amir
742

KGMC /MTI- HMC, PESHAWAR PAKISTAN

TEL : 091 9217140-6

OFFICE OF THE CHAIRMAN HOSPITAL NUTRITION COMMITTEE



24088
No. /GAS /MTI/ HMC

Dated: 20/ 11/2019

OFFICER ORDER

Dr. Abdullah S/O Luqman Shah , Principal Medical Officer Department of Gastroenterology MTI/HMC Peshawar has been included in Hospital Nutrition Committee as a member with immediate effect .

Copy Forwarded to:

1. Medical Director MTI/HMC Peshawar
2. Hospital Director MTI/HMC Peshawar
3. Secretary to BOG MTI/HMC Peshawar
4. Dr. Abdullah PMO Gastroenterology MTI/HMC Peshawar
5. All member of the Committee MTI/HMC Peshawar

CHAIRMAN, HOSPITAL NUTRITION COMMITTEE
KGMC/MTI-HMC PESHAWAR

Dr. Saad Akbar

MBBS, FCPS (Gastroenterology)
Assistant Professor
Department of Gastroenterology & Hepatology
KGMC / MTI Peshawar, PAK

DEPARTMENT OF GASTROENTEROLOGY & HEPATOLOGY
KGMC / HMC, PESHAWAR PAKISTAN

(43)

Professor & Chairman of the Department

Dr. Ijaz Mohammad Khan

MBBS, MD (USA) FACG (USA)

DAB of Int-MED & Gastroenterology (USA)

Associate Professor

Dr. Sher Rehman

MBBS, FCPS (Med), FCPS (Gastro)

Assistant Professor

Dr. Mohammad Iltaf

MBBS, FCPS (Gastro)



Professor & Co-Chairman of the Department

Dr. Khalid Hameed

MBBS, FCPS (Med), FCPS (Gastro)

Associate Professor

Dr. Adnan Ur Rehman

MBBS, FCPS (Gastro)

Assistant Professor

Dr. Naeem Jan

MBBS, FCPS (Gastro)

No: 2596 / GAS / MTI / HMC

Dated: 19 / 02 / 2020

OFFICE ORDER

Reference to the communication with Chairman Medical and allied Department, Dr. Abdullah Gastroenterologist and Hepatologist (Principal Medical Officer/ Consultant) has been nominated as a focal person of Gastroenterology Department for teaching sessions in skill lab with Khyber Khyber Girls Medical college students .

Professor

Dr. Khalid Hameed

FCPS (MED), FCPS (GASTRO)

Hayatabad Medical Complex Peshawar

Prof Dr. Khalid Hameed

IC/CO-Chairman, Gastroenterology Department

MTI/HMC Peshawar

Professor & Head,
Deptt of Gastroenterology/Hepatology, PGMHMC.

Dr. Ijaz Mohammad Khan

MBBS (Per.), FACG (USA)

Diplomate American Board of Int-Med (USA)
Diplomate American Board of Gastroenterology (USA)
Fellow American College of Gastroenterology (USA)

Prof Dr. Ijaz Mohammad Khan

Chairman/Supervisor, Gastroenterology Department

MTI/HMC Peshawar

20/2/2020

**MEDICAL TEACHING INSTITUTION
HAYATABAD MEDICAL COMPLEX**
Peshawar, Khyber Pakhtunkhwa,
PAKISTAN



Annex R
(44)

Tel. Off: 92 (0) 91-9217188
Fax: No: 92 (0) 91-9217189
Tel: Exch: 092-91-9217140-47
www.hmckp.gov.pk

No. _____/MTI-HMC/HR
Dated: _____/2020

The Secretary to Government,
Health department, Khyber Pakhtunkhwa
Peshawar

Subject: REQUEST FOR ACTULIZATION
Sir,

I am directed to refer that Dr. Abdullah s/o Luqman Shah was promoted on regular basis on 13.05.2016 as Principal Medical Officer BS-19 by your respective office and posted at District Headquarter Hospital, Charsadda. He was unable to join there at DHQH Charsadda as the HMC (Gastroenterology department) was in dire need of his services at that time. For this reason he was not relieved and was granted NOC which was duly forwarded to your office as well.

It is requested to kindly allow him for actualization of promotion as PMO BS-19 at MTI-HMC Peshawar.

MANAGER (HR)
HAYATABAD MEDICAL COMPLEX
PESHAWAR

No. 12583-88/MTI-HMC/HR Department

Dated 10/09 /2020

Copy forwarded to:-

1. Hospital Director MTI HMC.
2. Medical Director MTI HMC.
3. Chief Finance Officer MTI HMC.
4. Dr Abdullah Ex; PMO MTI HMC.
5. Supdt; HR MTI HMC
6. P/file

MANAGER (HR)
HAYATABAD MEDICAL COMPLEX
PESHAWAR

Annex 5
(145)

GENERAL HOSPITAL SERVICES

U 0642
FINANCE
017-2018

Rs

342,000

1,661,500

1,661,500

TOTAL CUM OBJECT CLASSIFICATION AND PARTICULARS OF THE SCHEME		NUMBER OF POSTS		BUDGET ESTIMATES 2016-2017	REVISED ESTIMATES 2016-2017	BUDGET ESTIMATES 2017-2018
		2016-2017	2017-2018			
				Rs	Rs	Rs
07	HEALTH					
073	HOSPITAL SERVICES					
0731	GENERAL HOSPITAL SERVICES					
073101	GENERAL HOSPITAL SERVICES					
PR4335	Hayatabad Medical Complex (1000 Beds)					
461	TOTAL EMPLOYEES RELATED EXPENSES.			<u>881,838,000</u>	<u>1,046,830,000</u>	<u>1,104,685,000</u>
4611	TOTAL PAY	2010	2011	<u>333,821,000</u>	<u>344,315,000</u>	<u>433,236,000</u>
4611-1	TOTAL PAY OF OFFICERS	804	882	<u>212,768,000</u>	<u>223,262,000</u>	<u>287,758,000</u>
461101	Total Basic Pay Of Officer	804	889	<u>212,768,000</u>	<u>223,262,000</u>	<u>287,758,000</u>
C381	Chief Medical Officer (BPS-20)	2	1	2,145,000		1,318,000
D536	Director Medical (BPS-20)	1	1	911,000		1,187,000
H296	Hospital Director (BPS-20)	1	1	911,000		1,187,000
C048	Chief Physiotherapist (BPS-19) ✓	1	1	832,000		1,084,000
D064	Director Administration (BPS-19) ✓	1	1	832,000		1,084,000
D180	Deputy Medical Superintendent (Admn:) (BPS-19) ✓	1	1	832,000		1,084,000
D181	Deputy Medical Superintendent (Store) (BPS-19) ✓	1	1	832,000		1,084,000
D197	Deputy Medical Superintendent (Record) (BPS-19) ✓	1	1	832,000		1,084,000
P358	Principal Medical Officer (BPS-19) ✓	15	15	11,137,000		14,501,000
P359	Principal Dental Surgeon (BPS-19)	1	1	831,000		1,082,000
A039	Anaesthetist (BPS-18)	4	4	2,328,000		3,031,000
C189	Consultant Gynaecologist (BPS-18)	1	1	582,000		758,000
C461	Consultant Cardiologist (BPS-18)	1	1	582,000		758,000
D220	Director Finance (BPS-18)	1	1	582,000		758,000
D401	Deputy Director - IT (BPS-18)	1	1	312,000		406,000
D538	Director Nursing (BPS-18)	1	1	582,000		758,000
H090	Haematologist/Blood Bank Incharge (BPS-18)	1	1	582,000		758,000
PJ12	Physiotherapist (BPS-18)	1	1	582,000		758,000
R004	Radiologist (BPS-18)	1	1	283,000		369,000
R338	Research Officer MBBS MPH (BPS-18)	1	1	9,314,000		11,368,000
S213	Senior Medical Officer (BPS-18)	34	33			

48

073101 GENERAL HOSPITAL SERVICES

FUNCTIONAL CUM OBJECT CLASSIFICATION AND PARTICULARS OF THE SCHEME	NUMBER OF POSTS		BUDGET ESTIMATES	REVISED ESTIMATES	BUDGET ESTIMATES
	2017-2018	2018-2019	2017-2018	2017-2018	2018-2019
			Rs	Rs	Rs
07 HEALTH					
073 HOSPITAL SERVICES					
0731 GENERAL HOSPITAL SERVICES					
073101 GENERAL HOSPITAL SERVICES					
PR4335 Hayatabad Medical Complex (1000 Beds)					
A01 TOTAL EMPLOYEES RELATED EXPENSES.			<u>1,104,685,000</u>	<u>1,152,481,000</u>	<u>1,339,592,000</u>
A011 TOTAL PAY	2011	2046	<u>433,236,000</u>	<u>466,513,000</u>	<u>595,359,000</u>
A011-1 TOTAL PAY OF OFFICERS	889	924	<u>287,758,000</u>	<u>318,125,000</u>	<u>415,803,000</u>
A01101 Total Basic Pay Of Officer	889	924	<u>287,758,000</u>	<u>318,125,000</u>	<u>415,803,000</u>
C381 Chief Medical Officer (BPS-20)	1	1	1,318,000		1,613,000
D536 Director Medical (BPS-20)	1	1	1,187,000		1,456,000
H296 Hospital Director (BPS-20)	1	1	1,187,000		1,456,000
P322 Professor Neuro Surgery (BPS-20)		1			3,592,000
P332 Professor (Pediatric Surgery) (BPS-20)		1			3,592,000
P357 Professor (Oral Maxillofacial Surgery) (BPS-20)		1			3,592,000
A160 Associate Professor (BPS-19)		5			23,579,000
C048 Chief Physiotherapist (BPS-19)	1	1	1,084,000		1,322,000
D064 Director Administration (BPS-19)	1	1	1,084,000		1,322,000
D180 Deputy Medical Superintendent (Admn:) (BPS-19)	1	1	1,084,000		1,322,000
D181 Deputy Medical Superintendent (Store) (BPS-19)	1	1	1,084,000		1,322,000
D197 Deputy Medical Superintendent (Record) (BPS-19)	1	1	1,084,000		1,322,000
P358 Principal Medical Officer (BPS-19)	15	15	14,501,000		17,721,000
P359 Principal Dental Surgeon (BPS-19)	1	1	1,082,000		1,320,000
A039 Anaesthetist (BPS-18)	4	4	3,031,000		3,718,000
A130 Assistant Professor (BPS-18)		13			15,052,000
C189 Consultant Gynaecologist (BPS-18)	1	1	758,000		930,000
C461 Consultant Cardiologist (BPS-18)	1	1	758,000		930,000
D220 Director Finance (BPS-18)	1	1	758,000		930,000
D401 Deputy Director - IT (BPS-18)	1	1	758,000		930,000

(47)

بعد التینا سروس ٹریڈنگ (PPL) پشاور

Service Appeal No:

2020ء منجانب پشاور
بنام گورنمنٹ

ڈاکٹر عبداللہ

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آئنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام پشاور کیلئے نام محمد ایدو لکھ

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک رو پیسہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواخذ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائنا التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ تک تمام دورہ نہ ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا اوقات کا اہم اہم یاد کیا کہ سند ہے۔

Azhar

2020 ماہ

المقوم
پشاور

کے لئے منظور ہے۔

پشاور

بمقام

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 12100 OF 2020

Dr. Abdullah.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa and others.....Respondents

Respectfully Sheweth:

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

Preliminary Objections:-

1. That the appellant has got neither cause of action nor did locus standi to file the instant appeal.
2. That the appellant has filed the instant appeal just to pressurize the respondents.
3. That the instant appeal is against the prevailing Law and Rules.
4. That the appeal is not maintainable in its present form and also in the present circumstances of the issue.
5. That the appellant has filed the instant appeal with mala-fide intention hence liable to be dismissed.
6. That the appellant has not come to the Tribunal with clean hands.
7. That the appeal is time barred.
8. That the Honorable Tribunal has no Jurisdiction to adjudicate upon the matter.
9. That the instant appeal is bad for mis-joinder of unnecessary and non-joinder of necessary parties.

ON FACTS:

1. Pertains to record.
2. Pertains to record.
3. Incorrect. The appellant was promoted to the post of Senior Medical Officer (BPS-18) on seniority basis.
4. Incorrect. The appellant himself requested for retention in HMC Peshawar and the Respondent No. 4 i.e. Medical Director HMC Peshawar forwarded his request to Respondent No. 2 i.e. Secretary Health for necessary action.
5. Incorrect. The appellant was promoted on the post of Principal Medical Officer (BPS-19) and other than MTI and was posted to DHQ Hospital Charsadda on 13/05/2016, but he did not join duty over there and continuously working in HMC Peshawar as SMO (BPS-18).
6. In reply to the para it is submitted that the Appellant was promoted against the post of PMO (BPS-19) other than MTI and was supposed to join duty at DHQ Hospital Charsadda.
7. Incorrect. The appellant was promoted to the post of PMO (BPS-19) and posted to DHQ Hospital Charsadda on 13/05/2016 while other doctors were promoted to the post of PMO (BPS-19) in 2017-18.
8. Detailed reply has already been furnished in Para No. 6.
9. As per preceding para.
10. As per Para No. 6.
11. Incorrect. The appellant was promoted and posted to DHQ Hospital Charsadda on 13/05/2016, while Dr. Mukhlis Raza SMO (BPS-18) was retained in HMC Peshawar on 13/05/2019.
12. Pertains to record.

13. Pertains to record, hence no comments.

ON GROUNDS:

- A. The appellant neither obey the order of the competent authority nor join duty at DHQ Hospital Charsadda after his promotion as PMO (BPS-19).
- B. Detailed reply has already been furnished in preceding paras. However, mere mentioning the name of the appellant in seniority list does not create any right in his favor.
- C. The Appellant was promoted to the post of PMO (BPS-18) and posted to DHQ Hospital Charsadda, but he did not actualize his promotion and not reported over there.
- D. Incorrect. The appellant was not willing to report to DHQ Hospital Charsadda and was enjoying HMC Peshawar even after his promotion as PMO (BPS-19).
- E. The Appellant was promoted against the post of PMO (BPS-19) other than HMC Peshawar being MTI and he was required to report to DHQ Hospital Charsadda to actualize his promotion. The appellant was legally bound to obey the orders of the competent authority.
- F. Legal. However, under the law if an incumbent does not avail his / her promotion, he / she cannot subsequently request for its benefits under the principles of Estoppel.
- G. The letter dated 21/09/2020 under which the request of the appellant was rejected is legal and not discriminatory.
- H. No punishment has been given to the appellant and no fundamental rights have been violated. The appellant himself violated the order of the competent authority.
- I. Needs no reply being legal.

PRAYER:

It is therefore humbly prayed that on acceptance of the comments, the instant Appeal of the Appellant may very graciously be dismissed with costs.

Secretary to Govt. of Khyber
Pakhtunkhwa Health Department
Respondent No. 01 & 02

Director General Health Services,
Khyber Pakhtunkhwa.
Respondent No. 03