

10.04.2023

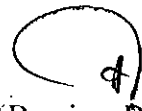
Appellant present through counsel.

Muhammad Jan, learned District Attorney for respondents present.

Former made a request for adjournment as he has not prepared the brief. Adjourned. To come up for arguments on 02.06.2023 before D.B. Parcha Peshi given to the parties.



(Fareeha Paul)  
Member (E)



(Rozina Rehman)  
Member (J)

23.11.2022

Learned counsel for the appellant present. Mr. Laiq Ahmad, Computer Operator alongwith Mr. Muhammad Jan, District Attorney for the respondents present.

Para-wise comments on behalf of respondents submitted, copy of which handed over to learned counsel for the appellant. Adjourned. To come up for rejoinder, if any, as well as arguments on 12.01.2023 before the D.B

SCANNED  
KF&T  
Peshawar



(Mian Muhammad)  
Member (E)



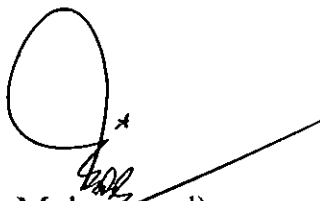
(Salah-Ud-Din)  
Member (J)

12.01.2023

Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not gone through the brief of the instant appeal. Adjourned. To come up for arguments on 10.04.2023 before the D.B.

SCANNED  
KF&T  
Peshawar



(Mian Muhammad)  
Member (E)



(Salah-Ud-Din)  
Member (J)

13-5-22

Proper DB not available in case  
adjourned on 26-7-22

Revised  
Reading

26<sup>th</sup> July 2022 Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not made preparation for arguments. Last opportunity granted for arguments. To come up for arguments on 06.09.2022 before the D.B.



(Salah-Ud-Din)  
Member (J)



(Kalim Arshad Khan)  
Chairman

06.09.2022

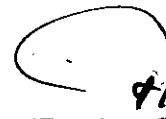
Junior to counsel for appellant present.

Naseer Ud Din Shah, learned Assistant Advocate General for respondents present.

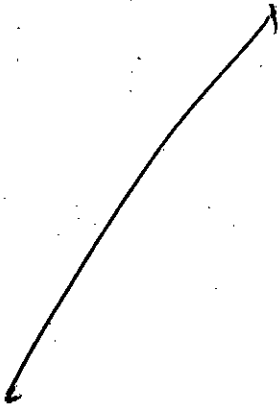
Former made a request for adjournment as senior counsel for appellant is busy before Peshawar High Court, Bannu Bench. Adjourned. To come up for arguments on 23.11.2022 before D.B.



(Fareeha Paul)  
Member(E)



(Rozina Rehman)  
Member(J)



10.06.2021

Junior to counsel and Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Written reply not submitted. Learned AAG is required to contact the respondents. The respondents are directed to submit written reply/comments in office within 10 days, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 27.10.2021 before the D.B.

*Stipulated period has passed and replies have not been submitted.*

  
Chairman

*[Handwritten marks]*

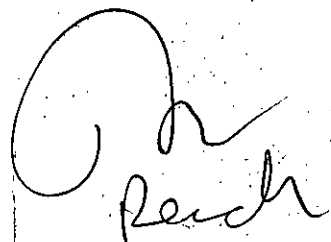
P.S

22.06.2021

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

  
Chairman

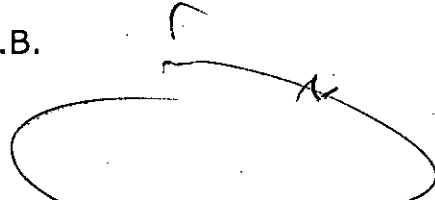
*Due to retirement of the Honble Chairman to come up for the same as before on 13/5/2022*

  
P. R. Raza

05.11.2020

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

Since the Members of the High Court as well as of the District Bar Association, Peshawar, are observing strike today, therefore, learned senior counsel for appellant is not available today. Adjourned to 21.01.2021 on which date to come up for preliminary hearing before S.B.

  
(Muhammad Jamal Khan)  
Member (Judicial)

21.01.2021

Appellant present through counsel. Preliminary arguments heard. File perused.

Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for written reply/comments. To come up for written reply/comments on 15.04.2021 before S.B.

Appellant Deposited  
Security & Process Fee  
26/1/21

  
(Rozina Rehman)  
Member (J)

15.04.2021

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 10.06.2021 for the same as before.

  
Reader

20/10

03.07.2020

Learned counsel for the appellant present.

In essence the grievance of appellant is that she had served for more than Seven (07) years in (MNCH) programme before her induction as Women Medical Officer in the Health department on 02.01.2017. Despite, her previous service in the project is not being counted for the purpose of pay fixation and other service benefits. The departmental appeal dated 01.01.2020 has not been responded to by the respondents.

In the circumstances of the case where the appellant is not subsequently denied the relief, it is appropriate to issued pre-admission notice to respondents for 01.09.2020 before S.B. Order Accordingly.



Chairman

01.09.2020

Mr. Mir Zaman Safi, Advocate on behalf of learned counsel for the appellant and Addl. AG for the respondents present.

Former requests for adjournment due to engagement of learned senior counsel for the appellant before Darul Qaza at Swat.

Adjourned to 05.11.2020 before S.B.





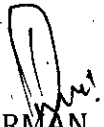
Chairman

Form- A

FORM OF ORDER SHEET

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

Case No.- 5676 /2020

1S.No.	Date of order proceedings	Order or other proceedings with signature of judge *
1	2	3
1-	09/06/2020  <b>SCANNED</b> <b>KES ST</b> <b>Peshawar</b>	<p>The appeal of Dr. Maryam Rehman presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>03/07/2020</u>.</p> <p style="text-align: center;"></p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

The appeal of Dr. Maryam Rehman submitted today i.e. 29.04.2020 by Mr. Noor Muhammad Khattak, Advocate is incomplete on the following score which is returned to his counsel for completion and resubmission within 15 days.

- 1- Pages 9, 10, 11 and 17 are illegible which may be replaced by legible one.
- 2- Wakalatnama is blank and not executed which may be completed.
- 3- One more copy of appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1098 /S.T,

Dt. 5-5- /2020

  
REGISTRAR

SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Noor Muhammad Khattak, Advocate Peshawar.

Sir,

All objections have been removed  
hence re-submitted.





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

APPEAL NO. **5676** /2020

**DR. MARYAM REHMAN**

**VS**

**HEALTH DEPTT:**

**INDEX**

<b>S.NO.</b>	<b>DOCUMENTS</b>	<b>ANNEXURE</b>	<b>PAGE</b>
1	Memo of appeal	.....	1- 4.
2	Appointment order	<b>A</b>	5.
3	Experience certificate	<b>B</b>	6.
4	Letter	<b>C</b>	7.
5	NOC	<b>D</b>	8.
6	Notification	<b>E</b>	9- 11.
7	Medical certificate	<b>F</b>	12.
8	Office order	<b>G</b>	13.
9	Arrival report	<b>H</b>	14.
10	Relieving order	<b>I</b>	15.
11	Notification	<b>J</b>	16.
12	Notification	<b>K</b>	17- 20.
13	Revise charge report	<b>L</b>	21.
14	Departmental appeal	<b>M</b>	22- 23.
15	Forwarding letter	<b>N</b>	24.
16	Vakalat nama	.....	25.

**APPELLANT**

**THROUGH:**

**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**

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

**APPEAL NO.** 5668/2020

Dr. Maryam Rehman, Women Medical Officer (BPS-17),  
RHC Sakhakot, Tehsil Dargai, District Malakand ..... **Appellant**

**VERSUS**

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Health Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The Director General Health Services Department, Khyber Pakhtunkhwa, Peshawar.

..... **RESPONDENTS**

**APPEAL UNDER SECTION- 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE INACTION OF THE RESPONDENTS BY NOT COUNTING THE PROJECT SERVICE OF THE APPELLANT TOWARDS REGULAR SERVICE I.E. w.e.f. 31.5.2010 TILL 12.1.2017 AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.**

**PRAYER:**

That on acceptance of this appeal the respondents may kindly be directed to count the project service of the appellant towards regular service i.e. w.e.f. 31.5.2010 till 12.1.2017 with all back benefits in light of Rule 2.3 of the West Pakistan Civil Services Pension Rules, 1963 and Article 371(A)(i) of the Civil Services Regulations. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

**Brief facts giving rise to the present appeal are as under:**

1. That appellant was initially appointed as women medical officer (BPS-17) on contract basis for a period of two years in the project named Maternal, Newborn & Child Health Program, Khyber Pakhtunkhwa (under the supervision/control of Health Department) vide office order dated 31.5.2010. **(Copy of the appointment order is attached as annexure..... A).**

2. That it is worth mentioning here, that appellant services were further extended from time to time. **(Copy of the experience certificate is attached as annexure ..... B).**
3. That during service as Women medical officer in the MNCH the Khyber Pakhtunkhwa Public service commission advertised the posts of women medical officers (BPS-17). That appellant having the requisite qualifications applied for the said post of WMO (BPS-17) through proper channel and as such after successful selection process the appellant was recommended by the KP. public service commission for the post of WMO (BPS-17) on adhoc basis. **(Copies of the letter and NOC are attached as annexure ..... C & D).**
4. That accordingly vide Notification dated 12.1.2017 issued by the respondent No.2 the appellant was appointed as women medical officer (BPS-17) on adhoc basis for the period of one year. **(Copy of the Notification is attached as annexure ..... E).**
5. That in response to the said Notification dated 12.1.2017 the appellant got herself medically examined from the medical Superintendent of police services Hospital, Peshawar and as such vide office order dated 17.1.2017 the appellant was posted at RHC Sakhakot, District Malakand. That the appellant in response to the subsequent posting order dated 17.1.2017 submitted her arrival report at RHC Sakhakot vide dated 19.1.2017 and started her duty quite efficiently and up to the entire satisfaction of her superiors. **Copies of the medical certificate, office order and arrival report are attached as annexure ..... F, G & H.**
6. That it is very pertinent to mention here that vide office order dated 1.2.2017 the appellant was properly been relieved from MNCH program w.e.f. 16.1.2017 by the concerned officer. **(Copies of the relieving order and Notification are attached as annexure ..... I & J).**
7. That during service as WMO (BPS-17) in the respondent Department the Provincial Assembly Promulgated the Act, No.vii of 2017, herein after called the Regularization of Services Act, 2017 and in light of the Act ibid the services of the appellant along with her colleagues and junior colleagues were regularized by the Department vide Notification dated 26.5.2017. **(Copy of the Notification and revise charge report are attached as annexure ..... K & L).**
8. That as appellant had served in the MNCH project for more than seven years, therefore, in light of Rule 2.3 of the West Pakistan Civil services Pension Rules, 1963 and in light of Article 371 A (i) of the Civil service Regulations the appellant is fully entitle for counting of her previous service rendered in the project named Maternal, newborn & Child Health program towards Health Department with all back benefits.

9. That for the said benefit the appellant submitted Departmental appeal before the appellate authority i.e. respondent No.2 but the respondent No.2 succumbed on the Departmental appeal of the appellant. That feeling aggrieved and having no other remedy the appellant filed the instant appeal on following grounds inter alia. **(Copies of the Departmental appeal and forwarding letter are attached as annexure ..... M & N).**

**GROUND:**

- A- That the inaction of respondents by not counting the previous service of the appellant rendered in the MNCH program i.e. project period towards regular service of Health Department in light of Rule 2.3 of the West Pakistan Civil services Pension Rules, 1963 and in light of Article 371 A (i) of the Civil service Regulations is against the law, facts, norms of natural justice and materials on the record.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the respondents acted in arbitrary and mala fide manner by not counting the previous service of the appellant rendered in the MNCH program i.e. project period towards regular service of Health Department in light of Rule 2.3 of the West Pakistan Civil services Pension Rules, 1963 and in light of Article 371 A (i) of the Civil service Regulations.
- D- That the inaction of the respondents by not counting the previous service of the appellant rendered in the MNCH program i.e. project period towards regular service of Health Department in light of Rule 2.3 of the West Pakistan Civil services Pension Rules, 1963 and in light of Article 371 A (i) of the Civil service Regulations is discriminatory and against the norms of natural justice, therefore the same is not tenable in the eye of law.
- E- That under Article 38 (e) of the Constitution of Pakistan, 1973 state is bound to reduce disparity in the income and earning of the individuals including persons in the various services of Pakistan, therefore in light of the above mentioned Article the appellant is fully entitled for the counting of her previous service rendered in the MNCH program i.e. project period towards regular service of Health Department.
- F- That there is no break in service of appellant from the date of initial appointment till regular appointment upon recommendation of KP public service commission.

G- That in light of Rule 2.3 of the West Pakistan, Pension Rules, 1963 the appellant is fully entitle for the counting of her previous service.

H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated: 20.04.2020

**APPELLANT**

*Maryam*  
**MARYAM REHMAN**

**THORUGH:**

*N.M.*  
**NOOR MOHAMMAD KHATTAK,**

*M.Z.*  
**MIR ZAMAN SAFI**

*& S.*  
**SHAHZULLAH YOUSAFZAI**  
**ADVOCATES**



GOVERNMENT OF PAKISTAN  
MINISTRY OF HEALTH

A-5



National MNCH Program

National Maternal, Newborn & Child Health  
Program, Khyber Pakhtun Khwa

OFFICE ORDER

Date: 31-05-2010

No.109-12/MNCH/H/2010. On the recommendations of Selection / Interview Committee meeting held on 24-05-2010 under the Chairmanship of Secretary Health, Govt. of Khyber Pakhtun Khwa, Dr. Maryam Rehman W/O Dr. Ashfaq Ahmad Khan appointed as Women Medical Officer in BPS-17 (fixed pay Rs. 45000/- per month & 5% as annual increment) against the vacant post on the disposal of Executive District Officer (Health) Malakand for further posting. The appointment is on contract basis for a period of two years (extendable) on the terms and conditions mentioned below, in addition to other prevalent rules and regulations applicable. The appointment of the candidate is under the authority of the National MNCH Program, Khyber Pakhtun Khwa being specified for the provision of IMNCI & EmONC Services as mentioned in the PC-1 of the MNCH Program & the salary / incentive package will be paid by the same Program as per PC-1.

TERMS & CONDITIONS.

1. She is declared medically fit for Govt. service by authorized Medical Superintendent DMQ Hospital / Police & Services Hospital Peshawar.
2. She will be governed by the same rules and regulations as may be issued by the Govt. from time to time & may be attached to the concerned Executive District Officer (Health) / District MNCH Cell Malakand. The E.D.O (H) is the controlling authority & will be responsible for their management at the District.
3. If she wishes to resign, she will resign in writing by giving prior notice of one month or deposit one month pay in lieu of one month advance notice.
4. She will perform & will provide the IMNCI & EmONC related Services for which she has been appointed.
5. Her appointment is purely on contract basis and can be terminated without any notice or reason being assigned.
6. This is purely non transferable appointment & posting.
7. She will not be entitled for any pension/gratuity for the services rendered.
8. She has to join duty at her own expenses.
9. If the above terms and condition are acceptable to her, she should report for duty to the office of the Executive District Officer (H) Malakand for further posting with in one week of issuance of this Office Order, failing which the offer will be considered as withdrawn.

RECEIVED



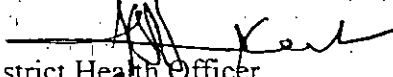
OFFICE OF THE DISTRICT HEALTH OFFICER MALAKAND  
PHONE No.0932-410399, FAX No.0932-413110  
E-mail.dhomalakand279@gmail.com


B-6

EXPERIENCE CERTIFICATE

Certified that Dr.Maryam Rehman is serving in Health Department ( MNCH Programme) at RHC Sakhakot since 07<sup>th</sup> June 2010. Her conduct has reminded good during the above mentioned period.

Station DHO Office Batkhela  
Dated 10.01.2017

  
District Health Officer  
Malakand.

**ATTESTED**  


National Maternal, Newborn & Child Health  
Program, Khyber Pakhtunkhwa



NO 117-19 MNCH/H

Date 21/1/2015


To

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


SUBJECT:  
Dear Sir,

DEPARTMENTAL PERMISSION.

Enclosed please find herewith certificate of departmental permission (in original) in favour of Dr. Maryam Rehman WMO MNCH Program District Malakand for onward submission to the Secretary Khyber Pakhtunkhwa Public Service Commission, Peshawar.

  
PROVINCIAL COORDINATOR  
NATIONAL MNCH PROGRAM  
PESHAWAR.

Copy for information to:-  
WMO Concerned.

ATTESTED  






Maternal, Newborn & Child Health Program,  
Khyber Pakhtunkhwa




No. 119 /MNCH/PF

Date 21-1-2013

**EXPERIENCE /NOC CERTIFICATE**

It is hereby certified that Dr. Maryam Rehman WMO working under MNCH Program at District Malakand since 01/06/2010 till date.

This office has no objection to apply for employment in any other department.

  
PROVINCIAL COORDINATOR  
NATIONAL MNCH PROGRAM  
PESHAWAR.

ATTTESTED  




GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

E - 9

Dated Peshawar the 12<sup>th</sup> January, 2017

NOTIFICATION.

No.SO(E)H-II/3-18/2016/1000: On the recommendations of Departmental Selection Committee, the Competent Authority (Chief Secretary Khyber Pakhtunkhwa) is pleased to appoint the following doctors as Medical Officers (BS-17) on Adhoc basis for a period of one year or till the arrival of selectees of Public Service Commission whichever is earlier with immediate effect.

OPEN MERIT (213 Candidates)

S.No.	Name and Fatorh Name	Zone	D.O.B
1.	Hakim Khan S/O Muhammad Shah	III	01/03/1979
2.	Muhammad Jawad S/O Jan Nisar	II	24/04/1981
3.	Saadia Haleema D/O Mukhtair Ali Khan	IV	25/05/1986
4.	Asma Zahir D/O Muhammad Zahir Khan	II	15/09/1980
5.	Anwar Ali S/O Bahroz Khan	III	15/03/1981
6.	Muhammad Sadiq S/O Abdullah Khan	II	17/04/1977
7.	Muhammad Iqbal S/O Faridun Khan CHINA	III	15/03/1984
8.	Muhammad Nauman Zafar S/O Zafar Biaz	I	31/10/1984
9.	Ittikhar Ahmad S/O Muhammad Isra: Khan	II	10/04/1987
10.	Mir Alam Khan S/O Abdul Latif	II	07/11/1979
11.	Muhammad Saieer S/O Muhammad Rafiq	II	30/03/1973
12.	Ishtiaq Ur Rahman S/O Hidayat Ur Rehman	III	04/03/1987
13.	Sajjad Gul S/O Rahim Gul	IV	13/04/1974
14.	Sheriza Shaheen D/O Muhammad Ishaq	V	02/03/1985
15.	Aheesa Fatima D/O Malik Muhammad Nisar	V	15/04/1989
16.	Abdul Wahab S/O Razaal Khan	I	15/02/1979
17.	Gul Badshah S/O Fazal Ur Rehman	I	01/12/1974
18.	Khial Jalal S/O Sahib Jalal	I	29/12/1978
19.	Qaisar Ali S/O Akbar Ali	I	25/02/1977
20.	Syeda Hina Zulfiqar D/O Syed Zulfiqar Hussain Shah	I	27/11/1984
21.	Arsalan Mufli S/O Taufiq Ahmad Mufli	II	14/08/1982
22.	Farman Ullah S/O Abdul Mustaan	III	01/02/1979
23.	Ittikhar Hussain S/O Inzar Gul	III	17/02/1982
24.	Muhammad Alam Khan S/O Muhammad Ali Khan	III	05/04/1976
25.	Nasir ul Mulk Khan S/O Jalal ud Din	III	01/04/1984
26.	Shahi Mulk S/O Muhammad Mukamal Khan	III	02/05/1970
27.	Zakaullah S/O Abbas Khan	III	15/04/1979
28.	Abdullah S/O Abdul Rashid	III	31/03/1979
29.	Wahid Waqas S/O Muhammad Mukhtiar	III	06/02/1987
30.	Arshad Ali s/o Ziarat Khan	I	15/05/1972
31.	Farid Ullah s/o Azim Khan	I	18/01/1982
32.	Muhammad Asif Hussain S/O Hajji Faqir Hussain	I	01/07/1977
33.	Muhammad Shah Jahan S/O Muhammad Gul	I	10/05/1976
34.	Raja Mir s/o Zarnir Khan	I	12/03/1974
35.	Faisal Khan S/O Muhammad Salim	II	26/02/1985
36.	Gul Faraz Khan S/O Gul Khitab Khan	II	20/09/1972
37.	Habib Ul Haq S/O Ikram Ud Din	II	20/01/1985
38.	Hina D/O Altaullah Khan	II	13/05/1987
39.	Moona Zahid D/O Syed Zahid Hussain Shah	II	10/09/1983
40.	Muhammad Irfan S/O Muhammad Anif	II	10/04/1983
		II	01/04/1980

*[Handwritten signature]*  
Secretary  
Health Department  
Peshawar

ATTESTED

*[Handwritten signature]*

FEMALE QUOTA (100)

S.NO	NAME AND FATHER NAME OF CANDIDATE	Zone	D.O.B
781	Hammad Ali s/o Muhammad Fiaz	V	12.02.1988
782	Ikrain zeb Khan S/O Jehanzeb Khan	V	02.01.1991
783	Junaid Iqbal S/O Zaffar Iqbal	V	06.10.1989
784	Khizar Hayat S/O Muhammad Ilyas Khan	V	16.03.1992
785	Mubashir Riaz S/O Dr. Riaz Muhammad	V	16.04.1990
786	Muhammad Najmul Ikram S/O Muhammad Shafiq	V	09.01.1988
787	Qurrri Ali S/O Qamar Zia	V	15.03.1989
788	Razi Ullah S/O Muhammad Iqbal Khan	V	15.03.1990
789	Tahira Sultan D/O Ahmad Sultan	V	11.10.1987
790	Syeda Maria Naz D/O S. Sibte Hussain	V	10.09.1984
791	Abdul Basil S/O Taj Muhammad Khan	V	01.11.1984
792	Zobeda Syed D/o Syed Yunas Shah	V	20.04.1982
793	Zaher Ahmad S/O Saeed Ahmad	V	22.02.1981
794	Syeda Mujahid Sherazi S/O Ajmal Hussain Shah	V	20.08.1988
795	Muhammad Zubair Afzal S/O Sher Afzal Khan	V	27.01.1986
796	Omer Khan S/O Ali Haider	V	19.02.1985
797	Sajid Khan S/O Khan Muhammad	V	02.04.1983
798	Fouzia Latif Abbasi D/O Abdul Latif Abbasi	V	23.09.1976
799	Shazadi Rizwana Banaras D/O Banaras Khan	V	12.04.1982
800	Muhammad Ismail S/o Fazl E Mehmood	V	15.03.1989
801	Anum Nazir D/O Nazir Ahmad Awan	V	07.10.1989
802	Saniha Nawaz D/O Rab Nawaz Khan	V	22.03.1987
803	Zahid Qamar S/O Qamar Zaman	V	25.02.1990
804	Ahsan Nazir Qureshi S/O Muhammad Nazir Qureshi	V	19.01.1991
805	Anum Khan Afsar D/O Khan Afsar Abbasi	V	26.06.1990
806	Arooba Rehman D/O Dr. Fazal ur Rehman	V	06.06.1989
807	Maryam Khan D/O Muhammad Anwar Khan	V	25.12.1991
808	Naira Azhar D/O Azhar Ali	V	21.07.1990
809	Oazi Naeem Ur Rehman S/O Mehboob Ur Rehman	V	23.01.1992
810	Sunila Munir D/O Muhammad Munir Awan	V	18.08.1989
811	Zainab Sajjad D/O Sajjad Akhtar Qazi	V	29-08-88
812	Azhar Naseem S/O Naseem Ashraf Abbasi	V	25.11.1977
813	Ghazanfar Saleem Jadoon S/O Muhammad Saleem	V	19.09.1990
814	Mehnaz Akhtar D/O Akhtar Javed Awan	V	09.11.1986
815	Saeed Ur Rehman s/o Jamil Ur Rehman	V	02-04-89
816	Samman Khurshid D/O Khurshid Ahmad	V	21.10.1989
817	Shamaila Riazat D/O Muhammad Riazat	V	07.07.1991
818	Zainab Bibi D/O Arif Mehmood	V	15.03.1991
819	Zeeshan Rashid S/O Abdur Rashid	V	06.12.1991
820	Javeria Zahid Khan D/o Zahid Ali Khan	V	03.05.1987
821	Irfan Kokab D/O Muhammad Asghar	V	21/05/1988
822	Alishba Iftikhar Khan D/O Iftikhar	V	04.07.1990
823	Adeel Zahir S/o Muhammad Zahir	V	30.12.1990
824	Ahmad Muhammad Rafique S/O Muhammad Rafique	V	30.04.1990
825	Azmat Sultana D/O Sher Ahmad Khan	V	28.11.1983
826	Muhammad Adnan Afsar S/O Afsar Khan	V	25.11.1990
827	Saniha Khatoon D/O Jamil Khan	V	05.01.1988
828	Sana Mehmood Gochi D/O Tariq Mehmood Gochi	V	14.10.1991
829	Shakeel Ahmad Alvi S/O Jameel ud Din Alvi	V	02.03.1985
830	Anjad Mehmood S/O Dair Khan	V	23.05.1985
831	Saleem Khan S/O Muhammad Akbar Khan	V	08.03.1983
832	Mohamad Asaad S/o Mohammad Saeed	V	10.04.1976
833	Marina Salim D/o Muhammad Salim Khan	V	01.01.1979
834	Muhammad Hammad S/O Dr. Abdul Wahid	V	24.09.1991
835	Nazneen Imran D/O Qazi Muhammad Yahya	V	13.4.1981
836	Farasat Umar S/o Muhammad Tasaddiq	V	10.04.1991
837	Lubna Irshad D/o Muhammad Irshad	V	26.03.1985
838	Fahad Anwar S/O Muhammad Anwar Awan	V	17.02.1991
839	Seemab Naheem D/O Naeem Akhtar	V	28.06.1989
840	Usman Roshan S/O Muhammad Roshan Khan	V	05.04.1990
841	Zupash D/O Sher Sahadar Khan	V	12-12-89
842	Subana Bhatti D/O Raja Tajmoor Ibrar	V	09.03.1986
843	Naghma Abid S/O Abid Hussain	V	14.09.1988
844	Adeela Nazish D/O Sain Muhammad	V	30.10.1989
845	Fuzgi Farooqi D/O Muhammad Tariq Farooqi	V	12.06.1991
846	Konran Sabir S/o Sabir Sultan	V	02.02.1991
847	Jawaria Hayat D/O Khizar hayat	V	20.04.1990
848	Qurat Ul Ain D/O Habib Ur Rehman	V	17/07/1988
849	Nomana Sadig S/O Muhammad Sadig	V	18.05.1985
850	Aroor Imtiaz D/O Syed Imtiaz Hussain Shah	V	05.01.1987

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ATTESTED



FEMALE QUOTA (100)

S.NO	NAME AND FATHER NAME OF CANDIDATE	Zone	D.O.B
851	Ahshan Khalid D/O Khalid Pervez	II	04.11.1990
852	Aisha Zahid D/O Zahid Hussain	II	15.08.1990
853	Amina Rehman D/O Fazal Rehman	II	03.03.1990
854	Aneesa Anam D/O Sabaz Ali Khan	II	25.10.1992
855	Arifa D/O Abdul Hadi	II	02.04.1990
856	Ayesha Rehman D/O Ajeeb ur Rehman	II	21.11.1989
857	Azra Nazeef D/O Muhammad Nazeef	II	15.04.1989
858	Faiza Mukhtiar D/O Syed Mukhtiar gul	II	12.01.1988
859	Fatima D/O Khair Ul' Bashir	II	09.01.1991
860	Hina Iftikhar D/O Iftikhar Khan	II	01.01.1990
861	Noreen Saba D/O Babar Khan	II	04.07.1986
862	Aqsa Ashraf D/O Ch. Muhammad Ashraf	II	09.09.1988
863	Seema Bibi D/O Syed Siraj Ahmad	II	24.02.1983
864	Tayyaba Rehman Butt D/O Abdur Rehman Butt	II	01.04.1978
865	Maryam Rehman D/O Fazl-e- Rehman	II	29.03.1983
866	Aasia Gul D/O Latif Ur rehman	II	07.08.1990
867	Humera Rabbani D/O Zahir Rabbani	II	05-04-89
868	Roobi Rehman D/O abdur Rehman	II	11.09.1990
869	Samreen Shah Malak D/O Malak Shah Wali	II	04.07.1988
870	Seema gul D/O Zirat Gul	II	03-04-87
871	Saima Jawad D/O Javed Khan	II	16.11.1981
872	Sofia Sunbal D/O Anwar Niaz	II	11.03.1991
873	Asma Inum D/O Shams Uz Zaman	II	05.01.1989
874	Bushra Zubair D/O Zubair Shah	II	04.10.1989
875	Haya Ahmad D/O Adil Ahmad	II	28.06.1992
876	Maria Sahibzada D/O Sahibzada Alamgir	II	09.08.1992
877	Mazish Naseer D/O Naseer Muhammad	II	03.10.1984
878	Maria Inayat D/O Inayatullah	II	04.02.1991
879	Saima Qamar D/O Qamar Nazir	II	15.12.1980
880	Urnama Jilani D/O Ghulam Jilani	II	20.09.1991
881	Chandnee D/O Rehmanhi Gul	II	26.03.1990
882	Sharafat Bibi D/O Muhammad Sharif	II	24.03.1985
883	Bushra Gul D/O Ikramullah	II	22.05.1984
884	Sunbal Altaf D/O Lutful Mabool	II	19.08.1979
885	Amina Yousaf D/O Syed Yousaf Shah	II	20.04.1981
886	Fahat Rahman D/O Khair-ur-Rahman	II	20.05.1989
887	Humas Haider D/O Haider Ali Khan	II	25.12.1990
888	Viqma Sardar D/O Sardar Ahmad	II	23.06.1991
889	Zaira Harum D/O Inamul Haq	II	16.08.1992
890	Fozia Mukhtiar D/O Mukhtiar-ur-Rehman	II	20.12.1987
891	Salma Mumtaz D/O Mumtaz Khan	II	16-08-90
892	Rubi Hayat D/O Badshah Hayat	II	23.10.1966
893	Robina Ali D/O Iqbal Khan	II	25.08.1988
894	Hafiza Rabail Ali D/O Akhtiar Ali	II	23.01.1991
895	Shamaila Parveen D/O Ali Hyder Shah	II	20.06.1989
896	Sunbal Iqbal D/O Iqbal Hussain	II	2.02.1991
897	Abida Siddiqui D/O Zafrullah Khan	II	5.12.1987
898	Aisha Nowshad D/O Nowshad Khan	II	3.02.1982
899	Amina Bibi D/O Abdul Bari	II	2.03.1989
900	Annum Noor D/O Noor Qasim Khan	II	4.03.1992
901	Jaharat Gul D/O Liaqat Ali Shah	II	16.04.1983
902	Laila Mukhtiar D/O Mukhtiar Ahmad	II	22.03.1986
903	Laila Saifullah D/O Saif Ullah	II	24.01.1987
904	Mahwish Khan D/O Himayat Ullah Khan	II	11.04.1990
905	Mamoona Khan D/O Taj Muhammad Khan	II	23.03.1989
906	Sydra Irshad D/O Muhammad Irshad	II	23.05.1988
907	Tanveer Fatima D/O Abdul Qayyum	II	29.11.1991
908	Perveen Akbar D/O Akbar Khan	II	24-08-89
909	Ancela Naz Saleem D/O Malik Saleem Shah	II	22.06.1985
910	Mamoona Saeed D/O Saeed Ullah	II	28.02.1969
911	Mehwish Yunas D/O Syed Maqbool Yunas	II	11.01.1990
912	Mahreen Sabz Ali D/O Sabz Ali Khan	II	25.11.1988
913	Amina Shaukat D/O Shaukat Ali	II	25.11.1988
914	Azra Aman D/O Aman Sher	II	27.09.1991
915	Fatima Khanam D/O Khan Badin	II	27.04.1990
916	Sadaf D/O Faqir Zada	II	23.03.1989
917	Samira Murad D/O Murad Ali	II	26.11.1987
918	Sana Ikram D/O Ikram Ullah Afridi	II	20.10.1990
919	Mazish Bahadur D/O Dr. Bahadur Khan	II	23.03.1982
920	Hina Umair D/O Ishliq Ahmad	II	21.01.1984
921	Uurat Ul' Ain D/O Aurangzeb Khan	II	28.08.1981
922	Syed Zainab Shah D/O Syed Muhammad Shah	II	27.11.1982
923	Saima Habib Bangash D/O Habib Ullah Khan	II	24.11.1987
924	Samra Shahzadi D/O Syed Shahzada	II	24.08.1977
925	Saeeda D/O Murtaza Khan	II	22.02.1976
926	Aisha Jan D/O Mian Jussuf Mian	II	25.05.1983

ATTESTED

11

# MEDICAL CERTIFICATE

F-12

Name of official MARYAM REHMAN  
 Caste or race PATHAN  
 Father's name FAZL-E-REHMAN  
 Residence VILLAGE AND P.O. GHAWAR KULLAY  
SAKHAROT MALAKAND DIVISION KADK  
 Date of birth 29-03-1983  
 Exact height by measurement 5 feet 8 inch  
 Personal mark of identification MOLE ON LEFT CHEEK  
 Signature of the official Dr. Maryam Rehman  
 Signature of head of office \_\_\_\_\_

Seal of office

I do hereby certify that I have examined Mr. MARYAM REHMAN a candidate  
 for employment in the Office of the HEALTH DEPARTMENT  
 and cannot discover that he had any disease communicable or other constitutional affection or bodily  
 infirmity except N/A

I do not consider this as disqualification for employment in the office of the HEALTH DEPARTMENT  
 His age according to his own statement 34 year and by appearance about  
 year THIRTY FOUR

**ATTESTED**

*[Signature]*  
 MEDICAL SUPERINTENDENT

CIVIL HOSPITAL

Police/Service Hospital  
Des 187824

*[Signature]*  
 Secretary  
 Standing Medical Board  
 Police/Service Hospital

LEFT HAND THUMB AND FINGER IMPRESSIONS

*[Signature]*  
 Physician  
 Police/Service Hospital





G-13

**OFFICE OF THE DISTRICT HEALTH OFFICER MALAKAND**  
**PHONE No.0932-410399, FAX No.0932-413110**  
**E-mail:dhomalakand279@gmail.com**

OFFICE ORDER.

The service of Dr.Maryam Rehman Women Medical Officer BPS-17 has please at the disposal of District Health Officer Malakand vide Govt. of Khyber Pakhtunkhwa Health Department Notification No.SO(E)H-II/3-18/2016/1000-1(S) dated 16<sup>th</sup> January, is hereby posted at RHC Sakhakot against the vacant post of against the vacant, in the best interest of public services.

District Health Officer  
Malakand.

No. 838-471 Dated Batkhela the 17/1/2017.

Copy to:

- 1-P.S to Secretary Health Govt. of Khyber Pakhtunkhwa.
- 2-Director General Health Services, Khyber Pakhtunkhwa Peshawar.
- 3-District Accounts Officer Malakand.
- 4-Senior Medical Officer Incharge RHC Sakhakot.

For information

- 5-Accountant of this office.
- 6-Doctor concerned.

For information and necessary action.

  
District Health Officer  
Malakand

**ATTESTED**





H - 14

**OFFICE OF THE DISTRICT HEALTH OFFICER MALAKAND**

**PHONE No.0932-410399, FAX No.0932-413110**

**E-mail dhomalakand279@gmail.com**

**CERTIFICATE OF TRANSFER OF CHARGE**

Certified that I, MARYAN REHMAN

Have this day before noon taken over charge as WOMEN MEDICAL OFFICER BPS-17  
Afternoon relinquished

with reference to Govt. of Khyber Pakhtunkhwa Health Department  
Notification No.SO(E)H-II/3-18/2016/1000-1(S) dated 16<sup>th</sup> January 2017

Particulars: APPOINTMENT ON ADHOC BASIS

Signature of relieving charge  
Government Servant \_\_\_\_\_

Designation \_\_\_\_\_

Station RHC SAKHAKOT  
Dated 17.01.2016 F.Noon.

Signature of receiving charge  
Government Servant DR. Maryan Rehman

Designation \_\_\_\_\_

No. 897-99 Dated Batkhela the 19/11/2017

Copy to:

- 1-Director General Health Services, Khyber Pakhtunkhwa Peshawar.
- 2-District Accounts Officer Malakand.
- 3-Senior Medical Officer Incharge RHC Sakhakot.
- 4-Accountant of this office.
- 5-Officer concerned

for information and necessary action.

**ATTESTED**

District Health Officer  
Malakand



National Maternal, Newborn & Child Health  
Program, Khyber Pakhtunkhwa

OFFICE ORDER

I - (15)

Resignation Dated 02/01/2017 tendered by Dr. Maryam Rehman WMO  
MNCH Program working at RHC Sakahkot District Malakah is hereby accepted with effect  
from 16/01/2017 subject to forfeited one month salary in lieu of one month prior notice..

PROVINCIAL COORDINATOR  
NATIONAL MNCH PROGRAM  
PESHAWAR

No 400-04 /PC/MNCH/PF.

Dated 11/2/2017

Copy forwarded for information and necessary action to:-

1. DHO Malakan.
2. Finance Officer, MNCH Program Peshawar.
3. M&E Officer, MNCH Program Peshawar.
4. WMO concerned.

5. Store keeper MNCH Program Pesh:  
to take over the MNCH assets given to her.

*Handwritten notes:*  
Handover concerned for  
MA  
2/2/17

ATTESTED





J-16

DIRECTORATE  
GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR

No. \_\_\_\_\_ / E.I.  
Dated: \_\_\_\_ / \_\_\_\_ / 2017.

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

E-Mail Address: [nw607@kpk.gov.pk](mailto:nw607@kpk.gov.pk)

Office Ph# 091-9210269

**NOTIFICATION.**

On her 1<sup>st</sup> Appointment as Women Medical Officer (BS-17) on Adhoc basis for a period of One year, Dr. Maryam Rehman D/O Fazl Rehman has assumed charge of her duties as Women Medical Officer (BS-17) at RHC, Skhakot (Malakand) on 17.01.2017 (FN).

DEPUTY DIRECTOR (HRM)  
DIRECTORATE GENERAL HEALTH  
SERVICES, KPK PESHAWAR

The Manager,  
Govt. Printing Press Khyber Pakhtunkhwa Peshawar  
For Publication in Government Gazette.

No. 2097 / E.I.

Dated Pesh. The. 27/02 / 2017.

Copy forwarded to the:-

01. Secretary to Govt. of KPK Health Department Peshawar for information.
02. District Health Officer, Malakand.
03. District Accounts Officer, Malakand (Original Health & Age certificate is attached).
04. AE-IV, DGHS office Peshawar.
05. Doctor concerned.  
For information and necessary action.

ATTESTED

DEPUTY DIRECTOR (HRM)  
DIRECTORATE GENERAL HEALTH  
SERVICES, KPK PESHAWAR



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

Dated Perwar May 20, 2017

NOTIFICATION

K-17

NO.SO(E)H-II/3-18/2017(1): In pursuance of clause of sub-section 1 Section 3of the Khyber Pakhtunkhwa (Regularization of Services) Act No. VII of 2017), the following Medical Officers B appointed on Adhoc basis, shall stand regularized with immediate effect against the posts which they are holding at the time of commencement of the Act ibid:

S.#	Name of doctor	Present posting
Charsadda		
1.	Syed Shaharyar Shah S/O Dr. Syed Roldar Shah	QH Charsadda
2.	Faiqa Khan D/O Mohibullah Khan	QH Charsadda
3.	Mahwish Khan D/O Hlmayat Ullah Khan	QH Charsadda
4.	Ranaz Begum D/o Nisar Ahmad	QH Charsadda
5.	Rabla Munir D/O Munir Ahmad	QH Charsadda
6.	Hadla Sabir D/O sabir Elahi	QH Charsadda
7.	Shumalla Raza D/o Anwar Shah	QH Charsadda
8.	Sidra Irshad D/O Muhammad Irshad	QH Charsadda
9.	Bibi Sabila D/O Muhammad Saleem	QH Charsadda
10.	Maryam Javid D/O Karam Javid	QH Charsadda
11.	Shan-e- Zahra D/O Muhammad Khalid Mehmood	QH Charsadda
12.	Fatima D/O Khair Ul Bashar	QH Charsadda

Govt. of Khyber Pakhtunkhwa  
Health Department

ATTESTED

35.	Matiullah S/O Waris Gul	Attached to DHO Malakand
36.	Shehla Khan D/O Habib ur Rahman	Attached to DHO Malakand
37.	Irfan Ghani S/O Ghani Gul	Attached to DHO Malakand
38.	Sana Nafees D/O Muhammad Nawab	Attached to DHO Malakand
39.	Nafees Ahmad S/O Bade uz Zaman Khan	Attached to DHO Malakand
40.	Tanveer Inam S/O Inamullah	Attached to DHO Malakand
41.	Ashfaq Ur Rehman S/O Abdul Haji	Attached to DHO Malakand
42.	Umar Raheem S/O Ibraheem	Attached to DHO Malakand
43.	Abdul Haleem S/O Khalil Ullah	Attached to DHO Malakand
44.	Kashif Hussham S/O Qayum Khan	Attached to DHO Malakand
45.	Amjad Hussain S/O Toti Rahman	Attached to DHO Malakand
46.	Naveed ur Rahman S/O Umar Rahman	Attached to DHO Malakand
47.	Amer Riaz s/o Riaz Ahmad	Attached to DHO Malakand
48.	Maryam Rehman D/O Fazi-e- Rehman	Attached to DHO Malakand
49.	Tariq Usman S/O Syed Mehmood	Attached to DHO Malakand
50.	Yasir Khan S/O Nadar Khan	Attached to DHO Malakand
51.	Roobl Rehman D/O abdur Rehman	Attached to DHO Malakand
52.	Husnul Hayat S/O Fazal Hayat	Attached to DHO Malakand
53.	Raza Muhammad S/O Gul Muhammad	Attached to DHO Malakand
54.	Qazi Shah Rukh S/o Qazi Nasim Ahmad	Attached to DHO Malakand
54.	Khadija Rehman D/O Shafi ur Rehman	Attached to DHO Malakand

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Section Officer  
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77.	Muhammad Ishfaq S/O Noor Waris	Male Attache to DHO
78.	Ebbad Jan S/O Fazal Khuda	Male Attache to DHO
79.	Muhammad Sohail Khan S/O Muhammad Rahim	Male Attache to DHO
80.	Muhammad Sadiq S/O Muhammad	Male DHO Dist.
81.	Gul Rehman S/O Khalil ur Rahman	Male DHO Dist.
82.	Abdur Ranim S/O Fazal Hakeem	Male DHO Dist.
83.	Imtiaz Gul S/O Saeed Gul	Male DHO Dist.
84.	Niaz Ali S/O Shah Wazir Khan	Male DHO Dist.
85.	Kaleem Ullah Khan S/O Shafi Ullah Khan	Male DHO Dist.
86.	Awais Ahmad S/O Bakht Zamin Shah	Male DHO Dist.
87.	Bilal Alam S/O Muhammad Alam	Male DHO Dist.
88.	Atta Ullah Shah S/O Ali Shah	Male DHO Dist.
89.	Afsaan Ahmad D/O Nazir Ahmad	Male DHO Dist.
<b>Lakki Marwat</b>		
90.	Abdul Wahab Khan S/o Gul Nawaz Khan	Male Attache to DHO Lakki Marwat
91.	Tariq Hameed S/o Hameedullah Khan	Male Attache to DHO Lakki Marwat
92.	Shafaat Ur Rehman S/o Muhammad Mehmood	Male Attache to DHO Lakki Marwat
93.	Wazir Ullah S/o Amanullah	Male Attache to DHO Lakki Marwat
94.	Mehtab Ahmad S/o Ahmad Khan	Male Attache to DHO Lakki Marwat
95.	Munir Khan S/o Haji Ghulam Nabi	Male Attache to DHO Lakki Marwat
96.	Ihsanullah Khan S/o Nawab Khan	Male Attache to DHO Lakki Marwat

ATTESTED

*[Handwritten Signature]*

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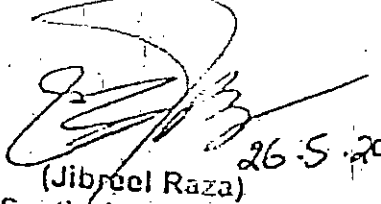
20

The inter se seniority of the doctors will be determined and notified separately.  
The above mentioned candidates will be on probation for initial period one year extendable upto another one year, if not terminated in writing as envisaged in Rule 13 on Appointment, Promotion and Transfer Rules, 1980.

Endt No. of even and date.

SECRETARY HEALTH

1. Accountant General, Khyber Pakhtunkhwa.
2. All Commissioners in Khyber Pakhtunkhwa.
3. Director General, Health Services, Khyber Pakhtunkhwa.
4. PSO to Chief Secretary, Khyber Pakhtunkhwa.
5. All Deputy Commissioners in Khyber Pakhtunkhwa.
6. All District Health Officers in Khyber Pakhtunkhwa.
7. All District Accounts Officers in Khyber Pakhtunkhwa.
8. All Medical Superintendent in Khyber Pakhtunkhwa.
9. Manager Printing Press, Khyber Pakhtunkhwa.
10. PS to Secretary Health, Khyber Pakhtunkhwa.

  
26.5.20  
(Jibreel Raza)  
Section Officer (E-II)  
Section Officer-II,  
Govt. of Khyber Pakhtunkhwa,  
Health Department

ATTESTED  




DNO 27812/EE  
Dt 25-08-17

L-21

OFFICE OF THE DISTRICT HEALTH OFFICER MALAKAND

PHONE No.0932-410399, FAX No.0932-413110

E-mail [dhomalakand279@gmail.com](mailto:dhomalakand279@gmail.com)

CERTIFICATE OF TRANSFER OF CHARGE

Certified that I, DR. MARYAM REHMAN  
Have this day before noon taken over charge as WOMEN MEDICAL OFFICER BPS-17  
Afternoon relinquished.

\_\_\_\_\_ with reference to Govt. of Khyber Pakhtunkhwa Health Department  
Notification No. SO(E)H-III/3-18/2017(1) DATED May 26, 2017

Particulars: REGULARIZATION

Signature of relieving charge  
Government Servant \_\_\_\_\_  
Designation \_\_\_\_\_

Station RHC SAKHAKOT  
Date 26.05.2017 F.Noon

Signature of receiving charge  
Government Servant Maryam Rehman  
Designation \_\_\_\_\_

No. 8968-72 Dated Balkhela the 24/8 2017.  
Copy to:

- 1-Director General Health Services, Khyber Pakhtunkhwa Peshawar.
- 2-District Accounts Officer Malakand.
- 3-Senior Medical Officer Incharge RHC Sakhakot  
for information.
- 3-Accountant of this office.
- 4-Official concerned  
for information and necessary action.

[Signature]  
District Health Officer  
Malakand

**ATTESTED**  
[Signature]

To

The Honorable Secretary Health,  
Khyber Pakhtunkhwa, Peshawar.

M - (22)

**SUBJECT: DEPARTMENTAL APPEAL FOR COUNTING OF PREVIOUS SERVICE RENDERED MNCH TOWARDS HEALTH DEPARTMENT IN LIGHT OF RULE 2.3 OF THE WEST PAKISTAN PENSION RULES, 1963 AND ARTICLE 371 A (i) OF THE CIVIL SERVICE REGULATIONS**

**R.SHEWETH,**

Most humbly it is stated that appellant was initially appointed as women medical officer (BPS-17) on contract basis for a period of two years in the project named Maternal, Newborn & Child Health Program, Khyber Pakhtunkhwa vide office order dated 31.5.2010.

Later on services of the appellant as women medical officer (BPS-17) on contract basis were extended from time to time and as such the appellant had performed her duties as women medical officer (BPS-17) in the said project quite efficiently and up to the entire satisfaction of her superiors.

During service in the said project the Khyber Pakhtunkhwa Public Service Commission advertised the posts Women Medical Officer (BPS-17) on adhoc basis. Appellant having the requisite qualifications and experience applied for the said post through proper channel and after participated in the selection process she was declared successful, accordingly the Khyber Pakhtunkhwa Public Service Commission recommended the appellant for appointment against the post of Women Medical Officer (BPS-17) in the Health Department.

Vide Notification dated 12.1.2017 the appellant was appointed as women medical officer (BPS-17) on adhoc basis, accordingly the appellant requested for her relieving from the project named MNCH. Accordingly the appellant was relieved w.e.f. 16.1.2017 vide office order dated 1.2.2017.

After relieving from the MNCH program the appellant submitted her arrival report at RHC, Sakhakot, Malakand and started her duty as Women medical Officer (BPS-17) quite efficiently and up to the entire satisfaction of her superiors. During service the Provincial Assembly Promulgated the Act, No.vii of 2017, herein after called the Regularization of Services Act, 2017 and in light of the Act ibid the services of the appellant along with her colleagues and junior colleagues were regularized by the Department vide Notification dated 26.5.2017.

As appellant had served in the MNCH project for more than seven years, therefore, in light of Rule 2.3 of the West Pakistan Civil services Pension Rules, 1963 and in light of Article 371 A (i) of the Civil service Regulations the appellant is fully entitle for counting of her previous service rendered in the project named Maternal, newborn & Child Health program towards Health Department with all back benefits.

It is therefore most humbly requested that on acceptance this Department appeal the previous service of the appellant may kindly be counted towards Health Department and oblige.

ATTESTED  
Q

**VAKALATNAMA**

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

\_\_\_\_\_ OF 2020

Dr. Maryam Rehman (APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Health Deptt, (RESPONDENT)  
(DEFENDANT)

I/We Maryam Rehman

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

Dated. \_\_\_\_/\_\_\_\_/2020

Maryam Rehman  
CLIENT

Noor Mohammad Khattak  
**ACCEPTED**  
**NOOR MOHAMMAD KHATTAK**

**SHAHZULLAH YOUSAFZAI**

Mir Zaman Safi  
**MIR ZAMAN SAFI**  
&

Afrasiab Khan Wazir  
**AFRASIAB KHAN WAZIR**  
**ADVOCATES**

OFFICE:  
Flat No.4, 2<sup>nd</sup> Floor, Juma Khan  
Plaza, near FATA Secretariat,  
Warsak Road, Peshawar.  
Mobile No.0345-9383141



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

**SERVICE APPEAL NO. 5676/2020**

Dr. Maryam Rehman.....Appellant

**Versus**

Government of Khyber Pakhtunkhwa & others .....Respondents

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*Filed  
Facal Dersen*

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

**SERVICE APPEAL NO. 5676/2020**

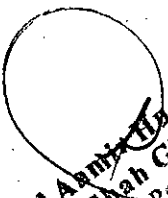
Dr. Maryam Rehman.....Appellant

**Versus**

Government of Khyber Pakhtunkhwa & others .....Respondents.

**Affidavit**

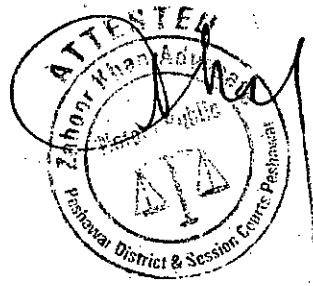
I, Laeeq Ahmad, Focal Person (Litigation) office of the Director General Health Services, Khyber Pakhtunkhwa, Peshawar, under the directions of the Competent Authority, do hereby solemnly affirm that the contents of the parawise Comments on behalf of Respondent are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'able Court.

  
Syed Amir Hussain  
(Shah G)  
Advocate Peshawar  
28/11/2022



Deponent

17301-1648599-



**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA**

**SERVICE TRIBUNAL PESHAWAR**

**SERVICE APPEAL NO.5676/2020**

Dr. Maryam Rehman.....Appellant

**Versus**

Govt. of Khyber Pakhtunkhwa, through Secretary, Health and Others.....Respondents

**PARAWISE COMMENTS ON BEHALF OF RESPONDENTS.**

**Respectfully Sheweth:**

**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.
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 and hit by laches.
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 however it is very much evident from the Office Order dated 01/02/2017 (Copy already annexed with the appeal as annex-I) that she resigned from the program services.
3. Misleading and incorrect. The appellant was appointed as Women Medical Officer (BPS-17) on the recommendation of Departmental Selection Committee of Health Department on Adhoc basis (Copy already annexed with the appeal as annex-A). Hence, the appellant trying to mislead the Hon'ble Khyber Pakhtunkhwa Service Tribunal that she was recommended by the Khyber Pakhtunkhwa Public Service Commission.
4. Correct to the extent that appellant was appointed as Women Medical Officer (BS-17) on Adhoc basis for a period of one year or till the arrival of selectees of Khyber Pakhtunkhwa Public Service Commission, whichever earlier on 12/01/2017 and her services were regularized vide Notification dated 26/05/2017 (Copy already annexed with the appeal as annex-K) in pursuance of the Khyber Pakhtunkhwa (Regularization of Services) Act 2017 with immediate effect.
5. Pertains to record, hence no comments.
6. Pertains to record however it is very much evident from the Office Order dated 01/02/2017 that she resigned from the program services on her own application dated 02/01/2017.
7. As per Para No. 3.
8. Correct to the extent that the appellant served in the program (MNCH) which was run by Federal Government however it is worth mentioning that that the appellant herself resigned from the program services and according to Rule 2.11(a) of West Pakistan Civil Services Pension Rules 1963, her past services has been forfeited

due to her resignation. Therefore the appellant is not entitled for its benefits. So far 371-A CSR is concerned, the same is not applicable to provincial employees being Federal subject as this Honorable Tribunal in service appeal No. 508/NEEM/1998 dated 26/12/2017 already decided the matter. Hence the appellant is not entitled for the counting of her previous service.

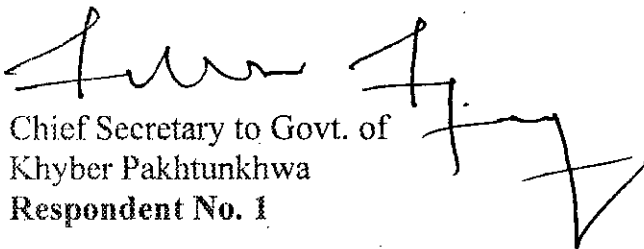
9. Subject to proof, however the appellant is not entitled for the relief.

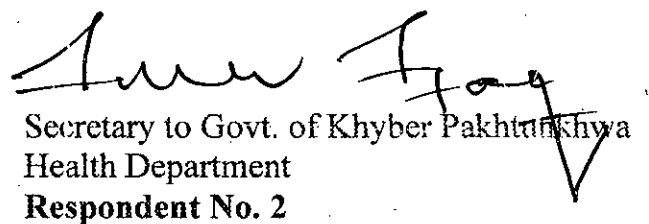
**ON GROUNDS:**

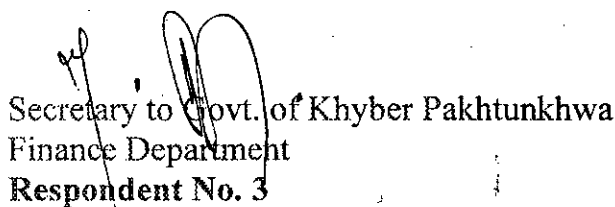
- A. Incorrect, detail reply has already been given in Para No. 8 of the Facts.
- B. Incorrect, the appellant has been treated in accordance with Article 4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- C. Incorrect, detail reply has been given in Para No. 8 of the Facts.
- D. Incorrect. The replying respondents acted as per law, rules, principles of natural justice and equality.
- E. The appellant has been treated in accordance with law and rules.
- F. Incorrect after tendering resignation and acceptance of the same under Rule 2.11 of Pension Rules 1963, her past services have been forfeited. Hence, she is not entitled for any benefits of the same.
- G. As per Para-F & Para No. 8 of the Facts.
- H. The replying respondents also seek permission of this honorable court to adduce other grounds during final arguments of the case.

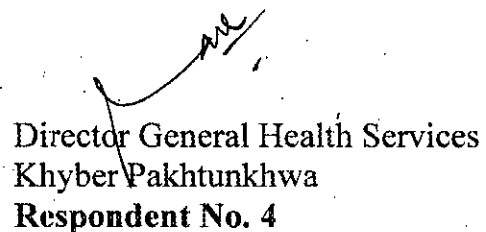
**PRAYER:**

It is therefore prayer that on acceptance of the instant comments, the titled appeal may please be dismissed with costs, throughout.

  
Chief Secretary to Govt. of  
Khyber Pakhtunkhwa  
Respondent No. 1

  
Secretary to Govt. of Khyber Pakhtunkhwa  
Health Department  
Respondent No. 2

  
Secretary to Govt. of Khyber Pakhtunkhwa  
Finance Department  
Respondent No. 3

  
Director General Health Services  
Khyber Pakhtunkhwa  
Respondent No. 4



GOVERNMENT OF PAKISTAN  
MINISTRY OF HEALTH

4  
A-5



National MNCH Program

National Maternal, Newborn & Child Health  
Program, Khyber Pakhtun Khwa

OFFICE ORDER

Date: 24-05-2010

No. 109-12/MNCH/H/2010. On the recommendations of Selection / Interview Committee meeting held on 24-05-2010 under the Chairmanship of Secretary Health, Govt. of Khyber Pakhtun Khwa, Dr. Maryam Rehman W/O Dr. Ashfaq Ahmad Khan appointed as Women Medical Officer in BPS-17 (fixed pay Rs. 45000/- per month & 5% as annual increment) against the vacant post on the disposal of Executive District Officer (Health) Malakand for further posting.. The appointment is on contract basis for a period of two years (extendable) on the terms and conditions mentioned below, in addition to other prevalent rules and regulations applicable. The appointment of the candidate is under the authority of the National MNCH Program, Khyber Pakhtun Khwa being specified for the provision of IMNCI & EmONC Services as mentioned in the PC-1 of the MNCH Program & the salary / incentive package will be paid by the same Program as per PC-1.

TERMS & CONDITIONS.

1. She is declared medically fit for Govt. service by authorized Medical Superintendent DHO Hospital / Police & Services Hospital Peshawar.
2. She will be governed by the same rules and regulations as may be issued by the Govt. from time to time & may be attached to the concerned Executive District Officer (Health) / District MNCH Cell Malakand. The E.D.O (H) is the controlling authority & will be responsible for their management at the District.
3. If she wishes to resign, she will resign in writing by giving prior notice of one month or deposit one month pay in lieu of one month advance notice.
4. She will perform & will provide the IMNCI & EmONC related Services for which she has been appointed.
5. Her appointment is purely on contract basis and can be terminated without any notice or reason being assigned.
6. This is purely non transferable appointment & posting.
7. She will not be entitled for any pension/gratuity for the services rendered.
8. She has to join duty at her own expenses.
9. If the above terms and condition are acceptable to her, she should report for duty to the office of the Executive District Officer (H) Malakand for further posting within one week of issuance of this Office Order, failing which the offer will be considered as withdrawn.

OFFICE ORDER



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

Dated Per May 20, 2017

NOTIFICATION

K-17

NO.SO(E)H-II/3-18/2017(1): In pursuance of clause of sub-section 1 Section 3of the Khyber Pakhtunkhwa (Regularization of Services) Act, 2017, (Khyber Pakhtunkhwa Act No. VII of 2017), the following Medical Officers B appointed on Adhoc basis, shall stand regularized with immediate effect against the posts which they are holding at the time of commencement of the Act Ibid:

S.#	Name of doctor	Present posting
Charsadda		
1.	Syed Shaharyar Shah S/O Dr. Syed Roldar Shah	QH Charsadda
2.	Faiqa Khan D/O Mohibullah Khan	QH Charsadda
3.	Mahwish Khan D/O Himayat Ullah Khan	QH Charsadda
4.	Ranaz Begum D/o Nisar Ahmad	QH Charsadda
5.	Rabla Munir D/O Munir Ahmad	QH Charsadda
6.	Hadla Sabir D/O sabir Elahi	QH Charsadda
7.	Shumalla Raza D/o Anwar Shah	QH Charsadda
8.	Sidra Irshad D/O Muhammad Irshad	QH Charsadda
9.	Bibi Sablla D/O Muhammad Saleem	QH Charsadda
10.	Maryam Javid D/O Karam Javid	QH Charsadda
11.	Shan-e- Zahra D/O Muhammad Khalid Mehmood	QH Charsadda
12.	Fatima D/O Khair Ul Bashar	QH Charsadda

Officer in Charge  
Khyber Pakhtunkhwa

ATTESTED

	Matiullah S/O Waris Gul	Attached to DHO Malakand
35.	Shehla Khan D/O Habib ur Rahman	Attached to DHO Malakand
36.	Irfan Ghani S/O Ghani Gul	Attached to DHO Malakand
37.	Sana Nafees D/O Muhammad Nawab	Attached to DHO Malakand
38.	Nafees Ahmad S/O Bade uz Zaman Khan	Attached to DHO Malakand
39.	Tanveer Inam S/O Inamullah	Attached to DHO Malakand
40.	Ashfaq Ur Rehman S/O Abdul Haji	Attached to DHO Malakand
41.	Umar Raheem S/O Ibraheem	Attached to DHO Malakand
42.	Abdul Haleem S/O Khalil Ullah	Attached to DHO Malakand
43.	Kashif Hussam S/O Qayum Khan	Attached to DHO Malakand
44.	Amjad Hussain S/O Toti Rahman	Attached to DHO Malakand
45.	Naveed ur Rahman S/O Umar Rahman	Attached to DHO Malakand
46.	Amer Riaz s/o Riaz Ahmad	Attached to DHO Malakand
47.	Maryam Rehman D/O Fazl-e- Rehman	Attached to DHO Malakand
48.	Tariq Usman S/O Syed Mehmood	Attached to DHO Malakand
49.	Yasir Khan S/O Nadar Khan	Attached to DHO Malakand
50.	Roobi Rehman D/O abdur Rehman	Attached to DHO Malakand
51.	Husnul Hayat S/O Fazal Hayat	Attached to DHO Malakand
52.	Raza Muhammad S/O Gul Muhammad	Attached to DHO Malakand
53.	Qazi Shah Rukh S/o Qazi Nasim Ahmad	Attached to DHO Malakand
54.	Khadija Rehman D/O Shafi ur Rehman	Attached to DHO Malakand

ATTESTED

Section Officer  
Govt. of Khyber Pakhtunkhwa  
Health Deptt.

77.	Muhammad Ishfaq S/O Noor Waris	Male	Attache	to DHO
78.	Ebbad Jan S/O Fazal Khuda	Male	Attache	to DHO
79.	Muhammad Sohail Khan S/O Muhammad Rahim	Male	Attache	to DHO
80.	Muhammad Sadiq S/O Sner Muhammad	DHO		DHO
81.	Gul Rehman S/O Khalil ur Rahman	DHO		DHO
82.	Abdur Rahim S/O Fazal Hakeem	DHO		DHO
83.	Imtiaz Gul S/O Saeesd Gul	DHO		DHO
84.	Niaz Ali S/O Shah Wazir Khan	DHO		DHO
85.	Kaleem Ullah Khan S/O Shafi Ullah Khan	DHO		DHO
86.	Awais Ahmad S/O Bakht Zamin Shah	DHO		DHO
87.	Bilal Alam S/O Muhammad Alam	DHO		DHO
88.	Atta Ullah Shah S/O Ali Shah	DHO		DHO
89.	Afshan Ahmad D/O Nazir Ahmad	DHO		DHO
<b>Lakki Marwat</b>				
90.	Abdul Wahab Khan S/o Gul Nawaz Khan	Attache		to DHO
91.	Tariq Hameed S/o Hameedullah Khan	Attache		to DHO
92.	Shafaat Ur Rehman S/o Muhammad Mehmood	Attache		to DHO
93.	Wazir Ullah S/o Amanullah	Attache		to DHO
94.	Mehtab Ahmad S/o Ahmad Khan	Attache		to DHO
95.	Munir Khan S/o Haji Ghulam Nabi	Attache		to DHO
96.	Ihsanullah Khan S/o Nawab Khan	Attache		to DHO

ATTESTED

*[Signature]*

*[Faint official stamp]*

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- 1. The order as to seniority of the doctors will be determined and notified separately.
- 2. The above mentioned candidates will be on probation for initial period one year extendable upto another one year, if not terminated in accordance as envisaged in Rule 15 on Appointment, Promotion and Transfer Rules, 1980.

Encl No of even and date.

SECRETARY HEALTH

- 1. Accountant General, Khyber Pakhtunkhwa.
- 2. All Commissioners in Khyber Pakhtunkhwa.
- 3. Director General, Health Services, Khyber Pakhtunkhwa.
- 4. PSO to Chief Secretary, Khyber Pakhtunkhwa.
- 5. All Deputy Commissioners in Khyber Pakhtunkhwa.
- 6. All District Health Officers in Khyber Pakhtunkhwa.
- 7. All District Accounts Officers in Khyber Pakhtunkhwa.
- 8. All Medical Superintendent in Khyber Pakhtunkhwa.
- 9. Manager Printing Press, Khyber Pakhtunkhwa.
- 10. PS to Secretary Health, Khyber Pakhtunkhwa.

  
26.5.20  
(Jibreel Raza)  
Section Officer (E-II)  
Section Officer-II,  
Govt. of Khyber Pakhtunkhwa  
Health Department

ATTACHED  
