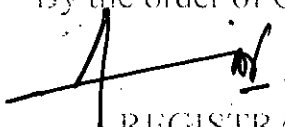


FORM OF ORDER SHEET

Court of _____

Appeal No. 1718/2023

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1- | 16/08/2023 | <p>The appeal of Mr. Pir Fazal Shah is presented today by Mr. Mir Zaman Safi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>25-08-2023</u>.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p> |

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 1718 /2023

PIR FAZAL SHAH

VS

GOVT: OF KP & OTHERS

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APPELLANT

THROUGH:

MIR ZAMAN SAFI

ADVOCATE

Office: Room No. 6-E, 5th Floor,
Rahim Medical Centre, Hashtnagri,
Peshawar.

Cell: 0333-9991564

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. 1718 /2023

Mr. Pir Fazal Shah, Junior Clerk (BPS-11),
Bacha Khan Medical College, District Mardan.

.....APPELLANT

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Establishment Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Secretary, Health 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 ISSUING/PREPARING JOINT AND INTER-SE-SENIORITY LIST OF THE MINISTERIAL STAFF I.E. JUNIOR/SENIOR CLERKS OF THE HEALTH DEPARTMENT AND AGAINST THE UN-NOTIFIED NOTIFICATIONS DATED 29.03.1982 AND 22.06.1983 AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS

PARYER:

That on acceptance of this appeal the respondents may very kindly be directed to issue/prepare joint and inter-se-seniority list of the Ministerial Staff of Health Department and the Un-Notified Notifications dated 29.03.1982 and 22.06.1983 may be declared as illegal, unlawful and void-ab-initio. Any other relief which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

- 1- That appellant is the employee of Health Department and is serving as Junior Clerk (BPS-11) at Bacha Khan Medical College, District Mardan quite efficiently and upto the entire satisfaction of his superiors. Copy of the appointment order is attached as annexure.....A.

- 2- That appellant is the senior most employee of Health Department and is serving against the same post i.e. Junior Clerk from the date of initial appointment and the Department has never granted a single benefit of promotion to the appellant till date.
- 3- That it is pertinent to mention that the Health Department unlawfully divided the Ministerial Staff into two cadres i.e. DG Health Services cadre and sub cadre (Sub Offices) of Health Department and in this respect issued separate seniority lists of the employees i.e. working at the strength of DG Health Office and in Sub Offices of Health Department. Copies of the seniority lists of DG Health Service cadre and Sub Cadre are attached as annexure.....**B, C & D.**
- 4- That the most junior employees who are working in the Directorate of Health Department have availed the benefit of promotions to the post of Senior Clerk and subsequent promotions to the post of Assistant (BPS-16) while the appellant and all those employees who are working in the Sub Offices/Hospitals are still working against the post of Junior Clerk (BPS-11). Copies of the promotion orders are attached as annexure.....**E & F.**
- 5- That it is also worth mentioning here that the authority concerned illegally and without any lawful authority divided the single cadre of Ministerial Staff into two cadres i.e. DG Health Services Cadre and Sub Cadre only to accommodate those employees who are working on the disposal of Directorate and this illegal and unlawful act which continuously affect the future services of the appellant.
- 6- That in this regard the appellant and his other colleagues preferred several applications/objections to the higher authorities for issuance/preparing joint and inter-se-seniority lists which were properly sent to the Worthy Director General Health Service Department, Khyber Pakhtunkhwa, Peshawar alongwith covering letters for preparing a draft of new service rules as well as joint and inter-se-seniority list of the Ministerial Staff of Health Department on the analogy of Elementary & Secondary Education Department and Higher Education Department but the respondent No.4 totally ignored the same. Copies of the correspondence are attached as annexure.....**G.**
- 7- That the respondent No.3 issued clear instructions to the respondent No.4 i.e. DG Health Services Department through letters dated 06.03.2023, 20.03.2023 and 24.03.2023 regarding submission of joint and inter-se-seniority list of the Director General Service cadre and sub cadre but in vain. Copies of the letters are attached as annexure.....**H, I & J.**

- 8- That the above mentioned cadres have been divided on the basis of un-notified notifications dated 29.03.1982 and 22.06.1983 which are not tenable in the eye of law and rules and as such the same are void-ab-initio. That even the separate seniority lists are issued without the support of any law, and even the un-notified Notifications and law under which the Supra notifications are allegedly issued, has also been repealed. Copy of the service rules alongwith Notifications dated 29.03.1982 and 22.06.1983 are attached as annexure.....K.
- 9- That the appellant feeling aggrieved from the action and inaction of the respondent No.4 by issuing separate seniority lists of the above mentioned cadres and not issuing joint and inter-se-seniority list preferred departmental appeals but no reply has been received so far from the quarter concerned. Copy of the departmental appeal is attached as annexure.....L.
- 10- That the appellant feeling aggrieved and having no other remedy but to file the instant writ petition on the following grounds amongst the others.

GROUND:

- A- That the action and inaction of the respondent Department by issuing separate seniority lists and not preparing/issuing joint and inter-se-seniority list of the Ministerial Staff of Health Department i.e. DG Health Services cadre and Sub cadre (Sub Offices) is against the law, facts, norms of natural justice and materials on the record.
- B- That the appellant has not been treated by the respondent No.4 in accordance with law and rules on the subject noted above and as such the respondents violated Article-4, 25 and 27 of the Constitution of Islamic Republic of Pakistan, 1973.
- C- That the respondent No.4 acted in arbitrary and malafide manner by not preparing joint and inter-se-seniority list of the Ministerial Staff i.e. Junior/Senior Clerks working in DG Health Service cadre and Sub-Cadre (Sub Offices) which is not tenable in the eye of law and rules.
- D- That being a provincial and a single separate seniority lists are illegal, unlawful and unjustifiable, hence the respondent department is duty bound to be issued a joint and inter-se-seniority list of the Ministerial staff.
- E- That the Ministerial staff divided into two cadres is illegal, unlawful, unconstitutional and ineffective upon the rights of appellant, therefore, the same is not tenable in the eye of law and liable to be merged in single cadre by preparing joint and inter-se-seniority lists.

F- That the separate seniority lists of DG Health Services cadre and Sub cadre (sub-Offices) of Health Department continuously affecting the promotions of the employees working in the sub offices, while the same is only beneficial for the employees working in the Directorate.

G- That separate seniority lists for the cadres of DG Health Services cadre and Sub Cadre (Sub Offices) of Health Department only beneficial for the employees working in the Directorate of Health Department while the same is in-effective upon the rights of sub-cadre.

H- That the separate seniority list for a single cadre is clear violation of Section-8 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-17 of the Civil Servants Appointment, Promotion and Transfer Rules, 1989.

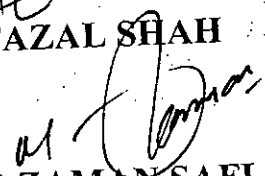
I- That the separate seniority lists are issuing on the basis of Notifications dated 29.03.1982 and 22.06.1983 are illegal, unlawful and without lawful authority and the same are un-notified, therefore, the same are void-ab-initio and liable to be struck down.

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

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

APPELLANT

PIR FAZAL SHAH

THROUGH: 
MIR ZAMAN SAFI
ADVOCATE

CERTIFICATE:

It is certified that no other earlier writ petition was filed between the parties.


DEPONENT

LIST OF BOOKS:

- 1- CONSTITUTION OF PAKISTAN, 1973.
- 2- SERVICES LAWS BOOKS.
- 3- ANY OTHER CASE LAW AS PER NEED.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

C.M NO. _____/2023

IN

APPEAL NO. _____/2023

PIR FAZAL SHAH

VS

GOVT: OF KP & OTHERS

APPLICATION FOR RESTRAINING THE RESPONDENTS
FROM FURTHER PROMOTIONS OF JUNIOR/SENIOR
CLERKS ON THE BASIS OF DISPUTED SEPARATE
SENIORITY LIST TILL THE DISPOSAL OF THE INSTANT
APPEAL

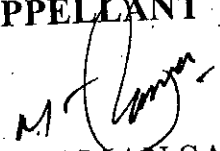
R/SHEWETH:

- 1- That the applicant filed the above mentioned appeal alongwith this application before this Honorable Tribunal in which no date has been fixed for hearing.
- 2- That appellant filed the above mentioned service appeal against the issuance of impugned separate seniority lists of Ministerial Cadre i.e. Junior/Senior Clerks.
- 3- That if the respondents make further promotions of the Junior/Senior Clerks on the basis of disputed separate seniority lists the appellant and those employees who are working in Sub Offices of Health Department would suffer a lot and as such face with irreparable loss.
- 4- That, all the three ingredients required for the grant of stay is in favor of the appellant.
- 5- That, any other ground would be taken at the time of arguments with prior permission of this Honorable Tribunal.

It is, therefore, most humbly prayed that on acceptance of this application the respondents may kindly be restrained from making further promotions on the basis of disputed separate seniority lists till the final disposal of the above mentioned service appeal.

APPELLANT

Through:


MIR ZAMAN SAFI
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. _____/2023

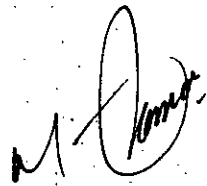
PIR FAZAL SHAH

VS

GOVT: OF KP & OTHERS

AFFIDAVIT

I, Mir Zaman Safi Advocate, High Court, Peshawar, on the instructions and on behalf of my client do hereby solemnly affirm that the contents of this **appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.



MIR ZAMAN SAFI,
ADVOCATE, HIGH COURT,
PESHAWAR

A - (6)
ORIGINAL

BACHA KHAN MEDICAL COLLEGE MARDAN

Prof. Zia-ul-Islam
Project Director / Principal



No. 1285 - A /BKMC
date: 11 / 02 / 2010

APPOINTMENT ORDER

In pursuance of the provision contained in sub section (2) of section 19 of the North West Frontier Province Civil servants Act, 1973 (NWFP Act No: XVIII of 1973), as amended by North West Frontier Province Civil Servants (Amendment) Act, 2005 (NWFP Act No. IX of 2005) and on the recommendation of Selection Committee BKMC, Mr. Pir Fazal Shah S/o Pir Jamal Shah NIC # 16101-0476901-1 R/o Pirano Dagma Mardan is appointed as Junior Clerk (BPS-7) on regular basis in the Bacha Khan Medical College Mardan on the following terms & conditions:

TERMS & CONDITIONS

1. He will be on probation initially for one year. His services can be terminated during the probation period, if his work and conduct found unsatisfactory.
2. He will be governed by such service rules and order as framed by the government from time to time for the category of government servant to which he belongs.
3. He will, for all intents and purposes, be Civil Servant except for the purpose of pension, commutation or gratuity. In lieu of pension, commutation or gratuity, he will be entitled to receive such amount as contributed by him toward Contributory Provident Fund (CP Fund) along with contribution made by Government to his account in the said fund, in the prescribed manner.
4. If he wishes to resign at any time, 14 days notice will be necessary or in lieu thereof 14 days pay will be forfeited.
5. He will produce an undertaking on judicial stamp paper that the documents provided by him are genuine / not fake and he has not been dismissed from any Govt. organization.

If he accepts this offer of appointment with the above mentioned terms and conditions, he is directed to report to the undersigned, within 07 days of the receipt of this order, alongwith fitness certificate issued by Medical Superintendent DHQ Hospital Mardan.

Project Director / Principal

Copy to:

1. Director General Health Services NWFP, Peshawar
2. District Comptroller of Accounts Mardan
3. Accounts Officer BKMC.
4. Pir Fazal Shah S/o Pir Jamal Shah R/o Pirano Dagma Mardan.
For information and necessary action.

Project Director / Principal

B-8

PROVISIONAL SENIORITY LIST OF JUNIOR CLERKS (BS-11) OF DGHS CADRE, KHYBERPUKHTUNKHWA, PESHAWAR FOR THE YEAR 2022

| S.No | Name / Father Name | Date of Appolntment as Junior Clerk | Place of Posting | DOB | Domicile | Date of Retirement |
|------|--|-------------------------------------|------------------|-------------|----------|--------------------|
| 1 | Tahir Naqash S/O Abdul Qayum Khan | 01.11.2010 | DGHS Office | 02.03.1982 | Peshawar | 01.03.2042 |
| 2 | Waqar Ali S/O Sardar Ali | 01.11.2010 | DGHS Office | 20.05.1982 | Peshawar | 19.05.2042 |
| 3 | All Raza S/O Abdul Khaliqb | 01.11.2010 | DGHS Office | 04.08.1982 | Peshawar | 03.08.2042 |
| 4 | Dilawar Taj S/O Sartaj all | 01.11.2010 | DGHS Office | 01.03.1986 | Peshawar | 28.02.2046 |
| 5 | Asfandyar S/O Gul Afzal | 01.11.2010 | DGHS Office | 18.12.1990 | Peshawar | 17.12.2050 |
| 6 | Noor ud din S/O Muhammad Jehangir | 12.04.2011 | DGHS Office | 11.09.1980 | Peshawar | 10.09.2040 |
| 7 | Muhammad Shahzaib Iqbal S/O Muhammad Iqbal | 12.04.2011 | DGHS Office | 27.11.1985 | Peshawar | 26.11.2045 |
| 8 | Muhammad Adil S/O Muhammad Iqbal | 12.04.2011 | DGHS Office | 01.04.1986 | Peshawar | 31.03.2046 |
| 9 | Izhar Ullah S/O Muhammad Irshad | 12.04.2011 | DGHS Office | 15.04.1989 | Peshawar | 14.04.2049 |
| 10 | Saeed Ullah S/O Habib Ullah | 01.06.2011 | DHHS Office | 17.04.1994 | Peshawar | 16.04.2054 |
| 11 | Numan Qadir S/O Abdul Qadir | 29.05.2013 | DGHS Office | 26.07.1991 | Peshawar | 25.06.2051 |
| 12 | Shehzad Ahmad S/O Mumtaz Ahmad Gul | 29.05.2013 | DGHS Office | 12.012.1994 | Peshawar | 11.12.2054 |
| 13 | Muhammad Anwar S/O Fazil Rahim | 15.07.2013 | DGHS Office | 04.06.1974 | Peshawar | 03.06.2034 |
| 14 | Ibrar Muhammad S/O Awal Khan | 15.07.2013 | DGHS Office | 31.08.1974 | Peshawar | 30.08.2034 |
| 15 | Abdullah Jan S/O Daulat Khan | 15.07.2013 | DGHS Office | 26.11.1977 | Peshawar | 25.11.2037 |
| 16 | Javed Khan S/O Zain Khan | 15.07.2013 | DGHS Office | 03.04.1979 | Peshawar | 02.04.2039 |
| 17 | Aurangzeb S/O Muhammad Ashraf | 15.07.2013 | DGHS Office | 16.04.1980 | Peshawar | 15.04.2040 |
| 18 | Aamer Chohan S/O Sohan Lal | 15.07.2013 | DGHS Office | 08.08.1980 | Peshawar | 07.08.2040 |
| 19 | Muhammad Naveed Khan S/O Zakir Ullah | 25.07.2013 | DGHS Office | 30.03.1992 | Peshawar | 29.03.2052 |
| 20 | Siyaf Khan S/O Dr. Sartaj Khan | 01.01.2015 | DGHS Office | 10.05.1987 | Peshawar | 09.05.2047 |
| 21 | Bakhtiar Sabri S/O Ishaq Ali Sabri | 30.08.2016 | DGHS Office | 31.03.1991 | Peshawar | 30.03.2051 |
| 22 | Muhammad Adil S/O Zahid Hussain | 30.06.2017 | DGHS Office | 11.04.1989 | Peshawar | 10.04.2049 |

ATTACHED
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| S No. | Name / Father Name | Date of Appointment as Junfor Clerk | Place of Posting | DOB | Domicile | Date of Retirement |
|-------|--|-------------------------------------|------------------|------------|----------|--------------------|
| 23 | Ahsan Ur Rehman S/O Matl ur Rehman | 08.08.2018 | DGHS Office | 03.03.1997 | Peshawar | 02.03.2051 |
| 24 | Ziaullah Khan Mashwani s/o Meraj-ud-Din | 07.03.2018 | DGHS Office | 06.04.1974 | Peshawar | 05.04.2034 |
| 25 | Muhammad Ibrahim S/O Yar Gul | 16.04.2019 | DGHS Office | 03.03.1986 | Peshawar | 02.03.2041 |
| 26 | Fayaz Ahmad S/O Falz Muhammad | 23.05.2019 | DGHS Office | 31.12.1997 | Peshawar | 04.04.2051 |
| 27 | Adil Shah S/O Zahir Shah | 24.05.2019 | DGHS Office | 19.02.1992 | Peshawar | 18.02.2051 |
| 28 | All Raza S/O Tariq Javeri | 24.05.2019 | DGHS Office | 26.09.1994 | Peshawar | 25.09.2051 |
| 29 | Syed Zulfiqar Ali Shah S/O Syed Iqbal Ali Shah | 24.05.2019 | DGHS Office | 25.05.1997 | Peshawar | 24.05.2051 |
| 30 | Ibad Ullah Shah S/O Jahanzeb Shah | 24.05.2019 | DGHS Office | 10.10.1998 | Peshawar | 09.10.2051 |
| 31 | Shahid Khan S/O Muhammad Yaqoob Khan | 08.11.2019 | DGHS Office | 11.11.1999 | Peshawar | 10.11.1951 |
| 32 | Mushtaq Khan S/O Salf ul Malook | 27.11.2019 | DGHS Office | 13.11.1974 | Peshawar | 12.11.2034 |
| 33 | Nageem Jan S/O Aslam Khan | 27.11.2019 | DGHS Office | 15.04.1977 | Peshawar | 14.04.2034 |
| 34 | Shah Khalid S/O Wazir Khan | 27.11.2019 | DGHS Office | 02.03.1980 | Peshawar | 01.03.2041 |
| 35 | Shah Alam Khan S/O Shahzada Khan | 27.11.2019 | DGHS Office | 04.03.1981 | Peshawar | 03.03.2041 |
| 36 | Idrees Khan S/O Hazrat Khan | 27.11.2019 | DGHS Office | 01.04.1986 | Peshawar | 31.03.2041 |
| 37 | Daniyal Kazmi S/O Syed Arshad kamal Shah Kazmi | 27.11.2019 | DGHS Office | 12.03.1990 | Peshawar | 11.03.2051 |
| 38 | Zahoor Ullah S/O Musharaf Khan | 27.11.2019 | DGHS Office | 10.04.1993 | Peshawar | 09.04.2051 |

Shahwan Afreen
DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

ATTACHED

10

PROVISIONAL SENIORITY LIST OF SENIOR CLERKS (BS-14) KHYBERPUKHTUNKHWA, PESHAWAR FOR THE YEAR 2022

| S No. | Name | Date of Appointment as Junior Clerk | Date of Promotion as Sr. Clerk | Place of Posting | DOB | Domicle | Date of Retirement |
|-------|--------------------------------------|-------------------------------------|--------------------------------|------------------|------------|-----------|--------------------|
| 1 | Abdul Aleem | 17.03.1991 | 19.05.2009 | DGHS Office | 10.01.1971 | Peshawar | 09.01.2 |
| 2 | S. Farman Shah | 18.12.1991 | 21.05.2013 | DGHS Office | 17.04.1971 | Peshawar | 16.07.2 |
| 3 | Kamran Javed | 18.12.1991 | 19.05.2009 | DGHS Office | 20.02.1973 | Peshawar | 19.02.2 |
| 4 | Mukhtiar Ali | 18.12.1991 | 19.05.2009 | DGHS Office | 07.03.1973 | Peshawar | 06.03.2 |
| 5 | Muhammad Shah | 18.06.1992 | 01.10.2019 | DGHS, office | 08.08.1968 | Peshawar | 08-08- |
| 6 | Hashmatullah | 12.11.1992 | 21.05.2013 | DGHS, office | 12.12.1972 | Peshawar | 11.12.7 |
| 7 | Nasrumnallah | 22.08.1993 | 21.05.2013 | DGHS Office | 02.01.1969 | Peshawar | 01.01.7 |
| 8 | Muhammad Ishaq S/O Sirbiland Khan | 22.08.1993 | 21.05.2013 | DGHS Office | 15.5.1969 | Peshawar | 14.05.7 |
| 9 | Mukarram Khan | 26.04.1994 | 21.05.2013 | HMC Peshawar | 08-07-55 | Peshawar | 07:07: |
| 10 | Umar Daraz | 23.11.1994 | 21.05.2013 | DGHS, Office | 15.01.1974 | Peshawar | 14:01: |
| 11 | Masam Khan | 20.01.1995 | 21.05.2013 | DGHS, Office | 06.02.1975 | Charsadda | 05:02: |
| 12 | Jehanzeb Khan | 09.02.1995 | 21.05.2013 | DHS FATA | 08.02.1975 | Peshawar | 07:02: |
| 13 | Muhammad Zahir | 14.02.1995 | 21.05.2013 | DGHS Office | 03.03.1974 | Peshawar | 02:03: |
| 14 | M. Shahid Amin | 12.05.1996 | 21.05.2013 | DGHS Office | 02.09.1976 | Charsadda | 01.09 |
| 15 | Wajid Shah | 17.09.1996 | 01.10.2019 | DHS, FATA | 30.09.1963 | Khyber | 29.09 |
| 16 | Nadeem Ullah | 17.09.1996 | 01.10.2019 | DHS, FATA | 09.01.1972 | Peshawar | 08.01 |
| 17 | Khalid Said | 19.09.1996 | 01.10.2019 | DHS, FATA | 15.09.1974 | Khyber | 14.09 |
| 18 | Nasim Ahmad | 19.05.1997 | 01.10.2019 | DGHS Office | 01.06.1966 | Peshawar | 31.06 |
| 19 | Muhammad Imran S/O Muhammad Younas | 14.06.1997 | 01.10.2019 | DHS, FATA | 01.08.1975 | Peshawar | 31.08 |
| 20 | Shaukat Ali | 01.07.1997 | 01.10.2019 | DHO Nowshera | 01.08.1971 | Peshawar | 31.08 |
| 21 | Muhammad Fayyaz | 29.06.1998 | 01.10.2019 | DHS, FATA | 02.05.1974 | Peshawar | 01.05 |
| 22 | Ikram Ullah S/O Fazal Rabbani | 25.01.2000 | 01.10.2019 | DGHS, Office | 20-10-74 | Charsadda | 19-10 |
| 23 | Zulfiqar Ali | 20.03.2002 | 01.10.2019 | DGHS, office | 16.01.1966 | Peshawar | 15.01 |
| 24 | Irfan Ullah S/O Nalmat Ullah | 20.03.2002 | 01.10.2019 | DGHS, office | 15.03.1974 | Peshawar | 14.03 |
| 25 | Abid Muhammad | 28.01.2004 | 01.10.2019 | KMC Peshawar | 15.02.1972 | Khyber | 14.02 |
| 26 | Mubashir Khan S/O Muhammad Ashraf | 29.04.2006 | 01.10.2019 | DGHS, Office | 07.01.1978 | Peshawar | 06.01 |
| 27 | Muhammad Nadeem | 29.04.2006 | 01.10.2019 | DGHS, Office | 01.12.1984 | Peshawar | 30.12 |
| 28 | Mujahid Khan S/O Firdous Khan | 02.12.2006 | 01.10.2019 | DHS, FATA | 01.06.1977 | Charsadda | 31.06 |
| 29 | Naveed ur Rahman | 06.07.2007 | 01.10.2019 | DHS, FATA | 10.04.1986 | Charsadda | 09.04 |
| 30 | Shafiqat Ullah Shah S/O Tilawat Shah | 31.07.2007 | 01.10.2019 | DGHS, Office | 08.03.1988 | Charsadda | 07.03 |
| 31 | Noman Hadi S/O Shamsul Hadi | 11.05.2009 | 01.10.2019 | DGHS, Office | 05.04.1983 | Bannu | 04.04 |
| 32 | Samin ul haq S/O Fazle Han | 03.03.2010 | 01.10.2019 | DGHS, Office | 01.07.1965 | Peshawar | 31.07 |

ATTACHED


(11) (13)

| S.No. | Name | Date of Appoitment as Junior Clerk | Date of Promotion as Sr.Clerk | Place of Posting. | DOB | Domicile | Date Retira |
|-------|--|------------------------------------|-------------------------------|-------------------|------------|-----------|-------------|
| 33 | Mumfat Ali Shah | 03.03.2010 | 01.10.2019 | DGHS, Office | 18.11.1968 | Charsadda | 17.11. |
| 34 | Fahad Khan S/O Khan Rose | 22.03.2010 | 15.12.2021 | DGHS, Office | 01.02.1991 | Peshawar | 31.01. |
| 35 | Syed Irfan Haidar Shah S/O Syed Shabbir Hussain Shah | 01.11.2010 | 15.12.2.21 | DGHS, Office | 01.11.1981 | Peshawar | 01.11. |
| 36 | Syed Mehmood Ali Shah S/O Syed Abid Ali Shah | 01.11.2010 | 15.12.2.21 | DGHS, Office | 11.01.1983 | Peshawar | 10.01. |
| 37 | Fazal Mahmood S/O Fateh Muhammad | 01.11.2010 | 15.12.2.21 | DGHS, Office | 10.06.1985 | Peshawar | 09.06. |
| 38 | Faisal Javed S/O Javed Iqbal | 01.11.2010 | 15.12.2.21 | DGHS, Office | 05.11.1990 | Peshawar | 04.11. |

Shabeen Afidi
DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

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| | |
|---|--|
|  | DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA, PESHAWAR |
| | E-Mail Address: hr@dgshs.kp.gov.pk office: Psh 091-9210259, 9210196 Fax #: 091-9210230 |

No. 13328-47 Promotion Cell Dated Peshawar the

05/12/2022

To,

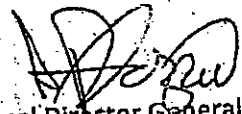
1. The Director General PHSA, Peshawar.
2. The Director IKD, Hayatabad, Peshawar
3. The Chief Executive Officer, PGMI, Peshawar.
4. All Principals/Deans of Public Sector Medical Colleges in Khyber Pakhtunkhwa
5. All Hospital Directors of MTIs in Khyber Pakhtunkhwa
6. All Medical Superintendents of Hospitals in Khyber Pakhtunkhwa
7. All District Health Officers in Khyber Pakhtunkhwa
8. All Project Directors/Program Managers and Provincial Coordinators of Vertical Projects/Programs in Health Department Khyber Pakhtunkhwa

Subject:

PROVISIONAL SENIORITY LIST OF JUNIOR CLERK (BS-11) & SENIOR CLERK (BS-14)
(SUB-CADRE) OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA-2021-22.

Enclosed please find herewith Provisional Seniority List of above-mentioned categories for information of all concerned with the request that the same may be circulated amongst all the Incumbents for their perusal with the request to go through the lists and submit their inputs within 15 days in case of any error, omission and objection (if any); so as to finalize the seniority lists in order to initiate the process of promotion. The list can also be viewed on website www.dhis.kp.gov.pk.


Note: All the incumbents are directed to submit their appointment/promotion orders for record.


Additional Director General (HR)
Directorate General Health Services Khyber
Pakhtunkhwa, Peshawar.

C.c

1. The Secretary to Government of Khyber Pakhtunkhwa Health Department Peshawar.
2. The Director DHIS, DGHS Office, Khyber Pakhtunkhwa, for information with the request to upload the attached seniority list of Junior Clerk (BS-11) and Senior Clerk (BS-14) Health Services Khyber Pakhtunkhwa on the website mentioned above.
3. Faisal Javed Karim, President APCA, KPK, Peshawar.

For information:


ATTACHED

13

| PROVINCIAL SENIORITY LIST OF JUNIOR CLERKS (BS-11) SUB-CADRE OF HEALTH SERVICES IN KHYBER PAKHTUNKHWA PESHAWAR 2022 | | | | | | |
|---|---|-------------------------------------|--------------------------------|------------|------------------|---|
| S No. | Name / Father Name | Date of Appointment as Junior Clerk | Place of Posting | DOB | Domicile | Date of Retirement |
| 1. | Dawood Khan S/O Muhammad Akbar Khan | 04-10-89 | KTH Peshawar | 13-08-68 | Peshawar | 12-08-2028 |
| 2. | Khan Muhammad | 16-10-89 | AHQ Teaching H: Miran Shah | 20.12.1969 | North Waziristan | 19.12.2029 |
| 3. | Kamal Amar Balg S/O Uz Balg | 21-11-89 | DHO Abbottabad | 02.04.1964 | Abbottabad | 01.04.2024 Forgone his promotion 13/05/2019 |
| 4. | Tahir Ali S/O Khair Din | 25-11-89 | DHO Abbottabad | 25.06.1968 | Abbottabad | 24.06.2028 Forgone his promotion 13/05/2019 |
| 5. | Marizoor Hussain S/O Mir Afzal | 21-12-89 | ATH, Abbottabad | 08.01.1967 | Abbottabad | 07.01.2027 |
| 6. | Iqbal-ud-Din S/O Abdul Ghan | 25-01-90 | DHO Dir Lower | 06.02.1965 | Dir Lower | 05.02.2025 |
| 7. | Zakir Hussain S/O Khan Gul | 15-03-90 | LRH Peshawar | 03.01.1970 | Kohat | 02.01.2030 |
| 8. | Altaf Qadir S/O Haji Gul Bahadar | 28-03-90 | MAM Hosp: Peshawar | 30.04.1970 | Peshawar | 29.04.2030 |
| 9. | Maqsood Ur Rehman S/o Shah Zaman | 01-07-90 | ATH Abbottabad | 25.08.1968 | Abbottabad | 24.08.2028 |
| 10. | Amanullah | 24-09-90 | Agency Surgeon Wana | 11.03.1970 | North Waziristan | 10.03.2030 |
| 11. | Naviaz Ahmad | 30-09-91 | LRH Peshawar | 21.04.1971 | Peshawar | 20.04.2031 |
| 12. | Sallim Javeed S/O Kalo Khan | 04-11-91 | MMM Teaching Hospital D.I.Khan | 05.09.1972 | D.I.Khan | 04.09.2032 |
| 13. | Ibne Amin S/o Mobeem Khan | 18-01-92 | DHQ Hospital Nowshera | 10.05.1972 | Nowshera | 09.05.2032 |
| 14. | Wahid Sher S/O Muhammad Sher | 01-07-92 | DHO, Swabi | 01.10.1968 | Swabi | 01.10.2028 |
| 15. | Abdul Khalid S/O Akram Khan | 05-07-92 | DHO Abbottabad | 12.01.1970 | Karak | 11.01.2030 |
| 16. | Nawab Khan | 02-08-92 | LRH Peshawar | 25.04.1972 | Peshawar | 24.04.2032 |
| 17. | Nasrullah Khan S/O Abdul Ghafoor | 21-03-93 | DHQT Hospital, Kohat | 12.10.1970 | Kohat | 11.10.2030 |
| 18. | Muhammad Raza | 29-06-93 | DHO Abbottabad | 11.05.1968 | Abbottabad | 10.05.2028 |
| 19. | Muhammad Younas Shah S/O Syed Muhammad Ismail | 21-10-93 | MMC Mardan | 18.04.1973 | Mardan | 17.04.2033 |
| 20. | Tariq Ahmad S/O Noor Ahmad | 01-10-94 | BBS Abbottabad | 02.04.1963 | Abbottabad | 01.04.2023 Forgone his promotion 08/05/2019 |
| 21. | Bakht Munir S/O Bakht Karam | 12-10-94 | SMC Swat | 06.01.1969 | Swat | 05.01.2029 |
| 22. | Shabir Ahmad | 23-10-94 | DHO Peshawar | 01.01.1967 | Kurram | 31.12.2026 |
| 23. | Sufail Iqbal Khan S/o Muhammad Iqbal Khan | 06-12-94 | DHO, D.I Khan | 15.03.1972 | D.I Khan | 14.03.2032 |
| 24. | Sayed Hamid Hussain S/O Syed Ali Hussain | 22-12-94 | DHQH, Parachinar | 14.03.197 | Kurram | 13.03.2035 |
| 25. | Ashiq Hussain S/O Sabir Hussain | 28-12-94 | AHQ H: Parachinar | 12.04.1968 | Kurram | 11.04.2028 |
| 26. | Said Hamid Hussain S/O Sardar Hussain | 29-12-94 | DHO, Kurram | 19.04.1970 | Kurram | 18.04.2030 |
| 27. | Muhammad Fayaz S/O Muhammad Yaqoob | 21-01-95 | KMC Peshawar | 02.03.1974 | Peshawar | 01.03.2034 |
| 28. | Bakhtiar Ahmad | 26-01-95 | PGMI/ HMC, Peshawar | 26.09.1974 | Peshawar | 25.09.2034 |
| 29. | Inamullah S/O Abdur Rabbi | 31-01-95 | KTH Peshawar | 20.11.1972 | Charsadda | 19.11.2032 |

ATTENDED

| S.No. | Name / Father Name | Date of Appointment as Junior Clerk | Place of Posting | DOB | Domicile | Date of Retirement |
|-------|---|-------------------------------------|-------------------------------|------------|------------------|--------------------|
| 30. | Gohar Ali S/o Nalk Zada Bacha | 01-02-95 | DHQ: Batkhela | 01.02.1969 | Swat | 31.01.2028. |
| 31. | Abdul Ali S/O Badshah Wall | 11-02-95 | AHQ Hospital Miranshah | 10.12.1973 | North Waziristan | 09.12.2033 |
| 32. | Saif ur Rahman S/O Fazal Mehmood | 15-02-95 | KTH Peshawar | 17.03.1967 | Orakzai | 16.03.2027 |
| 33. | Aamjad Ali | 27-02-95 | Agency Surgeon Orakzai | 09.09.1972 | Orakzai | 08.09.2032 |
| 34. | Muhammad Riaz S/O Tamash Khan | 28-02-95 | DHS Merged Area | 14.03.1967 | Khyber | 13.03.2027 |
| 35. | Jan Zarif S/O Ajmal Zarif | 05-04-95 | AHQ Miranshah | 11.02.1974 | Charsadda | 10.02.2034 |
| 36. | Javed Khan S/O Mehar Dil Khan | 06-04-95 | Maternity Hosp: Peshawar | 10-11-68 | Charsadda | 09-11-2028 |
| 37. | Taj Ali Khan S/O Sardar Ali Khan | 17-04-95 | DHO, Lakki Marwat | 06.02.1970 | Lakki Marwat | 05.02.2030 |
| 38. | Hazrat Yousaf | 20-04-95 | Agency Surgeon Bajaur Agency | 01.07.1965 | Bajaur | 30.06.2025 |
| 39. | Abdul Wadood | 20-04-95 | Agency Surgeon Mohmand Agency | 01.04.1969 | Mohmand | 31.03.2029 |
| 40. | Gulab Khan S/O Mirat Khan | 30-04-95 | DHQ Hospital Wana S.W | 14.04.1968 | Swat | 13.04.2028 |
| 41. | Umar Badshah | 02-05-95 | DHO, Malakand | 01.02.1971 | Malakand | 31.01.2031 |
| 42. | Sayed Nijat Hussain S/O Gulab Hussain | 18-05-95 | AHQ: Parachinar | 26.03.1975 | Kurram | 25.03.2035 |
| 43. | Sar Anajam Khan S/O Sher Khan | 28-06-95 | DHO Peshawar | 06.09.1971 | Peshawar | 05.09.2031 |
| 44. | Ashiq Ali | 29-06-95 | DGHS, Peshawar | 01.04.1966 | Mardan | 31.03.2026 |
| 45. | Haseen ur Rehman S/O Inayat ur Rehman | 01-07-95 | DHO, Charsadda | 15.03.1971 | Charsadda | 14.03.2031 |
| 46. | Abdul Hamid S/O Khair Muhammad | 01-07-95 | KTH Peshawar | 01.09.1971 | Karak | 31.08.2031 |
| 47. | Wajid Ali S/O Muhammad Ali | 01-07-95 | AHQ: Parachinar | 13.02.1973 | Kurram | 12.02.2033 |
| 48. | Saif Ullah S/o Malik Gul Jan | 02-07-95 | GMC DI Khan | 10.11.1974 | D.I Khan | 09.11.2034 |
| 49. | Fazle Qadir | 16-07-95 | DGHS Peshawar | 13.05.1974 | Charsadda | 12.05.2034 |
| 50. | Umar Gul Jan | 27-07-95 | KTH Peshawar | 15.02.1969 | Nowshera | 14.02.2029 |
| 51. | Mushtaq Khan S/O Muhammad Yousaf | 29-07-95 | DHO Mardan | 29.07.1971 | Mardan | 03.02.2031 |
| 52. | Fazli Akbar S/O Muhammad Fayyaz | 30-07-95 | DHQ Hosp: Mardan | 11.05.1969 | Mardan | 10.05.2029 |
| 53. | Muhammad Siraj S/O Muhammad Akber | 31-07-95 | DHO, Peshawar | 04.05.1972 | Peshawar | 03.05.2032 |
| 54. | Amin Gul S/O Muhim Gul | 15-08-95 | DHO, Swat | 05.05.1974 | Swat | 04.05.2034 |
| 55. | Abdullah S/O Faridoon | 23-09-95 | Saidu Medical College Swat | 10.09.1965 | Swat | 10.09.2027 |
| 56. | Syed Nasim Abbas Shah S/O Syed Sadiq Hussain Shah | 26-09-95 | DHQ D.I Khan | 18-07-1969 | D.I Khan | 17-07-2029 |
| 57. | Anwar Ali S/O Ali Akbar | 04-10-95 | DHO Swat | 04.03.1969 | Swat | 03.03.2029 |
| 58. | Sadiqullah S/O Attaullah Khan | 01-11-95 | MS DHQ, Karak | 15.04.1969 | Karak | 14.04.2029 |
| 59. | Muhammad Shabir S/O Abdul Jallil | 26-11-95 | DHO Haripur | 17.02.1971 | Abbottabad | 26.02.2031 |
| 60. | Najib Zaman | 10-12-95 | PGMI Peshawar | 17.01.1971 | Peshawar | 16.01.2031 |
| 61. | Javed Iqbal S/O Sher Azam Khan | 24-01-96 | DHO Chitral | 12.02.1973 | Chitral | 11.02.2033 |
| 62. | Ihsanullah | 01-02-96 | KMC Peshawar | 02.02.1975 | Peshawar | 01.02.2035 |
| 63. | Said Muhammad S/O Mir Zaman | 26-02-96 | Agency Surgeon NWA | 28.02.1971 | NWA | 27.02.2031 |

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| S No. | Name / Father Name | Date of Appointment as Junior Clerk | Place of Posting | DOB | Comidile | Date of Retirement |
|-------|---|-------------------------------------|------------------------------|------------|-----------------|---------------------------------|
| 64. | Asif Rehman S/O Nek Muhammad | 29-02-96 | DHO Karak | 11.05.1974 | Karak | 10.05.2034 |
| 65. | Ghulam Abass S/O Malik Gamb | 09-04-96 | DHO D.I.Khan | 20.08.1970 | D.I Khan | 20.08.2030 |
| 66. | Taslim Bad.Shah S/O Rang Bad Shah | 24-04-96 | DHQ Hosp: Karak | 26.03.1968 | Karak | 25.03.2028 |
| 67. | Abdul Wadood S/O Fazal Wadood | 02-05-96 | DHO Swat | 13.05.1966 | Swat | 12.05.2026 |
| 68. | Zahoor ul Islam S/O Islam Murad | 06-05-96 | DHO, Malakand | 01.03.1969 | Malakand | 29.02.2029 |
| 69. | Salfullah Khan S/O Lal Bad Shah | 16-06-96 | DHO Tank | 10.09.1974 | Tank | 09.09.2034 |
| 70. | Muhammad Ayub S/O Muhammad Yousaf | 20-08-96 | DHO, Malakand | 15.04.1971 | Malakand | 14.04.2034 |
| 71. | Nadeemullah | 07-09-96 | Nursing School Mardan | 09.01.1972 | Mardan | 08.01.2032 |
| 72. | Muhammad Yaar | 01-01-97 | Agency Surgeon Bajour Agency | 10.06.1964 | Bajaur | 09.06.2024 |
| 73. | Muhammad Rizaz | 31-03-97 | DHQT Hospital DI Khan | 09.09.1972 | D.I Khan | 08.09.2032 |
| 74. | Syed Tahir Hussain S/O Syed Yayah Hussain | 14-10-97 | AHQ Parhachinar | 21-04-74 | Kurram | 20-04-2034 Verification 2006 |
| 75. | Syed Farooq Shah S/O Gul Badshah | 18-12-97 | DHO Manshehra | 28.03.1966 | Manshehra | 27.03.2026 |
| 76. | Rafi Ullah S/O Muhammad Sadiq | 01-06-98 | DHQM, Lakki | 16.04.1976 | Lakki Marwat | 16.04.2036 |
| 77. | Muhammad Tariq | 20-06-98 | Agency Surgeon Wana | 12.04.1967 | D.I Khan | 11.04.2027 |
| 78. | Iftikhar Ahmad Shah S/O Nazir Ahmad Shah | 01-09-98 | Agency Surgeon Wana | 08.01.1969 | Sout Waziristan | 07.01.2029 |
| 79. | Azmat Ali Shah S/O Rehmat Ali Shah | 17-10-98 | DHO Peshawar | 04.04.1977 | Peshawar | 03.04.2037 |
| 80. | Qasim Jan S/O Feroz Shah | 28-12-98 | DHS FATA | 16.06.1974 | Charsadda | 15.06.2034 |
| 81. | Ali Akber S/O Afzal Khan | 25-01-99 | DHO Charsadda | 01.01.1976 | Charsadda | 31.12.2035 |
| 82. | Jamshed Ahmad s/o Khalsta Gul | 16-02-99 | DHO Charsadda | KCD | Peshawar | |
| 83. | Muhammad Arshad s/o m. zaman | 16-02-99 | BKMC MARDAN | 06.11.1969 | Peshawar | 05.11.2029 |
| 84. | Khalil ur Rehman | 16-02-99 | HMC Peshawar | 30.04.1970 | Peshawar | 29.04.2030 |
| 85. | Abdul Khalil S/O Atta Muhammad Khan | 18-09-99 | DHQ Hospital, Bannu | 03.02.1978 | D.I Khan | 02.02.2038 |
| 86. | Abdul Wajid S/O Abdul Wadood | 15-10-99 | DHQ Hospital Bannu | 16.07.1970 | Bannu | 15.07.2030 |
| 87. | Syed Majid S/O Syed Nisar Ahmad | 11-03-00 | LRH Peshawar | 01.11.1974 | Peshawar | 30.10.2034 |
| 88. | Muhammad Imran S/O Adam Khan | 17-07-00 | DHQ Lakki Marwat | 02.04.1982 | Lakki Marwat | 01.04.2042 |
| 89. | Asmatullah S/O Fazal Rehman | 25-07-00 | DHO Lakki Marwat | 19.10.1976 | Lakki Marwat | 18.10.2036 |
| 90. | Qaisar Khan S/O Kabir Khan | 01-09-00 | Dental College Swat | 12-02-70 | Charsadda | 11-02-2030 |
| 91. | Javed Akhter S/O Shah Jehan | 13-02-01 | DHO Khyber | 28.11.1973 | Charsadda | 27.11.2033 |
| 92. | Ghulam Qadir S/O Sardar Muhammad Zardad. | 14-04-01 | DHO Abbottabad | 20.04.1967 | Abbottabad | 19.04.2027 |
| 93. | Noor Zaman S/O Khan Zaman | 11-09-01 | DHO Charsadda | 02.05.1968 | Charsadda | 01.05.2028 |
| 94. | Arshad Ali S/O Ehsar Ahmad Khan | 06-11-01 | LRH Peshawar | 29.09.1977 | Charsadda | 28.09.2037 |
| 95. | Javed Gul S/O Sardar Gul | 10-11-01 | DHO Chitral | 15.02.1974 | Chitral | 14.02.2034 |

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| S No. | Name / Father Name | Date of Appointment as Junior Clerk | Place of Posting | DOB | Domicile | Date of Retirement |
|-------|---|-------------------------------------|---------------------------------|------------|------------|--------------------|
| 323. | Muhammad Ismail S/O Akbar Khan | 24-05-19 | DHQH, Charsadda | 28.02.1997 | Charsadda | 27.02.2057 |
| 324. | Syed Munib Ali Shah S/O Syed Salid Ali Shah | 24-05-19 | LMH, Kohat | 14.04.1999 | Kohat | 13.04.2059 |
| 325. | Nazmeen Siddique S/O Muhammad Siddique | 27-05-19 | DHO, Abbottabad | 01.06.1984 | Abbottabad | 31.05.2044 |
| 326. | Fisal Adnan S/O Muhammad Raees Khan | 28-05-19 | BKMC, Swabi | 03.10.1990 | Karak | 02.10.2050 |
| 327. | Islam Ullah S/O Habib Ullah | 29-05-19 | THQ Hospital Lahor General duty | 10.04.1992 | Swabi | 10-04.2052 |
| 328. | Jamal Shah S/O Sehat Shah | 29-05-19 | DHO, Mardan. | 03.05.1994 | Mardan | 03.05.2054 |
| 329. | Jehad Ali S/O Shah Nawaz Khan | 30-05-19 | W & C Hospital Rajjar Charsadda | 05-03-95 | Charsadda | 04-03-2055 |
| 330. | Israr Shoukat S/O Dr. Shoukat Hussain | 18-06-19 | DHO, Mansehra | 01.01.1990 | Mansehra | 31.12.2050 |
| 331. | Hassan Zeb Awan S/O Amjad Hussain Awan | 18-06-19 | DHO, Mansehra | 14.08.1998 | Mansehra | 13.08.2058 |
| 332. | Syed Mukhtar Hussain S/O Dr. Syed Rooh Ul Hussain | 01-07-19 | DHO, Mardan. | 05.01.1983 | Mardan | 05.01.2043 |
| 333. | Noor ul Saba | 23-08-19 | DHO, Abbottabad | 17.05.1994 | Abbottabad | 16.05.2054 |
| 334. | Muhammad Ammar S/O Hifz ur Rehman | 19-09-19 | DHO, Mansehra | 17.08.1995 | Mansehra | 16.08.2055 |
| 335. | Tanzeel ur Rehman S/O Maqsood Alam | 01-11-19 | DHQT, Hospital, Kohat. | 08.03.1989 | Kohat | 07.03.2051 |
| 336. | Muhammad Naveed S/O Salid Ali Khan | 05-11-19 | SMC, SGTH, Swat | 02.01.2000 | Swat | 1.1.2060 |
| 337. | Rehm Nawaz S/O Muhammad Nawaz | 08-11-19 | DHO, Haripur | 15.03.1983 | Haripur | 03.03.2043 |
| 338. | Arsalan Khan S/O Muhammad Ishaq | 11-11-19 | DHO, Haripur | 08.09.1990 | Haripur | 07.09.2050 |
| 339. | Murad Anwar S/O | 25-11-19 | SMC, SGTH, Swat | 15.05.1987 | Swat | 14.05.1947 |
| 340. | Sarwar Khan | 25-11-19 | SMC, SGTH, Swat | 16.03.1994 | Swat | 15.03.2054 |
| 341. | Atif Mehmood S/O Bakht Rawan | 28-11-19 | DHO, Malakand | 22.04.1999 | Malakand | 21.04.2059 |
| 342. | Hamza Khan S/O Muhammad Ayub | 20-01-20 | DHO, Kohat | 29.01.1996 | Kohat | 28.01.2056 |
| 343. | Muhammad Waqas S/O Yar Muhammad Khan | 13-02-20 | DHO, Kohat | 01.03.1998 | Kohat | 31.02.2058 |
| 344. | Arshad S/O Israr ul Haq | 07-02-20 | DHO, Mansehra | 26.01.1982 | Mansehra | 25.01.2042 |
| 345. | Faheem Khan Saifi S/O Wazir Khan | 01-04-20 | DHO, Mardan. | 20.09.1995 | Mardan | 20.09.2057 |
| 346. | Inam Ullah S/O Fazil Akbar | 16-06-20 | AHQ Mohmand | 13.03.1978 | Charsadda | 12.03.2038 |
| 347. | Ayesha Gulfam D/O Gulfam | 08-08-20 | KATH, Mansehra | 04.03.1997 | Mansehra | 03.03.2057 |
| 348. | Amir Suhail S/O Aliauddin | 25-11-20 | DHO, Kohat | 18.01.1990 | Kohat | 17.01.2050 |
| 349. | Rahid Ullah S/O Akbar Ali Khan | 15-12-20 | DHQT, Hospital, Kohat. | 19.12.1996 | Kohat | 18.12.2056 |
| 350. | Waqas S/O Muhammad Saddique | 11-03-21 | DHO, Mansehra | 28.02.1995 | Mansehra | 27.02.2055 |
| 351. | Waheed Ullah Khan S/O Rahmat Ullah Khan | 16-03-21 | DHO, Malakand | 15.03.1965 | Malakand | 14.03.2025 |
| 352. | Muhammad Naeem S/O Muhammad Miskeen | 23-04-21 | DHO, Mansehra | 20.04.1977 | Mansehra | 31.01.2037 |
| 353. | Arif Hussain Shah S/O Syed Saddique Shah | 23-04-21 | DHO, Mansehra | 01.02.1978 | Mansehra | 31.01.2038 |
| 354. | Sabtain Arshad S/O Arshad Kamal | 10-06-21 | DHO, Malakand | 12.03.1998 | Malakand | 11.03.2058 |

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| S.No. | Name / Father Name | Date of Appointment as Junior Clerk | Place of Posting | DOB | Domicile | Date of Retirement |
|-------|--------------------------------------|-------------------------------------|---------------------|------------|----------|--------------------|
| 355. | Umar Said S/O Shafi ur Rehman | 28-09-21 | DHQH, Swabi | 16.03.1988 | Swabi | 08.04.2048 |
| 356. | Irfan Khan S/O Sultanat Khan | 13-11-21 | SMC, SGTH, Swat | 30.07.1992 | Swat | 29.07.2052 |
| 357. | Abdul Wahab S/O Bahadur Khan | 18-11-21 | DHO Mardan | 15.04.1995 | Mardan | 15.04.2055 |
| 358. | Afaq Ahmad S/O Kamran | 22-02-22 | KATH, Mansehra | 29.05.1998 | Mansehra | 28.05.2058 |
| 359. | Sana D/O Abdul Hal | 26-02-22 | DHO Haripur | 03.02.1985 | Haripur | 03.02.2045 |
| 360. | Shahbaz Khan S/O Muhammad Imran Khan | 26-02-22 | DHO Haripur | 10.12.1999 | Haripur | 09.12.2059 |
| 361. | Hashim Waheed S/O Muhammad Waheed | 07-03-22 | KATH, Mansehra | 05.08.1996 | Mansehra | 04.08.2056 |
| 362. | Adil Malik S/O Muhammad Nazir Awan | 08-03-22 | KATH, Mansehra | 02.04.1978 | Mansehra | 01.04.2038 |
| 363. | Muhammad Ali S/O Sher Muhammad | 22-04-22 | KATH, Mansehra | 14.10.1995 | Mansehra | 13.10.2055 |
| 364. | Ishad Ali S/O Miza | 10-06-22 | DHQH, Alpur Shangla | 07.01.1999 | Shangla | 06.01.2059 |
| 365. | Ahsan Ali S/O Sikandar Ali | 25-07-22 | DHQH, Swabi | 25.03.1994 | Swabi | 24.03.2054 |
| 366. | Wisal S/O Akhtar Hussain | 22-09-22 | DHO, Karak | 15.04.1994 | Karak | 14.04.2054 |

Shahbaz Afzal
DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

[Signature]

REGISTERED

Senior clerk

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O-E

PROVISIONAL SENIORITY LIST OF SENIOR CLERKS (BS-14) OF SUB-CADRE, KHYBERPUKHTUNKHWA, PESHAWAR FOR THE YEAR 2022

| S No. | Name / Father Name | Date of Appointment as Junior Clerk | Date of Promotion as Sr. Clerk | Place of Posting. | DOB | Domicile | Date of Retirement |
|-------|--|-------------------------------------|--------------------------------|--|------------|-----------|--------------------|
| 1 | Siraj ul Arifeen S/O Sultan UJ Arifeen | 19-10-82 | 26.09.1994 | KMC Peshawar | 01.02.1954 | Chitral | 31.01.2024 |
| 2 | Muhammad Ayub S/O Nadir Khan | 01-12-82 | 26.09.1994 | DHO Chitral | 01.03.1963 | Chitral | 28.02.2023 |
| 3 | Ajmal Khan S/O Muhammad Afzal | 22-10-83 | 09.04.2019 | DHO Mansehra | 15.02.1963 | Mansehra | 14.02.2023 |
| 4 | Muhammad Qurash | 22-10-83 | 30.06.2000 | Khyber Agency | 01.01.1966 | Mardan | 31.12.2025 |
| 5 | Mukhtar Ali S/O Mutabar | 17-11-84 | 30.06.2000 | DHO, Alpuri Shangla | 11.08.1964 | Shangla | 10.08.2024 |
| 6 | Karim Khan S/O Abad Sher | 28-11-85 | 07.02.2007 | DHO Peshawar | 15.11.1965 | Peshawar | 14.11.2025 |
| 7 | Tariq Khan S/O Muhammad Ramzan | 01-02-86 | 22/09/2006 | DHO, D.I Khan | 12.06.1964 | D.I Khan | 11.05.2024 |
| 8 | Qayyum Nawaz S/O Haq Nawaz | 12-02-86 | 31.12.2009 | GMC, D.I Khan | 04.04.1963 | D.I Khan | 03.04.2023 |
| 9 | Niaz Anwar S/O Saifullah Khan | 01-03-86 | 22.09.2006 | DHO Tank | 13.01.1963 | Tank | 12.01.2023 |
| 10 | Muhammad Sadiq S/O Naleeb Khan | 19-06-86 | 18.03.2011 | DHO Karak | 01.06.1966 | Karak | 31.05.2026 |
| 11 | Niaz Muhammad S/O Dost Muhammad | 01-07-86 | 28.06.2008 | DHO Chitral | 08.05.1963 | Chitral | 07.05.2025 |
| 12 | Abdul Kabeer S/O Abdur Rauf | 29-11-86 | 22.09.2006 | DHO Malakand | 16.01.1964 | Malakand | 15.01.2024 |
| 13 | Amjad Ali S/O Abdur Rasheed | 21-12-86 | 09.04.2019 | DHQ Hosp: Mardan | 04.10.1958 | Mardan | 03.10.2028 |
| 14 | Inayat Ali S/O Bashir Ahmad | 27-12-86 | 07.02.2007 | Drug Testing Lab, Peshawar | 06.12.1965 | Peshawar | 05.12.2025 |
| 15 | Muhammad Amin S/O Ghulam Qadir | 16-02-87 | 07.02.2007 | KMC Peshawar | 14.03.1968 | Peshawar | 13.03.2028 |
| 16 | Zafar Ali Khan S/O Muhammad Aslam | 01-04-87 | 07.02.2007 | PGMI Peshawar | 19.10.1964 | Mardan | 18.10.2024 |
| 17 | Ashfaqullah | 02-04-87 | 07.02.2007 | AHQ Hospital Ghallani | 02.04.1966 | Charsadda | 01.04.2026 |
| 18 | Naeem ul Haq S/O Zia ul Haq | 12-04-87 | 07.02.2007 | Mingul Abdul Haq Jahanzeb Kidny Hospital, Swat | 30.10.1969 | Swat | 29.10.2029 |
| 19 | Qasim Jah s/o Syed Pacha | 10-05-87 | 07-02-07 | DHO, Hospital Timergara | 01-09-64 | Dir | 31.04.2024 |
| 20 | Niaz Anwar S/O Amir Nawab | 14-06-87 | 07.02.2007 | DHOH Nowshera | 19.12.1962 | Nowshera | 18.12.2022 |
| 21 | Muhammad Ali S/O Khaperay Mla | 21-06-87 | 07.02.2007 | DHO Shangla | 01.01.1963 | Swat | 01.01.2023 |
| 22 | Muhammad Ali S/O Mir Zail Khan | 30-06-87 | 07.02.2007 | DHO Tank | 23.05.1965 | D.I Khan | 22.05.2025 |
| 23 | Mushtaq Hussain | 08-07-87 | 07.02.2007 | Additional Agency Surgeon Office Sadana | 06.01.1965 | D.I Khan | 05.01.2026 |
| 24 | Muhammad Amir S/O Muhammad Sharif | 03-08-87 | 07.02.2007 | HMC, Peshawar | 29.02.1968 | Peshawar | 28.02.2028 |
| 25 | Miftaz Gul S/O Sahib Gul | 19-09-87 | 09.04.2019 | DHO Mardan | 25.04.1966 | Mardan | 24.04.2026 |
| 26 | Habib ur Rehman | 22-10-87 | 31.12.2009 | BMC, Bannu | 05.12.1962 | D.I Khan | 04.12.2022 |
| 27 | Amir Hussain S/O Hussain Khan | 16-11-87 | 28-06-08 | DHO Chitral TBC | 08-03-63 | Chitral | 07.03.2023 |
| 28 | Akhtar Muhammad S/O Khona Gul | 16-11-87 | 06.10.2009 | DHO Kohistan | 15.12.1967 | Dir Lower | 14.12.2027 |
| 29 | Nasir Khan S/O Hassan Khan | 12-12-87 | 31.12.2009 | BMC, Mardan | 25.03.1965 | Nowshera | 24.03.2025 |

ATTESTED

(19) (19)

| S No. | Name / Father Name | Date of Appointment as Junior Clerk | Date of Promotion as Sr. Clerk | Place of Posting. | DOB | Domicle | Date of Retirement |
|-------|---|-------------------------------------|--------------------------------|---|------------|------------------|--------------------|
| 30 | Hazrat Khalil S/O Pir Kachkool | 01-02-88 | 01.01.2009 | DHO Swat | 15.08.1963 | Swat | 14.08.2023 |
| 31 | Kiramatullah S/O Abdur. Rauf | 10-02-88 | 31.12.2009 | KMC, Peshawar | 08.09.1969 | Peshawar | 07.09.2029 |
| 32 | Umar Nawaz S/O Khan Wali | 16-02-88 | 11-10-08 | DHO Kohat | 08.03.1967 | Kohat | 07.03.2027 |
| 33 | Abdul Hadi S/O Qasim Khan | 13-03-88 | 31.12.2009 | KGN Teaching Hospital, Bannu. | 06.03.1964 | Bannu | 05.03.2024 |
| 34 | Saeed ullah | 28-03-88 | 31.12.2009 | AS Miranshah | 16.04.1971 | North Waziristan | 15.04.2031 |
| 35 | Ghla's ud Din S/O Said Hakim | 11-05-88 | 17.10.2009 | DHO Dir Lower | 02.04.1964 | Dir Lower | 01.04.2024 |
| 36 | Aurangzeb S/O Abdus Salam | 31-05-88 | 09.04.2019 | DHO Kohat | 20.03.1965 | Kohat | 19.03.2025 |
| 37 | Israr Khan | 30-09-88 | 31.12.2009 | Food Lab, Peshawar | 06.02.1969 | Peshawar | 05.02.2029 |
| 38 | Johar Shah S/O Abdul Ahad | 05-11-88 | 31.12.2009 | LRH, Peshawar. | 04.04.1963 | Peshawar | 03.04.2023 |
| 39 | Jamil Akhtar S/O Awal Sher | 05-11-88 | 31.12.2009 | LRH, Peshawar. | 14.06.1964 | Peshawar | 13.06.2024 |
| 40 | Muneer Hussain S/O Abdur. Rehman | 15-12-88 | 06.02.2010 | DHO Abbottabad | 20.02.1966 | Abbottabad | 19.02.2026 |
| 41 | Dilawar Khan s/O | 10-06-89 | 18.03.2011 | DHO, Bannu | 01.10.1971 | Bannu | 31.09.2031 |
| 42 | Sarfaz Khan S/O Bacha Khan | 27-06-89 | 31.12.2012 | DHO Swat | 22.04.1965 | Swat | 21.04.2025 |
| 43 | Rehmatullah Zakori | 01-07-89 | 31.12.2009 | Services Hospital Peshawar. | 16.01.1967 | Bannu | 15.01.2027 |
| 44 | Shakir Ullah | 01-07-89 | 31.12.2009 | Govt: Sifat Ghayur Memorial Hospital Pesh | 02.11.1970 | Nowshera | 01.11.2030 |
| 45 | All Zaman S/O Gul Rehan | 17-08-89 | 09.04.2019 | Type-C Hospital, Karak | 02.08.1970 | Karak | 01.08.2030 |
| 46 | Mamoor Khan S/O Abdul Nazar | 20-08-89 | 18.03.2011 | DHO Karak | 02.09.1964 | Karak | 01.09.2024 |
| 47 | Mehmood Haroon S/O Muhammad Baseer Khan | 20-08-89 | 09.04.2019 | W&C/ LMH Kohat | 01.06.1971 | Kohat | 31.05.2031 |
| 48 | Khalsta Muhammad S/O Noor Muhammad | 05-09-89 | 13.03.2009 | DHQH: Batkhela | 15.02.1967 | Malakand | 14.02.2027 |
| 49 | Bashir Muhammad S/O Allah-Diwana | 19-09-89 | 31.12.2009 | MMM Teaching, D.I Khan | 15.11.1965 | D.I Khan | 14.11.2025 |
| 50 | Sana Ullah Jan | 27-09-89 | 09.04.2019 | Women & Children Hospital Bannu | 14.05.1967 | Bannu | 13.05.2027 |
| 51 | Abdul Hamid Khan | 01-10-89 | 09.04.2019 | DHQT Hospital DI Khan. | 08.01.1967 | D.I Khan | 07.01.2027 |
| 52 | Umar Nilaz S/O Aslam Khan | 01-10-89 | 27.07.2009 | DHO Bannu | 15.09.1971 | Bannu | 14.09.2031 |
| 53 | Ghafoor Qaiser S/O Haji Badar ud Din | 05-10-89 | 31.12.2009 | GMC, D I Khan | 12.09.1970 | D.I Khan | 11.09.2030 |
| 54 | Ajmal Khan S/O Zaman Khan | 12-10-89 | 31.12.2009 | DHQ T H Bannu | 13.03.1969 | Bannu | 12.03.2029 |
| 55 | Khan Muhammad | 16-10-89 | 16.10.1989 | AHQ Miranshah | 20.12.1969 | Miranshah | 19.12.2029 |
| 56 | Abid S/O Abdullah | 08-11-89 | 29.10.2010 | DHO Abbottabad | 04.02.1970 | Abbottabad | 03.02.2030 |
| 57 | Aziz ullah Khan Wazir S/O Haji Abdul Khanan | 11-11-89 | 31.12.2009 | DHO Bannu. | 01.01.1969 | Bannu | 31.12.2028 |
| 58 | Parvez Khan S/O Mahar Gul | 13-11-89 | 31.12.2009 | HMC, Peshawar | 13.03.1969 | Peshawar. | 12.03.2029 |

ATTESTED

20

| S No. | Name / Father Name | Date of Appointment as Junior Clerk | Date of Promotion as Sr. Clerk | Place of Posting. | DOB | Domicile | Date of Retirement |
|-------|--|-------------------------------------|--------------------------------|-------------------|------------|----------|--------------------|
| 173 | Muhammad Sher Ali Khan S/O Shah Nazar | 12-06-04 | 31.12.2008 | DHO Shangla | 03.04.1974 | Shangla | 02.04.2034 |
| 174 | Syed Musaddiq Shah S/O Syed Farman Shah | 18-01-06 | 28-12-12 | DHO, Haripur | 04-02-1970 | Haripur | 03.02.2030 |
| 175 | Raja Adil S/O Raja Sajjad Ahmad | 25-03-09 | 20.05.2014 | DHO, Haripur | 17.03.1990 | Haripur | 16.03.2050 |
| 176 | Abdul Waheed S/O Abdul Maleed | 25-03-09 | 20.05.2014 | DHO, Haripur | 22.03.1982 | Haripur | 21.03.2042 |
| 177 | Sami Ullah S/o Fazl-e Khalig | 01-01-10 | 22.12.2012 | DHO, Haripur | 04.02.1970 | Haripur | 03.02.2030 |
| 178 | Kausar Hayat S/O Jehan Dad Khan | | 01.07.2012 | DHS Merged Area | 08.03.1981 | Bannu | 07.03.2041 |
| 179 | Aziz ur Rahman S/O. Shams ul Haq | | 17.03.2008 | DHO Bunir | 15.03.1969 | Buner | 14.03.2029 |
| 180 | Zain Ali S/O Samandar | | 29.05.2008 | DHO Bunir | 02.02.1972 | Buner | 02.02.2032 |

Shahwan Afendi
DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR.

APPROVED

Better Copy Page No. 21

**DIRECTORATE GENERAL HEALTH SERVICE
KHYBER PAKHTUNKHWA PESHAWAR**

Office Ph # 091-9210269 Exchange # 091-9210187, 091-9210196 Fax # 091-9210230
All Communication should be addressed to the Director General Health Services Peshawar and not to any Official by name.

OFFICE ORDER

On the recommendation of this Departmental Promotion Committee held on 14-03-2017, in Health Secretariat, the following Senior Clerks BPS-14 are hereby promoted on the post of Office Assistant (BPS-16) with immediate effect:-

| S No | Name of Official | Present Posting |
|------|------------------|---------------------------------------|
| 1 | Mr. Naseem Khan | DGHS (working in DHO Office Peshawar) |
| 2 | Mr. Yar Gul | DGHS Office Peshawar |
| 3 | Mr. Zafar Iqbal | DGHS Office Peshawar |
| 4 | Mr. Inayat Shah | DGHS Office Peshawar |

On their promotion as Office Assistant (BPS-16) the following posting / transfer are hereby ordered with immediate effect:-

| S No | Name of Official | From | To | Remarks |
|------|---|-----------------------------|-----------------------------|----------------------------|
| 1 | Nasim Khan Newly Promoted as Assistant | DHO Peshawar | DHS (FATA) Peshawar | Against the Vacant Post |
| 2 | Yar Gul Newly Promoted as Assistant | DGHS Office KPK Peshawar | DGHS Office KPK Peshawar | Against the Vacant Post |
| 3 | Zafar Iqbal Newly Promoted as Assistant | DGHS Office KPK Peshawar | DGHS Office KPK Peshawar | Against the Vacant Post |
| 4 | Inayat Shah Newly Promoted as Assistant | DGHS Office KPK Peshawar | DGHS Office KPK Peshawar | Against the Vacant Post |

NB: Arrival Reports should be submitted to this Directorate for record purpose.

Sd/xxxxxxxx

**DIRECTOR GENERAL HEALTH
SERVICES KPK PESHAWAR**

Dated 28/03/2017

No. 10247-54/Personnel/Promotion

Copy for information to the

1. Accountant General KPK Peshawar.
2. Director Health Services FATA Peshawar
3. District Health Officer Peshawar
4. PA to DGHS KPK Peshawar
5. Superintendent Promotion Cell DGHS KPK Peshawar
6. DHIS Cell DGHS KPK Peshawar
7. Official Concerned
8. Personnel File

For information and necessary Action.

**DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

ATTACHED
M/B

28-3-2017

DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR



21

Office Ph# 091 - 9210269 Exchange# 091 - 9210107, 091 - 9210196 Fax# 091 - 9210230
All communications should be addressed to the Director General Health Services Peshawar and not to any
Official by name.

OFFICE ORDER

On the recommendation of the Departmental Promotion Committee held on 14-03-2017, in Health Secretariat, the following Senior Clerks (NPS-14) are hereby promoted to the post of Office Assistant (NPS-16) with immediate effect:-

| S.No | Name of Official | Present posting |
|------|------------------|---------------------------------------|
| 01 | Mr. Naseem Khan | DGHS (Working in DHO Office Peshawar) |
| 02 | Mr. Yar Gul | DGHS Office |
| 03 | Mr. Zafar Iqbal | DGHS Office |
| 04 | Mr. Inayat Shah | DGHS Office |

On their promotion as Office Assistant (NPS-16) the following posting/transfer are hereby ordered with immediate effect:-

| S.No. | Name of Official | From | To | Remarks |
|-------|--|--------------------------|--------------------------|-------------------------|
| 01 | Nasim Khan Newly promoted as Assistant | DHO Peshawar | DHS (FATA) Peshawar | Against the vacant post |
| 02 | Yar Gul Newly promoted as Assistant | DGHS Office KPK | DGHS Office KPK Peshawar | Against the vacant post |
| 03 | Zafar Iqbal Newly promoted as Assistant | DGHS Office KPK Peshawar | DHS (FATA) Peshawar | Against the vacant post |
| 04 | Inayat Shah Newly promoted as Assistant | DGHS Office KPK Peshawar | DGHS Office KPK Peshawar | Against the vacant post |

NB: Arrival reports should be submitted to this Directorate for record purposes.

Sd/
DIRECTOR GENERAL HEALTH SERVICES KPK, PESHAWAR

Dated Peshawar, the 28th / 3 / 2017

No. 10247-54 / Personnel/Promotion

Copy forwarded to the:-

- 01 Acquisition General Khyber Pakhtunkhwa Peshawar.
- 02 Director Health Services FATA Peshawar
- 03 District Health Officer Peshawar.
- 04 P.A to DGHS KPK Peshawar.
- 05 Superintendent Promotion Cell DGHS, KPK Peshawar.
- 06 DHS Cell DGHS KPK Peshawar.
- 07 Official concerned
- 08 Personnel files.

For information and necessary action.

Sd/
Director General Health Services
Khyber Pakhtunkhwa, Peshawar.

Pto

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ATTESTED
M



15/12/2020

F-22

DIRECTORATE GENERAL HEALTH SERVICES GOVT. OF KHYBER PAKHTUNKHWA PESHAWAR.

OFFICE ORDER

80

Consequent upon approval recorded by the Departmental Promotion Committee in its meeting held on 11.12.2020, under the Chairmanship of DGHS Khyber Pakhtunkhwa Peshawar, the following Junior most Junior Clerks (BPS-11) of DGHS cadre are hereby promoted to the post of Senior Clerk (BPS-14) with immediate effect.

| Sr. | Name Of Official | Place of Posting |
|-----|--|----------------------|
| 1. | Mr. Fuzaid Khan Junior Clerk | DGHS Office Peshawar |
| 2. | Syed Irfan Haidar Shah Junior Clerk | DGHS Peshawar |
| 3. | Syed Mehmood Ali Shah Junior Clerk | DGHS Office Peshawar |
| 4. | Fazal Mehmood Junior Clerk | DGHS Office Peshawar |
| 5. | Faisal Javed Junior Clerk | DGHS Office Peshawar |

Union

Consequent upon their promotion to the post of Senior Clerk (BPS-14) they are hereby transferred and posted against the vacant posts as under:

| Sr. | Name of official | From | To | Remarks |
|-----|--|----------------------|----------------------|-------------------------|
| 1. | Mr. Fuzaid Khan Senior Clerk | DGHS Office Peshawar | DGHS Office Peshawar | Against the vacant post |
| 2. | Syed Irfan Haidar Shah Senior Clerk | DGHS Peshawar | DGHS Office Peshawar | -do- |
| 3. | Syed Mehmood Ali Shah Senior Clerk | DGHS Office Peshawar | DGHS Office Peshawar | -do- |
| 4. | Fazal Mehmood Senior Clerk | DGHS Office Peshawar | DGHS Office Peshawar | -do- |
| 5. | Faisal Javed Senior Clerk | DGHS Office Peshawar | DGHS Office Peshawar | -do- |

NB: Arrival/ departure report should be submitted to this Directorate for record.

Sd/xxxxxxxx
DIRECTOR GENERAL HEALTH SERVICES, K.P.K. PESHAWAR.
Dated 15/12/2020

No. 3721-25/Personnel

Copy forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Deputy Director (Accounts) DGHS Office Peshawar.
3. Incharge Ministerial Promotion Cell DGHS Office
4. PA to DGHS, Khyber Pakhtunkhwa Peshawar.
5. Officials concerned.

For information and necessary action.

DIRECTOR GENERAL HEALTH SERVICES, K.P. PESHAWAR

ATTESTED
M.C.

Better Copy Page No. ~~23~~ ~~24~~ 24

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

No. 8015/Personnel

DATED: 17-11-2021

To,

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

Attention:

Section Officer (VI)

SUBJECT:-

MINUTES OF THE STANDING SERVICES RULES COMMITTEE
REGARDING FORMATION / AMENDMENTS IN SERVICES RULL
OF MINISTERIAL STAFF OF HEALTH SERVICES KHYBRE
PAKHTUNKHWA HELD ON 03-07-2020.

Kindly refer to your letter No SOH(VI)HD/10-4/Ministerial staff dated 01-07-2021 on the subject noted above.

I have the honour to state that two segregated services Rules have been Form for Health Department Ministerial Staff (DGHS cadre/Sub Cadre) notified by the Government vide Notification No SO (V) IV/4-13/75 dated 29-03-20⁸² and No. SO (H) 4-6/83 dated 22-06-1983 (Copies attached).

However signed copies of above notifications are not traceable in Directorate.

The main reason of maintaining of separate cadres was probably to keep the ministerial staff at their home districts being low paid Government servants and to promotion opportunities for them. Other reasons was to create more posts for appointment deserve people who possess the required qualification at their home districts. Moreover if grounds which were put forwarded at the time of framing of service Rules in 1982 & 1983 be available in the files of section officer Health (IV) and section officer (I) as these were notified from above sections.

**DIRECTOR GENERAL HEALTH
SERVICES K.P.K PESHAWAR**

ATTENDED
M. B.

PUBLIC SERVICES
KHYBER PAKHTUN KHWA PESHAWAR

The Secretary to Govt. of Khyber Pakhtunkhwa
Health Department Peshawar

Section Officer (VI)

Attention:

Subject:

MINUTES OF THE STANDING SERVICE RULES COMMITTEE REGISTRATION/AMENDMENTS IN SERVICE RULES OF MINISTERIAL OFFICERS OF HEALTH SERVICES KHYBER PAKHTUN KHWA HOLD ON 03/07/2021

Sir,

Kindly refer to your letter No. SCH(VI)HD/10-4/Ministerial Staff

01.07.2021 on the subject noted above.

I have the honour to state that two segregated service Rules have been notified for Health Department Ministerial staff (DGHS cadre/Sub-cadre) notified by the vide Notification No. SO (H) IV/4-13/75 dated 29/03/2021, and No. SO (H) IV/22.06.1983 (copies attached).

However, signed copies of above notifications are not traceable in the Directorate.

The main reason of maintaining of separate cadres was probably the ministerial staff at their home districts being low paid Govt. servants and promotion opportunities for them. Other reasons was to create more posts for deserving people who possess the required qualification at their home districts. My grounds which were put forwarded at the time of framing of Service Rules in 1975 are available in the files of Section Officer Health (IV) and Section Officer (IV) were notified from above sections.

DIRECTOR GENERAL HEALTH SERVICES K.P.K.PESHAWAR

M
ATTESTED

(Handwritten signature)

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GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

No. SOH(VI)/4-4/2020-21/Ministerial Staff/DGHS
Dated Peshawar, the 10th December, 2021

To

The Secretary to Government
of Khyber Pakhtunkhwa
Establishment Department, Peshawar

(Handwritten initials)
(Handwritten initials)
(Handwritten number 25)

Attention:

Section Officer (R-II)

Subject:

GUIDANCE REGARDING DISPUTE BETWEEN CADERS OF
MINISTERIAL STAFF OF HEALTH DEPARTMENT DIRECTORATE
GENERAL HEALTH SERVICES, KHYBER PAKHTUNKHWA

Dear Sir,

I am directed to refer to your office letter No. SOH-II (ESAD) 1-20/2021
Dated Peshawar the 29th November 2021 on the subject noted above and to state that
the Service Rules Notified back in 1952 & 1993 have not been amended so far. As regards
the specification of allocation quota for promotion of Class-IV employees as per policy to
be considered while making amendment in the Service Rules under reference

It is therefore, requested to apprise guidance on the points, conveyed in
this department letter of even No dated 10.11.2021, to proceed further in the matter
please.

(Handwritten signature)
SECTION OFFICER (VI)

Copy forwarded to

PS to Secretary Health Khyber Pakhtunkhwa

SECTION OFFICER (VI)

(Handwritten signature)
ATTESTED
(Handwritten signature)
ATTESTED
(Handwritten signature)

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GOVERNEMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

No. SOH(VI)/4-4/2020/21/Ministerial Staff/DGHS
DATED PESHAWAR 2nd March 2022

To,

The Director General Health Services,
Khyber Pakhtunkhwa Peshawar

**SUBJECT:- GUIDANCE REGARDING DISPUTE BETWEEN CADRES OF
MINISTERIAL STAFF OF HEALTH DEPARTMENT DIRECTORATE
GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA
PESHAWAR.**

I am directed to refer to your office letter No. 8015/Personnel Dated 17-11-2021 on the subject noted above and to state that the case has been processed and forwarded to Establishment Department for guidance regarding dispute between cadre of Ministerial Staff DG Health Services cadre and sub cadre (sub offices) of Health Department. The Establishment Department has advised that Health Department is the administrative department and administrative secretary being Chairman SSRC may like to prepare draft services rules on the analogy of Elementary and Secondary Education Department and Higher Education Department (copy of the Establishment Department letter dated 31-12-2021 is enclosed).

I am therefore directed to request you to prepare draft service rules by integrating both the cadres on analogy of Elementary and Secondary Education Department and Higher Education Department and submit the same to this department for convening meeting SSRC.

An early action in the matter will be highly appreciated.

Encl: As above

Section Officer (Estab-VI)

Copy forwarded to the

1. PS to Secretary Health Khyber Pakhtunkhwa Peshawar
2. PS to Special Secretary Health Khyber Pakhtunkhwa Peshawar.
3. PA to Deputy Secretary Health Khyber Pakhtunkhwa Peshawar.

Section Officer (Estab-VI)



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

No SOH(VI)/4-4/2020-21/Ministerial Staff/DGHS
Dated Peshawar, the 2nd March 2022

To

The Director General Health Services,
Khyber Pakhtunkhwa, Peshawar

28 28

Subject: GUIDANCE REGARDING DISPUTE BETWEEN CADRES OF MINISTERIAL STAFF OF HEALTH DEPARTMENT DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA.

I am directed to refer to your office letter No. 8015/Personnel Dated 17/11/2021 on the subject noted above and to state that the case has been processed and forwarded to the Establishment Department for guidance regarding dispute between cadre of Ministerial staff DG Health Services cadre and sub cadre (Sub Offices) of Health Department. The Establishment Department has advised that Health department is the administrative department and administrative secretary being Chairman SSRC may like to prepare draft services rules on the analogy of Elementary and Secondary Education Department and Higher Education Department. (copy of the Establishment Department letter dated 30.12.2021 is enclosed).

I am therefore directed to request you to prepare draft service rules by integrating both the cadres on analogy of Elementary and Secondary Education Department and Higher Education Department and submit the same to this department for convening meeting of SSRC.

An early action in the matter will be highly appreciated.

Encl. As above.

Section Officer (Estab. VI)

02/03/2022

- Copy forwarded to
- 1. PS to Secretary Health Khyber Pakhtunkhwa
 - 2. PS to Special Secretary Health Khyber Pakhtunkhwa
 - 3. PA to Deputy Secretary Health Khyber Pakhtunkhwa

Section Officer (Estab. VI)

ATTESTED

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GOVERNMENT OF KHYBER PAKHTUNKHWA,
HEALTH DEPARTMENT

No. SOH(VI)/4-4/2020-21/Ministerial Staff/DGHS,
Dated Peshawar, the 19th July, 2022

3rd Reminder

To

The Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

Subject

GUIDANCE REGARDING DISPUTE BETWEEN CADRES OF
MINISTERIAL STAFF OF HEALTH DEPARTMENT DIRECTORATE
GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA.

I am directed to refer this department letter of even No. and dated 21st March, 2022 and also your office letter No. 8015/Personnel Dated 17/11/2021 on the subject noted above and to state that the case has been processed and forwarded to the Establishment Department vide letter No. SOH(VI)/4-4/2020-21 (Ministerial Staff/DGHS) Dated Peshawar 10th November, 2021 for guidance regarding dispute between cadre of Ministerial staff DG Health Services and sub cadre (Sub Offices) of Health Department, wherein reply is still awaited on your part.

I am therefore, directed to request you to prepare draft service rules by integrating both the cadres on analogy of Elementary and Secondary Education Department and Higher Education Department and submit the same to this department for convening meeting of SSRC.

Please submit the same on immediate basis to proceed further in the matter

D/C

Section Officer (Estab-VI)

Copy forwarded to

1. PS to Secretary Health Khyber Pakhtunkhwa.
2. PS to Special Secretary Health Khyber Pakhtunkhwa.
3. PA to Deputy Secretary Health Khyber Pakhtunkhwa.

Section Officer (Estab-VI)

ATTESTED

ATTESTED



OFFICE OF THE ADVISOR TO CARETAKER
CHIEF MINISTER FOR HEALTH

KHYBER PAKHTUNKHWA

1st Floor HRD Unit, Khyber Road Peshawar
Phone No. 091-9223603, Fax: 091-9223604

No. PS/ACCM/HEALTH/KP/1-5/124/23
Dated the Peshawar 6th March, 2023

To,

The Director General of Health Services
Khyber Pakhtunkhwa.

H-30-10-70

Subject:-

SWIFT DISPOSAL OF CASES FOR PROMOTION OF NURSING CADR
STAFF AND SERVICE RULES FOR MINISTERIAL STAFF.

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith copy of the application No.79/APCA Dated 03-03-2023 received from General Secretary A Pakistan Clerks Association, Health Department Khyber Pakhtunkhwa, which is self explanatory and to state that a meeting of the APCA sub Office was held on 23-02-2023 with Hon.able Advisor to Caretaker Chief Minister for Health and discussed the issue regarding their Seniority list.

I am further directed to request you to kindly prepare joint seniority list of ministerial staff of Directorate General of Health cadres and sub cadre at the earliest under intimation to this Office, please.

Yours faithfully,

PS Advisor to Chief Minister
for Health

End: of Even No & date

Copy forwarded for information to the General Secretary All Pakistan Clerks Association, Health Department Khyber Pakhtunkhwa with reference to your application No. 79/APCA dated mentioned above.

PS Advisor to Chief Minister
for Health

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OFFICE OF THE ADVISOR TO CARETAKER
CHIEF MINISTER FOR HEALTH

KHYBER PAKHTUNKHWA

1st Floor FIKD Unit, Khyber Road Peshawar
Phone No: 091-9223603; Fax: 091-9223604

No. PS/ACCM/HEALTH/KP/518
Dated the Peshawar 20th March 2023

To,

The Director General of Health Services
Khyber Pakhtunkhwa.

I-39

D-10

Subject: INSTRUCTION OF JOINT & INTER-SE SENIORITY LIST OF MINISTERIAL STAFF.

Dear Sir,

I am directed to refer to this office letter of even No. dated 06-03-2023 on the subject noted above and to enclose herewith a copy of the application No. & Dated Nil received from General Secretary All Pakistan Clerks Association, Health Department Khyber Pakhtunkhwa, which is self-explanatory and to state that the action on the subject issue is still awaited at your end.

I am further directed to once again request you to kindly submit the joint and inter-se seniority list of Directorate General and sub-cadre of Ministerial cadre at the earliest under intimation to this Office, please.

Yours faithfully,

PS Advisor to Chief Minister
for Health

End: of Even No & date

Copy forwarded for information and necessary action to the:-

1. Section Officer (VI), Health Department.
2. General Secretary All Pakistan Clerks Association, Health Department Khyber Pakhtunkhwa with reference to your application mentioned above.

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Better Copy Page No. 68

29 (32)

**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

No. SOH-VI/HD/MINISTERIAL/SSRC/4-4/2022-23/DGHS
DATED PESHAWAR 2nd March 2023

To,

**The Director General Health Services,
Khyber Pakhtunkhwa Peshawar**

**SUBJECT:- PROMOTION ON EXISTING SERVICE RULES OF MINISTERIAL
STAFF.**

I am directed to refer this department letter No. dated 3rd March February to your office letter No. 10515/Promotion Cell Dated 12-09-2022 and Dated 30/08/2022 letter No 10367/Promotion Cell, letter No 10370/Promotion Cell, letter No. 10366/Promotion Cell & letter No. 3260-61/Promotion Cell dated 13-10-2022 on the subject noted above and to state that please clearly mention for which categories of employees need to convince meeting of the SSRC also add the requisite Working paper for SSRC please.

Reply in the instant case is still awaited.

Section Officer (Estab-VI)

Endst: of even no & date

Copy forwarded to the

1. PS to Secretary Health Khyber Pakhtunkhwa Peshawar

Section Officer (Estab-VI)

Copy forwarded to the

4. PS to Secretary Health Khyber Pakhtunkhwa Peshawar
5. PS to Special Secretary Health Khyber Pakhtunkhwa Peshawar.
6. PA to Deputy Secretary Health Khyber Pakhtunkhwa Peshawar.

Section Officer (Estab-VI)

Reminder

32



**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

No. SOH-VI/HD/MINISTERIAL/SSRC/4-4/2022-23/DGHS
Dated the Peshawar 11th April, 2023

3

3088
11/4/2023

To

The Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

SUBJECT: INSTRUCTION OF JOINT & INTER-SE SENIORITY LIST OF MINISTERIAL STAFF

I am directed to refer this department letter of even No. dated 24th March, 2023 on the subject noted above, regarding working paper for SSRC, wherein reply still awaited on your part, in this connection PS to Advisor to Chief Minister for Health also forwarded letter No. PS/ACM/Health/KP/1-5/48-50 Dated 20th March, 2023 regarding joint and inter-seniority list of (Junior Clerk & Senior Clerk) of Directorate General, KP and Sub Cadre at earliest within week time as desired by PS to Advisor to Chief Minister for Health please.

Encl: as above

Section Officer-VI

Endst: of even no & date.

Copy forwarded to:-

1. PS Advisor to Chief Minister for Health w/r to their letter quoted above.
2. PS to Secretary Health, Khyber Pakhtunkhwa.

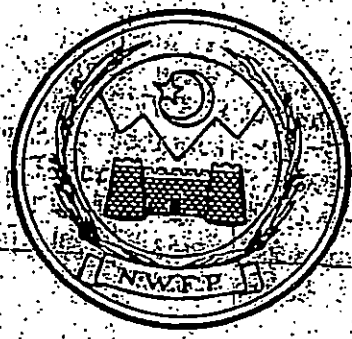
Section Officer-VI

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M. B.

Rules 2 1982 P. 108

GOVERNMENT OF N.W.F.P.
SERVICES & GENERAL
ADMINISTRATION DEPARTMENT

11-35
11-35



MANUAL
of
Service/Recruitment Rules,
North-West Frontier Province

Compiled by: O&M Wing, S&GAD

Printed by the Manager,
State Printing Dept., Govt. of N.W.F.P.

ATTEST

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M.B.

GOVERNMENT OF N.W.F.P.
HEALTH & S. WELFARE DEPARTMENT.

NOTIFICATION

Dated Peshawar the 29th March, 1982.

39

39

No. SO(H) IV-4-13/75.Pt.II. — In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1975, and in consultation with the Services and General Administration Department and the Finance Department, the Health Department hereby lays down the method of recruitment, qualification and other condition specified in columns 3 to 6 of the Appendix to this Notification; which shall be applicable to posts in the Health Directorate specified in column 2 of the said Appendix.

COPIES
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M. J.

APPENDIX

56

| Sl. No. | Nomenclature of Post | Minimum qualification for appointment by initial recruitment or by transfer | Minimum qualification prescribed for appointment by promotion. | Age limit for initial recruitment | Method of Recruitment |
|---------|------------------------|---|--|-----------------------------------|--|
| 1 | 2 | 3 | 4 | 5 | 6 |
| 1. | Administrative Officer | ... | ... | ... | By selection on merit, with due regard to seniority, from amongst Superintendents. |
| 2. | Superintendent | ... | ... | ... | By promotion, on the basis of seniority-cum-fitness, from amongst: a. Statistical Assistants/Assistants/Auditors/ Stenographers of the Health Directorate, and b. Head Clerk and Stenographers of the offices Sub-ordinate to Health Directorate with at least 5 years service as such. Note:- A common seniority list of eligible officials shall be maintained for the purposes of Superintendents. |
| 3. | Statistical Assistant | Degree from a recognized University with Mathematics/Statistics as one of the subjects. | ... | 20 years to 25 years | By initial recruitment. |
| 4. | Assistant | Degree from a recognized University. | ... | 20 years to 25 years | i) 75% by promotion on the basis of seniority-cum-fitness from amongst Senior Clerk, |

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| | | | | | |
|---|---|---|---|---|---|
| 1 | 2 | 3 | 4 | 5 | 6 |
|---|---|---|---|---|---|

5 Auditor.

with at least 3 years service as such; and

ii) 25% by initial recruitment.

6 Senior Clerks

By selection from amongst Assistants.

7 Junior Clerks

By promotion on the basis of seniority-cum-fitness, from amongst Junior Clerks, with at least 2 years service as such.

a) Matriculation or equivalent qualification from a recognized Board; and

18 years to 25 years

By initial recruitment.

b) A speed of 25 words per minute in typing.

8 Stenographers

a) Matriculation or equivalent qualification from a recognized Board; and

18 years to 25 years

i) By promotion, on the basis of seniority-cum-fitness, from amongst Stenotypists with at least 3 years as such; Or

b) A speed of 100 words per minute in shorthand in English and 40 words per minute in typing.

ii) If no suitable Stenotypist is available for promotion, then by initial recruitment.

9 Stenotypist

a) Matriculation or equivalent qualification from a recognized Board; and

18 years to 25 years

By initial recruitment.

b) A speed of 80 words per minute in shorthand in English and 35 words per minute in typing.

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| 1 | 2 | 3 | 4 | 5 | 6 |
|----------------------------|------------------------------|---|---|----------------------|------------------------|
| 10. A. Position: | APPOINTMENT OF 301 | | | | |
| 11. Description of Duties: | Preferably license | | | 18 years to 45 years | By initial recruitment |
| 12. Machinery/Operator: | 7. Minimum 1 year experience | | | 18 years to 45 years | By initial recruitment |
| 13. Job Title: | Preferably license | | | 18 years to 45 years | By initial recruitment |
| 14. Job Title/Subject: | Preferably ex-Serviceman | | | 18 years to 45 years | By initial recruitment |
| 15. Job Title/Subject: | Preferably license | | | 18 years to 45 years | By initial recruitment |
| 16. Job Title/Subject: | | | | | |
| 17. Job Title/Subject: | | | | | |
| 18. Job Title/Subject: | | | | | |
| 19. Job Title/Subject: | | | | | |
| 20. Job Title/Subject: | | | | | |

Amendment: made vide S&GAD Notification No. SOR-II (S&GAD) 5-2/80, DATED 27-10-1981. 10 per cent vacancies to be filled by initial recruitments to be reserved for ex-serviceman.

ATTESTED

[Signature]

GOVERNMENT OF N.W.F.P.
HEALTH & SOCIAL WELFARE DEPARTMENT

NOTIFICATION

Dated Peshawar the 22nd June, 1983.

(52) (39)

No. SO(H)1/4-6/83. — In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1973, the Health and Social Welfare Department, in consultation with the Services & General Administration Department and Finance Department, hereby lays down the method of recruitment, qualifications and other conditions specified in column 3 to 5 of the Appendix to this Notification which shall be applicable to the posts of Ministerial Service (Sub-Cadre) in the Health Department specified in column 2 of the said Appendix.

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Note: In all cases of initial recruitment, 10% of the posts, where practicable, shall be reserved for ex-servicemen.

APPENDIX

| Sl. No. | Nomenclature of the post with Grade | Minimum qualifications for initial recruitment | Age limit for initial recruitment. | Method of Recruitment |
|---------|--|--|------------------------------------|--|
| 1 | 2 | 3 | 4 | 5 |
| 1. | Accountant (Grade-16) | Graduate from a recognized University with at least 5 years experience in Accounts or qualified S.A.S. | 21 to 35 years | By initial recruitment or by transfer. |
| 2. | Superintendent (Grade-16) | | | By promotion on the basis of seniority-cum-fitness from amongst Statistical Assistants/Assistants/Auditors/Stenographers of Health Directorate and Assistant Stenographer/Senior Store Keepers Grade-11 of subordinate offices of the Health Directorate with at least five years service as such. Note:- A common seniority list of a ligible officials will be maintained for the purpose of promotion to the post of Superintendent. |
| 3. | Assistant/Senior Store Keeper (Grade-11) | | | By promotion from amongst Senior Clerk/Store Keeper Grade-6 with at least three years service as such. |
| 4. | Statistical Assistant (Grade-11) | Degree from a recognized University with mathematics or statistics as one of the subject. | 20 to 25 years | By initial recruitment. |
| 5. | Senior Clerk/Store Keeper (Grade-6) | | | By promotion on the basis of seniority-cum-fitness from amongst Junior Clerk/Store Keeper (Grade-5) with at least 2 years service as such. |
| 6. | Junior Clerk/Store Keeper (Grade-5) | a) Matriculation from recognized Board; and b) A speed of 25 words per minute in typing. | 18 to 25 years | By initial recruitment. |

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| 1 | 2 | 3 | 4 | 5 |
|-----|-------------------------|--|----------------|---|
| 7. | Stenographer (Grade-12) | a) Matriculation from a recognized Board; and b) A speed of 100 words per minute in shorthand in English and 40 words per minute in typing. | 18 to 25 years | By promotion on the basis of seniority-cum-fitness from amongst stenotypists with at least three years service as such, or if no suitable stenotypist is available for promotion then by initial recruitment. |
| 8. | Stenotypist (Grade-8) | a) Matriculation from a recognized Board; and b) A speed of 80 words per minute in shorthand in English and 35 words per minute in typing. | 18 to 25 years | By initial recruitment. |
| 9. | Restorer (Grade-2) | Middle-pass. | 18 to 25 years | By initial recruitment. |
| 10. | Naib Qasid (Grade-1) | Preferably literate. | 18 to 45 years | By initial recruitment. |

APPROVED

APPROVED

Note: In all cases of initial recruitment, ten percent of the posts, where practicable, shall be reserved for ex-servicemen.

To,

The Secretary, Health Department,
Khyber Pakhtunkhwa, Peshawar.

L-42

Subject:

DEPARTMENTAL APPEAL FOR PREPARING/ISSUING JOINT AND INTER-SE-SENIORITY LIST OF MINISTERIAL STAFF I.E. JUNIOR CLERKS & SENIOR CLERKS IN HEALTH DEPARTMENT AND FOR GRANTING OF ANTE DATED PROMOTIONS TO THE NEXT HIGHER SCALE ON SENIORIFY BASIS AS PER LAW AND RULES AND FOR DECLARING THE UN-SIGNED NOTIFICATIONS/RULES AS ILLEGAL, WITHOUT LAWFUL AUTHORITY AND INEFFECTIVE UPON THE RIGHTS OF THE APPELLANT

Respected Sir,

With great reverence it is stated that the appellant is the employee of your good self department and is working as junior clerk at Bacha Khan Medical College, Mardan quite efficiently and upto the entire satisfaction of his superiors.

That the appellant is the senior most employee of Health Department and is serving against the same post i.e. Junior Clerk from the date of initial appointment and the Department has never granted any benefit of promotion to the appellant till date.

That it is pertinent to mention here that the Department unlawfully divided the Ministerial Staff into two cadres i.e. DG Health Services cadre and sub cadre (Sub Offices) of Health Department. That it is also pertinent to mention here that the department prepared separate seniority lists of both the employees i.e. working at the strength of Directorate General of Health Department and of those employees who are working in Sub Offices of Health Department.

That those employees who are working in the Directorate of Health Department having the chances of promotions to the next higher scale i.e. from the post of junior clerk to senior clerk, office assistant and Superintendent (BPS-17) on the basis of separate seniority list and as such the junior most employees to the appellant have availed the benefit of promotions to the post of Senior Clerk and subsequent promotions to the posts of Assistant (BPS-16) and Superintendent (BPS-17) while the appellant and all those employees who are working in the Sub Offices/Hospitals are still working against the post of Junior Clerks which is clear violation of the Fundamental rights of the appellant and other employees.

That in this regard the appellant and his other colleagues preferred several applications/objections to the high ups regarding separate seniority lists whereas proper covering letters have been circulated to your good self for preparing a draft regarding joint and inter-se-seniority list on the analogy of Elementary & Secondary Education Department and Higher Education Department but no satisfactory reply has been received so far.

That the cadre of Ministerial staff divided into two parts by DG Health Services cadre and Sub cadre (Sub Offices) of Health Department is unjustified, unlawful, unconstitutional and ineffective upon the rights of appellant and other employees working in the sub-offices throughout Khyber Pakhtunkhwa. That the separate seniority lists of DG Health Services cadre and Sub cadre (sub Offices) of Health Department

continuously affecting the promotions of the employees working in the sub offices, while the same is only beneficial for the employees working in the Directorate.

That the above mentioned cadres have been divided on the basis of un-notified notifications which are not tenable in the eye of law and rules. That even the separate seniority lists are issued without the support of any law, and even the un-notified Notifications and law under which the Supra notifications are allegedly issued, has also been repealed.

That separate seniority lists for the cadres of DG Health Services cadre and Sub Cadre (Sub Offices) of Health Department only beneficial for the employees working in the Directorate of Health Department while the same is in-effective upon the rights of employees of sub-cadre (Sub Offices).

That the separate seniority lists for a single cadre is clear violation of Section-8 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-17 of the Civil Servants Appointment, Promotion and Transfer Rules, 1989.

That the Health Department is bound to reduce disparity amongst the employees and issued/circulated joint and inter-se-seniority of the Ministerial Staff as per analogy of Elementary and Secondary Education Department and Higher Education Department, Khyber Pakhtunkhwa.

That by not issuing/circulating joint and inter-se-seniority list of the Ministerial Staff continuously affecting the promotions of the Sub Cadre which is clear violation of Article-38(e) of the Constitution of Islamic Republic of Pakistan, 1973.

It is, therefore, most humbly prayed that on acceptance of this departmental appeal the joint and inter-se-seniority list of the Ministerial Staff i.e. Junior Clerks/Senior Clerks of Health Department may very kindly be prepared and as such ante dated promotion to the next higher scale may also be granted to the appellant as per seniority position in the joint and inter-se-seniority list and as such declare the illegal promotions granted on the basis of separate seniority lists as null and void as well as declare the unsigned Notifications/rules as illegal, unlawful and ineffective upon the rights of the appellant. Any other relief which your good self deems appropriate may also be granted in favor of the appellant.

Dated: 26.4.2023.

Your sincerely

PIR FAZAL SHAH, J/C (BPS-11),
Bacha Khan Medical College, Mardan

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43/A

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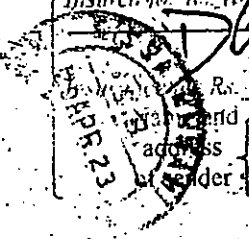
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VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

_____ OF 2023

Pir Fazal Shah

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Govt. of KP & Others

(RESPONDENT)
(DEFENDANT)

I/We Pir Fazal Shah

Do hereby appoint and constitute **MIR ZAMAN SAFI, 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. _____ / _____ /2023



CLIENT



ACCEPTED
MIR ZAMAN SAFI
ADVOCATE

OFFICE:

Room No.6-E, 5th Floor,
Rahim Medical Centre, G.T Road,
Hashtnagri, Peshawar.
Mobile No.0333-9991564
0317-9743003