


FORM OF ORDER SHEET Yasir Rehman is presented

Court of order by Mr. Mir Zaman Safi Advocate It is fixed for

Appeal No. 1723/2023 Single Bench at Peshawar on

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3 By the order of Chairman
1-	16/08/2023	<p>The appeal of <u>Mr. Yasir Rehman</u> is presented today by <u>Mr. Mir Zaman Safi Advocate</u>. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>25-08-2023</u>.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: center;"> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 1723 /2023

YASIR REHMAN

VS

GOVT: OF KP & OTHERS

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1	Memo of appeal	1- 4.
2	Stay application	5.
3	Affidavit	6.
4	Appointment order	A	7.
5	Seniority lists	B, C & D	8- 20.
6	Promotion orders	E & F	21- 22.
7	Correspondence	G	23- 28.
8	Letters	H, I & J	29- 32.
9	Impugned Notification/service rules	K	33- 40.
10	Departmental appeal	L	41- 42.
11	Wakalat Nama	43.

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. 1723/2023

Mr. Yasir Rehman, Junior Clerk (BPS-11),
DHQ Hospital, District Haripur.

.....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 DHQ Hospital, District Haripur 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.


GROUNDS:

- 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.

- E- 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 appellant 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
YASIR REHMAN

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

YASIR REHMAN

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

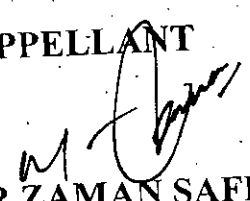
R/SHEWETH:

- 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


YASIR REHMAN

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-7

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (HEALTH) HAR

To, Mr Yasir Rehman S/O Fazalur Rehman
R/O Village Qarba District Haripur.

Subject Appointment As Junior Clerk (Disable).

Based on the recommendations made by the Departmental Selection Committee during its meeting held on 24/01/2008 the competent authority has been pleased to approve your appointment against the vacant post of Junior Clerk BPS-07 in Health Department Haripur with immediate effect.

- 1. You will be placed in minimum of BPS-07 with usual allowances as permissible to Government Servants of the same pay scale.

If the above offer for appointment is acceptable to you, you are advised to report to the Incharge, Type-D Hospital, Khanpur after medical examination from Superintendent DHQ Hospital, Haripur, within 14 days of the issuance of this order otherwise it shall stand cancelled.

Note: - Their pay will be released after verification of academic / professional qualification certificates.

Executive District Officer,
(Health) Haripur

No. 1733-18 Est. Dated Haripur, the 19.03.09.
Cc.

- 1. Director General Health Services NWFP Peshawar
- 2. District Coordination Officer, Haripur
- 3. Executive District Officer, Finance Department Haripur
- 4. District Accounts Officer, Haripur.
- 5. Incharge, Type-D Hospital, Khanpur.
- 6. Accounts Section (Local)

Executive District Officer,
(Health) Haripur

ATTACHED
[Signature]

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	Alli Raza S/O Abdul Khaliqb	01.11.2010	DGHS Office	04.08.1982	Peshawar	03.08.2042
4	Dilawar Taj S/O Sartaj ali	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 Shahzalb 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

ATTESTED

M.A.

9

S No.	Name / Father Name	Date of Appoitment 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	02.03.2057
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	02.03.2046
26	Fayaz Ahmad S/O Falz Muhammad	23.05.2019	DGHS Office	31.12.1997	Peshawar	04.04.2057
27	Adil Shah S/O Zahir Shah	24.05.2019	DGHS Office	19.02.1992	Peshawar	18.02.2052
28	All Raza S/O Tariq Javed	24.05.2019	DGHS Office	26.09.1994	Peshawar	25.09.2054
29	Syed Zulfikar Ali Shah S/O Syed Iqbal Ali Shah	24.05.2019	DGHS Office	25.05.1997	Peshawar	24.05.2057
30	Ibad Ullah Shah S/O Jahanzeb Shah	24.05.2019	DGHS Office	10.10.1998	Peshawar	09.10.2058
31	Shahid Khan S/O Muhammad Yaqoob Khan	08.11.2019	DGHS Office	11.11.1999	Peshawar	10.11.1959
32	Mushtaq Khan S/O Saif ul Malook	27.11.2019	DGHS Office	13.11.1974	Peshawar	12.11.2034
33	Naem Jan S/O Aslam Khan	27.11.2019	DGHS Office	15.04.1977	Peshawar	14.04.2037
34	Shah Khalid S/O Wazir Khan	27.11.2019	DGHS Office	02.03.1980	Peshawar	01.03.2040
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	31.03.2046
37	Daniyal Kazmi S/O Syed Arshad kamal Shah Kazmi	27.11.2019	DGHS Office	12.03.1990	Peshawar	11.03.2050
38	Zahoor Ullah S/O Musharaf Khan	27.11.2019	DGHS Office	10.04.1993	Peshawar	09.04.2053

Sheehan Afridi
DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

ATTACHED

ATTACHED

2

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

S No.	Name	Date of Appointment as Junior Clerk	Date of Promotion as Sr. Clerk	Place of Posting.	DOB	Domicile	Date of Retirement
1	Abdul Aleem	17.03.1991	19.05.2009	DGHS Office	10.01.1971	Peshawar	09.01.20
2	S. Farman Shah	18.12.1991	21.05.2013	DGHS Office	17.04.1971	Peshawar	16.07.20
3	Kamran Javed	18.12.1991	19.05.2009	DGHS Office	20.02.1973	Peshawar	19.02.20
4	Mukhtiar Ali	18.12.1991	19.05.2009	DGHS Office	07.03.1973	Peshawar	06.03.20
5	Mubarak Shah	18.06.1992	01.10.2019	DGHS, office	08.08.1958	Peshawar	08-08-20
6	Hashmatullah	12.11.1992	21.05.2013	DGHS, office	12.12.1972	Peshawar	11.12.20
7	Nasruminallah	22.08.1993	21.05.2013	DGHS Office	02.01.1969	Peshawar	01.01.20
8	Muhammad Ishaq S/O Sirbiland Khan	22.08.1993	21.05.2013	DGHS Office	15.5.1969	Peshawar	14.05.20
9	Mukarram Khan	26.04.1994	21.05.2013	HMC Peshawar	08-07-35	Peshawar	07:07:20
10	Umar Daraz	23.11.1994	21.05.2013	DGHS, Office	15.01.1974	Peshawar	14:01:20
11	Masam Khan	20.01.1995	21.05.2013	DGHS, Office	06.02.1975	Charsadda	05:02:20
12	Jehanzeb Khan	09.02.1995	21.05.2013	DHS FATA	08.02.1975	Peshawar	07:02:20
13	Muhammad Zahir	14.02.1995	21.05.2013	DGHS Office	03.03.1974	Peshawar	02.03.20
14	M. Shahid Amin	12.05.1996	21.05.2013	DGHS Office	02.09.1976	Charsadda	01.09.20
15	Wajid Shah	17.09.1996	01.10.2019	DHS, FATA	30.09.1963	Khyber	29:09:20
16	Nadeem ullah	17.09.1996	01.10.2019	DHS, FATA	09.01.1972	Peshawar	08:01:20
17	Khilal Sald	19.09.1996	01.10.2019	DHS, FATA	15.09.1974	Khyber	14:09:20
18	Nasim Ahmad	19.05.1997	01.10.2019	DGHS Office	01.06.1966	Peshawar	31:05:20
19	Muhammad Imran S/O Muhammad Younas	14.06.1997	01.10.2019	DHS, FATA	01.08.1975	Peshawar	31:07:20
20	Shaukat Ali	01.07.1997	01.10.2019	DHO Nowshera	01.08.1971	Peshawar	31:07:20
21	Muhammad Fayyaz	29.06.1998	01.10.2019	DHS, FATA	02.05.1974	Peshawar	01.05.20
22	Ikram Ullah S/O Fazal Rabbil	25.01.2000	01.10.2019	DGHS, Office	20-10-74	Charsadda	19-10-20
23	Zulfqar Ali	20.03.2002	01.10.2019	DGHS, office	16.01.1966	Peshawar	15:01:20
24	Irfan Ullah S/O Naimat ullah	20.03.2002	01.10.2019	DGHS, office	15.03.1974	Peshawar	14:03:20
25	Abid Muhammad	28.01.2004	01.10.2019	KMC Peshawar	15.02.1972	Khyber	14:02:20
26	Mubashir Khan S/O Muhammad Ashraf	29.04.2006	01.10.2019	DGHS, Office	07.01.1978	Peshawar	06:01:20
27	Muhammad Nadeem	29.04.2006	01.10.2019	DGHS, Office	01.12.1984	Peshawar	30:11:20
28	Mujahid Khan S/O Firdous Khan	02.12.2006	01.10.2019	DHS, FATA	01.06.1977	Charsadda	31:05:20
29	Naveed ur Rahman	06.07.2007	01.10.2019	DHS, FATA	10.04.1986	Charsadda	09:04:20
30	Shafiqat ullah Shah S/O Tilawat Shah	31.07.2007	01.10.2019	DGHS, Office	08.03.1988	Charsadda	07:03:20
31	Noman Hadi S/O Shamsul Hadi	11.05.2009	01.10.2019	DGHS, Office	05.04.1983	Bannu	04:04:20
32	Samin ul haq S/O Fazle Han	03.03.2010	01.10.2019	DGHS, Office	01.07.1965	Peshawar	31:11:20

ATTN: [Signature]

11

10

S.No.	Name	Date of Appointment as Junior Clerk	Date of Promotion as Sr.Clerk	Place of Posting.	DOB	Domicile	Date of Retirement
33	Mumfat All Shah	03.03.2010	01.10.2019	DGHS, Office	18.11.1968	Charsadda	17.11.20
34	Fahad Khan S/O Khan Rose	22.03.2010	15.12.2021	DGHS, Office	01.02.1991	Peshawar	31.01.20
35	Syed Irfan Haldar Shah S/O Syed Shabbir Hussain Shah	01.11.2010	15.12.2.21	DGHS, Office	01.11.1981	Peshawar	01.11.20
36	Syed Mehmood All Shah S/O Syed Abid All Shah	01.11.2010	15.12.2.21	DGHS, Office	11.01.1983	Peshawar	10.01.20
37	Fazal Mahmood S/O Fateh Muhammad	01.11.2010	15.12.2.21	DGHS, Office	10.06.1985	Peshawar	09.06.20
38	Faisal Javed S/O Javed Iqbal	01.11.2010	15.12.2.21	DGHS, Office	05.11.1990	Peshawar	04.11.20

Shabeen Afidi
DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

ATTESTED

ATTESTED

[Signature]



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR**

E-Mail Address: dgshs@khyber.gov.pk Office Phn 091-9210269, 9210196 Fax # 091-9210230

No. 13328-477 Promotion Cell Dated Peshawar the

05/12/2022

To,

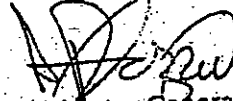
1. The Director General PHSA, Peshawar.
2. The Director IKD, Hayatabad, Peshawar
3. The Chief Executive Officer, PGMI, Peshawar.
4. All Principals/Deans of Public Sector Medical Colleges in Khyber Pakhtunkhwa
5. All Hospital Directors of MTIs in Khyber Pakhtunkhwa
6. All Medical Superintendents of Hospitals 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.

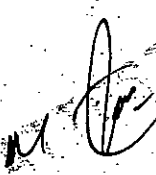

Additional Director General (HR)
Directorate General Health Services Khyber
Pakhtunkhwa, Peshawar.

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 Karimi, President APCA, KPK, Peshawar.

For information.


ATTACHED


ATTACHED

13-10

PROVINCIAL SENIORITY LIST OF JUNIOR CLERKS (BS-11) SUB-CADE 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 Anwar 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.	Manzoor Hussain S/O Mir Afzal	21-12-89	ATH, Abbottabad	08.01.1967	Abbottabad	07.01.2027
6.	Iqbal-ud-Din S/O Abdul Ghanl	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.	Nawaz Ahmad	30-09-91	LRH Peshawar	21.04.1971	Peshawar	20.04.2031
12.	Salim 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 Mobeen 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.	Suhail 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	Karsadda	19.11.2032

(Handwritten signature)

(14) (10)

S No.	Name / Father Name	Date of Appointment as Junior Clerk	Place of Posting	DOB	Domicile	Date of Retirement
30.	Gohar Ali S/o Naik Zada Bacha	01-02-95	DHQH: Batkhela	01.02.1969	Swat	31.01.2028.
31.	Abdul Ali S/O Badshah Wali	11-02-95	AHQ Hospital Miranshah	10.12.1973	North Waziristan	09.12.2033
32.	Salf ur Rahman S/O Fazal Mehmood	15-02-95	KTH Peshawar	17.03.1967	Orakzai	16.03.2027
33.	Amjad Ali	27-02-95	Agency Surgeon Orakzai	09.09.1972	Orakzai	08.09.2032
34.	Muhammad Rizaz 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	AHQH: 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	AHQH: Parachinar	13.02.1973	Kurram	12.02.2033
48.	Salf Ullah S/o Malik Gul Jan	02-07-95	GMC Di Khan	10.11.1974	Di 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.	Fazil 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	Asbottabad	26.02.2031
60.	Naib 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

ATTACHED

(15) (10)

S No.	Name / Father Name	Date of Appointment as Junior Clerk	Place of Posting	DOB	Home Circle	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 Gano	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 Yousef	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 Yasar	01-01-97	Agency Surgeon Bajour Agency	10.06.1964	Bajour	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	DHQ Mansehra	28.03.1966	Mansehra	27.03.2026
76.	Rafiq Ullah S/O Muhammad Sadiq	01-06-98	DHQH, 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.	Ifrikhar 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.	All Akber S/O Afzal Khan	25-01-99	DHQ 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 Khaliq 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

[Handwritten signature]

16

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 Saïd Ali Shah	24-05-19	LMH, Kohat	14.04.1999	Kohat	13.04.2059
325.	Nazmeen Siddique S/O Muhammad Saïddique	27-05-19	DHO, Abbottabad	01.06.1984	Abbottabad	31.05.2044
326.	Faisal 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 Amlad Hussain Awan	18-06-19	DHO, Mansehra	14.08.1998	Mansehra	13.08.2058
332.	Syed Mukhtiar 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 Magsood Alam	01-11-19	DHQT, Hospital, Kohat.	08.03.1989	Kohat	07.03.2051
336.	Muhammad Naveed S/O Saïd 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.	Sarwat 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	25.01.1982	Mansehra	25.01.2042
345.	Faheem Khan Saif S/O Wazir Khan	01-04-20	DHO, Mardan.	20.09.1995	Mardan	20.09.2057
346.	Inam Ullah S/O Fazli 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 Allauddin	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 Saïddique	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 Saïddique 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

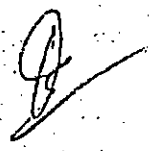
ATTESTED

ATTESTED


17

S No.	Name / Father Name	Date of Appointment as Junior Clerk	Place of Posting	DOB	Domicile	Date of Retirement
359.	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.	Irshad Ali S/O Miza	10-05-22	DHQH, Alpur Shangla	07.01.1999	Shangla	06.01.2059
365.	Ahsan Ali S/O Sikanjar 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 Afid
DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR



M. Afid
M. Afid

ATTESTED


Senior clerk

D-18

PROVISIONAL SENIORITY LIST OF SENIOR CLERKS (BS-14) OF SUB-CADRE, KHYBER PAKHTUNKHWA, 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 Ul Arifeen	19-10-82	26.09.1994	KMC Peshawar	01.02.1964	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	Almal 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	Mukhtiar Ali S/O Mutabar	17-11-84	30.06.2000	DHQH, 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	22/092006	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	Riaz 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 Najeel 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	04.10.1968	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	14.03.1963	Peshawar	13.03.2028
16	Zafar Ali Khan S/O Muhammad Aslam	01-04-87	07.02.2007	PGMI Peshawar	19.10.1966	Mardan	18.10.2024
17	Ashfaqullah	02-04-87	07.02.2007	AHQ Hospital Ghallani	02.04.1963	Charsadda	01.04.2026
18	Naeem ul Haq S/O Zia ul Haq	12-04-87	07.02.2007	Mirajul Abdul Haq Jahanzeb Kidney Hospital, Swat	30.10.1969	Swat	29.10.2029
19	Qasim Jan s/o Syed Pacha	10-05-87	07-02-07	DHQ, Hospital Timergara	01-09-64	Dir	31.04.2024
20	Niaz Anwar S/O Amir Nawab	14-06-87	07.02.2007	DHQH 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	06.01.1963	D.I Khan	05.01.2026
24	Muhammad Amir S/O Muhammad Sharif	03-08-87	07.02.2007	HMC, Peshawar	29.02.1965	Peshawar	28.02.2028
25	Iftikraz 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	Ameer 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	25.03.1963	Nowshera	24.03.2025

APPROVED

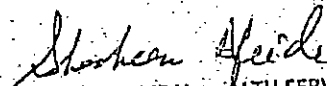
(19)


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
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	08.09.1965	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	Ghias ud Din S/O Sald 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: Sifwat Ghayur Memorial Hospital Pesh	02.11.1970	Nowshera	01.11.2030
45	Ali 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 Diwaya	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 D.I Khan.	08.01.1967	D.I Khan	07.01.2027
52	Umar Niaz 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.	01.01.1968	Bannu	31.12.2028
58	Parvez Khan S/O Mahar Gul	13-11-89	31.12.2009	HMC, Peshawar	13.03.1968	Peshawar	12.03.2029


ATTACHED

ATTACHED

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 Majeed	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	01.02.2032


 DIRECTOR GENERAL HEALTH SERVICES
 KHYBER PAKHTUNKHWA, PESHAWAR


 RECEIVED


 ATTACHED

Better Copy Page No. 3

**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**

ATTESTED

28-3-2017

E-21

DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR



Office Ph# 091 - 9210269 Exchange# 091 - 9210107, 091 - 9210196 Fax# 091 - 9210210
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 (BPS-14) are hereby promoted to the post of Office Assistant (BPS-16) with immediate effect:-

S.No	Name of official	Present posting
01	Mr. Nasim 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 (BPS-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 purpose.

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

Dated Peshawar the 28/3/2017

No/0247-54 /Personnel/Promotion

Copy forwarded to the:-

- 01 Accountant 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 DHIS Cell DGHS KPK Peshawar.
- 07 Official concerned
- 08 Personnel files.

For information and necessary action.

Director General Health Services
Khyber Pakhtunkhwa, Peshawar.

Pto

ATTESTED

ATTESTED



15/12-2020

22

DIRECTORATE GENERAL HEALTH SERVICES GOVT. OF KHYBER PAKHTUNKHWA PESHAWAR.

OFFICE ORDER

Consequent upon approval accorded by the Departmental Promotion Committee in its meeting held on 11.12.2020, under the Chairmanship of DGHS Khyber Pakhtunkhwa Peshawar, the following Senior 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. Fahad 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.	Fazul Mehmood Junior Clerk	DGHS Office Peshawar
5.	Faisal Javed Junior Clerk	DGHS Office Peshawar

Union
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. Fahad 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.	Fazul 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/xxxxxxxxx
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.K. PESHAWAR

ATTACHED

ATTACHED

ATTACHED

Better Copy Page No. ~~23~~ 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
MB

ATTENDED

GOVERNMENT OF NAGALAND
MINISTRY OF HEALTH
SECTION OFFICER (IV)

29

The Secretary to Govt. Health Deptt.
Health Department, Dispur
Dispur, Assam

MINUTES OF THE STANDING SERVICE RULES COMMITTEE FOR
FORMATION OF AMENDMENTS IN SERVICE RULES OF MINISTERIAL
OFFICIAL SERVICES FOR CADRE PAPER NO. 13/75 DATED 03/07/2020

Kindly refer to your letter No. SO/HA/HD/102/Ministerial Staff
of 07/2021 on the subject noted above.

I have the honour to state that two segregated service Rules have been
for Health Department Ministerial Staff (DHS cadre/sub-cadre) notified by the Govt.
vide Notification No. SO (H) IV/4-13/75 dated 29.03.2021, and No. SO (H) 4/6/
22.06.1985 (copies attached).

However, signed copies of above modifications are not traceable
Directorate.

The main reason of maintaining of separate cadres was probably to
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 an
deserve people who possess the required qualification at their home districts. More
grounds which were put forwarded at the time of framing of Service Rules in 198
be available in the files of Section Officer Health (IV) and Section Officer (I)
were notified from above sections.



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

25

No. SOH(VI)/44/2020-21 Ministerial Staff/DGHS
Dated Peshawar, the 18th December, 2021

To:

The Secretary to Government
of Khyber Pakhtunkhwa
Establishment Department, Peshawar

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. SO/II (E&AD) 1-20/2021(a) 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 regard the specification of allocation quota for promotion of Class-IV employees as per policy the same may be considered while making amendment in the Service Rules under reference.

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

[Signature]
SECTION OFFICER (VI)

Copy forwarded to
PS to Secretary Health, Khyber Pakhtunkhwa

[Signature]
SECTION OFFICER (VI)

ATTESTED *[Signature]*
ATTESTED *[Signature]*
ATTESTED

NO. SOR-115/2022 (Ministerial Staff Directorate General Health Service Cadre and Sub-Cadre)



To: The Secretary to Govt of Khyber Pakhtunkhwa
Health Department


Subject:

GUIDANCE REGARDING DISPUTES BETWEEN CADRES OF MINISTERIAL STAFF DIRECTORATE GENERAL HEALTH SERVICE CADRE AND SUB-CADRE (SUB-OFFICES) OF HEALTH DEPARTMENT

Dear Sir,

It is directed to refer to your letter NO. SOR-115/2022 (Ministerial Staff Directorate General Health Service Cadre and Sub-Cadre) dated 16-12-2022 for the captioned subject and to state that Health Department is the Administrative Department of both the Ministerial Cadre Staff and the Administrative Secretary (Being Chairman of SSRC) may like to prepare their Service Rules on the analogy of Elementary & Secondary Education and Higher Education Departments. The same may be placed before the SSRC being relevant forum. However, the forum can frame their Service Rules/Regulations/Recruitment/Promotion Rules for its Ministerial employees in the best possible interest/Department so that discrimination amongst the Ministerial staff or Sub-Cadre could be avoided and once and for all.

Yours faithfully,


ABDUL WAHID
SECTION OFFICER (P&D)
Phone NO: 92-1732


D.K. KHAN

ATTACHED
M (17)



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.

27

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. 3015/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)

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.

03/03/2022

Section Officer (Estab-VI)

mb

ATTESTED

ATTESTED

GOVERNMENT OF KHYBER PAKHTUNKHWA,
HEALTH DEPARTMENT

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

5th 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

ATTESTED

H-29

	<p align="center">OFFICE OF THE ADVISOR TO CARETAKER CHIEF MINISTER FOR HEALTH KHYBER PAKHTUNKHWA</p> <p align="center">1st Floor III(D) Unit, Khyber Road Peshawar Phone No. 091-9223603, Fax: 091-9223604</p>
---	---

No. PS/ACCM/HEALTH/KP/1-5/121/2023
Dated the Peshawar 6th March, 2023

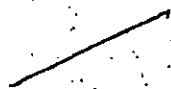
To,
The Director General of Health Services
Khyber Pakhtunkhwa.

Subject:- SWIFT DISPOSAL OF CASES FOR PROMOTION OF NURSING CADRE
STAFF AND SERVICE RULES FOR MINISTERIAL STAFF.

Dear Sir,
I am directed to refer to the subject noted above and to enclose herewith a copy of the application No.79/APCA Dated 03-03-2023 received from General Secretary All 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.

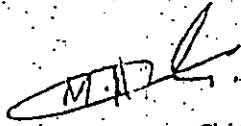
I am further directed to request you to kindly prepare joint seniority list of ministerial staff of Directorate General of Health cadres and sub cadre at the earliest under intimation to this Office, please.


Yours faithfully,


PS Advisor to Chief Minister
for Health

End: of Even No & date

Copy forwarded for informallon to the General Secretary All Pakistan Clerks Association, Health Department Khyber Pakhtunkhwa with reference to your application No & date mentioned above.


PS Advisor to Chief Minister
for Health

RECEIVED




OFFICE OF THE ADVISOR TO CARETAKER

CHIEF MINISTER FOR HEALTH

KHYBER PAKHTUNKHWA

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

No. PS/ACGM/HEALTH/KP/A-5/48
Dated the Peshawar 20th March, 2023

To,

The Director General of Health Services
Khyber Pakhtunkhwa.

1 - 30

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.

ATTESTED

ATTESTED

ATTESTED

Better Copy Page No. ~~30~~ 31

**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.

ATTESTED

Section Officer (Estab-VI)

2nd Reminder

31



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

No. 504/VI/ADMINISTRATIVE/SSRC/1-1/2022-23/DGHS
Dated: 11th Peshawar, 24th March 2023

To

The Director General Health Services
Khyber Pakhtunkhwa, Peshawar

SUBJECT: PROMOTION ON EXISTING SERVICE VII-SOR MINISTERIAL STAFF

I am directed to refer this department letter of even No dated 31/ March
February to your office letter No. 10515/Promotion cell dated 27/09/2022 & dated
30/05/2022 letter No. 10367/Promotion cell letter No. 10370/Promotion cell letter No.
10366/Promotion cell letter No. 8260-61/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 convene meeting of the SSRC. Also add the requisite Working
papers for SSRC please

Reply in the instant case is still awaited

Section Officer VI

Ends of Government orders

Copy forwarded to

1. To Section Health Khyber Pakhtunkhwa

Under



**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

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

32

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 Mfnister for Health w/r to their letter quoted above.
2. PS to Secretary Health, Khyber Pakhtunkhwa.

Section Officer-VI

ATTESTED
[Signature]

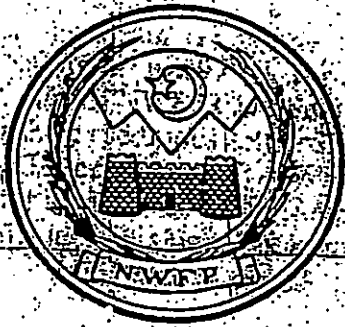
ATTESTED
[Signature]

ATTESTED

Rules 2 1982 P. 108

GOVERNMENT OF N.W.F.P.

**SERVICES & GENERAL
ADMINISTRATION DEPARTMENT**



K-33

MANUAL

of

**Service/Recruitment Rules,
North-West Frontier Province**

Compiled by: Q&M Wing, S&GAD

Printed by the Manager,

State Govt. Dept., Govt. of N.W.F.P.

ATTESTED

ATTESTED

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

34

NOTIFICATION

Dated Peshawar the 29th March, 1982.

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.

M. Ch
ATTESTED

M. Ch
ATTESTED

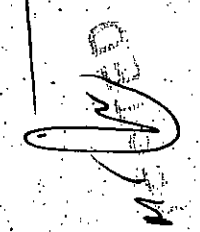
ATTESTED

326

APPENDIX

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: <ul style="list-style-type: none"> <li data-bbox="1589 694 1963 774">a. Statistical Assistants/Assistants/Auditors/ Stenographers of the Health Directorate, and <li data-bbox="1589 805 1963 913">b. Head Clerk and Stenographers of the offices Sub-ordinate to Health Directorate with, at least 5 years service as such.
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,

RECEIVED
 10/11/54
 HEALTH DEPARTMENT
 GOVT. OF INDIA


 10/11/54

36

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

5. Auditor.

6. Senior Clerks.

7. Junior Clerks.

8. Stenographers.

9. Stenotypist.

with at least 3 years service as such; and

ii) 25% by initial recruitment.

By selection from amongst Assistants.

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

18 years to 25 years
By initial recruitment.

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

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

18 years to 25 years
By initial recruitment.

a) Matriculation or equivalent qualification from a recognized Board; and
b) A speed of 25 words per minute in typing.

a) Matriculation or equivalent qualification from a recognized Board; and
b) A speed of 100 words per minute in shorthand in English and 40 words per minute in typing.

a) Matriculation or equivalent qualification from a recognized Board; and
b) A speed of 80 words per minute in shorthand in English and 35 words per minute in typing.

[Handwritten Signature]

ATTESTED

[Handwritten Signature]
ATTESTED

37

Sl. No.	Post Name	Qualification	Age	Recruitment
10	Restorer	Preferably literate.	18 years to 45 years	By initial recruitment.
11	Machine Operator	Preferably literate.	18 years to 45 years	By initial recruitment.
12	Naib Qasid	Preferably literate.	18 years to 45 years	By initial recruitment.
13	Chowkidar	Preferably ex-Serviceman	18 years to 45 years	By initial recruitment.
14	Bhishi/Sweeper/Mali	Preferably literate.	18 years to 45 years	By initial recruitment.
15	Young Clerk			
16	Inspector			

RECEIVED
M
M

ATTACHED
M

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 recruitment is to be reserved for ex-serviceman.

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

38

NOTIFICATION

Dated Peshawar the 22nd June, 1983.

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, 1955, 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.

[Handwritten signature]

[Handwritten signature]
ATTESTED

ATTESTED

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 Clerks/Store Keeper Grade-6 with at least three years service as such.
4.	Statistical Assisiant (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.

39

ATTENDED

APPROVED

ATTESTED

To,

The Secretary, Health Department,
Khyber Pakhtunkhwa, Peshawar.

L- (41)

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 SENIORITY BASIS AS PER LAW AND RULES AND FOR DECLARING THE UN-NOTIFIED 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 DHQ Hospital, Haripur 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 Superintendant (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 Superintendant (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

ATTACHED
M B

(42)

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.

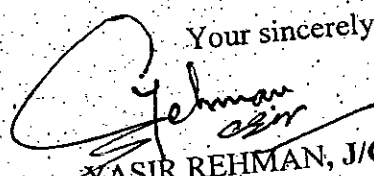
That the Health Department is bound to reduce disparity amongst the employees and issued/circulated joint and inter-se-seniority of the Ministerial Staff as per analogy of Elementary and Secondary Education Department and Higher Education Department, Khyber Pakhtunkhwa.

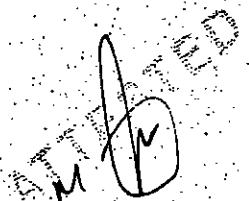
That by not issuing/circulating joint and inter-se-seniority list of the Ministerial Staff continuously affecting the promotions of the Sub Cadre which is clear violation of Article-38(e) of the Constitution of Islamic Republic of Pakistan, 1973.

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 granted on the basis of separate seniority lists and as such declare the illegal promotions 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


YASIR REHMAN, J/C (BPS-11),
DHQ Hospital, District Haripur



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.

ATTESTED
 ATTESTED
 ATTESTED

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

42/A

No. 1536 For RGL105606462

Stamps affixed except in case of insured letters of more than the initial weight specified in the Post Office Guide or on which an acknowledgment is due.

Rs. Ps. 68

Received a registered letter addressed to

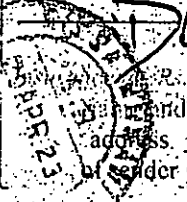
Dr. Secretary Health

Initials of Receiving Officer

Write here "letter", "note", "packet" or "parcel". In the word "insured" before it when necessary.

Insured for Rs. (in words)

Rs. P. (in words)



Weight in Grams 100

Signature of sender

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

_____ OF 2023

Yasir Rehman

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Govt. of KP & Others

(RESPONDENT)
(DEFENDANT)

I/We Yasir Rehman

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

Yasir Rehman
CLIENT

MIR ZAMAN SAFI
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