


FORM OF ORDER SHEET

Court of _____

Appeal No.

1786/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/09/2023	<p>The appeal of Dr. Salma Bibi presented today by Mr. Imdad Ullah Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 1786 of 2023

Dr. Salma Bibi Senior Medical Officer Miangul Abdul Haq Jehanzeb Kidney
Hospital, Manglaor, District Swat.

...Appellant

VERSUS

The Secretary Health Services Government of Khyber Pakhtunkhwa, Peshawar
and Others.

...Respondents

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Appellant Through


Imdad Ullah

Advocate Swat

Office: Khan Plaza, Gulshone Chowk,

Mingora Swat, Cell 0333 929 7746

Email: imdadswati@gmail.com

(1)

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ of 2023

Dr. Salma Bibi Senior Medical Officer Miangul Abdul
Haq Jehanzeb Kidney Hospital, Manglaor, District Swat.

...Appellant

VERSUS

1. The Secretary Health Services Government of Khyber Pakhtunkhwa, Peshawar.
2. The Director Health Services Government of Khyber Pakhtunkhwa, Peshawar.
3. The Medical Superintendent Miangul Abdul Haq Jehanzeb Kidney Hospital, Manglawar, District Swat.
4. The District Accounts Officer Swat at Saidu Sharif, District Swat.

...Respondents

SERVICE APPEAL UNDER SECTION 4
OF THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT, 1974
AGAINST THE ILLEGAL STOPPAGE
AND RECOVERY OF ANNUAL
INCREMENTS, OF THE AD HOC
PERIOD, AGAINST THE LAW AND
RULES, FEELING AGGRIEVED THE
APPELLANT SUBMITTED A
DEPARTMENTAL APPEAL, BUT THE
SAME WAS NOT RESPONDED TO
DESPITE THE LAPSE OF STATUTORY
PERIOD OF TIME.

PRAYER:

That on acceptance of this service appeal on acceptance of this service appeal the illegal recovery be stopped forthwith, they recovery be repaid and also the annual increments for the ad hoc period, stopped, also be released.

Respectfully Sheweth:

Facts:

- i. That the Appellant got appointed as WMO (Woman Medical Officer) B-17 vide Notification No. 3078085/E.I Peshawar the 24-12-2011 after the fulfilment of all the codal formalities in due course of law. Copy of the order dated 24-12-2011 is enclosed as Annexure "A".*
- ii. That the service of the Appellant along with others was regularized vide Notification No. SOH (E-II) 3-18/2015 dated Peshawar the 21st October, 2015 in light of the Khyber Pakhtunkhwa Medical Officers and Dental Surgeons (Regularization of Services) Act, 2015. Copy of the order dated 15-10-2015 is enclosed as Annexure "B".*
- iii. That the Appellant has regularly been performing her duties to the satisfaction of the Authorities and without any break.*

- iv. That recently after the promotion of the Appellant to the B-18 it was dawned upon the Appellant that not only her annual increments for the period from first entry till regularization are stopped illegally, but the same time recovery is also made, both of these acts are in clear juxtaposition of the law and rules. That strange and flabbergasting enough the Appellant was informed through Email that recovery has been affected i.e. monthly deduction started PKR 39133.00 w.e.f. 01-04-2023 till 31-03-2024, yet no order was communicated to the Appellant. Copy of the printout is enclosed as Annexure "C".
- v. That feeling aggrieved the Appellant preferred a departmental appeal, but the same was not responded to despite the lapse of statutory period of time. Copy of the departmental appeal is enclosed as Annexure "D".
- vi. That still feeling aggrieved and having no other option this Honourable Tribunal is approached for the redressal of the grievances on the following grounds.

Grounds:

- a. That the Appellant has not been treated in accordance with the law and rules on the subject and made to suffer without affording any opportunity of defense or being heard.

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- b. That the alleged overpayment made is not with connivance of the Appellant rather was made by the Respondent Department, for which the Appellant cannot be made to suffer in the shape of recovery.
- c. That as per the law and rules and further endorsed by numerous judgments of the Service Tribunal and the August Supreme Court of Pakistan this issue has been decided once and for all.
- d. That the issue is regarding the payment of increments for the Ad Hoc period and not of seniority, which issue stands decided, yet the Appellant is made to suffer.

It is, therefore, very respectfully prayed that on acceptance of this service appeal the illegal recovery be stopped forthwith and also the annual increments for the ad hoc period, stopped, also be released.

Any other relief deemed appropriate in the circumstances and not specifically prayed for may also very kindly be granted.

Appellant
Salma Bibi
Salma Bibi
Through Counsels,
Aziz-ur-Rahman
Aziz-ur-Rahman
Imdad Ullah
Imdad Ullah
Advocates Swat

5

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ of 2023

Dr. Salma Bibi Senior Medical Officer Miangul Abdul
Haq Jehanzeb Kidney Hospital, Manglaor, District Swat.

...Appellant

VERSUS

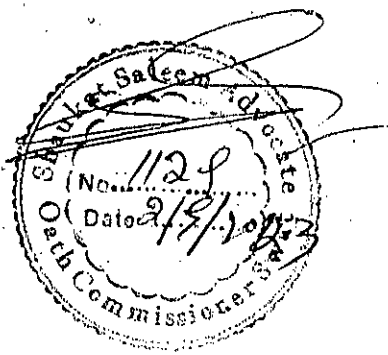
The Secretary Health Services Government of Khyber
Pakhtunkhwa, Peshawar and Others.

...Respondents

AFFIDAVIT

It is solemnly stated on Oath that all the contents of
this service appeal are true and correct to the best of my
knowledge and belief and nothing has either been
misstated or kept concealed before this Honourable
Tribunal.

Deponent
Salma Bibi
Dr. Salma Bibi



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BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ of 2023

Dr. Salma Bibi Senior Medical Officer Miangul Abdul
Haq Jehanzeb Kidney Hospital, Manglaor, District Swat.

...Appellant

VERSUS

The Secretary Health Services Government of Khyber
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...Respondents

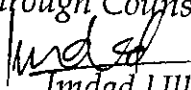
ADDRESSES OF THE PARTIES

Appellant:

Dr. Salma Bibi Senior Medical Officer Miangul Abdul
Haq Jehanzeb Kidney Hospital, Manglaor, District Swat.

Respondents:

1. The Secretary Health Services Government of
Khyber Pakhtunkhwa, Peshawar.
2. The Director Health Services Government of
Khyber Pakhtunkhwa, Peshawar.
3. The Medical Superintendent Miangul Abdul Haq
Jehanzeb Kidney Hospital, Manglawar, District
Swat.
4. The District Accounts Officer Swat at Saidu Sharif,
District Swat.

Appellant
Through Counsel,

Imdad Ullah
Advocate Swat

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ of 2023

Dr. Salma Bibi Senior Medical Officer Miangul Abdul
Haq Jehanzeb Kidney Hospital, Manglaor, District Swat.

...Appellant

VERSUS

The Secretary Health Services Government of Khyber
Pakhtunkhwa, Peshawar and Others.

...Respondents

Application for grant of interim relief
to the effect that the recovery of PKR
39133.00 be stopped till final disposal
of the case.

Respectfully Sheweth:

- i. That the applicant has filled a service appeal before this Honourable Tribunal in which no date of hearing is fixed as yet.
- ii. That the Respondent Department is making an illegal recovery of the above mentioned amount to the detriment of the Applicant.
- iii. That if the recovery is stopped the same will not cause any prejudice, whatsoever, on the outcome of the service appeal.
- iv. That the Applicant will face hardship if the recovery is not stopped.

v. That the balance of convince is also in favour of the Applicant.

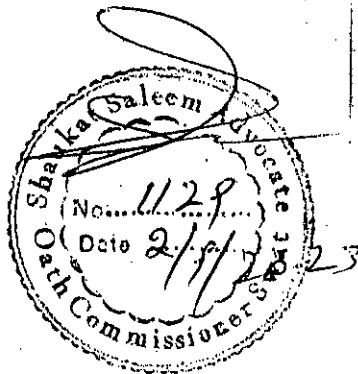
It is, therefore, very respectfully prayed that on acceptance of this application the Respondents be ordered to stop the recovery of the above mentioned amount till the final disposal of the case.

Applicant
Salma
Dr. Salma Bibi
Through Counsel,
Imdad
Imdad Ullah
Advocate Swat

Affidavit:

It is solemnly stated on Oath that all the contents of this application are true and correct to the best of my knowledge and belief.

Deponent
Salma
Dr. Salma Bibi





**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

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

Office Ph: 091-9270210 Exchange Ph: 091-9270211, 091-9270212 FAX: 091-9270213

No. _____/E.I

Dated. ____/12/2011

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Annexure
P.A.

NOTIFICATION:

On her 1st appointment as Woman Medical Officer (B-17) on Adhoc basis for a period of one year Dr. Salma Bibi D/O Aziz-ur-Rehman has assumed charge of her duties as woman Medical Officer at CH Khawzakhela Distt: Swat on 28/10/2011 (FN).

ASSISTANT DIRECTOR (P-I)
DIRECTORATE GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA

The Manager,
Govt: Printing Press KPK, Peshawar
For Publication in Govt: Gazette.

No. 3078-85/E.I Peshawar the Dated: 27/12/2011

Copy forwarded to the:-

1. Secretary to Govt: of KPK, Health Department Peshawar.
2. EDO (Health) Swat.
3. DAO Swat (Original Health & age Certificate attached).
4. Doctor concerned.
5. AE-IV DGHS Office KPK, Peshawar.
6. AE-III DGHS Office KPK, Peshawar.

For information & necessary action.

ASSISTANT DIRECTOR (P-I)
DIRECTORATE GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA

24/12/11

Attested
Ali
Advocate

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**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT.**

Dated 25th October, 2011

Notification:

No.SO(E)H-II/3-18/2011: The Competent Authority on the recommendations of Departmental Selection Committee is pleased to appoint the following doctors as Medical Officers (BS-17) on adhoc basis for a period of one year or till the arrival of regular selectees of Khyber Pakhtunkhwa Public Service Commission whichever is earlier with immediate effect and post them in the health facilities as mentioned against each:

S.No.	Name of Candidate with Father's Name	Date of Birth	Domicile	Place of posting
1.	Amir Amanullah s/o Munda Khan	8/8/1982	Swat	SGTH Swat
2.	Sanam Ismail D/O M. Ismail Khan	12/3/1983	Swat	SGTH Swat
3.	Zarghuna Khan D/O Haider Ali	03/07/185	Swat	Civil Hospital Barikot Swat
4.	Jamil Ahmad Siddiqi s/o Fazli Subhan	1/11/1985	Swat	SGTH Swat
5.	Jehan Zeb s/o Amir Dost Khan	10/6/1981	Swat	SGTH Swat
6.	Muhammad Azam s/o Salih Mohammad	15/4/1981	Swat	RHC Khazana Swat
7.	Kaloom Khan D/O Pardil Khan	27/9/1987	Swat	SGTH Swat
8.	Muhammad Iqbal s/o Fazal Ghani	4/1/1984	Swat	SGTH Swat
9.	Asghar Khan s/o Iltbar Khan	6/4/1980	Swat	SGTH Swat
10.	Shams-ud-Din s/o Noorullah Jan	8/3/1984	Swat	Civil Hospital Kabal Swat
11.	Samina Perwaish D/O M. Perwaish	20/6/1980	Swat	BHU Islampur Swat
12.	Alishan Ismail s/o Dr.M. Ismail Khan	12/8/1984	Swat	SGTH Swat
13.	Hanny Nisar D/O Nisar Ahmad	9/9/1985	Swat	SGTH Swat
14.	Sadia Khan D/O Sherin Wali	15/04/1982	Swat	RHC Chuprial Swat
15.	Ubaid Ullah s/o Hidayat Ullah	6/3/1984	Swat	BHU Behrain Swat
16.	Waseem Zareen s/o Muhammad Zareen	30/3/1984	Swat	Civil Hospital Barikot Swat
17.	Zeeshan s/o Shah Dawran	1/1/1984	Swat	Civil Hospital-Kabal Swat
18.	Farooq Ahmad s/o Abdul Khaliq	20/09/1980	Swat	Civil Hospital Kabal Swat
19.	Azhar Alam s/o Shah Roze Khan	1/4/1983	Swat	BHU Banjol Swat
20.	[REDACTED]	10/1/1986	Swat	BHU Char Bagh Swat
21.	Muhammad Suleman s/o Fazal Mohammad	21/6/1983	Swat	BHU Manyar Swat
22.	Jehangir s/o M. Akber Khan	18/03/1975	Swat	BHU Guli Bagh Swat

Attested
[Signature]
Advocate

(11)

23.	Saima Qadir D/O Fazal Qadir	4/12/1979	Swat	BHU Qambar Swat
24.	Naveed Tayyab Khalily s/o Muhammad Tayyab	8/3/1982	Swat	BHU Bar Shawar Swat
25.	Asghar Khan s/o Raza Khan	13/3/1983	Swat	BHU Laikot Swat
26.	Mushtaq Ahmad s/o Arsalan	17/03/1987	Swat	BHU Taghma Swat
27.	Sajad Ali Shah s/o Sardar Shah	18/09/1980	Swat	BHU Bishband Swat
28.	Kamran Khan s/o Ismail	9/3/1982	Swat	BHU Tirath Swat
29.	Tariq Naseem s/o Dr. Mohammad Naseem	1/5/1984	Swat	BHU Baidara Swat
30.	Muhammad Tariq Khan s/o Muhammad Shah Khan	4/7/1975	Swat	BHU Chail Swat
31.	Iftikhar Ahmad s/o M. Yameen	16/04/1983	Swat	Civil Hospital Kalam Swat
32.	Yasir Khan s/o Rahim Shah	30/12/1984	Swat	Civil Hospital Barikot Swat
33.	Salma Bibi D/O Aziz-ur-Rehman	19/2/1984	Swat	Civil Hospital Khawazakhela Swat
34.	Sher Akber Khan s/o Sultan	2/3/1981	Swat	Civil Hospital Kalam Swat
35.	Adnan Badar s/o Abdul Rahman	2/1/1981	Swat	Civil Hospital Kalam Swat
36.	Muhammad Ayaz Khan s/o M. Shah Khan	10/1/1979	Swat	Civil Hospital Kalam Swat

Their appointment is subject to the following terms and conditions:

1. The employee will be entitled to receive salary equal to the minimum of BS-17 in addition to other allowances as admissible to Civil Servants of the same scale.
2. The appointment shall be health facility specific and non-transferable.
3. Appointment will be purely on adhoc basis for a period of one year or till the arrival of regular selectee of Khyber Pakhtunkhwa, Public Service Commission whichever is earlier.
4. On the expiry of one year or on arrival of the recommendee of the Commission, which ever is earlier, the services of the employee shall stand automatically terminated.
5. No extension will be granted on the expiry of adhoc appointment.
6. The employee shall be entitled to medical treatment as admissible under the Khyber Pakhtunkhwa Government Servants, Medical Attendance Rules, 1959 for BS-17 officers.
7. Leave: a) The employee shall be entitled to two days casual leave on full pay for every calendar month on duty rendered.
b) No other leave shall be admissible to the employee.
8. The employee shall not be entitled to undergo any kind of training inside the country or abroad.

Attested

[Signature]

Advocate

9. The absence from duty, of the employee, even for a single day, will be considered as misconduct and violation of the agreement. In that case the Health Department is competent to terminate the agreement without any notice.

10. The employee shall not be required to contribute to CP/GP Fund.

11. The adhoc appointment is non-pensionable and without gratuity.

12. The employee is not permitted to do private practice, open any clinic, private dispensary or have any interest in any such private facility.

13. Adhoc appointment shall be subject to medical fitness and verification of antecedents as well as testimonials.

14. In case the employee is found undergoing training in any institution sponsored by any Health Project of the government either provincial or federal and in that regard signed any agreement with the project, his/her appointment shall stand terminated. Further if he/she intends to join the adhoc appointment all expenses incurred on such training will be refunded to the concerned project by the employee.

15. In case of breach of any of the above terms and conditions, the Health Department shall be competent to terminate the agreement without assigning any notice or compensation.

If the above terms and conditions are acceptable to the adhoc appointment, he/she is required to report for duty to the concerned EDO(H)/Medical Superintendent till 25th November, 2011 and sign the agreement deed with concerned EDO(H)/ Medical Superintendent. After 25th November, 2011, no arrival shall be accepted and the appointment order shall stand automatically withdrawn.


SECRETARY HEALTH

Endst. No. & Date even.

Copy forwarded to the:

1. Commissioner Malakand Division at Saidu Sharif Swat
2. Director General Health Services, Khyber Pakhtunkhwa Peshawar
3. District Coordination Officer, Swat
4. Provincial Programme Manager PPHI Khyber Pakhtunkhwa Peshawar
5. Executive District Officer (Health) Swat.
6. MS Saidu Group of Teaching Hospitals Swat
7. District Accounts Officer, Swat.
8. MS Police/Services Hospital Peshawar for arranging medical board
9. PS to Chief Secretary Khyber Pakhtunkhwa Peshawar
10. PS to Minister for Health Government of Khyber Pakhtunkhwa Peshawar
11. PS to Secretary Health
12. PA to Additional Secretary Health
13. Doctors concerned

Section Officer-II

Attested

 Advocate



[Handwritten signature]

Annexure *B*

13

GOVERNMENT OF KHYBER PAKHTUNKHWA

HEALTH DEPARTMENT

Dated Peshawar the 21st October-2015

NOTIFICATION

NO. SOH(E-II)3-18/2015 The Competent authority is pleased to regularize the services of the following Medical Officers (BS-17) working on contract basis under the Khyber Pakhtunkhwa Medical Officers and Dental Surgeons (Regularization of Services) Act, 2015 with effect from 20th March, 2015.

S.No	NAME OF DOCTORS	PLACE OF POSTING
1.	Dr. Muhammad Tahir S/O Rehmat Ali	Khalifa Gulnawaz Teaching Hospital Bannu
2.	Dr. Irum Rahim D/O Abdur Rehman	Khalifa Gulnawaz Teaching Hospital Bannu
3.	Dr. Akbar Jamal S/O Gul Jamal	Khalifa Gulnawaz Teaching Hospital Bannu
4.	Dr. Rafique Muhammad Khan S/O Tale Muhammad Khan	Khalifa Gulnawaz Teaching Hospital Bannu
5.	Dr. Sajjad Anwar S/O Amanullah Khan	Khalifa Gulnawaz Teaching Hospital Bannu
6.	Dr. Syed Usman Jalal Shah S/O S.M Jalal Shah	Khalifa Gulnawaz Teaching Hospital Bannu
7.	Dr. Syed Akhtar Khan S/O Akbar Ali Jan	Khalifa Gulnawaz Teaching Hospital Bannu
8.	Dr. Farooq Nawaz s/o Sher Nawaz	MORTH Bannu
9.	Dr. Farnad s/o Ghulam Rehman, Medical Officer (BS-17)	BHU Paoosa Torghar
10.	Dr. Dayar Khan S/O Sher Ahmad, Medical Officer (BS-17)	BHU Darbani Torghar
11.	Dr. Khalid S/O Amir Bahadar, Medical Officer (BS-17)	BHC Maza Maza Khet, Torghar
12.	Dr. Salman Gohar S/O Gohar Ali Khan, Medical Officer (BS-17)	BHC Suddah, Torghar
13.	Dr. Nawab Ali Khan S/O Abdul Hameed Khan, Medical Officer (BS-17)	BHU Shingal Dar Torghar
14.	Dr. Muhammad Nasir Waheed s/o Abdul Waheed	CE Zaryab Colony, Peshawar
15.	Dr. Abdur Rehman s/o Sakayat Khan	RHC Badaber Peshawar
16.	Dr. Meera Jilil Qureshi s/o Musa	RHC Badaber Peshawar
17.	Dr. Nasir Ayaz s/o Muhammad Ayaz	Services Hospital Peshawar
18.	Dr. Imtiaz Ahmad s/o Shehzad Khan	M. Anwar Shah Memorial Hospital Peshawar
19.	Dr. Syed Shah Faisal s/o Syed Chan Badshah	M. Anwar Shah Memorial Hospital, Peshawar

-1/ACC

[Handwritten signature]

Attested

Advocate

82	Dr. Hiran Aftab D/O Aftab Mughal	BHU Kokal Barseen Abbottabad
83	Dr. Raheel Ahmad s/o Bashir Ahmad	THQ Hospital Balakot
84	Dr. Mohammad Abdullah s/o Saeed Ahmed	CH: Baffa, Mansehra
85	Dr. Muhammad Rahim S/O Tasleem Khan	DHQ Battagram
86	Dr. Saghir ul Mani s/o Ghous ur Rehman	Cat: D Hospital, Agra Malakand
87	Dr. Saad Alam s/o Farid Sattar	RHC Dheri Aliadand Malakand
88	Dr. Nek Muhammad s/o Roudullah Khan	THQ Dargai Malakand
89	Dr. Sohail Waheed s/o Waheed Zada	Cat: D Hospital Agra Malakand
90	Dr. Gul Khan s/o Maqbool	DHQ Hospital Battagram
91	Dr. Muhammad Khalid s/o Muhammad Afzal Khan	DHQ Hospital Battagram
92	Dr. Riaz Muhammad s/o Fida Muhammad	DHQ Hospital Battagram
93	Dr. Mariam Faiz D/O Fayyaz Ahmad	DHQ Hospital Battagram
94	Dr. Jangir Khan s/o Mohammad Akbar Khan	CH: Kabal Swat
95	Dr. Yasir Khan s/o Rehim Shah	CH Barikot, Swat
96	Dr. Zarghuna Khan D/O Hejder Ali	CH Barikot, Swat
97	Dr. Samina Parvish D/O Mohammad Parvish	CH Barikot, Swat
98	Dr. Zeeshan s/o Dr. Saad Ali Bacha	CH: Manglor Swat
99	Dr. Salma Bibi D/O Aziz ur Rahman	CH: Manglor Swat
100	Dr. Mashiq Ahmad s/o Arsalan Khan	CH: K Khella Swat
101	Dr. Farooq Ahmad s/o Abdul Khaliq	CH: Kabal Swat
102	Dr. Niaz Muhammad s/o Muhammad Amin	RHC Asbair Lower Dir
103	Dr. Fazal Qayum s/o Abdur Rehman	THQ Hospital Samarbagh Lower Dir
104	Dr. Ihsanullah s/o Habibullah	THQ Hospital Chokdara Lower Dir
105	Dr. Mohammad Khalid Khan s/o Muhammad Farid Khan	RHC Ouch Lower Dir
106	Dr. Laiq Saad Bacha s/o Hussam Bakhsh Bacha	RHC Ouch Lower Dir
107	Dr. Fayaz Ali Shah s/o Muhammad Sardar	At the disposal of DHQ Chitral
108	Dr. Munir Khan s/o Poor Khan	Cat: D Hospital Wari, Upper Dir
109	Dr. Azmat Ullah s/o Abdullah	Cat: D Hospital Wari, Upper Dir

Attested

Advocate

Witness Officer
Upper Dir District
Chitral

BETTER COPY OF RELEVANT PORTION P No 14

GOVERNMENT OF KHYBER PAKHTUNKHWA

HEALTH DEPARTMENT

Dated Peshawar the 21st October-2015

NOTIFICATION

NO. SOH(E-II)3-18/2015 The Competent authority is pleased to regularize the Services of the following Medical Officers (BS-17) working on contract basis under the Khyber Pakhtunkhwa Medical Officers and Dental Surgeons (Regularization of Services) Act, 2015 with immediate effect from 20th March, 2015.

S.No.	NAME OF DOCTORS	PLACE OF POSTING
1	Dr. Muhammād Tahir S/o Rehmat Ali	Khalifa Gulnawaz Teaching Hospital Bannu
2	Dr. Irum Rahim D/O Abdur Rahim	Khalifa Gulnawaz Teaching Hospital Bannu
3	Dr. Akbar Jan S/O Gul Jamal	Khalifa Gulnawaz Teaching Hospital Bannu
.....
.....
.....
95	Dr. Samina Parwish D/O Muhammad Parwish	CH: Barikot, Swat
96	Dr. Zeeshan S/O Said Ali Khan	CH: Mangloar, Swat
97	Dr. Salma Bibi D/O Aziz ur Rahman	CH: Mangloar, Swat
.....
.....
.....

Attested

Advocate


15

EM FAX 0915286608

PLANNING-CELL (HEALTH)

201003

5. Chief Executive, KGNT Hospital Bannu.
6. Chief Executive, SGTH Swat.
7. Chief Executive, MMT Hospital D.I.Khan.
8. Project Director, DHIS Khyber Pakhtunkhwa, Peshawar.
9. PSO to Chief Minister Khyber Pakhtunkhwa.
10. PSO to Chief Secretary Khyber Pakhtunkhwa.
11. All the District Health Officers of the District mentioned above.
12. All the Medical Superintendents of the District mentioned above.
13. All the District Accounts Officer of the District mentioned above.
14. Director Information, Khyber Pakhtunkhwa.
15. Deputy Director (IT) Health Department.
16. Section Officer (Lit-I), Health Department.
17. PS to Secretary Establishment Department.
18. PS to Minister for Health Khyber Pakhtunkhwa.
19. PS to Secretary Health Department.
20. PA to Additional Secretary (Establishment) Health Department.
21. PA to Deputy Secretary-I, Health Department.
22. Doctors concerned.


(Dawlat Khan)
SECTION OFFICER (E-1)

E-1/A

21/11

Attested

Advocate

8/22/23, 12:23 PM

Gmail - Fwd: CHANGE ALERT - 14.04.2023 (00658929 - SALMA BIBI

16

Gmail

Annexure MGN

dr zeeshan <drzeeshan1986@gmail.com>

Fwd: CHANGE ALERT - 14.04.2023 (00658929 - SALMA BIBI

1 message

salma zeeshan <drsalmazeeshan@gmail.com>

To: "drzeeshan1986@gmail.com" <drzeeshan1986@gmail.com>

Tue, Aug 22, 2023 at 7:27 AM

----- Forwarded message -----

From: Employee Services <SERVICES@pifra.gov.pk>

Date: Fri, 14 Apr 2023 at 5:13 PM

Subject: CHANGE ALERT - 14.04.2023 (00658929 - SALMA BIBI

To: <DRSALMAZEESHAN@gmail.com>

00658929

SALMA BIBI

SW4524

Allowances and
Deductions

3915 (Health (ROP)) Monthly deduction started PKR 39133.00- w.e.f 01.04.2023 to
31.03.2024

Adjustment Details

5358 (Adj. Adhoc Rel AI 15% 22) One time regular payment started PKR 18128.00 Date
01.04.2023

یہ ای میل خودکار نظام کے تحت بھیجی جا رہی ہے جس کا مقصد ڈی ڈی اور کو ملازمین کی چینجز سے متعلق ہر وقت مطلع کرنا ہے۔ اگر اس ای میل میں شامل
ملازمین کی چینجز میں کوئی غلطی پائی جا رہی ہو، تو جلد از جلد اپنے متعلقہ اکاؤنٹ آفس سے رابطہ کر کے درستگی کروالیں

Kind Regards,

FABS Directorate

<http://www.fabs.gov.pk>

* This is an auto generated mail from PSH system, Do not reply ***

**Errors & omissions excepted

Attached

Dr

To

The Secretary Health Services,
Government of Khyber Pakhtunkhwa,
Peshawar.

(17)
Annexure ^ND ^N

Subject: DEPARTMENTAL APPEAL AGAINST THE ILLEGAL RECOVERY
AND STOPPAGE OF ANNUAL INCREMENTS.

Respected Sir,

The Appellant submits as under;

That the Appellant got appointed as WMO (Woman Medical Officer) B-17 vide Notification No. 3078085/E.I Peshawar the 24-12-2011 after the fulfilment of all the codal formalities in due course of law.

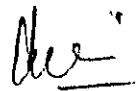
That the service of the Appellant along with others was regularized vide Notification No. SOH (E-II) 3-18/2015 dated Peshawar the 21st October, 2015 in light of the Khyber Pakhtunkhwa Medical Officers and Dental Surgeons (Regularization of Services) Act, 2015.

That the Appellant has regularly been performing her duties to the satisfaction of the Authorities and without any break.

That recently after the promotion of the Appellant to the B-18 it was dawned upon the Appellant that not only her annual increments for the period from first entry till regularization are stopped illegally, but the same time recovery is also made, both of these acts are in clear juxtaposition of the law and rules.

That as per the law and rules and further endorsed by numerous judgments of the Service Tribunal and the Supreme Court of Pakistan this issue has been decided once and for all.

That despite all these clear provisions the Appellant is made to suffer for no fault of her and is denied her vested right to her utter detriment.



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It is, therefore, very humbly requested that on acceptance of this departmental appeal firstly the illegal recovery be ordered to be stopped and the same time the annual increments stopped be made payable as well.

Appellant
Salma
Dr. Salma Bibi 15/5/2023
Senior Medical Officer
Miangul Abdul Haq Jehanzeb Kidney Hospital, Swat

Attested
Ali
Advocate

No 1315

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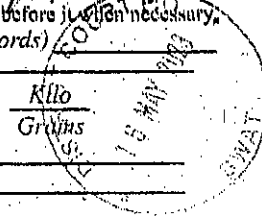
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Attested
Jacob
Advocate

