



OFFICE OF THE DISTRICT HEALTH OFFICER

Battagram (Khyber Pakhtunkhwa)

Phone & Fax: # (0997) 310507

No 11662-69 / Date 08/08/2023

To,

Assistant Registrar
Service Tribunal at Camp Court Abbottabad

Khyber Pakhtunkhwa
Service Tribunal

Disput. No. 8087

Date 04/10/23

Subject:- **SERVICE APPEAL NO. 87/2023 TITLED MUHAMMAD IBRAR VERSUS
GOVERNMENT OF KHYBER PAKHTUNKHWA AND OTHER**

Memo,

Enclosed please find herewith Parawise comments (in original) duly signed by all the respondents' alongwith copy of Annexure & vetted comments for further necessary action.


District Health Officer
Battagram

Copy forwarded to the :-

1. Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar
2. Addl: Advocate General Khyber Pakhtunkhwa Service Tribunal at Camp court Abbottabad
3. Deputy Secretary (Legal) Health Department Khyber Pakhtunkhwa Peshawar
4. Section Officer (Lit-II), Health Department ,Peshawar
5. Assistant Director (Litigation) DGHS, Khyber Pakhtunkhwa Peshawar
6. Litigation Officer Office of the undersigned for information
7. Office Copy

District Health Officer
Battagram



**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 # 091-9210269 Fax # 091-9210230

No. 3163-68 (Lit) Dated: 24 / 07 / 2023

MOST IMPORTANT

COURT MATTER

MOST IMMEDIATE

District Health Officer
Battagram 861

Disty No: _____

Date: 21-08-2023

District Health Officer
Battagram

Subject:

SERVICE APPEAL NO. 87/2023 TITLED MUHAMMAD IBRAR VERSUS
GOVERNMENT OF KHYBER PAKHTUNKHWA AND OTHERS

I am directed to refer to the subject Service Appeal & to enclose herewith parawise comments (in original) duly signed by all four respondents alongwith copy of annexures & vetted comments.

You are requested to please file the same in Honorable Khyber Pakhtunkhwa Service Tribunal, at Camp Court Abbottabad under intimation to this Directorate.

Encl: (As Above)

AA mu
21/07/23
Assistant Director (Litigation)
Directorate General Health Services
Khyber Pakhtunkhwa, Peshawar.

C.C. to:

1. Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar.
2. Addl: Advocate General Khyber Pakhtunkhwa Service Tribunal at Camp Court Abbottabad.
3. Deputy Secretary (Legal) Health Department Khyber Pakhtunkhwa Peshawar
4. Section Officer (Lit-II), Health Department, Peshawar w/r/t his letter dated 18/07/2023.
5. PA to Director General Health Services Khyber Pakhtunkhwa Peshawar

Litigation Assistant:

Sm
For n/a
31.07.2023

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 87 OF 2023

Muhammad Ibrar..... Appellant

Versus

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

PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO. 01 TO 04

Respectfully Sheweth:

Preliminary Objections:-

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

ON FACTS:

1. No comments.
2. Correct, advertisement for different posts of Para Medical staff (BPS-12) was issued by District Health Officer Battagram on 01/06/2021 (Annex-A).
3. Incorrect. An enquiry has been conducted in the matter and it was recommended by the Enquiry Committee that there were some irregularities in appointment process

i.e. experience certificate, therefore the appointment process has been cancelled by issuance of letter from DGHS office (Annex-B & C).

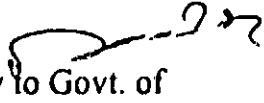
4. Incorrect as in preceding para.
5. As already explained in Para No. 3.
6. Needs no comments being formal.

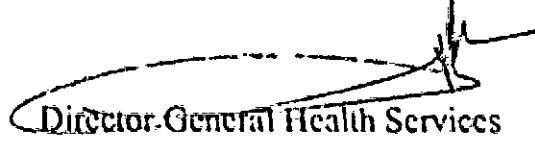
ON GROUNDS:

- A. Incorrect as in Para No. 3 of the Facts.
- B. As in preceding para.
- C. As in Para-A.
- D. As in Para-A.
- E. As in Para No. 3 of the Facts.
- F. As in preceding para.
- G. As in Para-A.
- H. As in Para No. 3 of the Facts.
- I. As in preceding para.

PRAYER:

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


Secretary to Govt. of
Khyber Pakhtunkhwa Health Department
Respondent No. 01 & 03


Director-General Health Services
Khyber Pakhtunkhwa
Respondent No. 02


District Health Officer Battagram
Respondent No. 04

امیدواروں کی فہرست

ہر امیدوار ایک سالہ اطلاع بگرام کے ملک مراکز صحت میں مندرجہ ذیل ای میل ایڈریسز کی آسامیاں خالی ہیں جن پر تقرری کیلئے اطلاع بگرام سے تعلق رکھنے والے اہل امیدواروں سے درخواستیں مطالبہ ہیں۔ اطلاع بگرام میں اہل امیدواروں کے متعلقہ اداروں کی صورت میں باقاعدہ اطلاع سے بھی اہل امیدواروں کی تقرری ہو سکتی ہے۔

نمبر شمار	نام آسامی	IPS	مقام
1	JOT (Radiology)	12	ٹیمپ ڈی اسپتال، RHC
2	JOT (Surgical)	12	ٹیمپ ڈی اسپتال
3	JOT (Radiology)	12	
4	PHOT (ER)	12	بی ایچ پور گورنمنٹ ہسپتال، پامال شریف، پونج
5	ERI Vaccinator	06	پھولائی، کھنڈوا اور RHC قراکوٹ

- (1)۔ میٹرک سائنس (کم از کم سیکنڈ ریجن) بعد دو سالہ متعلقہ شعبہ کا ایڈوانسڈ ڈیپلومہ یا پھر پندرہ سہ ماہیہ پروفیشنل ڈیپلومہ کی ضرورت ہے۔
- (2)۔ عمر کی حد 30 تا 18 سال۔ (3)۔ جس امیدوار کی عمر مروجہ عمر سے زیادہ ہو وہ 00 Ago Relaxation سے مستثنیٰ نہیں کرنے کا پابند ہوگا۔ (4)۔ تجربہ کار امیدواروں کی مطلوبہ قابلیت کے بعد تصور کیا جائے گا نیز تجربہ کار امیدواروں کا Certificate سند نیز سندوں کی کا Certificate متعلقہ محاذات قرار سے منظور شدہ محض کیا جائے گا۔ (5)۔ معذور افراد کیلئے 2% کوٹیشن کیا جائے گا۔ (6)۔ امیدوارانہ طور کے سونچ پر اپنی اصلی اسناد لے آئے تو تنگی صورت میں انٹرویو میں شامل نہیں کیا جائے گا صرف شاندار امیدواروں کو نمٹوانے کے لئے بلایا جائے گا۔ (7)۔ مکمل اور متحرک تاریخ کو درج ہوئے والی درخواستوں پر غور نہیں کیا جائے گا۔ (8)۔ انٹرویو کیلئے آنے والے کوئی TADA نہیں دیا جائے گا۔ (9)۔ تقرری سوبائی حکومت کے جملہ قواعد و ضوابط کے تحت عمل میں لائی جائیگی۔ (10)۔ آسامیوں کی تعداد کی پیشی ہو سکتی ہے۔ (11)۔ خزانہ سندھ امیدوار اشتہار شائع ہونے کے بعد 15 ایم کے اندر سڑک ویلجھ آفس بگرام کے پاس اپنی درخواستیں سارے کاغذ پر بعد CV کیپسٹرز ذریعہ شانتی کارڈ تھری اسٹیمپ اسناد کی تصدیق نقل اور ایک عدد تازہ تصویر جمع کروانی ہوگی۔ (12)۔ جعلی اسناد جمع کرنے والے امیدوار کے خلاف قانونی کارروائی عمل میں لائی جائے گی۔ (13)۔ مجاز آفسروں کو جہتاً بلایا جائے گا اور یہ کونسل کر سکتا ہے۔

پنجاب پبلک سروس کمیشن

[Handwritten Signature]

(10)

OFFICE OF THE DISTRICT HEALTH OFFICER Battagram (Khyber Pakhtunkhwa)

Phone & Fax # (0997) 310507

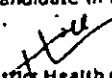
OFFICE ORDER

No. PHC-21 / date 17/08/2021

Consequent upon the recommendation of the Departmental Selection Committee, Mr. Muhammad Idris S/O. Mabiz Khan is hereby appointed as PHCT (MP) EPB BPS-12 against the vacant post plus usual allowances as admissible under the rules and subject to revision from time to time on the following terms and conditions according to the Government policies. This order is subject to the verification of the original documents from the issuing authority/ production of two years Diploma either from Khyber Pakhtunkhwa or any other illegible/ Register able Institute/ College or University/ if the Diploma is from outside KPK it must be registered with Medical Faculty of Khyber Pakhtunkhwa Peshawa.

1. If the academic/ Technician/ experience certificates is not from the government institutions or International organization that will be not consider as experience.
2. If the academic/ technician/ experience certificates of any candidate found fake/ bogus of any stage his/ her services will be considered terminated automatically.
3. He/ She shall initially be on probation for a period of Two years under the rules extendable further for a period of one year.
4. He/ She can be terminated without any notice during the probation of his/her work if his/her conduct found unsatisfactory.
5. He/ She shall be governed by the Government of Khyber Pakhtunkhwa civil servants act 1973 and the laws applicable to the civil servants under the rule made there under E&S rules 2011
6. He/ She shall be entitled to annual increments as per existing policy.
7. He/ She join his duties at his own expenses.
8. In case you wish to resign at any time, one month notice will be essential or in lieu shall be forfeited.
9. You will be awarded by such rules/ entitlement and orders related to TA, leave and MRC etc as may be issued by the Govt, from time to time for the category of Government servant to which you belong.
10. Your appointment will be subject to provision of Medical Fitness certificate.
11. The appointee shall be bound to perform any duty assigned by the undersigned as per Govt. rules.
12. Your duty in National obligation and International commitment may be required time to time.

If He/ She accept the above mentioned Terms & Conditions he/she should report to the undersigned within 14 Days of receipt of this offer and submit original documents along with one set of the photocopies for verification from concerned Boards/ University/Medical Faculty KPK/ Nursing Council, if applicable in case he/ she fails to report for duty within stipulated period of time this appointment order will automatically stand cancelled and the next candidate in merit list (waiting) will be considered for appointment.


District Health Officer
Battagram.

Copy forwarded to the:-

1. Director General Health Services Khyber Pakhtunkhwa for Information
2. District Accounts officer Battagram for Information
3. Incharge BHU _____ for Information
4. Account Section office of the undersigned for Information
5. Official for information and compliance
6. Incharge Establishment section office of the undersigned for information and compliance
7. Office copy.


District Health Officer
Battagram.





DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR

Office No. 071 • 92102691 (Exchange 071) • 9210101100 (071) • 92101102 (Mails) • 92101103 (92701) • 92101104

No. (307) S. 100000

Dated 27/08/2021

OFFICE ORDER


Reportedly there are irregularities in the recruitment process of various cadre of Para Medics by District Health Officer Battagram, therefore all recent recruitment done by District Health Officer Battagram of various cadre of Medical Technician are hereby stand cancelled with immediate effect and an inquiry committee consisting of following officers is hereby constituted to conduct the inquiry and submit report within 07 days.

1. Dr. Faisal Khanzada (ADG Hazara Division) DGHS Office.
2. Mr. Hidayat (Deputy Director Coordination) DGHS Office.

The recruitment process will be reinitiated after proper inquiry as per government rules & policy.


DIRECTOR GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

Cc

1. Dr. Faisal Khanzada (ADG Hazara Division) DGHS Office (Inquiry Officer).
 2. Mr. Hidayat (Deputy Director Coordination) DGHS Office (Inquiry Officer).
 3. District Health Officer Battagram for immediate compliance.
 4. PS to Minister Health Khyber Pakhtunkhwa.
 5. PS to Secretary Health Khyber Pakhtunkhwa.
 6. District Account Officer Battagram.
- 

OFFICE OF THE DISTRICT HEALTH OFFICER,
Battagram (Khyber Pakhtunkhwa)
Phone & Fax: // (0997) 310507

(12)

No. 1805-08 /DHO/BTGM

Dated 27/8/2021

OFFICE ORDER

In compliance with the DGHS Peshawar Letter No. 6028/DGHS dated: 23/8/2021; all appointment letters issued from the office of the undersigned are hereby stand cancelled. Moreover, all facility In-charges are directed not to accept the arrival of any candidate in this regard.

District Health Officer
Battagram

Copy forwarded to

1. Director General Health Services (DGHS) Peshawar.
2. Dr Faisal Khanzada (ADG) Hazara Division.
3. Deputy Commissioner Battagram.
4. District Account Officer Battagram.
5. All facilities In-charges Battagram for information and compliance
6. Office copy

District Health Officer
Battagram

BEFORE THE HONOURABLE KHYBER PAKHTUNKWA SERVICE
TRIBUNAL CAMP COURT ABBOTTABAD

SA No.87/2023

Muhammad Ibrar

Petitioners

Versus

Govt of KPK & Others

Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENT *17/04*

Respectfully Sheweth

Preliminary Objections:

1. That the petitioner has neither cause of action nor locus standi to file the instant petition.
2. That the petitioner has not come to the Honourable Court with clean hands.
3. That the instant petition is not maintainable due to non joinder and mis joinder of necessary parties.
4. That the petitioners have got no cause of action to file this instant petition.
5. That the petition is not maintainable in its present form.

7. That the appeal is barred by law and limitation.

ON FACTS:

1. *Partia as to record*
2. Correct advertisement for different posts of para medical staff (BPS-12) was issued by DHO Barigram on 01-06-2021, (Copy Attached Annexure A).
3. Correct upto appear before selection committee. In correct the appoint order was issued *in correct* for the post of PHCT (EPI) (BPS-12), by not following all codal formalities (Copy Attached Annexure B&C).
4. *Correct* was served there for a few days. In correct appointment orders were cancelled *or* *by enquiry* has been conducted in the matter and it was recommended by the Enquiry Committee that there were some irregularities in the appointment process i.e. experience certificate, therefore the appointment process has been cancelled by the issuance of letter from the Director General Health Services Khyber Pakhtunkhwa Peshawar (Copy Attached Annexure D) *annexed enquiry report appointment letter.*
5. *Partia as to record*
6. *Incorrect*

Grounds:

- A. As explained in Para-04 above
- B. As explained in Para-04 above
- C. As explained in Para-04 above
- D. As explained in Para-04 above
- E. As explained in Para-04 above
- F. As explained in Para-04 above
- G. As explained in Para-04 above
- H. As explained in Para-04 above
- I. As explained in Para-04 above

- H. As explained in Para-04 above.
- I. As explained in Para-04 above.
- J. As explained in Para-04 above.
- K. As explained in Para-04 above.

Prayer:

It is humbly submitted that in view of the above facts this service appeal may kindly be dismissed being devoid of merit.

Respondent No. 01
DHO Bhatnagar.

*Submitted for
vetting 1
Jain
26/5/2023*

Vetted

*Subject to correction
annexed all relevant
documents alongwith index
and affidavit.*

*Officer
26/5/23*

*Submitted for approval of AAC.
J.
26/5/22*



OFFICE OF THE DISTRICT HEALTH OFFICER

Battagram (Khyber Pakhtunkhwa)

Phone & Fax: # (0997) 310507

No 1062-69 / Date 08/08/2023

To,

Assistant Registrar
Service Tribunal at Camp Court Abbottabad

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GOVERNMENT OF KHYBER PAKHTUNKHWA AND OTHER**

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Battagram

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District Health Officer
Battagram



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

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Peshawar and not to any official by name
Office # 091-9210239 Fax # 091-9210230

No. 3163-68 (Lit) Dated: 24 / 07 / 2023

MOST IMPORTANT

COURT MATTER

MOST IMMEDIATE

District Health Officer
Battagram 261

Diary No: _____
Date: 01-08-2023

District Health Officer
Battagram

Subject:

SERVICE APPEAL NO. 87/2023 TITLED MUHAMMAD IBRAR VERSUS
GOVERNMENT OF KHYBER PAKHTUNKHWA AND OTHERS

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You are requested to please file the same in Honorable Khyber Pakhtunkhwa
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Encl: (As Above)

AA *mu*
24/07/23
Assistant Director (Litigation)
Directorate General Health Services
Khyber Pakhtunkhwa, Peshawar.

C.C. to:

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Litigation Assistant:

For n/a.
31.07.2023

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 87 OF 2023

Muhammad Ibrar..... Appellant

Versus

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

PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO. 01 TO 04

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ON FACTS:

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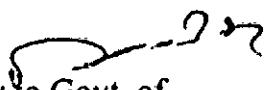
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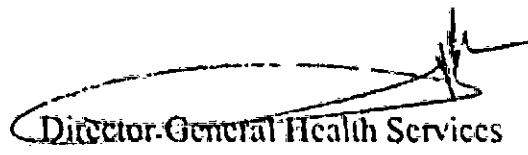
ON GROUNDS:

- A. Incorrect as in Para No. 3 of the Facts.
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- C. As in Para-A.
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- F. As in preceding para.
- G. As in Para-A.
- H. As in Para No. 3 of the Facts.
- I. As in preceding para.

PRAYER:

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


Secretary to Govt. of
Khyber Pakhtunkhwa Health Department
Respondent No. 01 & 03


Director-General Health Services
Khyber Pakhtunkhwa
Respondent No. 02


District Health Officer Battagram
Respondent No. 04

امیدوارانہ فہرست

ہر امیدوار ایک سال ضلع ہگرام کے مختلف مراکز صحت میں مندرجہ ذیل ڈی ایچ ای بیکل سٹاف کی آسامیاں خالی ہیں جن پر تقرری کیلئے ضلع ہگرام سے تعلق رکھنے والے اہل امیدواروں سے درخواستیں مطالب ہیں۔ ضلع ہگرام میں اہل امیدوار دستیاب نہ ہونے کی صورت میں باقاعدہ اطلاع سے بھی اہل امیدواروں کی تقرری اویکتی ہے۔

نمبر شمار	نام آسامی	IPS	مراکز صحت
1	JOT (Radiology)	12	ڈی ایچ ای ہسپتال، RHC
2	JOT (Surgical)	12	ڈی ایچ ای ہسپتال
3	JOT (Pathology)	12	
4	PHOT (ER)	12	بی ایچ ای کورنگڈول، لکھئی، بیلہ، پامال شریف، پرمنگ بھسائی، کھنڈوا اور RHC ٹاؤن
5	ERI Vaccinator	06	

- (1) میٹرک سائنس (کم از کم سینڈ اورینٹ) بعد و سالہ متعلقہ شعبہ کا ڈیپلومہ میٹرک وغیرہ وغیرہ یا کسی بھی دیگر صوبے کی میٹرک بیکل لکھئی یا حلقہ کی باغی میں کسی سکورشڈ بورڈ سے ایف ایس سی۔ (2) عمر کی حد 30 تا 35 سال۔ (3) جس امیدوار کی عمر مزید عمر سے زیادہ ہو تو AGE Relaxation میں گنت پیش کرنے کا ہند ہوگا۔ (4) تجربہ کار بھرتیوں کی مطلوبہ قابلیت کے بعد تصور کیا جائے گا نیز تجربہ کار کا Certificate سند ادارے سے حاصل کروں گا ضروری ہے غیر مستحانہ نام کے Certificate قابل قبول نہیں ہوگا۔ (5) سفارشی فراڈ کیلئے %20 کوڈ مختص کیا جائے گا نیز سفارشی کا Certificate متعلقہ محاذ اقرار نامی سے سکورشڈ متعلقہ محاذ ہوگا۔ (6) امیدوارانہ طور پر کے سوچ پر اپنی اصلی اساتذہ کے آئے نہ رہتی صورت میں انٹرویو میں شامل نہیں کیا جائے گا صرف اشاریہ ایس ایس او کی گولڈ میڈل اور ایس ایس او کی گولڈ میڈل کے ذریعہ یا اور ہی کی جائے گی۔ (7) مکمل اور سفارشی تاریخ کو بعد مہینہ اور ہونے والی درخواستوں پر غور نہیں کیا جائے گا۔ (8) انٹرویو کیلئے آنے والے لوگوں کی TA/DA نہیں دیا جائے گا۔ (9) تقرری سوبائی حکومت کے فوروارد و ممبرانہ کے تحت عمل میں لائی جائے گی۔ (10) آسامیوں کی تعداد کی پیشی ہوکتی ہے۔ (11) خواہشمند امیدوار اشتہار شائع ہونے کے بعد 15 یوم کے اندر سٹریٹ ایسی ایف ہگرام کے پاس اپنی درخواستیں ساتھ ساتھ CV کے ساتھ لازمی شامی کارڈ اپنی اساتذہ کی تصدیق سے تازہ تصویر جمع کروانی ہوگی۔ (12) جعلی اساتذہ کرنے والے امیدوار کے خلاف قانونی کارروائی عمل میں لائی جائے گی۔ (13) ہزار آفیسروں کو ہیٹاے ایگریٹسٹ اور ایگریٹسٹ کونسل کر سکتا ہے۔

بیمارستانہ فہرست

Signature

(10)

OFFICE OF THE DISTRICT HEALTH OFFICER
Battagram (Khyber Pakhtunkhwa)

Phone & Fax # (0997) 310507

No. / 2021 / date 17/08/2021

OFFICE ORDER

Consequent upon the recommendation of the Departmental Selection Committee, Mr. Muhammad Iqbal S/O. Mubir Khan is hereby appointed as PHCT (MPI) EPI RPS-12 against the vacant post plus usual allowances as admissible under the rules and subject to revision from time to time on the following terms and conditions according to the Government policies. This order is subject to the verification of the original documents from the issuing authority/producer of two years Diploma either from Khyber Pakhtunkhwa or any other legible/ Registerable Institute/ College or University/ if the Diploma is from outside KPK it must be registered with Medical Faculty of Khyber Pakhtunkhwa Peshawa.

1. If the academic/ Technician/ experience certificates is not from the government institutions or International organization that will be not consider as experience.
2. If the academic/ technician/ experience certificates of any candidate found fake/ bogus of any stage his/ her services will be considered terminated automatically.
3. He/ She shall initially be on probation for a period of Two years under the rules extendable further for a period of one year.
4. He/ She can be terminated without any notice during the probation of his/her work if his/her conduct found unsatisfactory.
5. He/ She shall be governed by the Government of Khyber Pakhtunkhwa civil servants act 1973 and the laws applicable to the civil servants under the rule made there under E&S rules 2011
6. He/ She shall be entitled to annual increments as per existing policy.
7. He/ She join his duties at his own expenses.
8. In case you wish to resign at any time, one month notice will be essential or in lieu shall be forfeited.
9. You will be awarded by such rules/ entitlement and orders related to TA, leave and MRC etc as may be issued by the Govt. from time to time for the category of Government servant to which you belong.
10. Your appointment will be subject to provision of Medical Fitness certificate.
11. The appointee shall be bound to perform any duty assigned by the undersigned as per Govt. rules.
12. Your duty in National obligation and International commitment may be required time to time.

If He/ She accept the above mentioned Terms & Conditions he/she should report to the undersigned within 14 Days of receipt of this offer and submit original documents along with one set of the photocopies for verification from concerned Boards/ University/Medical Faculty KPK/ Nursing Council, if applicable in case he/ she fails to report for duty within stipulated period of time this appointment order will automatically stand cancelled and the next candidate in merit list (waiting) will be considered for appointment.

[Signature]
District Health Officer
Battagram

Copy forwarded to the:-

1. Director General Health Services Khyber Pakhtunkhwa for Information
2. District Account's officer Battagram for Information
3. Incharge BHU _____ for Information
4. Account Section office of the undersigned for Information
5. Official for Information and compliance
6. Incharge Establishment section office of the undersigned for Information and compliance
7. Office copy.

District Health Officer
Battagram



DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR

Office Ph 071 - 9210261 exchange 071 - 9210101 to 071 - 9210110. Health & Family Welfare Department

No. 607/S/10000

Dated 27/08/2021

OFFICE ORDER

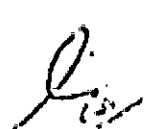
Reportedly there are irregularities in the recruitment process of various cadre of Para Medics by District Health Officer Battagram, therefore all recent recruitment done by District Health Officer Battagram of various cadre of Medical Technician are hereby stand cancelled with immediate effect and an inquiry committee consisting of following officers is hereby constituted to conduct the inquiry and submit report within 07 days.

1. Dr. Faisal Khanzada (ADG Hazara Division) DGHS Office.
2. Mr. Hidayat (Deputy Director Coordination) DGHS Office.

The recruitment process will be reinitiated after proper inquiry as per government rules & policy.


DIRECTOR GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

Cc

1. Dr. Faisal Khanzada (ADG Hazara Division) DGHS Office (Inquiry Officer).
 2. Mr. Hidayat (Deputy Director Coordination) DGHS Office (Inquiry Officer).
 3. District Health Officer Battagram for immediate compliance.
 4. PS to Minister Health Khyber Pakhtunkhwa.
 5. PS to Secretary Health Khyber Pakhtunkhwa.
 6. District Account Officer Battagram.
- 

OFFICE OF THE DISTRICT HEALTH OFFICER,
Battagram (Khyber Pakhtunkhwa)
Phone & Fax: // (0997) 310507

(12)

No. 1805-08 /DHO/BTGM

Dated 27/8/2021

OFFICE ORDER

In compliance with the DGHS Peshawar Letter No. 0028/DGHS dated: 23/8/2021; all appointment letters issued from the office of the undersigned are hereby stand cancelled. Moreover, all facility In-charges are directed not to accept the arrival of any candidate in this regard.

District Health Officer
Battagram

Copy forwarded to

- 1. Director General Health Services (DGHS) Peshawar.
- 2. Dr Faisal Khazada (ADG) Hazara Division.
- 3. Deputy Commissioner Battagram.
- 4. District Account Officer Battagram.
- 5. All facilities In-charges Battagram for information and compliance
- 6. Office copy

District Health Officer
Battagram

BEFORE THE HONOURABLE KHYBER PAKHTUNKWA SERVICE
TRIBUNAL CAMP COURT ABBOTTABAD

SA No.87/2023

Muhammad Ibrar

Petitioners

Versus

Govt of KPK & Others

Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENT *17/06*

Respectfully Sheweth.

Preliminary Objection:

1. That the petitioner has neither cause of action nor locus standi to file the instant petition.
2. That the petitioner has not come to the Honourable ^{tribunal} court with clean hands.
3. That the instant petition is not maintainable due to non joinder and mis joinder of necessary parties.
4. That the petitioners have got no cause of action to file this instant petition.
5. That the petition is not maintainable in its present form.
6. *That the appeal is barred by law and limitation.*

ON FACTS:

1. Facts as to record
2. Correct appointment for different posts of para medical staff (BPS-12) was issued by DHO Baragram on 01-06-2021, (Copy Attached Annexure A).
3. Correct memo to appear before selection committee. In correct the appoint order was issued to the appellants for the post of PHCT (EPI) (BPS-12), by not following all codal formalities (Copy Attached Annexure B&C)
4. Appellants served there for a few days. In correct appointment orders were cancelled by ~~the~~ enquiry has been conducted in the matter and it was recommended by the Enquiry committee that there were some irregularities in the appointment process i.e. experience certificate therefore the appointment process has been cancelled by the issuance of letter from the Director General Health Services Khyber Pakhtunkhwa Peshawar (Copy Attached Annexure D) *annexed inquiry report appointment letter.*
5. *facts as to record*
6. *is incorrect.*

Arguments

- A. As explained in Para-04 above
- B. As explained in Para-04 above
- C. As explained in Para-04 above
- D. As explained in Para-04 above
- E. As explained in Para-04 above
- F. As explained in Para-04 above
- G. As explained in Para-04 above
- H. As explained in Para-04 above
- I. As explained in Para-04 above

- H. As explained in Para-04 above.
- I. As explained in Para-04 above.
- J. As explained in Para-04 above.
- K. As explained in Para-04 above.

Prayer:

It is humbly submitted that in view of the above facts this service appeal may kindly be dismissed being devoid of merit.

Respondent No. 04
DHO Battagram.

*Submitted for
vetting /
Yamin
26/5/2023*

Vetted

*Subject to correction
annexed all relevant
documents alongwith index
and affidavit.*

*Yamin
26/5/23*

Submitted for approval of SAC.

*12 J.
26/5/23*