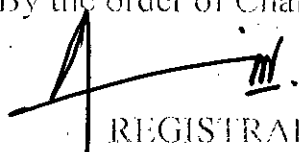


FORM OF ORDER SHEET

Court of _____

Appeal No. 2202/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/10/2023	<p>The appeal of Mr. Adnan Rahim resubmitted today by Mr. Fazal Shah Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Parcha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Adnan Rahim son of Rahim Shah Ex-Driver Rescue Headquarters Peshawar received today i.e on 10.10.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of order dated 21.05.2021 is not attached with the appeal be placed on it.
- 2- Copy of regularization order mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 3- Annexures F & G of the appeal are illegible which may be replaced by legible/better one.

No. 3378 /S.T.

DT: 11/10 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Fazal Shah Mohmand Adv.
High Court Peshawar.

R/Siv,

All the objections removed,
re-submitted accordingly.

Dated 20/10/2023

Baseer Ahmad Shah
Advocate
Peshawar



R/Siv,

Copy of order dated 21/5/2021
is not existing anywhere because the
appellant has mistakenly wrote in his

departmental appeals in Jari ii is
21-5-2020 which is available on
Page No: 9, furthermore copy of
regularisation order is available on
Page No: 41 on the Service book of
the appellant, moreover Annex "E" & "F"
which is attendance register and
could not be converted to legible
copies and the department does
not provide the copies of said
register to the appellant.

23/10/2023

Baseer Ahmad Shah
Adv



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No 2202/2023

Adnan Rahim..... **Appellant**

V E R S U S

Govt. and others..... **Respondents**

I N D E X

S. No	Description of Documents	Annexure	Pages
1.	Service Appeal with Affidavit		1-4
2.	Application for condonation of delay with Affidavit		5-6
3.	Copies of Testimonials & appointment order dated 21-05-2020	A, B	7-9
4.	Copy of Agreement, Medical Certificate, Arrival report & Order dated December 2020	C, D & E	10-15
5.	Copies of Attendance Register	F	16-35
6.	Copy of Notification dated 12-06-2022, Driving License & Extract from Service Book	G, H & I	36-42
7.	Copy of appeal dated 15-02-2023	J	43-45
8.	Copy of Resignation	K	46
9.	Copy of application dated 19-07-2023 & Order dated 18-08-2023	L & M	47-48
10.	Copy of departmental appeal	N	49-51
11.	Vakalat Nama		52

Dated:-05-10-2023

Appellant

Through

Fazal Shah Mohmand
Advocate,
Supreme Court of Pakistan

OFFICE:- Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell# 0301 8804841
Email:- fazalshahmohmand@gmail.com

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No 2209 /2023

Adnan Rahim S/O Rahim Shah, Ex. Driver Rescue Headquarters,
Peshawar **Appellant**

V E R S U S

1. Government of Khyber Pakhtunkhwa through Secretary, Relief, Rehabilitation & Settlement, Department, Peshawar.
2. Director General, Emergency Rescue Services (Rescue 1122), Khyber Pakhtunkhwa, Peshawar.

..... **Respondents**

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 FOR THE MODIFICATION OF ENTRY IN THE SERVICE BOOK FOR WHICH DEPARTMENTAL APPEAL OF THE APPELLANT HAS NOT BEEN RESPONDED DESPITE THE LAPSE OF MORE THAN THE STATUTORY PERIOD OF NINETY DAYS

PRAYER:-

On acceptance of this appeal the impugned entry in the Service Book of the appellant dated Nil may kindly be modified to the extent of the post of Emergency Medical Technician (BPS-12), instead of Driver, thereby regularizing the services of the appellant as Emergency Medical Technician (BPS-12), with all back benefits.

Respectfully Submitted:-

1. That the appellant has qualified his Secondary School Certificate in the year 2013 besides two years Paramedical Diploma in the year 2017 and was appointed as Emergency Medical Technician (BPS-12) being qualified for the same, after due process of law pursuant to the decision of the Special Provincial Cabinet meeting, on contract basis initially for one year vide Office Order dated 21-05-2020 against salary of Rs. 30,000/- Per month. Since appointment the appellant performed his duties with honesty and full devotion and to the entire satisfaction of high ups. **(Copies of Testimonials & appointment order dated 21-05-2020 are enclosed as Annexure A & B).**

2. That the appellant after executing agreement and being medically fit, reported arrival on 28-05-2020 and was posted to Rescue Station 55 and later on was transferred to Police Service Hospital in December 2020. **(Copy of Agreement, Medical Certificate, Arrival report & Order dated December 2020 is enclosed as Annexure C, D & E).**
3. That the appellant was initially paid salary of four months @ of Rs. 20,000/- per month however upon contact, the appellant was told that there is some issue which will soon be resolved and hence the appellant was paid salary with dues in the next month salary and was accordingly paid salary of Rs. 30,000/- for the next three months, however later recovery was effected from the appellant, on quarry he was told that the issue of salary will be resolved soon. It is worth to mention that the appellant performed duties as Emergency Medical Technician as evident from the Attendance Register. **(Copies of Attendance Register is enclosed as Annexure F).**
4. That the Khyber Pakhtunkhwa Emergency Rescue Service (Amendment) Act, 2022 was enacted vide Notification dated 12-06-2022, for regularizing the services of the contract employees of the department, where after the appellant was directed to provide Driving License to the department which was accordingly provided and the services of the appellant were regularized from the date of enactment of the Act, ibid accordingly as Driver (BP-06) instead as Emergency Medical Technician as evident from the entry in service book for reasons other than fair and bonafide. **(Copy of Notification dated 12-06-2022, Driving License & Extract from Service Book is enclosed as Annexure G, H & I).**
5. That the appellant time and again approached respondents that as he was appointed as EMT which fact is evident from the record and that his services may be regularized as EMT instead as Driver however the appellant was compelled to perform his duties as Driver since December 2022. Finally the appellant filed departmental appeal dated 15-02-2023 for his regularization as EMT instead of Driver, which was not responded. **(Copy of appeal dated 15-02-2023 is enclosed as Annexure J).**
6. That the appellant was told that if did not refrain from claiming regularization as EMT he will have to face dire consequences including removal from service, even the appellant was told to submit his resignation immediately otherwise he will be removed from service, thus the appellant was compelled to

submit his resignation. **(Copy of Resignation is enclosed as Annexure K).**

7. That the appellant continued his duties and on 19-07-2023, the appellant submitted application that as he was forced to submit his resignation, therefore the same may not be accepted, however to the utter shock and dismay, resignation of the appellant was accepted vide Order dated 18-08-2023, copy of which was received by the appellant through his own efforts on 13-09-2023. **(Copy of application dated 19-07-2023 & Order dated 18-08-2023 is enclosed as Annexure L & M).**
8. That the appellant preferred departmental appeal for his regularization as EMT (BPS-12), before respondent No 1 which has not been responded so far despite the lapse of more than the statutory period of ninety days. **(Copy of departmental appeal is enclosed as Annexure N).**
9. That the impugned entry in the Service Book, Order dated Nil, is against the law, facts and principles of justice on grounds inter-alia as follows:

GROUND:

- A. That the impugned entry in the Service Book of the appellant to the extent of the post of Driver instead of the post of Emergency Medical Technician (BPS-12), is illegal, unlawful, without lawful authority and void.
- B. That the appealing is not treated in accordance with law and rules which being his fundamental right as per Article 4 and 25 of the Constitution and law of the land.
- C. That the appellant was appointed as the post of Emergency Medical Technician (BPS-12), which fact is evident from his appointment order, agreement, transfer order besides the attendance register, hence the impugned entry is liable to be modified accordingly.
- D. That in order to favor blue eyed, the appellant has been kept deprived of his due rights in violation of principles of natural justice.
- E. That the appellant is equipped with qualification required for appointment as the post of Emergency Medical Technician (BPS-12), and was never in possession of

Driving License and he only secured Driving License in 2022 when the same was demanded from him, hence too the appellant is entitled to be regularized as the post of Emergency Medical Technician (BPS-12).

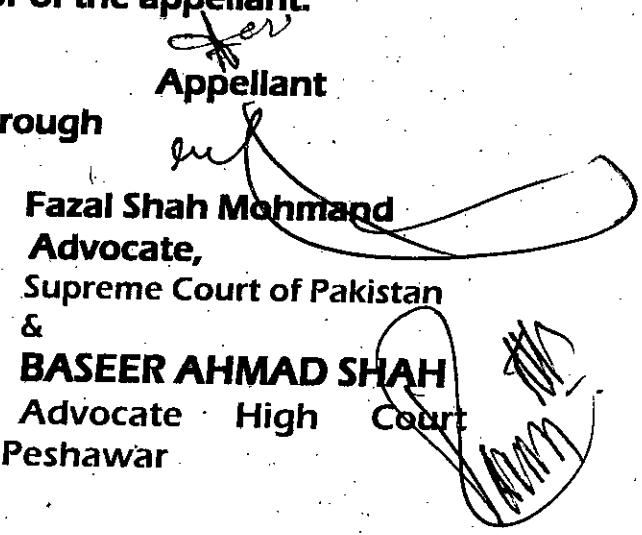
- F. That the appellant is subjected to exploitation in violation of Article 38 of the Constitution and law of the land.
- G. That there is no omission and commission on part of the appellant and the appellant could not be punished for the fault of others if any.
- H. That the appellant is having unblemished service record and has performed his duties as Emergency Medical Technician, hence is duly entitled to be regularized as Emergency Medical Technician.
- I. That the appellant seeks the permission of this honorable tribunal for further/additional grounds at the time of arguments.

It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for in the heading of the appeal.

Any other relief deemed appropriate and not specifically asked for, may also be granted in favor of the appellant.

Dated: 05-10-2023

Appellant
 Through
 Fazal Shah Mohmand
 Advocate,
 Supreme Court of Pakistan
 &
 BASEER AHMAD SHAH
 Advocate High Court
 Peshawar



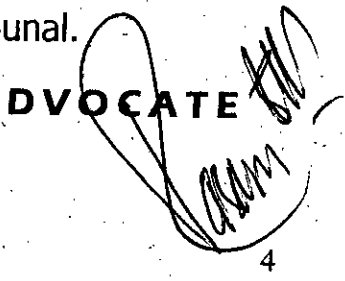
LIST OF BOOKS:

- 1. Constitution 1973.
- 2. other books as per need

CERTIFICATE:

Certified that as per instructions of my client, no other Service Appeal on the same subject and between the same parties has been filed previously or concurrently before this honorable Tribunal.

ADVOCATE



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

Service Appeal No _____/2023

Adnan Rahim..... **Appellant**

V E R S U S

Govt. and others..... **Respondents**

Application for condonation of delay if any

Respectfully Submitted:-

1. That the accompanying appeal is being filed today in which no date of hearing has been fixed so far.
2. That the grounds of appeal may be considered as integral Part of this application.
3. That departmental appeal of the appellant is still pending before respondents besides the issue in hand is of financial implications construing recurring cause of action.
4. That the law as well as the dictums of the superior Courts also favors decisions of cases on merit.

It is therefore prayed that on acceptance of this application, the delay if any in filing of appeal may kindly be condoned.

Dated:-26-09-2023

Through

Asu
Appellant

Shah
**Fazal Shah Mohmand
Advocate,
Supreme Court of Pakistan**

AFFIDAVIT

I, Adnan Rahim S/O Rahim Shah, Ex Driver Rescue Headquarters, Peshawar, do hereby solemnly affirm and declare on oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

Asu
DEPONENT



Shah
05/10/23

6

AFFIDAVIT

I, Adnan Rahim S/O Rahim Shah, Ex Driver Rescue Headquarters, Peshawar, do hereby solemnly affirm and declare on oath 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 Tribunal.

[Signature]
DEPONENT



[Signature]
05/10/23

(7)

A

Roll No. 158922

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Sr. No. 54671

Board of Intermediate and Secondary Education
Peshawar Khyber Pakhtunkhwa
Pakistan



Secondary School Certificate Examination

(Science Group)

SESSION 2013- ANNUAL

This is to Certify that Adnan.Rahim

Son of Rahim Shah

Ex-student of Govt. High School Kaga Wala Peshawar

has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Peshawar held in March, 2013

He obtained 588 Marks out of 1050 and has been placed in Grade C

Representing Good The Candidate passed in the following subjects:

- | | |
|---------------------|---------------------|
| 1. English | 2. Urdu |
| 3. Islamiyat (Comp) | 4. Pakistan Studies |
| 5. Maths | 6. Physics |
| 7. Chemistry | 8. Biology |

Date of birth according to admission form is 01 May, 1994

Asstt. Secretary

Secretary

This certificate is issued without alteration or erasure.

ATTESTED

8

S.No. 169

Roll No. 63269

Session 2014-2015

Faculty of Paramedical and Allied Health Sciences Khyber Pakhtunkhwa PARAMEDICAL DIPLOMA (TWO YEARS)

This is to certify that ADNAN RAHIM Son/ Daughter of RAHIM SHAH
GOVT POST GRADUATE PARA MEDICAL INSTITUTE
and a student of PESHAWAR bearing Registration No. 2014/M/PRM/HT/SS/55

having passed the prescribed examination held in JULY-2017 on this day admitted by the Faculty
of Paramedical and Allied Health Sciences Khyber Pakhtunkhwa to the Diploma
Technology in C Grade.

Checked By: [Signature]

Verified By: [Signature]



[Signature]
Office of the
Chief Executive Officer
Faculty of Paramedical and Allied Health Sciences
Khyber Pakhtunkhwa, Peshawar

Chief Executive Officer

Result Declaration Date 20-October-2017 Print Date and Time 28-December-2017 1:44:03PM

Note- Error(s) & omission(s) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this Diploma



DIRECTORATE GENERAL OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
GOVERNMENT OF KHYBER PAKHTUNKHWA
T: 091-9222422, @: kprescuchq@gmail.com, F: 091-9222487



No: 1/DG-1122/Office Order/Estt/ 217-7966

OFFICE ORDER

Dated: 21/05/2020

In pursuance of Decision of Special Provincial Cabinet meeting on dated 23/03/2020, the Competent Authority is please to appoint Mr. Adnan Rahim S/o Rahim Shah having CNIC # 1730161878783 for the post of Emergency Medical Technicain (BPS-12) purely on contract Basis for "Ambulance Service" for a period of one year, subject to the following conditions:

- i- Clearance of medical examination to be held at Concern DHQ Hospital.
- ii- Police clearance certificate from local Police Station.
- iii- Verification of documents; which include CNIC, Domicile, Academic Qualification, Experience Certificates. In case of any discrepancy the appointment will stand cancelled and the salary paid during the period would be recovered.
- iv- Successful completion of the required basic Emergency Rescue Training.
- v- Your appointment shall be terminated in case you are not able to complete the training due to any reason.
- vi- Employment to be whole time; unless in any case it is otherwise provided, the whole time of an employee is at the disposal of the service and he may be employed in any manner required by the service without claim for additional remuneration.
- vii- Every member of the service shall be liable to serve anywhere within the province with the prior approval of the Competent authority.
- viii- Documentary proof to the effect that your employer had duly relieved you from your job/duty, if you are currently doing one in public or private sector. You are not allowed to do any part time job/study during the service of Rescue 1122 Khyber Pakhtunkhwa.
- ix- Executing contract agreement on a stamp paper of Rs. 50/- duly attested by Oath Commissioner, affirming the terms and conditions of the enlistment.

Note: The arrival report of the selected candidates would be accepted only after fulfilling the conditions mentioned in para i & ii above within 15 days of issuance of this order.

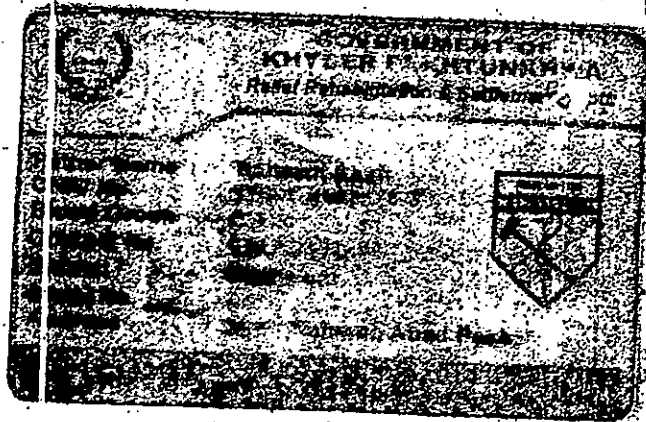
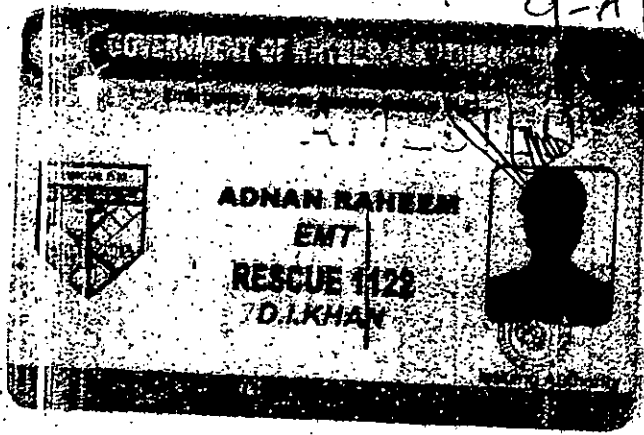
-SD-
(DIRECTOR GENERAL)

Copy forwarded to:

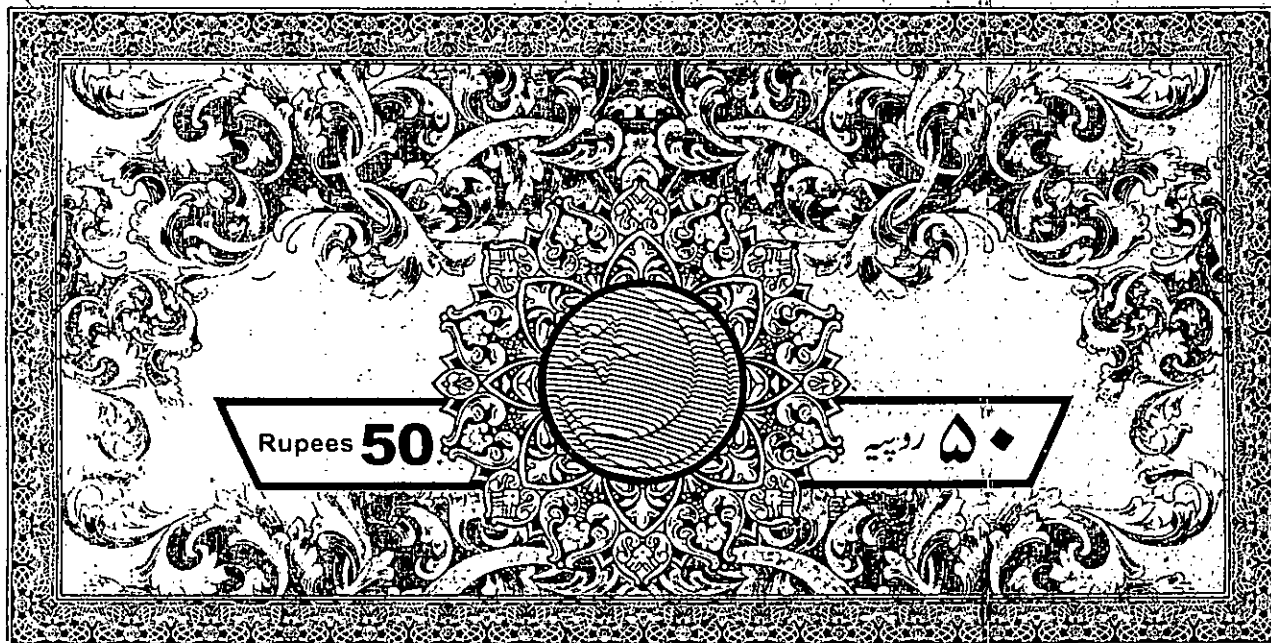
- 1- Accountant General, Govt. Khyber Pakhtunkhwa.
- 2- Medical Superintendent, DHQ Hospital Concerned, with the request to facilitate medical examination of the above mentioned appointee.
- 3- PS to Secretary, RR&S Department, Govt. of Khyber Pakhtunkhwa.
- 4- PA to Director General, ERS (Rescue 1122) Khyber Pakhtunkhwa.
- 5- Concerned District Police Officer, for facilitating in issuance of Police Clearance Certificate.
- 6- Accountant HQ, ERS (Rescue 1122), Khyber Pakhtunkhwa.
- 7- Official concerned.
- 8- Personal file

ATTES: [Signature]

[Signature]
ASSISTANT DIRECTOR (ADMIN)
Emergency Rescue Service (Rescue 1122)
Khyber Pakhtunkhwa, Peshawar.



ATTESTED



10
e
1

AGREEMENT

This agreement is made on this _____ day of _____ (Two Thousand, and Twenty) between Governor of the Khyber Pakhtunkhwa Province (hereinafter referred to as the Government) acting through DG ERS (Rescue-1122) on the ONEPART and ADNAN RAHEEM (hereinafter referred to as the employee) on the OTHER PART;

WHEREAS the Government has agreed to employ the Employee and the Employee has agreed to serve the Government as EMI-12 on the terms and conditions hereinafter mentioned;

NOW these present witnesses and the parties hereto respectively agree as follows:-

1. Subject to clause 9, the employee (Rescuer) shall serve the Government as EMI BPS-_____ under ERS (Rescue-1122) in Khyber Pakhtunkhwa, purely on contract basis of 01 year commencing from the date of assumption of charge of the post.
2. The Employee shall;
 - (a) Devote his/her whole-time to perform his/her duties as EMI in the ERS (Rescue-1122), in Khyber Pakhtunkhwa";
 - (b) Carry out such functions in relation to his/her duties as the competent authority may, from time to time, assign to him/her;
 - (c) submit himself/herself to the lawful orders of the Government and of the officers and authorities under whom his/her services may be placed from time to time, during the currency of this Agreement; and
 - (d) Proceed, whenever required, to such part of Pakistan and perform such duties relating to his/her appointment as the Government may specify.
3. (a) The pay of the Employee shall commence from the date of his/her assumption of charge of the post and cease on the date after mention of this agreement or on termination of his/her services for any reason, whichever may be earlier.
- (b) The Employee shall, if required to travel in the public interest be entitled to receive traveling allowance at such rate as may be prescribed, and
- (c) The Employee shall not, unless permitted by the Government, indulge in private practice, nor shall he/ she indulge, directly or indirectly, in any trade, business or occupation, and in any political activity whatsoever, other than his/ her obligations under this Agreement.
4. In the event of misconduct as defined in the Khyber Pakhtunkhwa Emergency Rescue Service Regulations 2015 or breach of any of the terms and conditions specified herein. The appointing authority, in such cases shall be the competent authority in respect of the staff involved in misconduct or breach of terms and condition or causing pecuniary loss to the Government.
5. If the performance of the employee is found unsatisfactory, his/her services shall be terminated on fifteen days-notice or payment of fifteen days salary in lieu of notice.
6. The Employee shall be held responsible for the losses accruing to the Government due to his/ her carelessness or in efficiency and shall be recovered from him.

ATTESTED



8. Employment to be whole time; Unless in any case it is otherwise provided, the whole time of an employee is at the disposal of the service and he may be employed in any manner required by the service without claim for additional remuneration.
9. Every member of the service shall be liable to serve anywhere within the province with the prior approval of the Director General Rescue 1122.
10. Either party to this agreement may terminate the agreement by giving to the other party fifteen days' notice in writing of its intention to do so and on the expiration of such notice this agreement shall be terminated. Provided that where no notice is served or served of a shorter period, the defaulting party shall pay to the other party an amount equal to the pay of the employee for the period of fifteen days or for such period by which the notice falls short, as the case may be.
11. The competent authority reserves the right to dispense with your services without assigning any reason. Further ADNAN RAHEEM forego my right to approach any Court of Law against the decision of the competent authority.
12. In witness where of the said ADNAN RAHEEM and DG ERS (RESCUE-1122) on behalf of the Government have hereinto set their hands first above written.

Signed by [Signature]
 In the presence of:

Witness 1:- [Signature]

Name: M. ABDULWAH
 CNIC #: 90406-0189845-5

Witness 2:- [Signature]
 Name: Badar-ul-Din
 CNIC #: 17201-8088282-7

(Authority: letter No. SOR-VI/RS/1121-25/007 Dated 22 July 2007)

Sir,
 Verified as per
 report of M.M.D.S. B.S.
 & S.H.O. INQ. Lab
[Signature]
 28-05-2020

[Signature]
 28-05-2020
 Principal
 GHS Sra Dargai
 H.S.D Peshawar

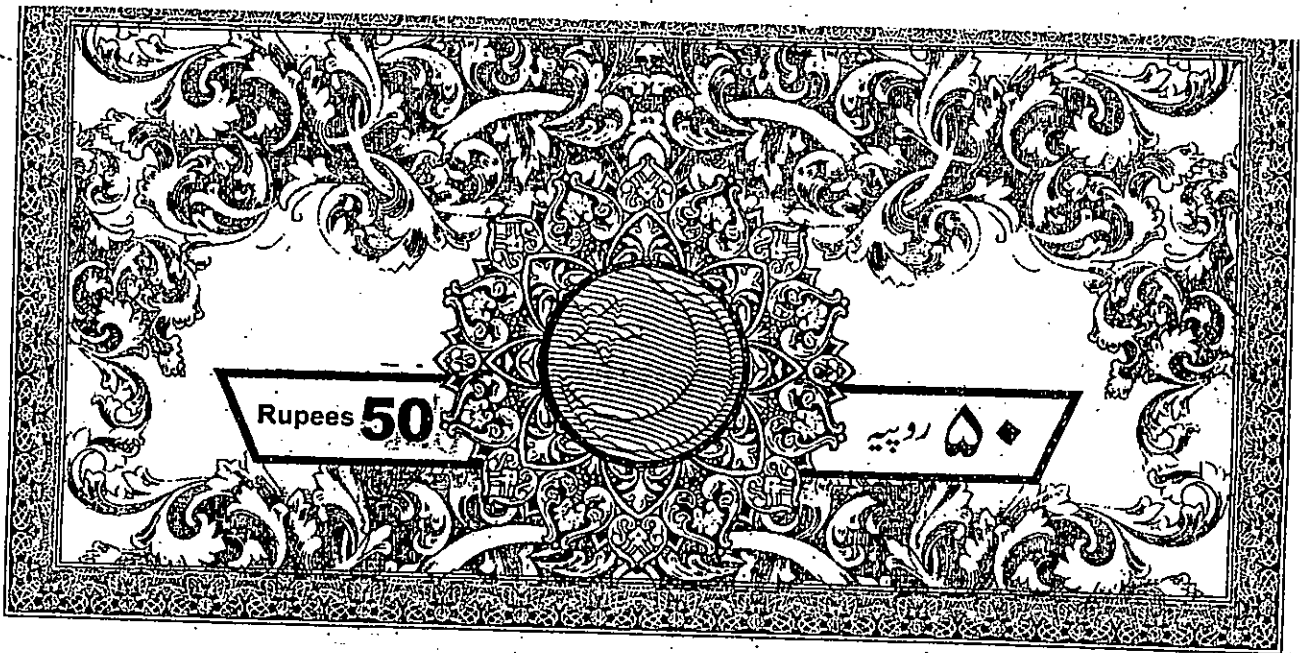
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صاحب عالی
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[Signature]
 28-05-2020

Forwarded to
[Signature]
 S.H.O. INQ
 28-5-2020



SURITY & UNDERTAKING

I do hereby solemnly affirm; that I have read/understood the terms and conditions attached to my selection in the Ambulance Service of ERS (Rescue-1122), in Khyber Pakhtunkhwa; as EMERGENCY MEDICAL TECHNICIAN (01/12).

2. I do also hereby affirm the following:
 - i. That my academic/qualification/experience certificates as furnished by me are correct.
 - ii. That I will abide by the rules, regulations and discipline and requirements during the training at the Punjab EPIC LAHORE.
 - iii. That I will not claim any exemption from training.
 - iv. That I will stand terminated from the service, if I willfully absent my self during the training.
 - v. I will relinquish any other full time or part time job if any and will dedicate myself fully to the activities of training and other Emergency Rescue Service (Rescue 1122) activities.
 - vi. I will not indulge in any undecent activities like gambling, or acts involving moral turpitude.
3. I understand; that in case I do not come up to any of the above undertakings, I am liable to be expelled from the service.

M. J. Khan
District Emergency
Service No. 1

Name ADNAN RAHEEM
S/O. RAHEEM SHAH
CNIC No. 17301-6187878-3

Name M. ABDULLAH
S/O. SHAMROZ KHAN
CNIC No. 90406-0189645-5
Address ALI KHEL FR Peshawar
POST OFFICE SHERKERA

ATTACHED
[Signature]

Witness No. 2
[Signature]

[Signature]

Name of official HAHAN RAHEEM
 Caste or race Khalil Momand
 Father's name RAHEEM SHAH
 Residence Mohallah Rahman abad, post office Budh Kagan wala Tehsil Peshawar
 Date of birth 2-5-1994
 Exact height by measurement 5'6"
 Personal mark of identification Will
 Signature of the official [Signature]
 Signature of head of office _____

Seal of office _____

I do hereby certify that I have examined Mr. ADNAN RAHEEM a candidat
 for employment in the Office of the Emergency Rescue Service 1122
 and cannot discover that he had any disease communicable or other constitutional affection or bodily
 infirmity except Will

I do not consider this as disqualification for employment in the office of the as above
 His age according to his own statement 26 years year and by appearance about
 year Twenty Six years

[Signature]
 District Emergency Officer

[Signature]
 MEDICAL SUPERINTENDENT,
 Medical Superintendent
 CIVIL HOSPITAL Police/Army Hospital
 Peshawar
 28/05/2020

LEFT HAND THUMB AND FINGER IMPRESSIONS



[Signature]
 ATTESTED

13

Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa.

Subject: ARRIVAL REPORT

In compliance to office order No. 1-1/DG-1122/Office Order/Estt: 217-7966
dated 29/04/2020, I the undersigned is hereby submit my arrival report on dated
28-05-2020 at Emergency Rescue Service (Rescue 1122) Headquarter, Peshawar.



Name: Adnan RAHEEM

F/Name: RAHEEM SHAH


CNIC 17301-6187878-3

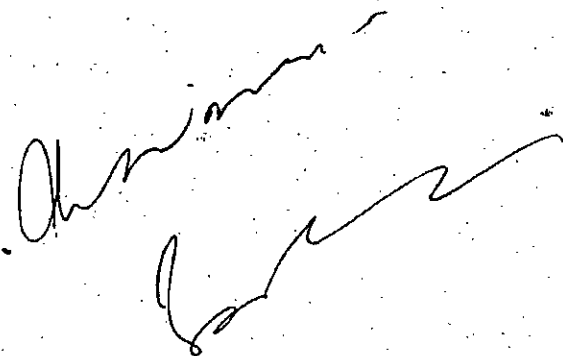
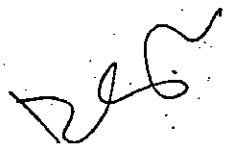
Post: FMT-12 LTV

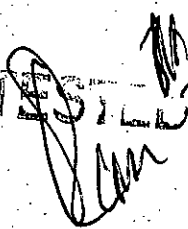
Contact: 0312-0193339

Address: MOH ROMAN ABAD Post OFFICE

BABIABARA Kogawala
Peshawar


District Emergency Officer
Khyber Pakhtunkhwa



ATTESTED




DIRECTORATE GENERAL
EMERGENCY RESCUE SERVICE (RESCUE - 1122)
Government of Khyber Pakhtunkhwa



(19) E

No.1-4/Dir (O-AS)/Office Order-20/

Dated Peshawar, the December, 2020

OFFICE ORDER

Consequent upon the approval of the competent authority, the following officials are hereby transferred and posted with immediate effect as per details given below: -

S.No	Name	Father Name	Desig:	From	To
1	Muhammad Bitai	Musharaf Khan	EMT	Rescue Station-11	Molvi G Hospital 02 Ambulances
2	Irshad Khan	Muhammad Zaman	EMT		
3	Membar Shah	Robat Khan	EMT		
4	Adil Ayub	Ayub Khan	EMT		
5	Fayaz Noor	Noor Khan	LTV		
6	Inayat ur Rehman	Saif Ur Rehman	LTV		
7	Adnan Iqbal	Zafar Iqbal	LTV		
8	Asfandiyar	Fazal Raziq	LTV		
9	Muhammad Afzal	Hamayoun Khan	LTV		
10	Shahid Hussain	Noor Raheem	LTV		
11	Muhammad Tahir		LTV Health		
12	Muhammad Rafiq	Abid Hussain	EMT		
13	Ahmad Wali	Muhammad Wali	EMT		
14	Ayaz Khan	Siraj Gul	EMT		
15	Rooh Ullah	Arif Ullah	EMT		
16	Muhammad Zahir	Muhammad Nazir	LTV		
17	Ahmad Ali	Janas Khan	LTV		
18	Shujat Ali	Muhammad Shabir	LTV		
19	Fakhruddin	Nasruddin	LTV		
20	Waseem		LTV Health		
21	Mr. Abbas		LTV Health		
22	Muhammad Zamceer	Khadi Gul	EMT	Rescue Station-44	Naseer Ullah Babar Hospital 02 Ambulances
23	Abbas Ahmad	Janat Khan	EMT		
24	Fawad Ullah	Noor Haj	EMT		
25	Bilal Hameed	Rasool Jan	EMT		
26	Hazrat Ali	Sher Muhammad	LTV		
27	Muhammad Bilal	Muhammad Ayaz	LTV		
28	Mr. Saif Ullah		LTV		
29	Muhammad Tahir		LTV		
30	Zahid Tanveer	Muhammad Naeem	LTV		
31	Mr. Shahab Khan	Raees Khan	LTV		
32	Mr. Omer Khayam	Gulzar Khan	LTV	Rescue Station-55	LRH Hospital 01 Ambulance
33	Inam Ullah	Ihsan Ullah	EMT		
34	Abdul Haseeb	Irshad Muhammad	EMT		
35	Shafi Ullah	Wazir Khan	EMT		
36	Muhammad Nigar		LTV Health		
37	Shah Faisal	Dost Muhammad	LTV		
38	Azmat Ali	Akbar Hussain	LTV		
39	Muhammad Farhan	Ghulam Fareed khan	LTV	Rescue Station-55	Police Service Hospital 02 Ambulances
40	Syed Abbas Ali Shah	Muhammad Yousaf	EMT		
41	Muhammad Arif	Aziz Khan	EMT		
42	Adnan Raheem	Raheem Shah	EMT		
43	Asad Ali	Mukhtiar Uddin	LTV		
44	Mr. Shoukat		LTV Health		
45	Mr. Javid Ullah		LTV Health		
46	Mr. Ayaz		LTV Health	Rescue Station-66	KTH Hospital 01 Ambulance
47	Mr. Sadaqat Ali		LTV Health		
48	Kamran Zada	Muhammad Zada	EMT		
49	Ateeq Ur Rehman	Shams Ur Rehman	EMT	Rescue Station-66	KTH Hospital 01 Ambulance
50	Muhammad Awais		LTV Health		
51	Asad Ullah	Anwar Hussain	LTV		
52	Aqeel Ur Rehman	Muhammad Rehman	LTV	Rescue Station-77	Peshawar Institute of Cardiology 01 Ambulance
53	Junaid Khan	Kaptan Hussain	EMT		
54	Shakir Khan	Hayat Ullah	EMT		
55	Ali Imran	Muhammad Ishaq	LTV	Rescue Station-77	HMC Hospital 01 Ambulance
56	Shahid Rafiq	Muhammad Rafiq	LTV		
57	Waqar Ahmad	Maroof Khan	LTV		
58	Muhammad Irshad	Lal Shah	EMT	Rescue Station-77	HMC Hospital 01 Ambulance
59	Adil Khan	Hanif Khan	EMT		
60	Muhammad Haris Khalid	Khalid Munir	LTV		
61	Ubaid Ur Rehman		LTV Health	Rescue Station-99	Cat-D Hospital Ghari Tajik 01 Ambulance
62	Imran Hussain		LTV Health		
63	Farman Ullah	Muhammad Azam	EMT		
64	Zahoor Khan	Syed Hayat Khan	EMT	Rescue Station-99	Cat-D Hospital Ghari Tajik 01 Ambulance
65	Muhammad Imran		LTV Health		
66	Muhammad Aqeel		LTV Health		
67	MR. Ghayour		LTV Health		

(Handwritten signature and initials)



DIRECTORATE GENERAL
EMERGENCY RESCUE SERVICE (RESCUE - 1122)
Government of Khyber Pakhtunkhwa



(15)

No.1-4/Dir (O-AS)/Office Order-20/

Dated Peshawar, the

December, 2020

68	Asif Ullah	Midrar Ullah	EMT	Rescue Station-10	Emergency satellite Hospital Nahqi 01 Ambulance
69	Saeed Ahmad	Wakila Jan	EMT		
70	Naveed		LTV Health		
71	Ibrahim		LTV Health		
72	Nisar Khan		LTV Health	Rescue Station-12	Sifwat Ghayour Hospital 02 Ambulance
73	Iqrar Ali Khan	Sahib Ali Khan	EMT		
74	Muhammad Fawad	Shikar Ullah	EMT		
75	Fazal Munir Khan	Fazle Mula	EMT		
76	Sanobar Khan	Sarwar Khan	EMT		
77	Waqas Ullah Khan	Gul Wali Khan	LTV		
78	Manzoor Khan	Zahoor Khan	LTV		
79	Fawad Ullah	Shoukat Ali	LTV		
80	Muhammad Farooq	Shah Nawaz	LTV		
81	Shafiq Ullah	Amin Ullah	LTV		
82	Manir Ahmad	Rahmat Masih	LTV		
83	Saif Ullah		LTV Health	Rescue Station-14	Cat- D Hospital Budabher 01 Ambulance
84	Zahid Khan	Falak Naz	EMT		
85	Abdullah	Falak Naz	EMT		
86	Tariq bin Yousaf	Yousaf Khan Khattak	LTV		
87	Jabran Khan	Wasal Khan	LTV	Rescue Station-14	Cat-D Civil Hospital Matani 01 Ambulance.
88	Zahid Ali	Fazal Rabbi	LTV		
89	Muhammad Sajjad	Bakhtiar Khan	EMT		
90	Fawad Hussain	Shah Hussain	EMT		
91	Muhammad Shahid	Haji Niaz Muhammad	LTV		
92	Waqas Ahmad	Iftikhar Ahmad	LTV	Rescue Station-15	Hassan Khei RHC Sub- Div Peshawar 01 Ambulance
93	Aman Khan	Faridoon Khan	LTV		
94	Muhammad Shafeeq	Sameen Jan	EMT		
95	Tasleem Khan	Muslim Khan	EMT		
96	Fida Muhammad		LTV Health		
97	Muhammad Yousaf		LTV Health		
98	Naseem Dad		LTV Health		

The above transferred officials are hereby directed to report to their designated Rescue Stations immediately. The concerned Station Incharges are directed to ensure timely and proper relieving/arrival of the transferred official(s) with intimation to this office.

(District Emergency Officer)
ERS (Rescue-1122),
Peshawar.

Copy forwarded for information to :-

- 1- Director Operations (Ambulance Service), ERS (Rescue-1122), Khyber Pakhtunkhwa.
- 2- PA to Director General, ERS (Rescue-1122), Khyber Pakhtunkhwa.
- 3- All concerned Station House Incharge ERS (Rescue-1122), Peshawar.
- 4- Office file.

(District Emergency Officer)

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Daily Attendance Register of the ...

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EXTRAORDINARY
GOVERNMENT



REGISTERED NO PIII

GAZETTE

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, SUNDAY, 12TH JUNE, 2022.

PROVINCIAL ASSEMBLY OF KHYBER PAKHTUNKHWA

NOTIFICATION

Dated Peshawar, the 12th June, 2022.

No. PA/Khyber Pakhtunkhwa/Bills-235/2022/16125. The Khyber Pakhtunkhwa Emergency Rescue Service (Amendment) Bill, 2022 having been passed by the Provincial Assembly of Khyber Pakhtunkhwa on 10th June, 2022 and assented to by the Governor of the Khyber Pakhtunkhwa on 12th June, 2022 is hereby published as an Act of the Provincial Legislature of the Khyber Pakhtunkhwa.

THE KHYBER PAKHTUNKHWA EMERGENCY RESCUE SERVICE (AMENDMENT) ACT, 2022. (KHYBER PAKHTUNKHWA ACT NO. XXVII OF 2022)

(First published after having received the assent of the Governor of the Khyber Pakhtunkhwa in the Gazette of the Khyber Pakhtunkhwa (Extraordinary), dated the 12th June, 2022)

AN
ACT

Further to amend the Khyber Pakhtunkhwa Emergency
Rescue Service Act, 2012.

WHEREAS, it is expedient further to amend the Khyber Pakhtunkhwa Emergency Rescue Service Act, 2012 (Khyber Pakhtunkhwa Act No. XV of 2012), for the purposes hereinafter appearing.

It is hereby enacted by the Provincial Assembly of Khyber Pakhtunkhwa as follows:

1. **Short title and commencement.**—(1) This Act may be called the Khyber Pakhtunkhwa Emergency Rescue Service (Amendment) Act, 2022.

(2) It shall come into force at once.

2. **Insertion of new section 23A to the Khyber Pakhtunkhwa Act No. XV of 2012.**— In the Khyber Pakhtunkhwa Emergency Rescue Service Act, 2012 (Khyber Pakhtunkhwa Act No. XV of 2012), after section 23, the following new section shall be inserted, namely:

BETTER COPY

EXTRAORDINARY
GOVERNMENT

REGISTERED NO. PIII
GAZETTE

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, SUNDAY, 12th JUNE, 2022.

PROVINCIAL ASSEMBLY OF KHYBER PAKHTUNKHWA

NOTIFICATION

Dated Peshawar, the 12th June, 2022.

No. PA/Khyber Pakhtunkhwa/Bills-235/2022/16125. The Khyber Pakhtunkhwa Emergency Rescue Service (Amendment) Bill, 2022 having been passed by the Provincial Assembly of Khyber Pakhtunkhwa on 10th June, 2022 and assented to by the Governor of the Khyber Pakhtunkhwa on 12th June, 2022 is hereby published as an Act of the Provincial Legislature of the Khyber Pakhtunkhwa.

THE KHYBER PAKHTUNKHWA EMERGENCY RESCUE SERVICE

(AMENDMENT) ACT, 2022.

(KHYBER PAKHTUNKHWA ACT NO. XXVII OF 2022)

AN

ACT

Further to amend the Khyber Pakhtunkhwa Emergency

Rescue Service Act, 2012.

WHEREAS, it is expedient further to amend the Khyber Pakhtunkhwa Emergency Rescue Service Act, 2012 (Khyber Pakhtunkhwa Act No. XV of 2012). For the purposes here matter appearing.

It is hereby enacted by the Provincial Assembly of Khyber Pakhtunkhwa as follows.

1. **Short title and commencement.**---(1) This Act may be called the Khyber Pakhtunkhwa Emergency Rescue Service (Amendment) Act, 2022.
(2) It shall come into force at once.
2. **Insertion of new section 23A to the Khyber Pakhtunkhwa Act No. XV of 2012.**---
In the Khyber Pakhtunkhwa Emergency Rescue Service Act, 2012 (Khyber Pakhtunkhwa Act No. XV of 2012), after section 23. The following new section shall be inserted. Namely:

37

23A Regularization of contract employees.---(1) Notwithstanding anything contained in any other law or rules for the time being enforce, all the employees appointed on contract basis in the various projects of Annual Development Programme, as listed in the Table below and holding posts in the said projects, till the commencement of this Act, shall be deemed to have been validly appointed on regular basis from the date of commencement of this Act, subject to verification of their qualification and other credentials by the Administrative Department in the prescribed manner.

TABLE

S. No.	Name of Project.
1.	Establishment of ERS Rescue-1122 District Shangla
2.	Establishment of ERS Rescue-1122 District Malakand
3.	Establishment of ERS Rescue-1122 District Lower Kohistan
4.	Establishment of ERS Rescue-1122 District Lakki Marwat
5.	Establishment of ERS Rescue-1122 District Buner
6.	Establishment of ERS Rescue-1122 District Hanau
7.	Establishment of ERS Rescue-1122 District Karak.
8.	Establishment of ERS Rescue-1122 in Tehsil Shergarh District Mardan.
9.	Establishment of ERS Rescue-1122 District Abbottabad.
10.	Establishment of ERS Rescue-1122 District Nowshera.
11.	Establishment of ERS Rescue-1122 District D.I.Khan
12.	Establishment of ERS Rescue-1122 District Swabi.
13.	Establishment of ERS Rescue-1122 District South Waziristan.
14.	Establishment of ERS Rescue-1122 District North Waziristan.
15.	Establishment of ERS Rescue-1122 District Kurram.
16.	Establishment of ERS Rescue-1122 District Orakzai.
17.	Establishment of ERS Rescue-1122 District Bazaour.
18.	Establishment of ERS Rescue-1122 District Khyber.
19.	Establishment of ERS Rescue-1122 District Mohmand.
20.	Establishment of ERS Rescue-1122 FR Kohat.
21.	Establishment of ERS Rescue-1122 FR Peshawar.
22.	Establishment of ERS Rescue-1122 FR D.I.Khan.
23.	Establishment of ERS Rescue-1122 FR Lakki Marwat.
24.	Establishment of ERS Rescue-1122 FR Tank.
25.	Establishment of ERS Rescue-1122 FR Bannu.
26.	Contract Staff of Covid-19.

2 The seniority of the employees shall be determined in the prescribed manner."

BY ORDER OF MR. SPEAKER
PROVINCIAL ASSEMBLY OF KHYBER
PAKHTUNKHWA

(KIFAYAT ULLAH KHAN AFRIDI)
Secretary

Provincial Assembly of Khyber Pakhtunkhwa

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917 KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 12TH JUNE, 2022.

'23A Regularization of contract employees,....(1) Notwithstanding anything contained in any other law of rules for the time being enforce all the employees appointed on contract basis in the various projects of Annual Development Programme. As listed in the Table below and holding posts in the said projects, till the commencement of this Act shall be deemed to have been validly appointed on regular basis from the date of commencement of this Act, subject to verification of their qualification and other credentials by the Administrative Department in the prescribe manner.

TABLE

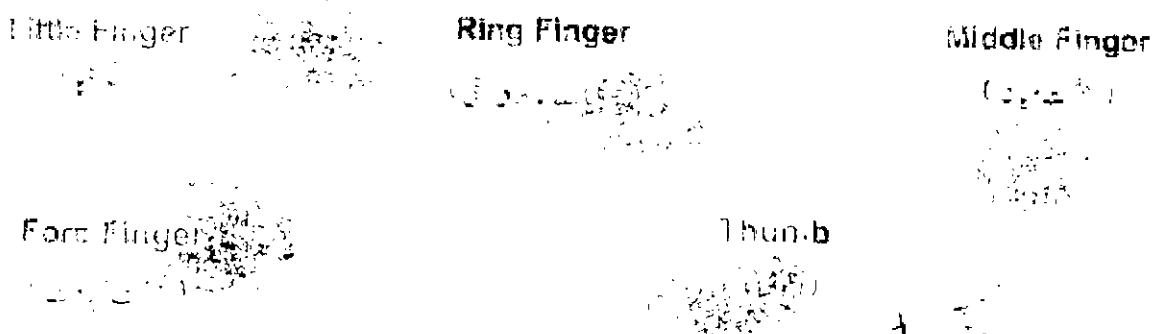
S. No.	Name of Project
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2.	Establishment of ERS Rescue-1122 District Malakand
3.	Establishment of ERS Rescue-1122 District Lower Kohistan
4.	Establishment of ERS Rescue-1122 District Lakki Marwat
5.	Establishment of ERS Rescue-1122 District Bannu
6.	Establishment of ERS Rescue-1122 District Hangu
7.	Establishment of ERS Rescue-1122 District Karak
8.	Establishment of ERS Rescue-1122 in Tehsil Shergarh District Mardan
9.	Establishment of ERS Rescue-1122 District Abbottabad
10.	Establishment of ERS Rescue-1122 District Nowshera
11.	Establishment of ERS Rescue-1122 District D.I Khan
12.	Establishment of ERS Rescue-1122 District Swabi
13.	Establishment of ERS Rescue-1122 District South Waziristan
14.	Establishment of ERS Rescue-1122 District North Waziristan
15.	Establishment of ERS Rescue-1122 District Kurram
16.	Establishment of ERS Rescue-1122 District Orakzai
17.	Establishment of ERS Rescue-1122 District Bajaour
18.	Establishment of ERS Rescue-1122 District Khyber
19.	Establishment of ERS Rescue-1122 District Mohmand
20.	Establishment of ERS Rescue-1122 FR Kohat
21.	Establishment of ERS Rescue-1122 FR Peshawar
22.	Establishment of ERS Rescue-1122 FR D.I Khan
23.	Establishment of ERS Rescue-1122 FR Lakki Marwat
24.	Establishment of ERS Rescue-1122 FR Tank
25.	Establishment of ERS Rescue-1122 FR Bannu
26.	Contract Staff of Covid-19

2 The seniority of the employees shall be determined in the prescribed manner.

BY ORDER OF MR. SPEAKER
PROVINCIAL ASSEMBLY OF KHYBER
PAKHTUNKHWA

(KIFAYAT ULLAH KHAN AFRIDI)
Secretary
Provincial Assembly of Khyber Pakhtunkhwa

- 1. Name _____
- 2. Nationality and Religion Muslim / Indian
- 3. Residence 10/11, Durga Mata Road, Meerut
- 4. Father's Name and Residence 10/11, Durga Mata Road
- 5. Date of birth by Christian era as nearly as can be ascertained 15/05/1946
- 6. Exact height by measurement _____
- 7. Personal mark of identification 11
- 8. Left hand (right hand thumb and finger impressions of Non-gazetted officer)



- 9. Signature of Government Servant _____
- 10. Signature and designation of the Head of the Office or other Attesting Officer _____

Finger impressions in this page should be renewed or re-registered at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken up every 5 years under this rule.

Name	Address	City	State	Zip	Phone	Occupation	Remarks
[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]
[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]
[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]
[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]
[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]
[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]
[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]
[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]
[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]
[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]
[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]
[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]
[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]
[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]
[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]	[Faint]

42

AG KP Peshawar

AG KP Peshawar

S#:1

S#:2

P Sec:007 Month:January 2023
PR4978 -Rescue 1122 District Emerg
RESCUE 1122 DISTRICT EMER

P Sec:007 Month:January 2023
PR4978 -Rescue 1122 District Emerg
RESCUE 1122 DISTRICT EMER

Pers #: 01018944 Buckle:
Name: ADNAN RAHIM
DRIVER

Pers #: 01018944 Buckle:
Name: ADNAN RAHIM
DRIVER

CNIC No.1730161878783
GPF Interest Free
06 Active Temporary

CNIC No.1730161878783
GPF Interest Free
06 Active Temporary

PAYS AND ALLOWANCES:

PAYS AND ALLOWANCES:

0001-Basic Pay
1004-House Rent Allow 45% KP21
1210-Convey Allowance 2005
1300-Medical Allowance
2311-Dress Allowance - 2021
2312-Washing Allowance 2021
2313-Integrated Allowance 2021
2341-Dispr. Red All 15% 2022KP
2347-Adhoc Rel Al 15% 22(PS17)

2362-Riske Allow Rescue-1122

Gross Pay and Allowances

Gross Pay and Allowances

DEDUCTIONS:

DEDUCTIONS:

GPF Balance 950.00
3501-Benevolent Fund
4004-R. Benefits & Death Comp:

GPF Balance 950.00

Subrc: 950.00
1,200.00
450.00

Subrc:

Total Deductions

Total Deductions

2,600.00

2,600.00

29,735.00

29,735.00

D.O.B
01.05.1994

LFP Quota:
THE BANK OF KHYBER ASHRAF ROAD PESHAWAR
200869058

00 Years 07 Months 021 Days

D.O.B
01.05.1994

LFP Quota:
THE BANK OF KHYBER - ASHRAF ROAD PESHAWAR
200869058

00 Years 07 Months 021 Days

ATTACHED


To,

The Director General
Emergency Rescue Services (Rescue 1122)
Khyber Pakhtunkhwa Peshawar.

Subject **APPEAL FOR MODIFICATION OF ORDER DATED 21-05-2021**

Respectfully Submitted:-

1. That the appellant has qualified his Secondary School Certificate in the year 2013 besides two years Paramedical Diploma in the year 2017 and was appointed as Emergency Medical Technician (BPS-12) being qualified for the same, after due process of law pursuant to the decision of the Special Provincial Cabinet meeting on contract basis initially for one year vide Office Order dated 21-05-2020 against salary of Rs. 30,000/- Per month. Since appointment the appellant performed his duties with honesty and full devotion and to the entire satisfaction of high ups. **(Copies of Testimonials & appointment order dated 21-05-2020 are enclosed as Annexure A & B).**
2. That the appellant after executing agreement and being medically fit, reported arrival on 28-05-2020 and was posted to Rescue Station 55 and later on was transferred to Police Service Hospital in December 2020. **(Copy of Agreement, Medical Certificate, Arrival report & Order dated December 2020 is enclosed as Annexure C, D & E).**
3. That the appellant was initially paid salary of four months @ of Rs. 20,000/- per month however upon contact, the appellant was told that there is some issue which will soon be resolved and hence the appellant was paid salary with dues in the next month salary and was accordingly paid salary of Rs. 30,000/- for the next three months, however later recovery was effected from the appellant, on quarry he was told that the issue of salary will be resolved soon. It is worth to mention that the appellant performed duties as Emergency Medical Technician as evident from the Attendance Register. **(Copies of Attendance Register is enclosed as Annexure F).**

ATTESTED


J (43)

44

4. That the KP Emergency Rescue Service (Amendment) Act, 2022 was enacted vide Notification dated 12-06-2022 for regularizing the services of the contract employees of the department, where after the appellant was directed to provide Driving License to the department which was accordingly provided and the services of the appellant were regularized from the date of enactment of the Act, ibid accordingly as Driver (BP-06) instead as Emergency Medical Technician as evident from the entry in service book for reasons other than fair and bonafide. **(Copy of Notification dated 12-06-2022, Driving License & Extract from Service Book is enclosed as Annexure G, H& I).**

5. That since December 2022 the appellant performed duties as Driver and he time and again approached the authorities with request that he being qualified for appointment as Emergency Medical Technician, was appointed as EMT and also performed his duties as such and not as Driver, therefore his regularization order may kindly be modified thereby regularizing the appellant as Emergency Medical Technician, upon which the appellant was told that as he was initially appointed as Driver therefore he cannot be regularized on the post of EMT.

6. That the impugned entry in the Service Book dated Nil to the extent of Driver (BPS-06) instead as Emergency Medical Technician (BPS-12), is against the law, facts and principles of justice on grounds inter-alia as follows:

GROUND:

A. That the impugned entry to the extent of the post of Driver instead of the post of Emergency Medical Technician (BPS-12), is illegal, unlawful, without lawful authority and void.

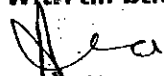
ATTESTED
[Signature]

48

- B. That the appealing is not treated in accordance with law and rules which being his fundamental right as per Article 4 and 25 of the Constitution and law of the land.
- C. That the appellant was appointed as the post of Emergency Medical Technician (BPS-12), which fact is evident from his appointment order, agreement, transfer order besides the attendance register, hence the impugned entry is liable to be modified accordingly.
- D. That in order to favor blue eyed, the appellant has been kept deprived of his due rights in violation of principles of natural justice.
- E. That the appellant is equipped with qualification required for appointment as the post of Emergency Medical Technician (BPS-12), and was never in possession of Driving License and he only secured Driving License in 2022 when the same was demanded from him, hence too the appellant is entitled to be regularized as the post of Emergency Medical Technician (BPS-12).
- F. That there is no omission and commission on part of the appellant and the appellant could not be punished for the fault of others if any.
- G. That the appellant is having unblemished service record.

It is therefore prayed that on acceptance of this appeal, the impugned entry in the Service Book dated Nil may kindly be modified to the extent of the post of the post of Emergency Medical Technician (BPS-12), instead of Driver with all back benefits.

Dated:-15-02-2023


Adnan Rahim
S/O Rahim Shah,
Driver Rescue Headquarters,
Peshawar.
Cell # 0312 0193339

Copy to the Secretary

Before the secretary RR & S Department Government of Khyber Pakhtunkhwa, Peshawar

ATTESTED

K 98

To

The Director General Emergency
Rescue Services (Rescue 1122)
Khyber Pakhtunkhwa Peshawar

Subject

Resignation:

1. That I was appointed as Emergency Medical Technician (BPS-12) on 21/05/2020, initially was paid less salary upon contact, the salary was then paid as per my appointment order, since appointment, I performed my duty with honesty and full devotion. My services were regularized under the Khyber Pakhtunkhwa Emergency Rescue Service Act 2022, against the post of Driver instead on the post of Emergency Medical Technician. I filed Departmental Appeal for the regularization of my service as Emergency Medical Technician in February, 2023, on submission of which I was called by Deputy Director who forced me to submit an affidavit to the effect that the appointment order was mistakenly issued due to clerical mistake and that I will not claim the issue before any legal forum. I was also told of removal from service which is not only illegal and unlawful but also compelled me to submit my resignation.

Keeping I in view the above I submit resignation from my post.

Dated 02/5/2023x

Adnan

Adnan Rahim

S/o Rahim Shah

Driver Rescue Headquarters Peshawar

Cell No 03120193339

Received
(1479)

Received

ATTESTED
Adnan

خدمت صفا - ڈائریکٹر جنرل اعلیٰ تعلیمی ریسرچ سروس ایڈزنگٹون کو اس کے

عنوان: واپسی استغفی

صفا - عالی

میں 2 جولائی 2023-25-2 کو فوری طور پر استغفی
دیا گیا تھا جو ایک منطوری نہیں ہوا۔ میں ذرا سوچتا
ہوں کہ استغفی واپس لے کر آیا کرتا ہوں۔

اپنے استغفی کے لیے میرا استغفی پر غور
کراؤ اور اسے لے کر دیا جائے کیونکہ اسے
اپنا استغفی واپس لے کر ڈیوٹی سرانجام دینا چاہتا
ہوں۔

محمد نواز - صمیم و لبر سٹیٹ
19/7/23

ڈیوٹی ایڈزنگٹون، ریسرچ سروس ایڈزنگٹون

0312-0193339

محمد نواز

ATTESTED



DIRECTORATE GENERAL OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122)
GOVERNMENT OF KHYBER PAKHTUNKHWA
feedbackrescue1122@gmail.com www.rescue1122kpk.com



48
M

No.1-1/Office Order/DG-1122/Estt: 7470-77

Peshawar: 12.8 -2023

RELIEVING ORDER:

On the request of the official and subsequently approval of the Competent Authority (Director General) resignation tender by Mr. Adnan Raheem S/O Raheem Shah bearing CNIC No. 17301-6187878-3 (Driver) Khyber Pakhtunkhwa ERS (Rescue-1122), is hereby accepted w.e.f 02-05-2023.

SD/-
(DIRECTOR GENERAL ERS 1122)

Endstt: No.1-11/Office Order/DG-1122/Estt:

Copy to:-

1. Accountant General, Khyber Pakhtunkhwa.
2. Director Administration, ERS (Rescue-1122) Khyber Pakhtunkhwa.
3. Director Operations, ERS (Rescue-1122) Khyber Pakhtunkhwa.
4. Assistant Director (Actts), ERS (Rescue-1122), Khyber Pakhtunkhwa the absentee period of the official is converted into Extraordinary leave.
5. Incharge PMC, ERS (Rescue-1122), Khyber Pakhtunkhwa.
6. P.A to Director General, ERS (Rescue 1122), Khyber Pakhtunkhwa.
7. Official Concerned.
8. Personal File of the concerned.

copy Received
on 13-09-2023

DEPUTY DIRECTOR (ADMIN)

ATTESTED

To,

The Director General
Emergency Rescue Services (Rescue 1122)
Khyber Pakhtunkhwa Peshawar.

N

49

Subject APPEAL FOR MODIFICATION OF ORDER DATED 21-05-2021

Respectfully Submitted:-

1. That the appellant has qualified his Secondary School Certificate in the year 2013 besides two years Paramedical Diploma in the year 2017 and was appointed as Emergency Medical Technician (BPS-12) being qualified for the same, after due process of law pursuant to the decision of the Special Provincial Cabinet meeting on contract basis initially for one year vide Office Order dated 21-05-2020 against salary of Rs. 30,000/- Per month. Since appointment the appellant performed his duties with honesty and full devotion and to the entire satisfaction of high ups. **(Copies of Testimonials & appointment order dated 21-05-2020 are enclosed as Annexure A & B).**
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3. That the appellant was initially paid salary of four months @ of Rs. 20,000/- per month however upon contact, the appellant was told that there is some issue which will soon be resolved and hence the appellant was paid salary with dues in the next month salary and was accordingly paid salary of Rs. 30,000/- for the next three months, however later recovery was effected from the appellant, on query he was told that the issue of salary will be resolved soon. It is worth to mention that the appellant performed duties as Emergency Medical Technician as evident from the Attendance Register. **(Copies of Attendance Register is enclosed as Annexure F).**

Date 3/7/23 *Feb*

ATTESTED
[Signature]

50

4. That the KP Emergency Rescue Service (Amendment) Act, 2022 was enacted vide Notification dated 12-06-2022 for regularizing the services of the contract employees of the department, where after the appellant was directed to provide Driving License to the department which was accordingly provided and the services of the appellant were regularized from the date of enactment of the Act, ibid accordingly as Driver (BP-06) instead as Emergency Medical Technician as evident from the entry in service book for reasons other than fair and bonafide. **(Copy of Notification dated 12-06-2022, Driving License & Extract from Service Book is enclosed as Annexure G, H& I).**
5. That since December 2022 the appellant performed duties as Driver and he time and again approached the authorities with request that he being qualified for appointment as Emergency Medical Technician, was appointed as EMT and also performed his duties as such and not as Driver, therefore his regularization order may kindly be modified thereby regularizing the appellant as Emergency Medical Technician, upon which the appellant was told that as he was initially appointed as Driver therefore he cannot be regularized on the post of EMT.
6. That the impugned entry in the Service Book dated Nil to the extent of Driver (BPS-06) instead as Emergency Medical Technician (BPS-12), is against the law, facts and principles of justice on grounds inter-alia as follows:

GROUND:

- A. That the impugned entry to the extent of the post of Driver instead of the post of Emergency Medical Technician (BPS-12), is illegal, unlawful, without lawful authority and void.

Date 3/7/23 *[Signature]*


[Signature]
ESTAB
[Signature]

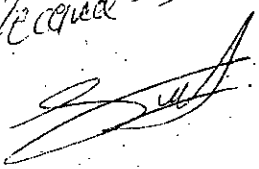
51

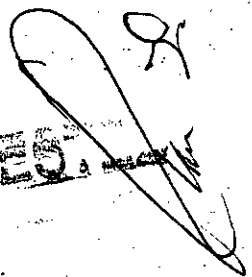
- B. That the appealing is not treated in accordance with law and rules which being his fundamental right as per Article 4 and 25 of the Constitution and law of the land.
- C. That the appellant was appointed as the post of Emergency Medical Technician (BPS-12), which fact is evident from his appointment order, agreement, transfer order besides the attendance register, hence the impugned entry is liable to be modified accordingly.
- D. That in order to favor blue eyed, the appellant has been kept deprived of his due rights in violation of principles of natural justice.
- E. That the appellant is equipped with qualification required for appointment as the post of Emergency Medical Technician (BPS-12), and was never in possession of Driving License and he only secured Driving License in 2022 when the same was demanded from him, hence too the appellant is entitled to be regularized as the post of Emergency Medical Technician (BPS-12).
- F. That there is no omission and commission on part of the appellant and the appellant could not be punished for the fault of others if any.
- G. That the appellant is having unblemished service record.

It is therefore prayed that on acceptance of this appeal, the impugned entry in the Service Book dated Nil may kindly be modified to the extent of the post of the post of Emergency Medical Technician (BPS-12), instead of Driver with all back benefits.

Dated:- 3/7/23


Adnan Rahim
S/O Rahim Shah,
Driver Rescue Headquarters,
Peshawar.
Cell # 0312 0193339

Received - 3-07-23



ATTES

بعدالت

سرور ٹریبونل ہندوستان کواٹریٹ

مورخہ

مقدمہ

دعویٰ

جرم

2 منجانب

عمرنان رحیم بنام حکومت و منیہ

Service Appeal

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام سرور ٹریبونل ہندوستان اور کیلئے فضل شاہ مہمند، لکھنؤ، اتر پردیش

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے ق تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی

اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت

مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے

تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے

اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے

سبب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔

کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

2023ء

ماہ اکتوبر

05/10/2023

المرقوم

ابو العبد

د

العبد

عمرنان رحیم

CNIC # 17361-6187878-3

عمرنان رحیم ولد رحیم شاہ کٹہ کوٹہ اتر پردیش