

Appeal No. 579/2016

Date of Institution ... 30.05.2016

Date of Decision ... 11.07.2017

Bibi Sultania Instructor, Public Health School,
Phase V, Hayatabad, Peshawar. ... (Appellant)

VERSUS

1. The Secretary Health Department, Khyber Pakhtunkhwa,
Peshawar and others. ... (Respondents)

MR. MUHAMMAD ASIF YOUSAFZAI, Advocate
For appellant.

MR. MUHAMMAD JAN, Deputy District Attorney.
For respondents.

MR. NIAZ MUHAMMAD KHAN, CHAIRMAN
MR. GUL ZEB KHAN, MEMBER

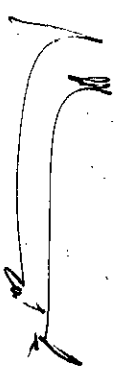
JUDGMENT

Arguments of the learned
counsel for the parties heard and record perused.

FACTS

2. The brief facts are that the present appeal has been filed against the impugned

transfer order dated 06.05.2016 whereby the appellant was transferred from Public Health School, Hayatabad, Peshawar to Police & Services Hospital, Peshawar. The appellant has assailed this order on the ground that the transfer is the result of bias and malafide of the department against the appellant as the husband of the appellant has filed a complaint against the Principal of the said school. That the appellant was having requisite qualification for the post from which she was transferred through the impugned order.



ARGUMENTS

3. The learned counsel for the appellant argued that the reasons given in the impugned order are not sustainable for the reason that the appellant was having the required qualification. The learned counsel for the appellant in this respect relied upon two documents. First is the method of recruitment notified on 10.05.2016 under Rule 3 (2) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and second is the criterion of Pakistan Nursing Council notified on 13.05.2015. According to learned counsel for the appellant, the appellant fulfilled the requisite qualification according to both these rules and criterion and the reasons given by the transferring authority in the impugned order are not correct.

4. The learned counsel for the appellant also argued that when an enquiry into application of the present appellant for release of her salary was conducted, it was opined in a letter dated 15.2.2016 that there are no specific rules regarding posting of Instructor in Public Health School where LHVs are being trained and that currently certain changes had been made in the service rules of nurses wherein the Masters in Public Health School had been included as a pre-requisite qualification (which was under process) in the Health Department and were being finalized. That there are many other Instructors who do not fulfill the requisite qualification but no action has been taken against those ineligible Instructors except the appellant.

5. On the other hand the learned Deputy District Attorney argued that the appellant in fact belongs to General Cadre and not to the Regular Cadre of teaching. That in accordance with the memorandum of appeal it was admitted by the appellant that she was posted/adjusted against an ex-cadre post. The learned D.D.A pressed into service the concerned criterion of Pakistan Nursing Council dated 03.12.2015 which according to him had been referred to in the impugned order.

CONCLUSION.

6. After hearing arguments of both the learned counsel for the parties and perusing the record this Tribunal reaches the conclusion that the transfer could be made by the department if reasons are given in the transfer order and those reasons are, of course, justiciable. The first notification as referred to by the learned counsel for the appellant dated 10.05.2016 is regarding method of recruitment but the present impugned transfer order had been passed prior to this notification. Therefore, no retrospectivity can be given to any delegated legislation what to say about method of recruitment made under Rule 3 sub rule 2 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989. Secondly, the method of recruitment always deals with the initial appointment and promotion of the civil servants who are regular employee of the particular department. This is not the case of the present appellant who is not a regular employee but is posted on ex-cadre post. Secondly the Pakistan Nursing Council Criterion notified on 13.05.2015 is also irrelevant because the current criteria at the time of impugned transfer order was issued on 03.12.2015 and the impugned order referred to the qualification mentioned in category-1 of the said criterion i.e. Diploma in Ward Administration and Diploma in Teaching Administration. This Tribunal, therefore, reaches the conclusion that the reasons given by the transferring authority in the transfer order are well based and in accordance with the rules and criterion. Furthermore, the appellant in her departmental appeal had not mentioned that she was qualified to be posted in the post despite the fact that the transferring authority had specifically mentioned the reasons for transfer which is itself strongly proof of the fact that the appellant was having no prescribed qualification for the said post.

7. So far as the letter dated 15.02.2015 is concerned it shows that no rules had been finalized which were under process. The rules referred to in the impugned

order in fact are not the rules but the qualification and selection criteria for Clinical Instructor (BPS-17) in Public Health School. So in the absence of any specific rules the department had rightly followed the qualification and selection criteria for Clinical Instructors set forth by Pakistan Nursing Council. Regarding the continuation of appointment of other ineligible staff in the Teaching Institute, this Tribunal cannot grant any relief on the basis of the principle that one wrong does not justify another wrong. Regarding malafide the learned counsel for the appellant has not relied upon any law/rulings whereby transfer orders can be set aside on this score if other legal formalities are fulfilled.

8. The nutshell of the above discussion is that the appeal is dismissed, leaving the parties to bear their own costs. File be consigned to the record room.



(GUL ZEB KHAN)
MEMBER



(NIAZ MUHAMMAD KHAN)
CHAIRMAN

ANNOUNCED
11.07.2017


579/2016

11.07.2017

Counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney alongwith Dr. Ubaidur Rahman, Principal and Hasham Ali, Asstt. for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of to-day, this appeal is dismissed, leave the parties to bear their own costs. File be consigned to the record room.


Member


Chairman

ANNOUNCED
11.07.2017

31.05.2017

Counsel for the appellant and Mr. Muhammad Adeel Butt, Additional AG for the respondent present. Counsel for the appellant requested for adjournment. Adjournd. To come for arguments on 10.07.2017, before D.B. The restraint order shall continue for the respondents present. Wakalatnama on behalf of the appellant submitted. The newly engaged counsel for the appellant requested for adjournment. Since there is restraint order for the last more than one year, therefore this case is fixed for tomorrow for final hearing before the D.B. The restraint order shall continue.

(Gul Zeha Khan)
Member

Member

Member

Chairman

10.07.2017

Appellant alongwith counsel (Mr. Muhammad Asif Yousafzai, Advocate) and Addl. AG alongwith Dr. Ubaidur Rahman, Principal for the respondents present. Wakalatnama on behalf of the appellant submitted. The newly engaged counsel for the appellant requested for adjournment. Since there is restraint order for the last more than one year, therefore this case is fixed for tomorrow for final hearing before the D.B. The restraint order shall continue.

Member

Chairman

27.02.2017

Counsel for the appellant and Assistant AG for respondents present. Counsel for the appellant requested for adjournment. Request accepted. To come up for arguments on 29.03.2017 before D.B. The restraint order shall continue.


(AHMAD HASSAN)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER

29.03.2017

Counsel for the appellant and Mr. Muhammad Jan, GP alongwith Muhammad Hasham, Asstt. for the respondents present. Counsel for the appellant submitted fresh Wakalatnama. Requested for adjournment. To come up for final hearing before the D.B on 25.04.2017. The restraint order shall continue.


Member


Chairman

25.04.2017

Junior to counsel for the appellant, Senior Govt. Pleader alongwith Hasham Khan, Asstt, for respondents No. 1 & 2 and Mr. Zartaj Anwar, Advocate for respondent No. 3 present and fresh Wakalatnama submitted. Senior counsel for the appellant is stated busy in Peshawar High Court Bar Association Election, 2017 and requested for adjournment. Last opportunity granted. Adjourned for final hearing to 31.05.2017 before the D.B. The restraint order shall continue.



Member


Chairman

Appeal No. 579/2016
Bibi Sultania vs Govt

27.10.2016

Counsel for the appellant and Mr. Amjad Ali, Assisnat alongwith Addl. AG for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing on 14.12.2016. The restrain order shall continue.


Member

14.12.2016

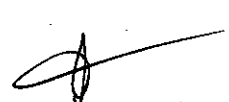
Counsel for the appellant and Addl: AG for respondents present. Counsel for the appellant requested for time to file rejoinder. Request accept. To come up for rejoinder on 26.01.2017. The restrain order shall continue.


(ASHFAQU TAJ)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER

26.01.2017

Counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Rejoinder submitted which is placed on file. To come up for arguments on 27.02.2017.


(AHMAD HASSAN)
MEMBER



(MUHAMMAD AAMIR NAZIR)
MEMBER

570/15

Appeal No. 579/2016
Bibi Sultanica vs Bort

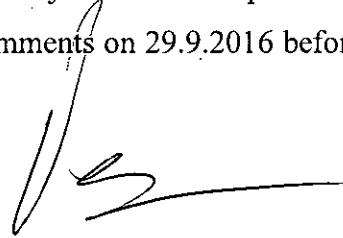
26.07.2016

Counsel for the appellant, Mr. Amjad Ali, Assistant alongwith Addl. AG for the official respondents and Mr. Sajid Amin, Advocate for respondent No. 3 present. Wakaltnama submitted. None present for private respondent No. 4. Proceeded ex-parte. Requested for adjournment. To come up for written reply/comments on 24.08.2016 before S.B. The restraint order shall continue.


Chairman

24.08.2016

Counsel for the appellant and Hashim Ali, Assistant alongwith Addl. AG for official respondents present. Written reply not submitted. Requested for adjournment. Request accepted. To come up for written reply/comments on 29.9.2016 before S.B. The restraint order shall continue.


Member

29.09.2016

Counsel for the appellant and Mr. Hashim, Assistant alongwith Addl: AG for respondents present. Written reply not submitted. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 27.10.2016 before S.B.


Chairman

Appeal No. 579/2016
Bibi Sultania vs Govt

31.05.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant ~~is serving~~ as Instructor (BPS-17) at Public Health School, Hayatabad, Peshawar. That vide impugned order 6th May, 2016 appellant was removed from the said school by way of transfer on the ground that the appellant does not possess the qualification prescribed for the post of Sister Tutor/ Instructor. That according to the criteria laid down by the provincial government of the Khyber Pakhtunkhwa Health Department, vide notification dated 10th May, 2016, the appellant having qualification of B.Sc. Nursing and Master Degree in Public Health is entitled to serve as Nursing/Instructor but despite her eligibility she was removed from the said post constraining her to prefer departmental appeal on 09.05.2016 which was rejected on 26.05.2016 and hence the instant service appeal on 30.06.2016.

That apart from the appellant other similarly placed employees having similar qualification are serving as Instructors in the said school but appellant singled out malafidely which orders are therefore not maintainable under the law. That the appellant has not yet relinquished the charge of the post of Instructor.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 26.07.2016 before S.B. Notice of stay application shall also be issued to the respondents for the date fixed. Since the appellant has not relinquished the charge, therefore, status quo be maintained.



Appellant Deposited
Security & Process Fee

Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 579/2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	30/05/2016	<p>The appeal of Mst. Bibi Sultania presented today by Mr. Mahboob Ali Khan Khalil Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2	31-5-16	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>1-6-16</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE HON'BLE SERVICE TRIBUNAL-KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 579 /2016

Bibi Sultania.....Appellant

Versus

Secretary Health KPK and Others.....Respondents

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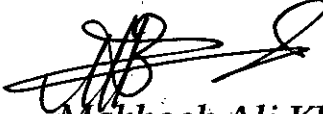
S. N	Description of documents	Annex	Pages
1.	Appeal with affidavit		1-7
2.	Application for Interim Relief/Stay		8-9
3.	Addresses of parties		10
4.	Copy of Order/Notification dated 06.05.2016 & Order/notification dated 18.05.2016 of the respondent No.4	A & B	11-12
5.	Copy of Departmental Appeal and Rejection Order	C	13-17
6.	Copies of Professional Qualification and experience based Documents	D	18-30
7.	Copy of Notification/order dated 17.08.2010	E	31
8.	Copy of Notification	F	32-35
9.	Copies of Order of newly sanction Post dated 31.07.2015, Charge report dated 31.07.2016, Notification & dated 27.01.2016 alongwith Explanation	G	36-39
10.	Copy of Office Order dated 19.01.2016, 19.01.2016, 21.01.2016 & 22.01.2016	H	40-43
11.	Wakalat-Nama		44

Appellant

Through

Zia-Ud-Din Khan

&


Mahboob Ali Khan khalil

Advocate,

High Court Peshawar

Cell No.0333-9361987

Dated 30.05.2016

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 579 /2016

Khyber Pakhtukhwa
Service Tribunal

Diary No. 556

Dated 30-5-2016

Bibi Sultania Instructor

Public Health School Phase V Hayat Abad Peshawar..... **Appellant**

VERSUS

1. The Secretary Health KPK Peshawar.
2. The Director Provincial Health Services Academy, (Dowran Pur) Peshawar, KPK.
3. The Principal Public Health School Phase- V, Hayatabad Peshawar.

(4.) Dr. Shabnam Khawas WMO, HMC, Hayatabad Peshawar.
.....**Respondents**

APPEAL U/S 4 OF THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA ACT 1974,
AGAINST THE OFFICE ORDER NO. SOH-
III/8-89/2015, DATED 6TH MAY, 2016,
WHEREBY THE APPELLANT HAS BEEN
POSTED/TRANSFERRED FROM PUBLIC
HEALTH SCHOOL, HAYATABAD
PESHAWAR TO POLICE SERVICES
HOSPITAL, PESHAWAR AGAINST THE
VACANT POST OF HEAD NURSE (BS- 17)
AND AGAINST THE OFFICE ORDER NO.
SOH-III/8-89/2015, DATED 26.05.2016,
WHEREBY THE RESPONDENT REJECTED
DEPARTMENTAL APPEAL OF THE
APPELLANT.

Filed to-day

Registrar

30/5/2016

EX parte
on 26-7-2016

PRAYER:

On acceptance of the instant Appeal:

- i) *The impugned Office Order/Notification No. SOH-III/8-89/2015, Dated 06.05.2016 & Order/Notification No. SO (H) E-II/4-1/2016, Dated 18.05.2016 of the respondents may please be set aside and the appellant be restored/deputed at the Public Health School, Hayatabad Peshawar and the current posting/transfer order at Police Services Hospital Peshawar of the appellant shall be withdrawn.*
- ii) *The appellant shall be declared instructor as per notification No SOH-III/8-89/2015 dated 27/01/2016 and Under Published Rules as per serial No 3 of notification No.SOH-III/3-5/2014, dated 10/5/2016 by respondent department.*
- iii) *That no adverse action should be taken against the appellant during the pendency of this appeal and also issue directions to the Respondents to insure to release the salary from November 2015 till date to the appellant.*
- iv) *Any other remedy deemed appropriate in the circumstances may also please be granted.*

Respectfully Sheweth;

FACTS:

- 1) *That the appellant currently serving and working as Instructor (Bps- 17) under the administrative control of Respondent No.1 (Secretary Health KPK).*

- 2) That the appellant was deputed/transferred through vide Office Order No. SOH-III/8-89/2015, Dated 06.05.2016, by the respondent from Public Health School, Hayatabad Peshawar to Police Services Hospital Peshawar (Copy of Order/Notification dated 06.05.2016 & Order/notification dated 18.05.2016 of the respondent No.4 are annexed as Annexure- "A" & "B").
- 3) That the appellant submitted Departmental Appeal against the said order before the Respondent No (1), dated 18/05/2016. for redressal of her grievances. However, the respondent No (1) rejected Departmental Appeal of the appellant through Office Order No. SOH-III/8-89/2015, dated 26/05/2016. (Copy of Departmental Appeal and Rejection Order annexed as Annexure- "C").
- 4) That the condition and rules mention in the transfer order of the appellant for post of instructor can not fulfill by the three other lady doctors on the post of instructors with respondent No 3, which by itself show the malafide of the respondents..
- 5) That the Respondent No (1) deputed/posted the appellant at the Police Services Hospital Peshawar purely on political intervention and pressure as exerted by the Respondent No (3), which is based on biased attitude and personal vendetta of Respondent No (3). Despite the fact that the appellant possess all the requisite qualifications and experience. Hence, the impugned order dated 06.05.2016, is illegal, unlawful and the same order has been passed by the Respondent No (1) is not only in violation of the posting/transfer policy of the Provincial Govt but also against the verdict of the Hon'ble Supreme Court of Pakistan reported in PLD 1995 SC 530. (Copies of Professional Qualification and experience based Documents annexed as Annexure- "D")

- 6) That the appellant agitated the subject matter several times before the respondents but the same was bluntly refused.
- 7) That being aggrieved by the said unlawful act of the respondents and finding no other alternate remedy, the appellant had left with no option except to approach this Hon'ble Court/Tribunal through the instant appeal ⁱⁿ hand inter-alia on the following grounds:

GROUND S:

- A) That the appellant was deputed through vide Letter No. SOH-III/3-5/10, dated 17/08/2010, on the requisition of both the respondent No 2 and No 3 vide Letter No. 8960-PHSA/F-259, dated 03/08/2010. (Copy of Notification/order dated 17.08.2010 is attached as annexure "E").
- B) That the appellant was receiving her salary from the Office of Directorate of PHSA due to the non-availability of requisite post of BPS- 17with the Respondent No 3.
- C) That there was no exigency of service, nor the transfer order of the appellant can be termed to have been passed in the interest of public service but it has been issued by Respondent No (1) at the behest of Respondent No (3) due to political pressure at the cost of appellant and thus the impugned order is neither maintainable nor sustainable in the eyes of law but is liable to be set aside.
- D) That the impugned transfer order was / is illegal, unlawful, having been passed without lawful authority and is without jurisdiction and was not in the prescribed period, strictly in violation of posting/transfer policy and thus nullity in the eyes of law and not tenable.

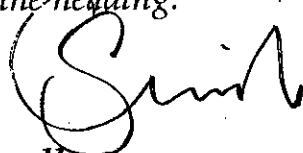
- E) That as a matter of fact political pressure for seeking posting/transfer through political pressure of any Civil Servant is not only violation of the Civil Servants Act, 1973, but also amounts to Misconduct under the Government Servants Conduct Rules 1987. Hence, the present posting/transfer order of the appellant is not tenable in the eyes of Law.
- F) That neither a Minister nor an MPA has been vested with any powers whatsoever under the law or Rules of Business of Government in matter of posting and transfer of any Government Servant and this kind of political pressure exerted upon the competent authorities has been deprecated by the Supreme Court of Pakistan in a recent judgment reported in 2007 SCMR 599. Moreover, the appellant possess all the requisite qualification and experience as per Khyber Pakhtunkhwa Health Department Notification dated 10/05/2016. (Copy of Notification annexed as Annexure- "F")
- G) That in the Public Health School the Finance Department sanctioned a new post of "Instructor" and the Director PHSA issued order through Letter No. 3787-93, dated 31/07/2015 in favor of the appellant and the appellant was posted on the newly sanctioned post accordingly. The appellant then submitted her charge report but the Respondent No (3) made negative correspondence and the appellant filed an appeal before the Respondent No (1) against the Respondent No (3) for implementation of the said order. On acceptance of the said appeal, the Respondent No (1) (Secretary Health KPK) issued Order No. 237-41 dated 22/01/2016, but the Respondent No (3) turn down the same order and the Respondent No (1) issued Office Order/Notification No SOH-III/8-89/2015 dated 27/01/2016 in

favor of the appellant for the implementation of the said order along with explanation called from the Respondent No (2&3). (Copies of Order of newly sanction Post dated 31.07.2015, Charge report dated 31.07.2016, Notification & dated 27.01.2016 alongwith Explanation annexed as Annexure- "G")

- H) That the malafide conduct of the respondent No 2 and No 3 is very much clear because, when the latter was issued for the relieving of one Margrat Mahi by the DG health Office KPK to respondent No 2 and No 3, the respondent No 2 and No 3 also relieve the appellant which was not the requirement of respondent No 1. (Copy of Office Order dated 19.01.2016, 19.01.2016, 21.01.2016 & 22.01.2016 are attached as annexure "H").
- I) That the appellant seeks permission of this Hon'ble Court/Tribunal to rely any other additional grounds at the time of arguments.

It is, therefore, most humbly prayed that this appeal may kindly be accepted as prayed for in the heading.

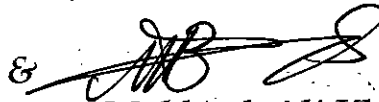
Dated: 30/05/2016



Appellant

Through

Zia-Ud-Din Khan



Mahboob Ali Khan khalil

Advocate,

High Court Peshawar

**BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR**

Misc. Application No. _____/2016

Bibi Sultania.....*Appellant*

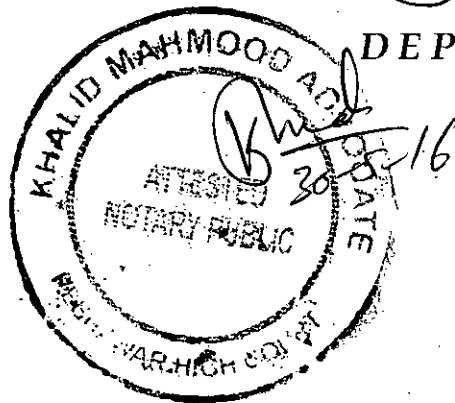
Versus

Secretary Health KPK and Others.....*Respondents*

AFFIDAVIT

I, Bibi Sultania Instructor Public Health School Phase V Hayat Abad Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

DEPONENT



BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Misc. Application No. _____/2016

Bibi Sultania.....Appellant

Versus

Secretary Health KPK and Others.....Respondents

APPLICATION FOR INTERIM RELIEF TO THE
EFFECT THAT TILL THE FINAL DISPOSAL OF
THE INSTANT APPEAL THE OPERATION OF
THE IMPUGNED ORDER DATED 06/05/2016,
MAY KINDLY BE SUSPENDED BY
MAINTAINING STATUS QUO.

Respectfully Sheweth;

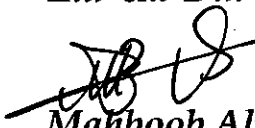
- 1) That the appellant/applicant has filed the accompanied appeal in this Hon'ble Court/Tribunal, wherein no date has yet been fixed.
- 2) That there is a good prima facie case in favour of the appellant/applicant and the balance of convenience is also tilted in his favour.
- 3) That if the interim relief as prayed for has not been granted, the applicant will suffer irreparable loss and the instant appeal will become infructuous.

It is, therefore, prayed that on acceptance of this application the relief prayed for may kindly be granted and the Status Quo be maintain.

Appellant
Through

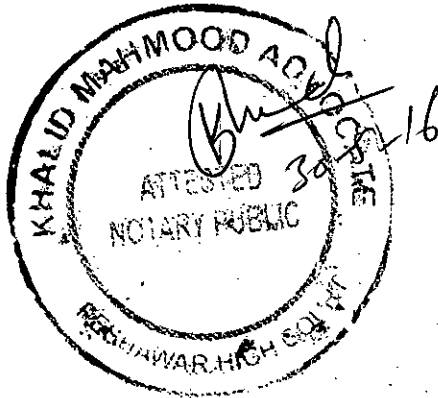
Zia-Ud-Din Khan

&


Mahboob Ali Khan khalil
Advocate,
High Court Peshawar

AFFIDAVIT:

I, *Bibi Sultania*, do hereby solemnly affirm and declare on oath that the contents of the above "**Application**" are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court/Tribunal.




DEPONENT

**BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR**

Misc Application No. _____/2016

Bibi Sultania.....Appellant

Versus

Secretary Health KPK and Others.....Respondents

ADDRESSES OF PARTIES

APPELLANT

Bibi Sultania Instructor
Public Health School Phase V Hayat Abad Peshawar

RESPONDENTS

1. The Secretary Health KPK Peshawar.
2. The Director Provincial Health Services Academy, (Dowran Pur) Peshawar, KPK.
3. The Principal Public Health School Phase- V, Hayatabad Peshawar.
4. Dr. Shabnam Khawas WMO, HMC, Hayatabad Peshawar

Appellant

Through

Zia-Ud-Din Khan

&

Mahboob Ali Khan khalil

Advocate,
High Court Peshawar



NOTIFICATION

**GOVT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

Dated Peshawar the 06th May, 2016

No. SOH-III/8-89/2015. Mst. Bibi Sultania, Head Nurse (BS-17) working against the post of Instructor (BS-17), Public Health School, Hayatabad Peshawar is hereby transferred to Police Services Hospital, Peshawar against the vacant post of Head Nurse (BS-17) with immediate effect in the public interest.

2. The transfer of the above named Head Nurse is made on account of the fact that she does not possess the relevant qualification to be adjusted/posted against the post of Sister Tutor/Instructor as per Pakistan Nursing Council Rules (PNC), i.e. Diploma in Ward Administration and Teaching Administration which is mandatory for the post of Sister Tutor/Instructor.

SECRETARY HEALTH

Endst even No & date.

Copy forward to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director, Provincial Health Services Academy, Peshawar.
3. The Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
4. Medical Superintendent, Police Services Hospital, Peshawar.
5. Principal, Public Health School, Hayatabad Peshawar.
6. PS to Secretary Health, Khyber Pakhtunkhwa.
7. Master File.
8. Head Nurse concerned.

(MUHAMMAD TARIQ)
SECTION OFFICER-III

*4-M
9-5-16
Attested
to be true
copy*

07



12

**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

Dated Peshawar the 18th May 2016

NOTIFICATION

No.SO(H)E-II/4-1/2016. The Competent Authority is pleased to transfer Dr. Shabnam Khawas WMO (BS-17) from Hayatabad Medical Complex Peshawar to Public Health School Hayatabad against the vacant post of Instructor (BS-17) with immediate effect in the public interest.

**SECRETARY HEALTH
HEALTH DEPARTMENT**

Endst of even No. and Date.

Copy to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
3. Hospital Director HMC Peshawar.
4. Director PHSA Khyber Pakhtunkhwa.
5. Principal Public Health School Hayatabad Peshawar.
6. Deputy Director (IT) Health Department.
7. Coordinator HSRU, Health Department.
8. PS to Minister for Health Khyber Pakhtunkhwa.
9. PS to Secretary Health, Khyber Pakhtunkhwa.
10. PA to Deputy Secretary-I, Health Department.
11. Doctor concerned.

*Attested to
be true copy*

[Signature]

[Signature]
Section Officer (E-II) 18/5/16

The Secretary Health
Khyber Pakhtunkhwa
Peshawar.

SUBJECT:

**DEPARTMENTAL APPEAL FOR THE
CANCELATION OF TRANSFER ORDER DATED
06/05/2016 OF BIBI SULTANIA INSTRUCTOR
PUBLIC HEALTH SCHOOL, HAYATABAD,
PESHAWAR.**

Respected Sir,

1. That the appellant was deputed under the letter No. SOH,III/3-5/10 dated 07/08/2010 on the requisition of Principal Public Health School Hayatabad, Peshawar, through letter No. 8960 PHS/A/F-259 dated 03/08/2010.

That as such the appellant was receiving their salary from the office of Directorate of PHS/A due to non availability of requisite post of BPS-17.

3. That in the Public Health School the Finance Department sanctioned a new post of Instructor and therefore, the Director PHS/A issue order through

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(13)

18.5.16
5031

(13)

letter No. 3787-93 dated 31/07/2015 in favour of the appellant and was posted her on the newly sanction post accordingly.

4. That the appellant submitted her charge report, the principal did obeyed the order rather made negative correspondence. (Copy of record is available in this office).

5. That the appellant then filed appeal against the principal before this Office as well as before the Provincial Inspection Team for the implementation of the said order in favour of the appellant.

6. That on the acceptance of the appeal, the Secretary Health KPK Peshawar issued order 237-41 dated 22/01/2016 but the principal did not honoured its order hence, the Secretary Health KPK Peshawar issued a notification No. SOH-III/8-89/2015 dated 27/01/2016 in the favour of the appellant for the implementation of the said order along with the explanation called from the principal.

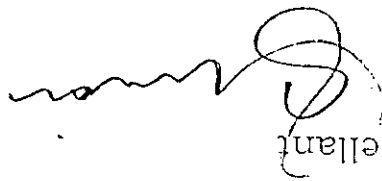
7. That PIT Chairman in the initial stage of inquiry stated to the appellant, that he would be unable to do justice in between the appellant and the principal, therefore, the appellant had moved application for withdrawal of complaint filed against the principal but even then the Chairman of PIT has not stopped the proceeding on the complaint and deliberately and willingly favour the principal and shown undue favour while supported the illegal stance of the principal which was not the subject matter before the Chairman PIT, KPK.

8. That according to the parameter and criteria of the PIT no teacher/ instructor of Public Health can fulfill the eligibility while it is not applicable on the appellant but even then the appellant was targeted because the appellant submitted application for withdrawal of the complaint as appellant was lost her trust and appellant also filed complaint before the Director Anti Corruption against the Principal Public Health School and her husband Mehboob Ali Khan Advocate also remained contested Advocate against the Principal Public Health School.

9. That the office was required to implement legal and lawful order along with the notification and also to issue and release the salary of the appellant from November 2015 till date rather this office was issued a transfer order which is the violation of existing rules and laws passed by this office.

It is, therefore, most humbly requested that on acceptance of this departmental appeal, the transfer order may kindly be cancelled according to existing rules and laws of this office and also implement the order of this office with the direction to sign the charge report and release the salary of the appellant to avoid litigation.

Appellant



Bibi Sultania
Instructor Public Health School
Phase-5, Hayatabad, Peshawar

Dated: 09/05/2016

16



(17)
GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

No.SOH-III/8-89/2015

Dated 26.05.2016

To

Bibi Sultania
Head Nurse(BS-17)
Police & Service Hospital,
Peshawar.

Subject: **Departmental Appeal for the cancellation of Transfer Order dated 6.5.2016 of Bibi Sultania Instructor Public Health School, Hayatabad, Peshawar.**

Reference to the subject noted above regarding departmental appeal for the cancellation of transfer order dated 6.5.2016 has been examined and rejected on the ground that you do not possess the relevant qualification to be adjusted/posted against the post of Sister Tutor/Instructor as per Pakistan Nursing Council Rules (PNC) i.e Diploma in Ward Administration and Teaching Administration which is mandatory for the post of Sister Tutor/Instructor.


Section Officer-III

Endst. Of even number date.

Copy forwarded to:

1. DGHS Khyber Pakhtunkhwa.
2. Principal, Public Health School, Hayatabad, Peshawar.
3. P.S to Secretary Health, Khyber Pakhtunkhwa.


Section Officer-III

*Attested
to be true
copy*

14



GOVT. OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT
No. SOH-III/8-89/2015(Bibi Sultania)
Dated the Peshawar 15th February, 2016

To

The Secretary,
Provincial Inspection Team,
Khyber Pakhtunkhwa.

SUBJECT: INQUIRY INTO APPLICATION OF MST. BIBI SULTANIA FOR
RELEASE OF HER SALARY.

I am directed to refer to your letter No. 8259/INSP/05/PIT/2016 dated: 04-02-2016 on the subject noted above and to state that Mst. Bibi Sultania Head Nurse BS-17 has been adjusted against the vacant post of Instructor BS-17 (without changing her cadre) as the Health Department is short of Nursing Instructors.

Moreover, the rules & regulations laid down by Pakistan Nursing Council (PNC) are specifically related to Nursing School while the said official has been adjusted in the Public Health School not Nursing School.

There are no specific rules regarding posting of Instructor in Public Health School where LHV's are being trained.

It is further added that the above cited official is having Masters in Public Health (MPH) implying that she is well qualified for teaching at the Public Health School.

It is pertinent to mention that currently certain changes have been made in the service rules of Nurses wherein the Masters in Public Health has been included as a pre-requisite qualification (which is under process) in Health Department.

Endst: of even no & date.

Copy forwarded to:-

PS to Secretary Health, Khyber Pakhtunkhwa.

(Muhammad Tariq)
Section Officer-III

Section Officer-III

18

TIME TABLE CMW STUDENTS (SESSION 2016-17)
PUBLIC HEALTH SCHOOL HAYATABAD PESHAWAR

Days Time	8:00- 8:30	8:30- 9:30	9:30- 10:30	10:30 - 11:30	11:30 - 12:00	12:00 - 01:00	01:00 - 2:00
Monday	Assembly	Ms. Shamim	Ms. Razia	Ms. Rehmat	Break	Ms. Gulshan	Ms. Shamim
Tuesday		Ms. Shamim	Dr. Shaima	Ms. Razia		Ms. Shamim	Ms. Gulshan
Wednesday		Ms. Shamim	Dr. Shaima	Ms. Razia		Ms. Rehmat	Ms. Gulshan
Thursday		Ms. Shamim	Ms. Razia	Ms. Gulshan		Ms. Rehmat	Ms. Razia
Friday		Ms. Razia	Ms. Shamim	Ms. Rehmat		CLOSED	CLOSED
Saturday		Ms. Shamim	Dr. Shaima	Ms. Gulshan		Ms. Razia	Ms. Shamim

Class Teacher

Ms. Razia

[Handwritten Signature]
24/10

16

TIME TABLE LHV 1st YEAR STUDENTS (SESSION 2016-18)
PUBLIC HEALTH SCHOOL HAYATABAD PESHAWAR

Days Time	8:00- 8:30	8:30- 9:30	9:30- 10:30	10:30 - 11:30	11:30 - 12:00	12:00 - 01:00	01:00 - 2:00
Monday	Assembly	English	Ms. Gulshan	Dr. Safia	Break	Dr. Shaima	Ms. Rehmat
Tuesday		English	Ms. Gulshan	Dr. Safia		Dr. Shaima	Ms. Rehmat
Wednesday		English	Ms. Gulshan	Dr. Shaima		Dr. Safia	Ms. Rehmat
Thursday		English	Ms. Gulshan	Dr. Safia		Dr. Shaima	Ms. Rehmat
Friday		English	Ms. Gulshan	Dr. Shaima		CLOSED	CLOSED
Saturday		English	Ms. Gulshan	Dr. Safia		Dr. Shaima	Ms. Rehmat

Class Teacher

Ms. Rehmat

[Handwritten Signature]
24/10

17

TIME TABLE LHV 2nd YEAR STUDENTS (SESSION 2016-18)
PUBLIC HEALTH SCHOOL HAYATABAD PESHAWAR

Days Time	8:00- 8:30	8:30- 9:30	9:30- 10:30	10:30 - 11:30	11:30 - 12:00	12:00 - 01:00	01:00 - 2:00
Monday	Assembly	Ms. Rehmat	English	Dr. Shaima	Break	Dr. Safia	Ms. Gulshan
Tuesday		Ms. Rehmat	English	Dr. Shaima		Ms. Gulshan	Dr. Safia
Wednesday		Ms. Gulshan	English	Dr. Safia		Dr. Shaima	Ms. Rehmat
Thursday		Ms. Rehmat	English	Dr. Shaima		Dr. Safia	Ms. Gulshan
Friday		Ms. Rehmat	English	Dr. Safia		CLOSED	CLOSED
Saturday		Ms. Rehmat	English	Dr. Shaima		Dr. Safia	Ms. Gulshan

Class Teacher

Ms. Gulshan

[Signature]
24/10/2016

Dr Shamina Malik

(18)

Accounts Office of PP Peshawar
PAYROLL DIVISION
For the month of October, 2016

Page 1,407
Date 20.10.2016

Code	Description	Amount
1001	Basic Allowance	5,000.00
1026	Dress/Uniform Allow	2,100.00
1097	House Allowance	5,000.00
1047	Medical Allow 15% (I)	2,401.00
1048	Adhoc Allowance 2010	5,405.00
1985	Health Professional	19,000.00
2140	15% Adhoc Relief All	1,280.00
2199	Adhoc Relief Allow 0	900.00
2211	Adhoc Relief All 201	4,474.00
5011	Adj Conveyance Allow	50,000.00
5012	Adj Medical & Dental	24,010.00
5010	Adj Dress/Uniform All	21,000.00
5015	Adj House Allowance	55,000.00
5007	Adj 15% Adhoc Allow	30,720.00
5001	Adj Basic Pay	307,510.00
5070	Adj Adhoc Allowance	64,050.00
5020	Adj Health Prof. All	55,000.00
5050	Adj Adhoc Relief All	17,920.00
5064	Adj Adhoc Relief All	25,361.00
5075	Adj Adhoc Relief All	13,422.00

3017	CPF Subscription - Rs	2,870.00-
4001	Adj Benevolent Fund	2,500.00-
3004	Adj Group Insurance	7,300.00-
6075	Adj CPF	20,930.00-
5105	Adj Adh Group Insur	250.00-
3501	Benevolent Fund	250.00-
3609	Income Tax	9,767.00-

CPF#: 000001977
INCOME TAX 97,906.55
9,767.00
31,878.00
70,138.24

PAYMENTS 698,119.00 DEDUCTIONS 46,945.00 NET PAY 791,174.00
Branch Code: 250845 PDA Complex Hayatabad ALLIED BANK LIMITED PDA Complex Hayatabad Peshawar
01.10.2016 31.10.2016
Accont. No: 64149

00405047 DR. SHAMINA MALIK CHIC: 1730112074214 Desig: INSTRUCTOR (00215492) Grade: 17 N/A
P A Y M E N T S A M O U N T D E D U C T I O N S A M O U N T LEAVE/FUND Booklet No.: PRINCIPAL
Sazette/Non-Sazette: 0
REPAID BALANCE

0001	Basic Pay	31,230.00
1001	House Rent Allowance	4,433.00
1010	Convey Allowance 20	5,000.00
1030	Non - Practising All	3,000.00
1047	Medical Allow 15% (I)	1,477.00
1048	Adhoc Allowance 2010	4,925.00
1985	Health Professional	42,000.00
2140	15% Adhoc Relief All	920.00
2199	Adhoc Relief Allow 0	634.00
2211	Adhoc Relief All 201	3,123.00

3017	CPF Subscription - Rs	3,579.00-
3501	Benevolent Fund	250.00-
4004	R. Benefits & Death C	900.00-
3609	Income Tax	4,633.00-

CPF#: 000001977
INCOME TAX 55,590.36
10,532.00
152,361.00
37,059.96

PAYMENTS 96,742.00 DEDUCTIONS 9,362.00 NET PAY 87,380.00
Branch Code: 220404 University Campus, Peshawar. HABIB BANK LIMITED University Campus, Peshawar. PESHAWAR
01.10.2016 31.10.2016
Accont. No: 0404700000003

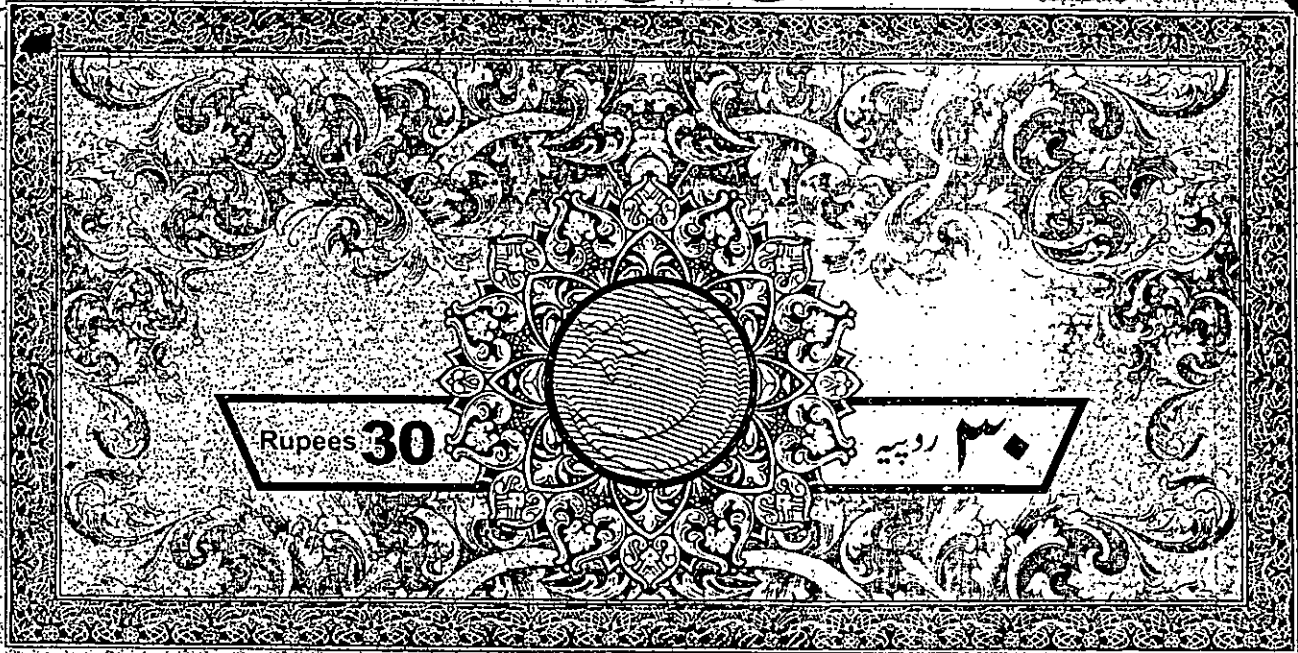
00406255 ABID AKHTAR HASSAN CHIC: 1730102744825 Desig: COMPUTER OPERATOR (00448652) Grade: 16 N/A
P A Y M E N T S A M O U N T D E D U C T I O N S A M O U N T LEAVE/FUND Booklet No.: PRINCIPAL
Sazette/Non-Sazette: 0
REPAID BALANCE

0001	Basic Pay	18,440.00
1010	Convey Allowance 20	5,000.00
1500	Computer Allowance	750.00
1047	Medical Allow 15% (I)	1,500.00
1048	Adhoc Allowance 2010	2,642.00
2140	15% Adhoc Relief All	550.00
2199	Adhoc Relief Allow 0	373.00
2211	Adhoc Relief All 201	1,844.00
5011	Adj Conveyance Allow	207.00
5001	Adj Basic Pay	2,693.00
5075	Adj Adhoc Relief All	276.00

3010	CPF Subscription - Rs	2,806.00-
3501	Benevolent Fund	250.00-
3620	House Rent Deduction	922.00-

CPF#: 406259
126,574.00

PAYMENTS 34,275.00 DEDUCTIONS 4,628.00 NET PAY 29,647.00
Branch Code: 090064 PESHAWAR CITY PAYMENT THROUGH BANK PESHAWAR CITY PESHAWAR
01.10.2016 31.10.2016
Accont. No: 01899039



BEFORE THE ACCOUNTANT GENERAL KPK PESHAWAR
AFFIDAVIT

I **Bibi Sultania W/o Mehbub Ali Khan R/o Street-3/ C-1 House No.178 Phase 5 Hayatabad Peshawar** Do hereby solemnly affirm and declare on oath that I was transferred on dated 31/07/2016 from PHSA Duran Pur Peshawar to public health School Phase 5 Hayatabad by the competent authority on the newly created seat of Instructor BPS-17.

On the bases of said order I submitted my arrival report hence assume the charge to the principal concerned however due to personal grudge and ill will, the principal of the public health school phase 5 Hayatabad has not signed my arrival report and for the said reason this office has not released my salary since Nov 2015 till date for which I am legally entitled because I am attending my duty regularly and have made no concealment of fact and in case I found incorrect or not entitled for the said salary this office is empowered for the recovery of my above salary.

Therefore I submit this affidavit to this office which is correct and correctly bears my signature.

ATTESTED
DAWOOD KHAN ADVOCATE
NOTARY PUBLIC
Date _____
High Court Peshawar
06 OCT 2016

DEPONENT
BIBI SULTANIA

Dated 06/10/2016

(21)



GOVT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 06th May, 2016

NOTIFICATION

No. SOH-III/8-89/2015. Mst. Bibi Sultania, Head Nurse (BS-17) working against the post of Instructor (BS-17), Public Health School, Hayatabad Peshawar is hereby transferred to Police Services Hospital, Peshawar against the vacant post of Head Nurse (BS-17) with immediate effect in the public interest.

2. The transfer of the above named Head Nurse is made on account of the fact that she does not possess the relevant qualification to be adjusted/posted against the post of Sister Tutor/Instructor as per Pakistan Nursing Council Rules (PNC), i.e Diploma in Ward Administration and Teaching Administration which is mandatory for the post of Sister Tutor/Instructor.

SECRETARY HEALTH

Endst even No & date.

Copy forward to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director, Provincial Health Services Academy, Peshawar.
3. The Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
4. Medical Superintendent, Police Services Hospital, Peshawar.
5. Principal, Public Health School, Hayatabad Peshawar.
6. PS to Secretary Health, Khyber Pakhtunkhwa.
7. Master File.
8. Head Nurse concerned.

*Seen
file
4/5/2016*

(MUHAMMAD TARIQ)
SECTION OFFICER-IV

22

Office of the Principal PHS Hayatabad Peshawar

No.16/PHS-H/Admission/2016-17/

Dated: 08/12/2016

Phone No. 091-9217353

Fax No. 091-9217342

E-mail: phshayatabad98@yahoo.com

L.No. 22878
Date 26/12/16
Secretary Health

To:

The Secretary
Health Department
Government of Khyber Pakhtunkhwa
Peshawar.


Subject: **ADVICE**

Reference notification No. SO(H)E-II/4-1/2016 dated 2nd June 2016 as regard the posting orders of Mst. Sultania, Head Nurse (BS-17) (under transfer to Services Hospital Peshawar) I would like to request for your advice on the following grounds

- 1- Reference Notification No. SOH-III/8-89/2015 dated 6th May 2015 (Copy attached at Flag-A) in which it is clearly mentioned that Mst. Sultania does not fulfill the criteria for being an Instructor in Public health School Hayatabad as per PNC criteria
- 2- In the notification dated 2nd June 2016 it is mentioned that "in pursuance of judgment passed by Hon'able Khyber Pakhtunkhwa Service Tribunal in appeal No. 579/2016" while it is not so, the case is still sub judged in Service Tribunal and only stay has been given but no judgment (Copy attached at Flag-B)
- 3- Sultana has unofficially joined North West Institute for postgraduate studies i-e; Post RN without prior permission from the government.

Taking into consideration it is requested to kindly give me advice as regard acceptance of her **Arrival Report** and moreover about her permission for continuation of post graduate studies

Dated: 26-12-2016


Dr Obaid Ur Rahman
Principal Public Health School
Hayat Abad

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Re discussion.
Sof*

*See comments
from D6 PHS A.
S.O E/111
steno
27/12*

POWER OF ATTORNEY

In the Court of KPK Service Tribunal Peshawar

BiBi Sultana } For
} Plaintiff
} Appellant
} Petitioner
} Complainant

VERSUS

The secretary Health KPK Peshawar } Defendant
} Respondent
Respondent No 3 } Accused

Appeal/Revision/Suit/Application/Petition/Case No. 579 of 2016
Fixed for _____

I/W, the undersigned, do hereby nominate and appoint

ZARTAJ ANWAR ADVOCATE, my true and lawful attorney, for me in my same and on my behalf to appear at _____ to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions. An appeal, statements, accounts, exhibits. Compromise or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or sub-poena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

IN WITNESS whereof I/we have hereto signed at _____
the _____ day to _____ the year _____
Executant/Executants _____
Accepted subject to the terms regarding fee _____

Zartaj Anwar
Advocate High Courts

ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT
FR-3-4, Fourth Floor, Bilour Plaza, Saddar Road, Peshawar Cantt
Ph.091-5272154 Mobile-0331-9399185

10	ایڈووکیٹ: <u>Asif Ghalibai, R/A</u>	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
	بار کونسل ایسوسی ایشن نمبر:	96253
	رابطہ نمبر:	

Service Tribunal Peshawar

بعدالت جناب:

منجانب: <u>سائلہ</u>	دعویٰ:
کی بی سلطانیہ	علت نمبر:
بنام	مورخہ:
سیلوی ڈیپارٹمنٹ	جرم:
	تھانہ:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام سیلوی ڈیپارٹمنٹ کیلئے محمد آصف بھٹو کو وکیل 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 و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زیریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ 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 وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 10. 7. 17

العبد _____ وَاَوَّاهُ شَدَّ العبد _____

مقام سیلوی ڈیپارٹمنٹ کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی ذمہ داری نا قابل قبول ہوگی۔

EXTRAORDINARY
GOVERNMENT



REGISTERED NO. PIII
G A Z E T T E

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, TUESDAY, 10TH MAY, 2016

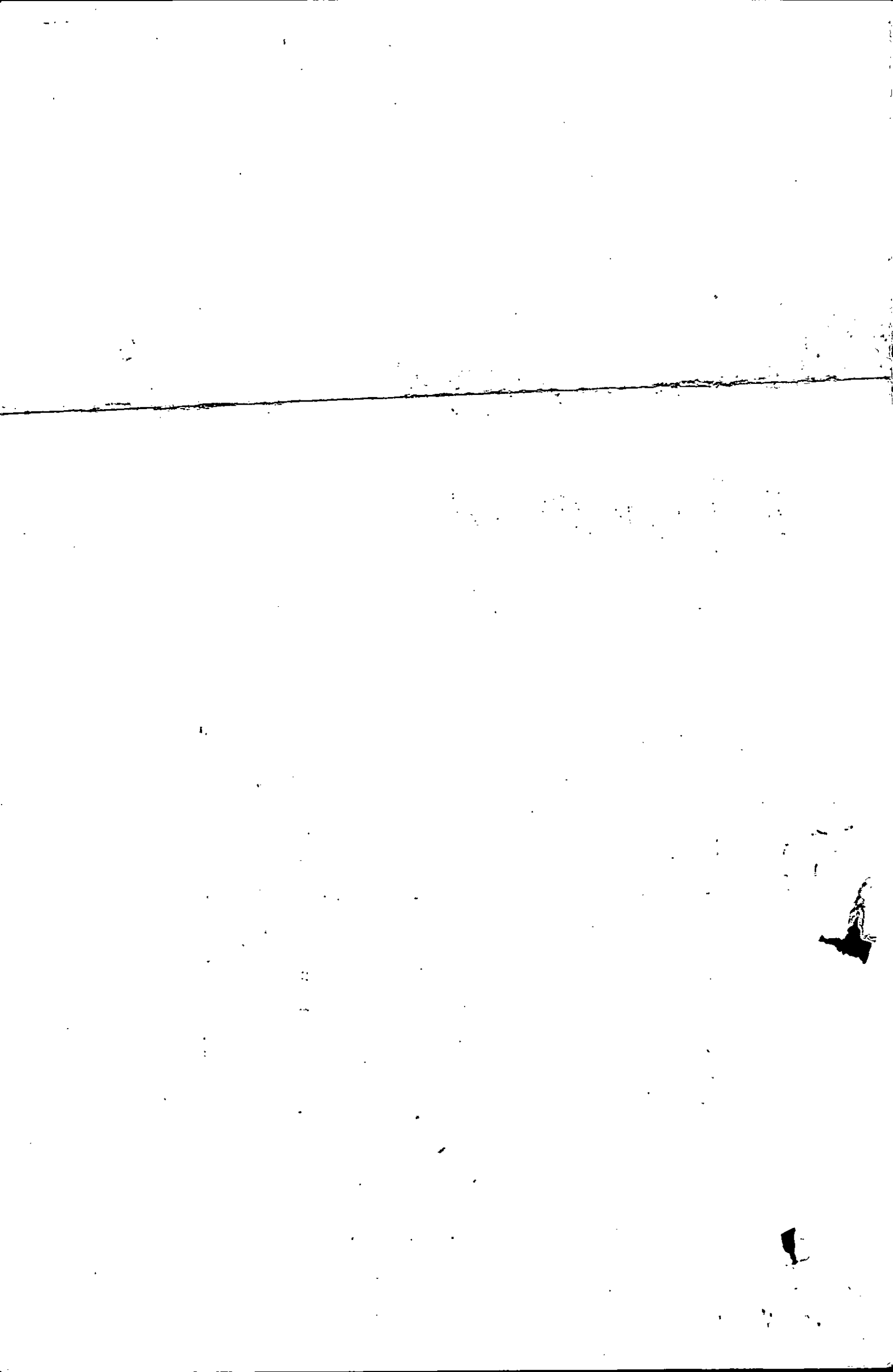
GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

NOTIFICATION

Peshawar dated the 10th May 2016.

*Attached
to be filed
copy*

No.SOH-III/3-5/2014 -In pursuance of the provision contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa, Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all Notifications issued in this behalf, the Health Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualification and other conditions specified in column 3 to 5 of the Appendix to the posts of Nursing Staff in the Health Department specified in column 2 of the said Appendix.



APPENDIX

S. No.	Nomenclature of the post.	Qualification for appointment by initial recruitment.	Age limits.	Method of recruitment.
1	2	3	4	5
1	Principal.			By promotion, on the basis of seniority - cum- fitness, from amongst the Chief Nursing Superintendent, Vice Principals and Nursing Tutors with at least twelve years service in BPS-17 and above.
2	Chief Nursing Superintendent/ Vice Principal / Nursing Tutor.			By promotion, on the basis of seniority -cum-fitness, from amongst the post of Nursing Superintendents and Nursing Instructors with at least five years service as such. Note: Joint seniority list of the Nursing Superintendents and Nursing Instructors shall be maintained for the purpose of promotion.
3	Nursing Superintendent/ Nursing Instructor.	(i) At least Second Class M.Sc. Nursing or equivalent qualification from a recognized University; or Post Registered B.Sc Nursing and Master's Degree in Public Health (MPH) or equivalent qualification from recognized University; or Diploma in Ward Administration and Diploma in Teaching Administration or equivalent qualification from recognized University; and (ii) Registered with Pakistan Nursing Council with at least five years experience as Head Nurse excluding training period.	25 to 40 Years.	(a) Seventy five percent by promotion, on the basis of seniority-cum-fitness, from amongst the Head Nurses with at least two year service as such; and (b) twenty five percent by initial recruitment.

4	Head Nurse.	<p>(i) Post Registered B.Sc Nursing registered with Pakistan Nursing Council; or</p> <p>(ii) Diploma in ward administration and Diploma in Teaching administration registered with Pakistan Nursing Council; or</p> <p>(iii) B.Sc Nursing Four years degree, with three years Clinical experience duly registered with Pakistan Nursing Council Excluding training period having experience from the public sector hospital or private teaching hospital or private hospital registered with the Khyber Pakhtunkhwa Health Care Commission.</p>	25 to 38 Years.	<p>(a) Seventy five percent by promotion, on the basis of seniority-cum fitness, from amongst the Charge Nurses possessing Post Registered B.Sc Nursing or Diploma in Ward Administration and Teaching Administration and with at least two years service as such.; and</p> <p>(a) twenty five percent by initial recruitment.</p>
5	Charge Nurse	<p>(i) B.Sc Nursing four years Degree; or Diploma in General Nursing and one year specialized post basic Diploma; and</p> <p>(ii) equal for both male and female candidates duly registered with Pakistan Nursing Council.</p>	21 to 35 Years.	By initial recruitment.

**SECRETARY TO
GOVERNMENT OF THE KHYBER PAKHTUNKHWA,
HEALTH DEPARTMENT.**

Printed and published by the Manager,
Staty. & Ptg. Deptt., Khyber Pakhtunkhwa, Peshawar

Deputy Secretary-II

35

APPENDIX

S. No.	Nomenclature of the post.	Qualification for appointment by initial recruitment.	Age limits.	Method of recruitment.
1	2	3	4	5
1	Principal.			By promotion, on the basis of seniority -cum- fitness, from amongst the Chief Nursing Superintendent, Vice Principals and Nursing Tutors with at least twelve years service in BPS-17 and above.
2	Chief Nursing Superintendent/ Vice Principal / Nursing Tutor.			By promotion, on the basis of seniority -cum-fitness, from amongst the post of Nursing Superintendents and Nursing Instructors with at least five years service as such. Note: Joint seniority list of the Nursing Superintendents and Nursing Instructors shall be maintained for the purpose of promotion.
3	Nursing Superintendent/ Nursing Instructor.	(i) At least Second Class M.Sc. Nursing or equivalent qualification from a recognized University; or Post Registered B.Sc Nursing and Master's Degree in Public Health (MPH) or equivalent qualification from recognized University; or Diploma in Ward Administration and Diploma in Teaching Administration or equivalent qualification from recognized University; and (ii) Registered with Pakistan Nursing Council with at least five years experience as Head Nurse excluding training period.	25 to 40 Years.	(a) Seventy five percent by promotion, on the basis of seniority-cum-fitness, from amongst the Head Nurses with at least two year service as such; and (b) twenty five percent by initial recruitment.



PAKISTAN NURSING COUNCIL

(NATIONAL INSTITUTE OF HEALTH)

CHAK SHEHZAD

ISLAMABAD

Annex-IV

NO. PNC-11-Admin/2015 - *2785*

DATE December 3, 2015

117
Principal,
Public Health School,
Hayatabad, Peshawar.

Subject: **INQUIRY ABOUT PAKISTAN NURSING COUNCIL'S CRITERIA FOR CLINICAL INSTRUCTOR (BPS-17) IN PUBLIC HEALTH SCHOOLS.**

With reference to your letter No. 66/PHS-H-A/PNC/2015-16/2162 dated 27.11.2015 on the subject noted above, qualifications and selection criteria for clinical instructor have been tabulated below.

Category - I	Category - II
<ul style="list-style-type: none">▪ Dip in Nursing 03 year▪ Dip in Midwifery 01 year▪ Dip in Ward Administration / Diploma in Nursing Administration 01 year▪ Dip in Teaching Administration / Diploma in Nursing Education 01 year <p>Total period for Nursing Education = 06 years</p>	<ul style="list-style-type: none">▪ Dip in Nursing 03 year▪ Dip of Midwifery 01 year▪ Post RN BS-N 02 year <p>Total period = 06 years for Nursing Education</p>
<p><u>Experience:</u></p> <ul style="list-style-type: none">○ 05 years clinical experience○ Candidate should have active/valid PNC registration	<p><u>Experience:</u></p> <ul style="list-style-type: none">○ 03 years Clinical experience○ Candidate should have active/valid PNC registration
<p>▪ Note: 02 year Post RN BS-N is equal to the Diploma in Teaching Administration and Diploma in Ward Administration.</p>	

List of Clinical specialty Diploma is as under:

<ul style="list-style-type: none">▪ Operation Theater Nursing▪ Mental Health Nursing▪ Community Health Nursing▪ Pediatric Nursing▪ Nephrology (Renal Nursing)	<ul style="list-style-type: none">▪ Coronary Care Nursing.▪ Psychiatric Nursing▪ Intensive Care Nursing▪ Ophthalmic Nursing▪ Anesthesia	<ul style="list-style-type: none">▪ Accident and Emergency Nursing▪ Oncology Nursing▪ Cardiac Nursing
---	---	---

*See file for record
12/12/2015*

Ju
Nighat I. Durrani
Registrar PNC



14

GOVT. OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT
No. SOH-III/8-89/2015(Bibi Sultania)
Dated the Peshawar 15th February, 2016

M
11-7-17

To.

The Secretary,
Provincial Inspection Team,
Khyber Pakhtunkhwa.

**SUBJECT: INQUIRY INTO APPLICATION OF MST. BIBI SULTANIA FOR
RELEASE OF HER SALARY.**

I am directed to refer to your letter No. 8259/INSP/05/PIT/2016 dated: 04-02-2016 on the subject noted above and to state that Mst. Bibi Sultania Head Nurse BS-17 has been adjusted against the vacant post of Instructor BS-17 (without changing her cadre) as the Health Department is short of Nursing Instructors.

Moreover, the rules & regulations laid down by Pakistan Nursing Council (PNC) are specifically related to Nursing School while the said official has been adjusted in the Public Health School not Nursing School.

There are no specific rules regarding posting of Instructor in Public Health School where LHV's are being trained.

It is further added that the above cited official is having Masters in Public Health (MPH) implying that she is well qualified for teaching at the Public Health School.

It is pertinent to mention that currently certain changes have been made in the service rules of Nurses wherein the Masters in Public Health has been included as a pre-requisite qualification (which is under process) in Health Department.

(Muhammad Tariq)
Section Officer-III

Endst: of even no & date.

Copy forwarded to:-

PS to Secretary Health, Khyber Pakhtunkhwa.

Section Officer-III



PAKISTAN NURSING COUNCIL

(NATIONAL INSTITUTE OF HEALTH)

CHAK SHEHZAD

ISLAMABAD

NO. PNC/11- PNC-admin/2015-743

DATE May13, 2015

Eligibility Conditions for Appointment of Faculty for

College of Nursing

North West Coll. Peshawar

Nursing Lecturer

Minimum
Qualification

- RN, RM with Post RN :
 - 2 Years post degree experience preferably in administration
- BSN:
 - Post Internship 3 Years experience. Administration experience preferred.

Assistant Professor

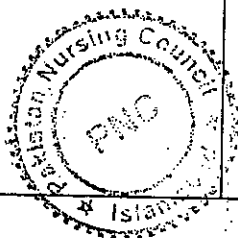
Minimum
Qualification

- RN, RM with Post RN, MSN, MsPH:
 - 3-5 Years Experience. Teaching and administration Experience
 - Minimum 2 Publications in any recognized Nursing Journal/Health Sciences Journal (with at least 1 of these publications in last 2 years)
 - Valid PNC license
- BSN, MSN, MsPH:
 - 3-5 Years experience. Teaching and administration experience preferred
 - Minimum 2 Publications in any recognized Nursing Journal/Health Sciences Journal (with at least 1 of these publications in last 2 years)
 - Valid PNC license

Associate Professor

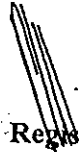
Minimum
Qualification

- RN, RM with Post RN, MSN, MsPH, MPhil in Health Education in HEC recognized Institute:
 - 5 - 8 Years Experience. Teaching and administration Experience
 - Minimum 3 Publications in any recognized Nursing Journal/Health Sciences Journal (with at least 1 of these publications in last 2 years)
 - Valid PNC license
- BSN, MSN, MsPH, Mphil in Health Education from any HEC recognized institute:
 - 5-8 Years experience. Teaching and administration experience preferred
 - Minimum 3 Publications in any recognized Nursing Journal/Health Sciences Journal (with at least 1 of these publications in last 2 years)
 - Valid PNC License



Professor	
Minimum Qualification	<ul style="list-style-type: none"> • RN, RM with Post RN, MSN, MsPH, MPhil, PhD in Health Education in HEC recognized Institute: <ul style="list-style-type: none"> ○ 10 years of experience in teaching and administration ○ Minimum 4 publication in any recognized Nursing Journal /Health Sciences Journal (with at least 1 of these publications in last 2 years) • BSN, MSN, MsPH, MPhil, PhD in Health Education in HEC recognized Institute <ul style="list-style-type: none"> ○ 10 years of experience in teaching and administration ○ Minimum 4 publication in any recognized Nursing /Health Sciences Journal (with at least 1 of these publications in last 2 years)




 Registrar
 Pakistan Nursing
 Council



GOVT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 16th January, 2017

NOTIFICATION

No. SOH-III/3-5/2016. The competent authority is pleased to relieve Mst. Bibi Sultania, Head Nurse (BS-17) working as Instructor (BS-17), Public Health School, Hayatabad Peshawar for Professional Development Degree (Post RN) training at North West Institute of Health Science under the umbrella of Khyber Medical University, Peshawar with immediate effect and till completion of said training i.e October, 2018.

2. She will be drawing her salary as Instructor BS-17 at Public Health School, Hayatabad Peshawar.

SECRETARY HEALTH

Endst even No & date.

Copy forward to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director, Provincial Health Services Academy, Peshawar.
3. The Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
4. The Medical Superintendent, Police Services Hospital, Peshawar.
5. The Principal, Public Health School, Hayatabad Peshawar.
6. PS to Secretary Health, Khyber Pakhtunkhwa.
7. Master File.
8. Head Nurse concerned.

(MUHAMMAD TARIQ)
SECTION OFFICER-III

M
11/2/17

3. DOWNGRADATION OF POSTS OF MANAGEMENT CADRE

S#	Name of Institution	Designation	Existing BPS	No. of Posts	FD Downgraded BPS
1	DHQ Abbottabad	Medical Supdt.	20	1	19
2	DHQ Abbottabad	Dy. Medical Supdt.	19	1	18
3	PHS Abbottabad	Principal	20	1	19
4	DHO Bannu	Coordinator	19	1	18
5	DHO Buner	Coordinator	19	1	18
6	DHO D.I.Khan	Coordinator	19	1	18
7	PHS D.I.Khan	from Instructor to Vice Principal	19	1	18
8	DHO Haripur	Coordinator	19	1	18
9	DHQ Haripur (B)	Dy. Medical Supdt.	19	1	18
10	DHO Hangu	Coordinator	19	1	18
11	DHO Karak	Coordinator	19	1	18
12	DHO Kohat	Coordinator	19	1	18
13	DHO Lakki	Coordinator	19	1	18
14	Sarai Naurang Lakki (Cat.-C Hosp.)	from MS to DMS	19	1	18
15	DHO Mardan	Coordinator	19	1	18
16	DHO Nowshera	Coordinator	19	1	18
17	DHO Peshawar	Coordinator	19	1	18
18	Naseerullah Babar Hosp. Pesh.	Medical Supdt.	20	1	19
19	Mental Hosp. Peshawar	Medical Supdt.	20	1	19
20	Mouvi Ameer Shah Hosp. Pesh. ©	Medical Supdt.	20	1	19
21	PHS Hayatabad Pesh.	Principal	20	1	19
22	DHO Swat	Coordinator	19	1	18
23	Saidu Teaching Hosp. Swat	Dy. Medical Supdt.	19	2	18
	Total			24	

4. CONVERSION OF POSTS OF MANAGEMENT CADRE

S#	Name of Institution	Existing Designation	BPS	No. of Posts	Re-designation/ conversion	
1.	DHQ Abbottabad	Dy. Director Admn.	18	1	Dy. Medical Supdt.	
2.	DHDC Abbottabad	Vice Principal	19	1	Dy. Director	
3.	DHQ Battagram	Dy. Director Admn.	18	1	Dy. Medical Supdt.	
4.	DHDC Bannu	Vice Principal	19	1	Dy. Director	
5.	DHQ Buner	Dy. Director Admn.	18	1	Dy. Medical Supdt.	
6.	DG Health Services	Director Health	20	1	Additional DG	
7.	DG Health Services	Director (Admn.)	20	1		
8.	DG Health Services	Dy. Director Public	19	1	Director	
9.	DG Health Services	Dy. Director (EPI)	19	1		
10.	DG Health Services	Dy. Director (RH)	19	1		
11.	DG Health Services	Dy. Director (Admn.)	19	1		
12.	DG Health Services	Dy. Director (Personal)	19	1		
13.	DG Health Services	Assistant Director (PH)	17	2	Deputy Director B-18	
14.	DG Health Services	Assistant Director (PH)	17	1		
15.	DG Health Services	Assistant Director (EPI)	17	2		
16.	DG Health Services	Assistant Director (RH)	17	2		
17.	DG Health Services	Assistant Director (Admn.)	17	1		
18.	DG Health Services	Assistant Director (Admn.)	17	1		
19.	DG Health Services	Assistant Director (Personal)	17	4		
20.	DG Health Services	Assistant Director (Admn.)	17	1		
21.	DG Health Services	Training Coordinator	17	1	Deputy Director	
22.	PHSA	Director	20	1		Director General
23.	PHSA	Dy. Dir. Management	19	1		Director
24.	PHSA	Course Dir. PHCKDC	19	1		
25.	PHSA	Course Dir. Management	19	1		
26.	PHSA	Dy. Director M&R	19	1		
27.	PHSA	Course Dir. MCH	18	1	Deputy Director	
28.	PHSA	Epidemiologist	18	1		
29.	DHQ Charsadda	Dy. Dir. Admn.	18	1	Dy. Medical Supdt.	
30.	DHQ Chitral	Dy. Dir. Admn.	18	1	Dy. Medical Supdt.	
31.	DHDC Chitral	Vice Principal	19	1	Dy. Director	
32.	PMI D.I.Khan	Vice Principal	19	1	Principal	

Handwritten signature/initials

#	Name of Institution	Existing Designation	BPS	No. of Posts	Re-designation/ conversion
33.	DHQ Dir (Upper)	Dy. Dir. Admn.	18	1	Dy. Medical Supdt.
34.	DHO Dir Lower	Dy. Dir. Admn.	18	1	Dy. Medical Supdt.
35.	DHQ Haripur	Dy. Dir. Admn.	18	1	Dy. Medical Supdt.
36.	DHQ Karak	Dy. Dir. Admn.	18	1	Dy. Medical Supdt.
37.	DHQ Kohat	Coordinator	19	1	Dy. Distt. Health Officer
38.	DHQ Kohat	Hospital Doctor	20	1	Medical Superintendent
39.	DHQ Kohat	Dy. Dir. Admn.	18	1	Dy. Medical Supdt.
40.	DHQ Lakki	Dy. Dir. Admn.	18	1	Dy. Medical Supdt.
41.	DHQ Malakand	Dy. Dir. Admn.	18	1	Dy. Medical Supdt.
42.	DHQ Mardan	Dy. Dir. Admn.	18	1	Dy. Medical Supdt.
43.	DHDC Mardan	Vice Principal	19	1	Dy. Director
44.	DHQ Mansehra	Dy. Dir. Admn.	18	1	Dy. Medical Supdt.
45.	PHS Hayatabad Pesh.	Instructor	18	1	Vice Principal
46.	PGPMI LRH Pesh.	Sr. Instructor	19	1	Principal BS-20
47.	DHQ Shangla	Dy. Dir. Admn.	18	1	Dy. Med. Supdt.
48.	Saidu Teach. Hosp.	Director	20	1	Medical Superintendent already converted
49.	Saidu Teach. Hosp.	Director Admn.	19	1	Dy. Med. Supdt.
50.	PMI Swat	Instructor	18	1	Vice Principal
51.	DHDC Swat	Vice Principal	19	1	Dy. Director
52.	DHQ Tank	Dy. Dir. Admn.	18	1	Dy. Med. Supdt.
53.	Maternity Hospital Peshawar	DMS (Female)	18	1	Dy. Med. Supdt.
54.	Public Health School Nishtarabad	Principal PHS (Trg & Research) Peshawar	0	0	Principal PHS Nishtarabad Peshawar
55.	DHO Swat	Dy. DHO Tehsil Swat	0	0	Dy. DHO Swat
	Total			59	

2- The expenditure involved therein will be met out from the sanctioned budget grant of the provincial institution concerned and through Account-IV of the district concerned during current financial year 2016-17.

3- It is pertinent to mention that upgradation of posts of Health Management Cadre will be notified separately.

Yours faithfully,

Mufarrah Shah
(MUFARRIH SHAH)
Budget Officer-VI

Ends of even & date:

- 1 Accountant General Khyber Pakhtunkhwa Peshawar.
- 2 Director General Health Services, Khyber Pakhtunkhwa.
- 3 All Medical Superintendents, Khyber Pakhtunkhwa.
- 4 All District Health Officers, Khyber Pakhtunkhwa.
- 5 All District Accounts Officers concerned.
- 6 Director FMIU, Finance Department.
- 7 Assistant Director HR, Finance Department.
- 8 Master file/concerned files.

Mufarrah Shah
Budget Officer-VI



36
Provincial Health Services Academy

Department of Health
Government of Khyber Pakhtunkhwa
Budhni Road Duranpur Peshawar
☎ 0912650861 / 2264718; Fax: 0912261249 / 2264717
E-mail: info@phsa.edu.pk
Website: www.phsa.edu.pk

on 31/07/15

OFFICE ORDER.

The competent authority is pleased to post/adjust Mst. Sultania Bibi Instructor from Provincial Health Services Academy Peshawar to Public Health School Hayatabad Peshawar, against the vacant post of Instructor BPS-17, with immediate effect, in the best interest of public services.

Note. Proper handing/taken over charge reports should be submitted to this Directorate for record.

--Sd/--
DIRECTOR

No.395/PHSA/Admn./Sister Tutor/2014-15/3787-Q3 Date:31/07/2015.
Copy forwarded to the:

1. Accountant General Khyber Pakhtunkhwa.
2. Director General Health Services Khyber Pakhtunkhwa.
3. Principal, Public Health School Hayatabad, Peshawar.
4. Section Officer-III Health Department Khyber Pakhtunkhwa, Peshawar.
5. Accounts Officer PHSA, Peshawar.
6. PA to Director PHSA, Peshawar.
7. Mst. Sultania Bibi Instructor Public Health School Hayatabad, Peshawar.

Attested to
be true copy

Administrative Officer

(37)

GOVERNMENT OF KHYBER PAKHTUNKHWA
CERTIFICATE OF TRANSFER OF CHARGE

Certified that I, Sultania Bibi

Have this day before noon taken over charge of the office of Instructor, PHS -

Hayatobod with reference to the Order of the Khyber Pakhtunkhwa Government

No. 395/PASA/Adm./S. Tutor/2014-15/3787-93 Dated: 31/07/2015

Transferring Mr.
to

2. Particulars of Cash and Important/Secret/Confidential documents handed over/taken over are noted on the reverse.

Station, Peshawar

Signature of relieved
Government Servant

Designation

Signature of Government
Servant receiving
Charge Sultania Bibi

Date: 01/08/2015

Designation Instructor (BPS-17)
PHS-H/A

Endst. No. 06/PHS-H/A/PAT-Office/2014-15

From

Dated: 01/08/2015

To

- 1. The Accountant-General Khyber Pakhtunkhwa
- 2. Secretary Health Government of Khyber Pakhtunkhwa
- 3. Director General Health Services Khyber Pakhtunkhwa
- 4. Director Provincial Health Services Academy
- 5. Officer Concerned

The charge of the Office of

was transferred from Mr.

to Mr.

on the fore noon of the

**PRINCIPAL
PHS HAYATABAD
PESHAWAR**

Signature

Designation



GOVT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

38

Dated the Peshawar 27th January, 2016

NOTIFICATION.

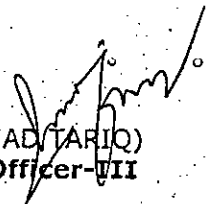
No. SOH-III/8-89/2015. The Competent Authority is pleased to retain Mrs. Bibi Sultania, Head Nurse (BS-17) as Instructor (BS-17) at Public Health School, Hayatabad Peshawar w.e.from 19-01-2016 in the public interest.

**Secretary to Govt. of Khyber Pakhtunkhwa
Health Department**

Endst of even No and Date.

Copy forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa.
3. The Director Provincial Health Services Academy Peshawar.
4. The Principal, Public Health School, Hayatabad Peshawar.
5. The Principal, Post Graduate College of Nursing, Peshawar.
6. PS to Minister for Health, Khyber Pakhtunkhwa.
7. PS to Secretary Health, Khyber Pakhtunkhwa.
8. Officer concerned.
9. Master File.


(MUHAMMAD TARIQ)
Section Officer-III



(39) ~~28~~

**GOVT. OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**
No. SOH-III/8-89/2015(Bibi Sultania/Instructor)
Dated the Peshawar 27th January, 2016

To

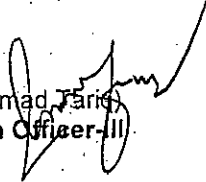
1. Dr. M. Javaid Khan, Director,
Provincial Health Services Academy,
Peshawar.
2. Mrs. Ghazala Zaffar
Principal, Public Health School,
Hayatabad, Peshawar.

SUBJECT: EXPLANATION.

You are hereby directed to explain the following.

- i) Under which rules you have relieved Bibi Sultania, Head Nurse BS-17 while the same does not come under the pervue of your competency.
- ii) You have not honord the direction of the Competent Authority issued vide letter of even number dated: 22-01-2016.

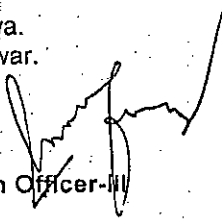
Your reply should reach this deparment within 07 Days positively otherwise disciplinary proceedings will be initiated against you under (E&D) Rules 2011.


(Muhammad Farid)
Section Officer-III

Endst: of even no & date.

Copy forwarded to:-

1. Director General, Health Services Khyber Pakhtunkhwa.
2. PS to Secretary Health, Khyber Pakhtunkhwa, Peshawar.


Section Officer-III



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

No. 106-07 /E.II,
Dated 19/01 /2016.

communications should be	
resented to the Director General	
Health Services Peshawar and no	
ity of	by name
Address	mpdghs@yahoo.com
Office Phone	91-9210269
Exchange	91-9210187, 9210196
fax/#	91-9210230

To:-

The Director
PHSA Peshawar.

Subject: - OFFICE ORDER.
Memo:-

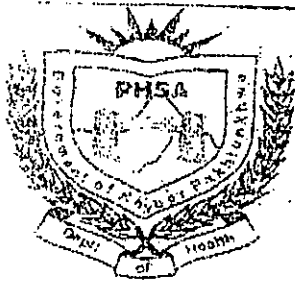
Reference your office order bearing Endst: No. 96 / PHSA / Admn: /P&T Sister Tutor / 2015-16/5593-97, dated 20.11.2015, on the subject noted above and to state that Mrs. Margret Mahi, Charge Nurse (BPS-17) drawing pay against the post of Evaluation Officer (BPS-17) PHSA Peshawar, so please relieve and direct her to report to this Directorate for further posting as there is ban on posting against Ex-cadre post issued vide the Directorate letter No. 9070/Personnel dated 27.08.2015 (Copy attached).

Admitted do be true copy

C.C

DEPUTY DIRECTRESS (NURSING),
DGHS KPK PESHAWAR
18/1

Principal Public Health School Hayatabad Peshawar for information and necessary action.



Provincial Health Services Academy

Department of Health
Government of Khyber Pakhtunkhwa
Budhni Road Duranpur Peshawar
☎ 091-2614223, 2614224 Fax: 0912614360
E-mail: info@phsa.edu.pk
Website: www.phsa.edu.pk

No. 396/PHSA/Admn./P&T Sister Tutor/2015-16/5290-96 Dated: 19-01-2016

To,

The Director General,
Health Services, Govt. of Khyber Pakhtunkhwa,
Peshawar.

Subject: OFFICE ORDER.

Reference your letter no. 106-07/E.II, dated: 19/01/2016 and letter no. 5353-54/E.II, dated: 2/09/2015 on the above cited subject.

Consequent upon the directives of worthy Director General Health Services, Khyber Pakhtunkhwa Peshawar the services of Margret Mahi, Charge Nurse (BPS-16) and Bibi Sultania, Head Nurse (BPS-17) are hereby relieved and their services are placed at the disposal of DGHS-KP for further posting.

-SD/x
DIRECTOR
PROVINCIAL HEALTH SERVICES ACADEMY
PESHAWAR

Copy forwarded to:

1. Principal, Public Health School, Hayatabad Peshawar for information and necessary action.
2. Deputy Directress (Nursing), DGHS, KPK Peshawar.
3. PS to Secretary Health, Govt. of Khyber Pakhtunkhwa, Peshawar.
4. PA to Director PHSA Peshawar.
- ✓ 5. Bibi Sultania, Head Nurse (BPS-17) relieved with the direction to report to DGHS, KP, Peshawar
6. Margret Mahi, Charge Nurse (BPS-16) relieved with the direction to report to DGHS, KP, Peshawar

[Signature]
CO-ORDINATOR
PROVINCIAL HEALTH SERVICES ACADEMY
PESHAWAR

(42)

Office of the Principal PHS Hayatabad Peshawar

No.12/PHS-H/A/PHSA-Office/2015-16/2204-06

Dated: 21/01/2016

Phone No. 091-9217353

E-mail phshayatabad98@yahoo.com

To

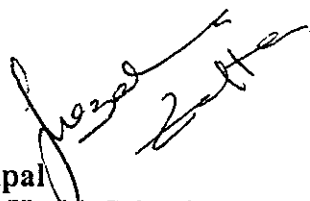
The Director
Provincial Health Services Academy
Khyber Pakhtunkhwa Peshawar

Subject: RELIEVING MRS. BIBI SULTANIA AND MRS. MARGARET MAHI FROM
PUBLIC HEALTH SCHOOL HAYATABAD PESHAWAR

Sir,

Reference to your good office letter No. 396/PHSA/Admn:/P&T Sister
Tutor/2015-16/5290-96 Dated:19/01/2016.

The undersigned is honoured to inform you that both Mrs. Bibi Sultania and
Mrs. Margaret are relieved from Public Health School Hayatabad Peshawar
w.e.f 20/01/2016 and their services are placed at the disposal of DGHS-KP for
further posting.


Principal
Public Health School
Hayatabad Peshawar

Copy forwarded to:-

1. The Director General, Health Services, Khyber Pakhtunkhwa Peshawar
2. Deputy Director Nursing Peshawar
3. Mrs. Margaret Mahi
4. Mrs. Bibi Sultania



42

GOVT. OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT
No. SOH-III/8-89/2015(Bibi Sultania/Instructor)
Dated the Peshawar 22nd January, 2016

The Director,
Provincial Health Services Academy,
Peshawar.

SUBJECT: OFFICE ORDER.

I am directed to refer to your office order No. 3963/PHSA/Admn/P&T/Sister Tutor/2015-16/5290-96 dated: 19-01-2016 on the subject noted above and to state that relieving order in r/o Bibi Sultania, Head Nurse BS-17 (working as Instructor BS-17) at Public Health School, Hayatabad Peshawar may immediately be withdrawn in the public interest as desired by the Competent Authority under intimation to this department.

2. The above named official should continue her services at Public Health School, Hayatabad Peshawar.

(Muhammad Tahir)
Section Officer-III

Encl: As above.

Copy forwarded to:-

1. The Directorate General Health Services, Khyber Pakhtunkhwa, Peshawar w/r to his office order No. 106-07/E.II, dated: 19-01-2016.
2. The Principal, Public Health School, Hayatabad Peshawar for information & necessary action.
3. PS to Secretary Health, Khyber Pakhtunkhwa, Peshawar.

Section Officer-III

**OFFICE OF THE DIRECTOR PROVINCIAL HEALTH SERVICES ACADEMY,
BUDNHI ROAD, DURANPUR, PESHAWAR.**

No F-02/PHSA/Admn/P&T Officers/2016-17/237-41

Dated: 22/01/2016

Copy endorsed for immediate action please:

1. Director General Health Services Khyber Pakhtunkhwa, Peshawar.
2. Principal Public Health School Hayatabad, Peshawar for compliance please.
3. Section Officer-III Health Department Govt. of Khyber Pakhtunkhwa, Peshawar.
4. PS to Secretary Health Khyber Pakhtunkhwa, Peshawar.
5. PA to Director PHSA, Peshawar.

---SD---
DIRECTOR

Heer
Administrative Officer

POWER OF ATTORNEY

In the Court of Physr Paktun Meer Soom Tohid
Bibi Sulaima

} For
} Plaintiff
} Appellant
} Petitioner
} Complainant

VERSUS

The Security Health VPK and others
} Defendant
} Respondent - 3
} Accused

Appeal/Revision/Suit/Application/Petition/Case No. _____ of _____
Fixed for _____

I/We, the undersigned, do hereby nominate and appoint

IJAZ ANWAR ADVOCATE, SUPREME COURT OF PAKISTAN

Sajid Amin Advocate my true and lawful attorney, for me in my same, and on my behalf to appear at Peshawar to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions. An appeal, statements, accounts, exhibits. Compromises or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or subpoena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

IN WITNESS whereof I/we have hereto signed at _____
the _____ day to _____ the year _____

Executant/Executants _____
Accepted subject to the terms regarding fee _____

Feroz Zafar
Principal
P.H.S Nayaabad
Peshawar.

Ijaz Anwar
Advocate High Courts & Supreme Court of Pakistan

ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT
PR-3 & 4, Fourth Floor, Biltar Plaza, Saddar Road, Peshawar Cantt
Ph.091-5272154 Mobile-0333-9107225

Sajid Amin
Advocate
Peshawar

Office of the Principal PHS Hayatabad Peshawar

No.14/PHS-H/A/Sec-Health/2015-16/2450-51

Dated: 16/07/2016

Phone No. 091-9217353

E-mail phshayatabad98@yahoo.com

To

The Secretary Health
Khyber Pakhtunkhwa Peshawar

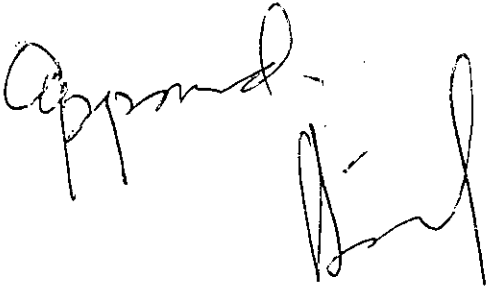
Subject: **HIRING OF PRIVATE LAWYER**

Sir,

With reference to the case No.SOH(LIT.II)13-4017/2016 (Copy Attached),.

It is hereby requested to sanction approval for a private lawyer to the undersigned for the case stated above. Looking forward for a favorable response.

Thanking you in anticipation.



Yours Sincerely

Dr. Ghazala Zaffar
PRINCIPAL
Public Health School
Hayatabad Peshawar

Copy forwarded to:-

1. Director, Provincial Health Services Academy, Khyber Pakhtunkhwa Peshawar



MOST IMMEDIATE.
COURT MATTER.

GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT
NO. SOH (Lit-II)13-4017/2016
Dated Pesh: the, 18/07/2016

To

The Principal,
Public Health School,
Hayatabad, Peshawar.

Subject:- SERVICE APPEAL NO. 579/2016 - MISS BIBI SULTANIA VERSUS GOVT
OF KHYBER PAKHTUNKHWA HEALTH DEPARTMENT AND OTHERS.

I am directed to refer to your letter No. 14/PHS-H/A/Sec-Health/2015-16/2450-51, dated 16/07/2016 on the subject noted above and to state that this department has no objection if a private council is hired on your own expense in the above subject case please.

SECTION OFFICER (LIT-II)

Endst: Even No. & date.

Copy forwarded for information to :-

1. PS to the Secretary Health.
2. P.A to Deputy Secretary-II.

SECTION OFFICER (LIT. II)

GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT
SOH (Lit-II)13-4017/2016
Pesh: the, 18/07/2016

①

Office of the Principal PHS Hayatabad Peshawar

No.14/PHS-H/A/Sec-Health/2015-16/2450-51

Dated: 16/07/2016

☎ Phone No. 091-9217353

✉ E-mail phshayatabad98@yahoo.com

To

The Secretary Health
Khyber Pakhtunkhwa Peshawar

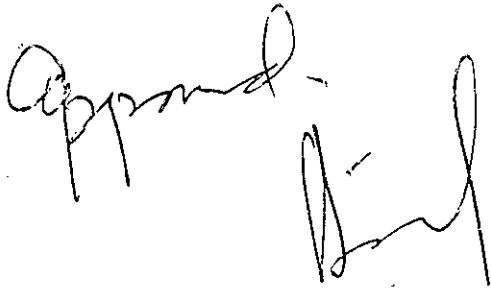
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Dr. Ghazala Zaffar
PRINCIPAL
Public Health School
Hayatabad Peshawar

Copy forwarded to:-

1 Director, Provincial Health Services Academy, Khyber Pakhtunkhwa Peshawar

2



MOST IMMEDIATE.
COURT MATTER.

GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT
NO. SOH (Lit-II)13-4017/2016
Dated Pesh: the, 18/07/2016

To

The Principal,
Public Health School,
Hayatabad, Peshawar.

Subject:- SERVICE APPEAL NO. 579/2016 - MISS BIBI SULTANIA VERSUS GOVT
OF KHYBER PAKHTUNKHWA HEALTH DEPARTMENT AND OTHERS.

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SECTION OFFICER (LIT-II)

Endst: Even No. & date.

Copy forwarded for information to :-

1. PS to the Secretary Health.
2. P.A to Deputy Secretary-II.

SECTION OFFICER (LIT. II)

BEFORE THE HONORABLE SERVICES TRIBUNAL

KHYBER PAKHTUNKHWA PESHAWAR.

Service Appeal NO. 579/2016.

Bibi Sultania , APPELLANT /PETITIONER.

VERSUS

1. The Secretary Health KPK Peshawar.
2. Director, Provincial Health Services Academy, Peshawar Budhni Near Northern by Pass Dauranpur, Peshawar.
3. The Principal Public Health School Phase-V, Hayatabad Peshawar.
4. Dr. Shabnam Khawas WMO, HMC Hayatabad Peshawar.

..... **RESPONDENTS.**

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1, 2 & 3

RESPECTFULLY SUBMITTED:

Preliminary objections:

- i. The Appellant has neither a cause of action nor locus standi.
- ii. The Appeal is not maintainable in its present form.
- iii. The Appellant has not come to the Tribunal with clean hands.

Reply on Facts

1. Partially correct to the extent that she is actually a Head Nurse and not an Instructor but working against the post of Instructor BPS-17 in her own pay scale on ex-cadre basis.
2. **In-correct** she has been transferred from ex-cadre post of Instructor to her original cadre post of Head Nurse.
3. Pertains to record.
4. **In-correct** that posts of Principal (BS-20), instructors (BS-18 & BS-17) belongs to Health Management Cadre schedule-I for doctors (**Annex-A**).
5. **In-correct.** No political pressure has been exerted to transfer the appellant; it was just a technical decision to post the appellant on her original cadre post in public interest. It is further added that the appellant does not possess the required qualification as in Para 04 above.
6. **In-correct** as the appellant does not have the right to be posted on her sweet wish and whim.
7. The appellant has got no cause of action to file instant appeal.



GROUNDS.

- A) **Incorrect** that the Appellant services were placed for further adjustment at Public Health School Hayatabad, as the post of Instructor was not available at Public Health School Hayatabad----a fact the appellant has herself admitted in Para B of Grounds. Rather such an artificial arrangement might possibly have been made because of some political or other factors on part of appellant herself.
- B) Appellant services were placed for further posting and Appellant was drawing salary from ex-cadre post as elaborated in Para A above (**Annex-B**).
- C) **Incorrect** as the Appellant transfer order has been issued on technical and tenure policy of the government hence the order is in accordance to the Government Policy in vogue.
- D) **Incorrect** the Appellant was serving from 3/08/2010 in the said school and has completed her normal tenure.
- E) **Incorrect.** The transfer order is in total conformity with the rules & policies in vogue as already commented in Para A,B,C&D.
- F) **Incorrect** and baseless as the Appellant was serving on ex-cadre post and does not possess the required qualification for the said post and no political pressures have been involved in her current transfer.
- G) The order was entertained by the respondent No. 03, while the said resubmitted to the higher authority for review on the grounds stated in Para-05.
- H) **Incorrect** as the policy of the Government KP Health Department related to ex-cadre posting was obeyed in letter and spirit.
- I) The respondents also seek permission to raise additional grounds at the time of arguments.

NOTE:- Furthermore as per current situation, the post against which she was posted has also been abolished as per Finance Department Govt: of KPK Notification No. BOVI/FD/4-1/2014-15/Vol-VII dated 09.09.2016 (**Annex-D**).

PRAYED

In view of the above clarifications, it is very humbly prayed that the above writ petition may please be dismissed.


(Respondent No. 3)
PRINCIPAL

Public Health School,
Hayatabad Peshawar.


(Respondent No. 2)
DIRECTOR

Provincial Health Services Academy,
Khyber Pakhtunkhwa, Peshawar.


(Respondent No.1)

Secretary to Govt. of Khyber Pakhtunkhwa,
Health Department, Peshawar.

BEFORE THE HONORABLE SERVICES TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR.

Service Appeal NO. 579/2016.

Bibi Sultania , APPELLANT /PETITIONER.

VERSUS

- 1. The Secretary Health KPK Peshawar.
- 2. Director, Provincial Health Services Academy, Peshawar Budhni Near Northern by Pass Dauranpur, Peshawar.
- 3. The Principal Public Health Scholl Phase-V, Hayatabad Peshawar.
- 4. Dr. Shabnam Khawas WMO, HMC Hayatabad Peshawar

..... **RESPONDENTS.**

AFFIDAVIT.

I, Mr. Tofeeq Ullah, Administrative Officer Provincial Health Services Academy (PHSA), Health Department, Khyber Pakhtunkhwa Peshawar, do hereby solemnly affirm and declare on oath that all the content of para-wise comments submitted in response to Service Appeal No. 579/2016, are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honorable court.

Identified by


DEPONENT.

17201-2250671-3



67/C
Annex - A

GOVERNMENT OF THE NORTH-WEST FRONTIER PROVINCE NWFP
HEALTH DEPARTMENT

NOTIFICATION

Peshawar, dated the 11th DECEMBER, 2008

No. SOH(EV)4 - 20 / 08 : In exercise of the powers conferred by section 26 of the North West Frontier Province Civil Servants Act, 1973 (N.-W.F.P. Act XVIII of 1973), the Governor of the North-West Frontier Province is pleased to make the following rules, namely:

THE NORTH-WEST FRONTIER PROVINCE
HEALTH (MANAGEMENT) SERVICE RULES, 2008.

PART - I
GENERAL

1. **Short title and commencement.** ---(1) These rules may be called the North-West Frontier Province Health (Management) Service Rules, 2008.

(2) They shall come into force at once.

2. **Definitions.**--- In these rules, unless the context otherwise requires, the following expressions shall have the meanings hereby respectively assigned to them, that is to say -

- (a) "appointing authority" in relation to a post, means the respective authority specified in para 4 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989;
- (b) "Commission" means the North-West Frontier Province Public Service Commission;
- (c) "Cadre" means Health Management Cadre;
- (d) "Government" means the Government of the North-West Frontier Province;
- (e) "Governor" means the Governor of the North-West Frontier Province;
- (f) "Initial recruitment" means appointment made otherwise than by promotion or transfer;
- (g) "Member of Service" means officer belonging to health management cadre as reflected in schedule I, II & III;

- 05/11
- (i) "Post" means a post specified in the Schedule-I of the rule and such other posts as may, from time to time, be determined by the Government;
 - (j) "Schedule" means the schedule appended to these rules; and
 - (k) "Service" means the North-West Frontier Province Health (Management) Service.

PART-II
RECRUITMENTS

- 3. **Number and nature of posts.**---The Service shall comprise the posts specified in the Schedule -I and such other posts as may be determined by Government from time to time.
- 4. **Method of Appointment.**---Method of appointment, qualifications and other conditions to applicable to a post in the Service shall be such as laid down in the column 3 to 5 of the Schedule - II.
- 5. **Syllabus and examination for appointment by initial recruitment.**--- Syllabus and standard for competitive examination for appointment by initial recruitment to the post in BS-17 shall be, as laid down in Schedule-III.

PART-III
CONDITIONS OF SERVICE

- 6. **Pre-Service Training & Departmental Examinations.**--- (1) On appointment to a post borne on the service in BS-17, every officer so appointed shall complete six months mandatory training including attachment as specified in schedule -IV.

(2) The training shall be followed by departmental examination to be conducted by Provincial Health Services Academy, which will be part of probation period.

- 7. **In-Service Training.**---Selection for in-service trainings which are linked with promotion shall be done on seniority basis and those at verge of promotion shall be given priority.

- 8. **Private Practice.**--- (1) No Member of Service shall be allowed private practice, in lieu he shall be entitled to non-practicing allowance, at such rate as may be prescribed by Government.

(2) In case of default, the Member shall be liable to disciplinary action under the law.

10. **One time exercise.** --- (1) Notwithstanding anything contained in the provision of these rules, Government shall, as one-time exercise, fill in posts in the Service described in Schedule-I by way of permanent transfer from amongst the Officers of General Cadre in equivalent basic pay scale who have the qualification of Master of Public Health or Postgraduate Diploma in Public Health or Postgraduate Diploma in Hospital Administration or Health Planning & Management or equivalent Master's Degree / Diploma in Health management or allied disciplines and opt for absorption;

Provided that the option once exercised shall be final.

(2) Where the number of officers opting for absorption in Management Cadre is more than the available positions in respective grade, the selection under one time exercise shall be done on the basis of seniority-cum-merit only in the respective grade;

Provided that for determining the suitability of the officers, additional relevant qualifications, trainings/courses in the relevant field and managerial experience, as such, shall be taken into consideration.

11. **Deletion of posts.**---Posts reflected in the schedule-I shall stand deleted from any other service rules for the time being in force and such rules shall be deemed to have been amended to the above extent:

SECRETARY TO GOVERNMENT OF NWFP
HEALTH DEPARTMENT

Endst. of even No & Date.

Copy to:

1. The Chairman, Public Service Commission, NWFP, Peshawar
2. PS to Minister for Health, NWFP.
3. PS to Chief Secretary, NWFP.
4. PS to Additional Chief Secretary, NWFP.
5. PS to Secretary E&A Department.
6. PS to Secretary Law Department.
7. PS to Secretary Finance Department.
8. Ps to Secretary Health.
9. PA to DGHS NWFP.
10. Computer Programmer, Health Department.

07/c

SCHEDULE – I
(Management Cadre)

Members of Service in BPS-20:

S.No.	Nomenclature of post	Number of post
1	Director General Health Services, NWFP, Peshawar	01
2	Director (Admn) DGHS NWFP Peshawar	01
3	Director Health Services DGHS NWFP Peshawar	01
4	Medical Superintendent Govt. LRH/KTH/HMC Peshawar	03
5	Medical Superintendent DHQ.Hospitals Kohat, Bannu, DIKhan, Mardan, Swat, Abbottabad	06
6	Medical Superintendent, Mufti Mehmood Memorial Hospital DIKhan	01
7	Medical Superintendent, Khalifa Gul Nawaz Hospital Bannu	01
8	Medical Superintendent, Govt. City Hospital Kohat Road Peshawar	01
9	Medical Superintendent, Sarhad Hospital for Psychiatric Diseases Peshawar	01
10	Medical Superintendent, Ayub Teaching Hospital Abbottabad	01
11	Executive District Officer (Health) Peshawar	01
12	Executive District Officer (Health) Swat	01
13	Executive District Officer (Health) Mardan	01
14	Executive District Officer (Health) Kohat	01
15	Director Provincial Health Services Academy, Peshawar	01
16	Principal Public Health School Hayatabad Peshawar	01
17	Principal Pubic Health School Abbottabad	01
18	MS Mardan Medical Complex	01
	TOTAL:	25

SCHEDULE – I
(Management Cadre)

Members of Service in BPS-19:

S.No.	Nomenclature of post	Number of post
1.	Executive District Officers (Health) in NWFP	20
2.	DDHOs/Coordinators EDO(H) Offices in NWFP	31
3.	Medical Superintendent DHQ.Hospitals in NWFP	17
4.	Medical Superintendent Govt. ID Children Hospital Peshawar	01
5.	Medical Superintendent Police/Services Hospital Peshawar	01
6.	Medical Superintendent Mental & General Hospital Dadar Mansehra	01
7.	Medical Superintendent, City Hospital Lakki Marwat	01
8.	DMS Women and Children Hospital DIKhan,	01
9.	DMS in DHQ. Hospital, Mardan, Swat, Nowshera, Haripur, Abbottabad and DIKhan	06
10.	District TB Control Officer, Peshawar, Mardan, Swabi, DIKhan, Haripur, Battagram, Mansehra, Swat, Chitral, Upper Dir	10
11.	Deputy Administrator Mardan Medical Complex Mardan	01
12.	MS/Incharge Civil/THQ.Hospital Tangi, Shabqaddar, Dargai, Pabbi, Matta, Darosh (Chitral), Rehana, Kulachi	08
13.	SMO I/C Women & Children Hospital Bannu	01
14.	Vice Principal Paramedical Institute, Abbottabad, DIKhan, Swat	03
15.	SMO (Health) Municipal Corporation Peshawar	01
16.	Deputy Directors in DGHS NWFP Peshawar	05
17.	DMS (Stores) Govt. LRH/KTH Peshawar	02
18.	Principal Postgraduate Paramedical Institute Peshawar	01
19.	Deputy Director (HRD) PHSA NWFP	01
20.	Deputy Director(Monitoring and Research) PHSA NWFP	01
21.	Deputy Director(Management) PHSA NWFP Peshawar	01

08/L

25.	DMS Ayub Teaching Hospital Abbottabad	01
26.	Director Health Services FATA Peshawar	01
27.	MS AHQ Hospital Parachinar, Ghallanai, Wana, Bajaur	04
	TOTAL:	128

Note: All Program Manager/Provincial Coordinators of Vertical Programs/ Projects & FATA Health positions would be filled from amongst Management Cadre.

BQ/C

SCHEDULE – I
(Management Cadre)

Members of Service in BPS-18:

S.No.	Nomenclature of post	Number of post
1.	Incharge Civil/THQ.Hospital Ziarat Kaka Sahib Nowshera, Rustam, Lund Khawar Mardan, Topi Swabi, Kalu Khan Swabi, Shakar Darra (Kohat), Thall Hangu, Serai Naurang Lakki Marwat, Balakot Mansehra and Thana Malakand Agency	10
2.	Senior Instructors DHDCs in NWFP (Abbottabad, Swat and DIKhan)	03
3.	Instructors in Public Health School, Hayatabad Peshawar and DIKhan	03
4.	Instructor Public Health School, Nishtarabad Peshawar	01
5.	Epidemiologist Govt. LRH and HMC Peshawar	02
6.	Course Director (MCH & Family Planning) PHSA NWFP	01
7.	Epidemiologist PHSA NWFP	01
8.	DMS Govt. Maternity Hospital Peshawar	01
9.	DMS (Admn) KTH Peshawar	01
10.	District TB Control Officer, Abbottabad, Kohistan, Nowshera, Charsadda, Malakand, Buner, Shangla, Lower Dir, Kohat, Hangu, Karak, Bannu, Lakki Marwat and Tank	14
11.	Deputy Director Admn./Deputy Director Dev.(02), Assistant Director EPI(02), DHS FATA	04
12.	Agency Surgeon Mohmand, Bajaur, Orakzai, Kurram, NW Agency, SW Agency, Khyber, FR Peshawar/ FR Kohat, FR DIKhan, FR Bannu,	10
13.	DMS(Admn), DMS(Stores) DMS (Dispensary) at Ayub Teaching Hospital Abbottabad	03
14.	Assistant Directors in Directorate General Health Services, NWFP, Peshawar	13
15.	ADHO FATA Health	4
	TOTAL:	71

Note: All Program /Project positions & FATA Health positions in BPS-18 would be filled from amongst Management Cadre.

11/c

SCHEDULE – I
(Management Cadre)

Members of Service in BPS-17:

S.No.	Nomenclature of post	Number of post
1.	Health Educator Directorate General Health Services, NWFP Peshawar	01
2.	Assistant Director (Homeo & Tibb) AD Personnel, AD Administration Directorate General Health Services, NWFP, Peshawar	04
3.	MO Trainer DHDC (02 each) in Mardan, Kohat, Bannu, DIKhan, Abbottabad, Swat and Chitral	14
4.	Instructors in PHSA, NWFP	03
5.	Evaluation Officer PHSA, NWFP	01
6.	Instructors Public Health School, Hayatabad Peshawar and Abbottabad	03
7.	Secretary Medical Faculty, NWFP Peshawar	01
8.	DMS Maintenance HMC Peshawar	01
9.	DMS Stores HMC Peshawar	01
10.	DMS Casualty, OPD and OTs HMC Peshawar	01
11.	Coordinator EDO(H) Offices in NWFP	71
	TOTAL:	101

Note: All Program /Project positions in BPS-17 & FATA Health positions would be filled from amongst Management Cadre.

SCHEDULE – II

S. No	Nomenclature of Post.	Qualification for appointment by initial recruitment	Age limit	Method of Appointment
1	2	3	4	5
1	Director General Health Services (BS-20)		-	<p>By transfer, on the basis of selection on merit, from amongst the ten senior most Members of the Service in (BS-20).</p> <p>Note: Preference will be given to those having additional postgraduate relevant qualifications or specialized courses.</p>
2	Members of Service (BS-20)			<p>(a) By promotion, on the basis of selection on merit, from amongst the Members of Service in (BS-19) with 5 years service as such or 17 years service in (BS-17) and above; and</p> <p>(b) Four months advance in-service training in Management from a recognized institution or PHSA NWFP.</p>

12/1

1	2	3	4	5
4.	Members of Service (BS-18)	(a) MBBS/BDS or equivalent qualification, from any institute recognized by the PMDC; and (b) (i) Doctorate / M.Phil in Public Health or Health Administration or Health Management or equivalent qualification from any University recognized by the H.E.C or PMDC; or (ii) Master in Public Health/Health Administration/ Health Management, allied discipline or equivalent qualification from any University recognized by H.E.C or PMDC with 5 years experience in the relevant field.	30-40 years	(i) Eighty percent by promotion, on the basis of seniority cum-fitness, from amongst Members of the Service in BS-17 having at least five years service as such, with two months in service training in Management from a recognized institution or PHSA; and (ii) Twenty percent by initial recruitment
5.	Members of Service (BS-17)	(a) MBBS/BDS or equivalent medical qualification from any institute recognized by PMDC; and (b) Master in Public Health/Health Administration/ Health Management or equivalent qualification from any institute recognized by H.E.C or PMDC.	25-32 years	By initial recruitment.

19/6

1/1/1

SCHEDULE – III

(HEALTH MANAGEMENT CADRE)

**Syllabus and Standard for competitive exam for
initial recruitment in BS-17**

1. The Examination shall include General Compulsory and Specialized Compulsory Subjects, and every candidate will take all the compulsory subjects.
2. A candidate shall answer the papers in English unless otherwise directed. However, the paper in Islamiyat may be answered in Urdu or English.
3. The total marks of General Compulsory Subjects are 350 while there should be two Specialized Compulsory Papers of 300 marks each covering 150 marks.
4. Psychological aptitude test 50 Marks
5. Viva Voce 200 Marks
6. The general compulsory and specialized compulsory subjects and maximum marks fixed for each subject shall be as shown in the statement below:

General Compulsory Subjects (350 Marks)

Serial No.	Subjects	Maximum Marks
1.	English	100
2.	English Essay	50
3.	General Knowledge / Everyday science	50
4.	Current affairs	50
5.	Pakistan affairs	50
6.	Islamiyat	50

Specialized Compulsory Subjects (400 Marks)

1. Health Planning and Management (Single Paper)	200
Topics:	

2. Epidemiology, Health System Research, Public Health and Disease Control (Single Paper)	100
Topics: Epidemiology, Research Methodology and Biostatistics, Health Systems, Surveillance and Disease Control, Monitoring & Evaluation. Infectious Diseases, Epidemiology and preventive methods, Reproductive Health, Occupational Health, Environmental Hazards and Sanitation, Nutrition with related disorders and prevention.	

7. In case of non-Muslim, the paper of Pakistan Studies and Current Affairs will be each of 75 marks instead of Islamiyat.
8. No candidate will be called for Psychological Aptitude Test unless he has obtained 40% marks in individual subject with aggregate of 50%.
9. The passing marks in Psychological Aptitude Test are 40%. Those failed will not be called for the interview.
10. The passing marks for Viva Voce are 40%. The candidate failing in interview or remained absent will not be included in the merit.
11. The selection of selected candidates will be purely on merit as per Zonal Allocation Formula notified by the Establishment Department.
12. In case of a tie, the order of merit will be determined in accordance with the total number of combined marks achieved in Psychological Aptitude Test and interview. In case of tie in this case even, the decision will be on the basis of marks obtained in compulsory subjects. Even still if there is a tie, the order of merit will be on the basis of age.

15/12

SCHEDULE IV

Induction training

Target Group:

The training is designed for newly recruited Medical Officers BS 17 in Health Management cadre .

Objective :

- To equip the doctors with Official Procedures , Financial & Procurement Rules and Regulations, Rules of Business, and other government functions with a view to benefit them for working as Health Managers.
- To develop their skill and knowledge in Planning, management and leadership.
- To develop skill and Knowledge regarding routine office procedures and management

Training Schedule :

The training is divided into two portions:

- Theory total duration 2 months
- Practical total duration 4 months

Theory:

To be imparted in PHSA in collaboration with STI, Audits and accounts training institute, NIMS, IMSciences etc.

Topics:

- Relationship of Management with Behaviour
- Principles of Management and planning
- Leadership
- Communication and advocacy
- Motivation.
- Team building
- Project management
- Donor coordination
- Health policies
- Human resource management

PH/C

- Rules of business
- Auditing & Accounting
- General Financial rules
- Esta code etc.

Practical Training (Attachment): Duration 4 months

During this period the under trainee health managers will be attached with different sections and institutions of DOH to gain supervised Practical experience which will help in developing the needed skills.

Beak up of Practical Training is as follows :

- | | |
|---|---------|
| 1. Health Directorate including Vertical Programmes | 1 Month |
| 2. Health Secretariat | 1 Month |
| 3. EDO H Office | 1 Month |
| 4. Hospital | 1 Month |

The Time table and other details of the theory part as well as practical training will be developed by PHSA and to be approved by academic committee of PHSA and DOH.

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18/12

NC21017 (013)
HEALTH

SECRETARIAT/POLICY/CURRICULUM

OFFICIAL CUM OBJECT CLASSIFICATION
PARTICULARS OF THE SCHEMENUMBER OF
POSTS
2016-2017BUDGET
ESTIMATES
2016-2017RELEASED
2016-2017

	Rs	Rs	Rs
99/ EDUCATION AFFAIRS AND SERVICES			
96/ ADMINISTRATION			
96/1 ADMINISTRATION			
96/101 SECRETARIAT/POLICY/CURRICULUM			
PR4298 Public Health School Hayat Abad Peshawar			
TOTAL EMPLOYEES RELATED EXPENSES.		<u>11,502,000</u>	<u>11,501,000</u>
TOTAL PAY	<u>30</u>	<u>4,786,000</u>	<u>4,786,000</u>
TOTAL PAY OF OFFICERS	<u>6</u>	<u>2,277,000</u>	<u>2,277,000</u>
Total Basic Pay Of Officer	<u>6</u>	<u>2,277,000</u>	<u>2,277,000</u>
Principal (BPS-20)	1	606,000	606,000
Instructor (BPS-18)	1	518,000	518,000
Instructor (BPS-17)	2	600,000	600,000
Chief PHC Technician (MCH) (BPS-16)	1	268,000	268,000
Public Health Supervisor (BPS-16)	1	285,000	285,000
TOTAL PAY OF OTHER STAFF	<u>24</u>	<u>2,509,000</u>	<u>2,509,000</u>
Total Basic Pay Other Staff	<u>24</u>	<u>2,504,000</u>	<u>2,504,000</u>
Senior Clerk (BPS-14)	1	154,000	154,000
Computer Operator (BPS-13)	1	117,000	117,000
Clinical Technician Primary Health Care (MCH) (BPS-12)	2	217,000	217,000
House Keeper (BPS-10)	1	147,000	147,000
Driver (BPS-06)	3	359,000	359,000
Bearer (BPS-03)	2	182,000	182,000
Chowkidar (BPS-03)	4	366,000	366,000
Cook (BPS-03)	2	232,000	232,000
Dai (BPS-03)	2	157,000	157,000
Mali (BPS-03)	2	223,000	223,000
Naib Qasid (BPS-03)	2	158,000	158,000
Sweeper (BPS-03)	2	192,000	192,000

mbr
BUDGET OFFICER VI
Govt. of Khyber Pakhtunkhwa
Finance Deptt;

1972
Annexure - B

GOVT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Pesh:the 17.8.2010

NOTIFICATION


No.SOH-III/3-5/10/Bibi Sultania. The Competent Authority is pleased to order the transfer of Mrs.Bibi Sultania, Head Nurse (BPS-17) from KTH Peshawar and placed her services at the disposal of Provincial Health Services Academy Peshawar with immediate effect.

SECRETARY HEALTH

Endst: No.SOH-III/3-5/10/Bibi Sultania Dated 17.8.2010

Copy forwarded for information and n/action to:-

- ✓ 1. The Accountant General NWFP Peshawar.
2. The Director General Health Services Peshawar with ref: to his No.20055/E-II dated 5.8.2010.
- ③ 3. The Director Provincial Health Services Academy Peshawar with ref: to his No.8960/PHSA/F-259 dated 3rd:August 2010 for information and further placing her services at Public Health School, Hayatabad Peshawar.
4. The Medical Superintendent, Khyber Teaching Hospital Peshawar.
5. The Princiapl, Public Health School, Hayatabad Peshawar.
6. P.S. to Secretary Health Khyber Pakhtunkhwa.
- ✓ 7. Officer concerned.


SECTION OFFICER-III

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBU

PESHAWAR.

Service Appeal No. 579/2016

Bibi Sultania.....(Ap

VERSUS

The Secretary Health KPK Peshawar

and others.....(Resp

I N D E X

S.No	Description of Documents	Annex	
1.	Rejoinder		
2.	Affidavit		
3.	Copy of Notification of Finance Department	A	1
4.	Copy of letter dated 15/02/2016	B	
5.	Copy of duty list	C	15
6.	Copy of pay slip on both instructors i.e. Dr. Shaima from Medical Manager and appellant	D & E	18
7.	Copy of affidavit for drawing salary	F	20
8.	Copy of endorsement order dated 06/05/2016		21
9.	Copy of advice letter dated 26/12/2016		22

Appellant

Through

Dated: 26/01/2017


Mahboob Ali Khan Khilil

Advocate, High Court
Peshawar.

Cell No. 0333-9361987

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 579/2016

Bibi Sultania.....(Appellant)

VERSUS

The Secretary Health KPK Peshawar
and others.....(Respondents)

REJOINDER ON BEHALF OF APPELLANT

Respectfully Sheweth:

Misleading and misconceived objection, have been raised for the sake of more objections only. The objections raised by the respondents are nothing but just to side the main issue.

1. That appellant posted against the post of Nursing Instructor and not on the post of Medical Manager. It is correct that the post of Instructor is schedule post of Health Management Cadre but Nursing Instructor is schedule post of Nursing Cadre. Health

Department trying to deceive the Forum on "Instructor" and "Nursing Instructor" this fact has mention clearing in Para 4 of the comments.

2. Incorrect as mentioned in Para-1 above.
3. Incorrect, while correct as in Original Appeal.
4. Incorrect. Health Department recently abolished excluded the post of Principal BPS-20, BPS-18 and BPS-17 of Instructor for Medical Manager from the schedule of health Management Cadre from Public Health School, Hayatabad, Peshawar by Finance Department while the post of the appellant remain intake because the appellant is a Nursing Instructor. (Copy of Notification of Finance Department is attached as annexure "A").
5. It is incorrect. Due to political approach the transfer order of the appellant was passed, while in other hand the respondent No. 1 prior to the official Gazette regarding the qualification for appellant has admitted under the letter No. SOH-III/8-89/2015 dated 15/02/2016 it was officially published and

declare that the appellant is well qualified for the Teaching at Public Health School, Hayatabad. Further the respondent No. 1 had added that it is pertinent to mention that currently certain changes have been made in the service rules of Nurses, wherein the Masters in Public Health has been included, which was in that time under process and later on in the Official Gazette dated 10/05/2016 it was published. The nomenclature (annexed on page No. 33 of the Service Appeal) for the post in Serial No. 3, in which the criteria of the said post has been mentioned, thresh out the whole doubt and clear, the qualification of the appellant which she possess and now these rules are very much in field and fully support and favour the appellant. (Copy of letter dated 15/02/2016 is attached as annexure "B").

6. Incorrect, as the appellant possess the required qualification and experience and same has been endorsed by Health Department in its notification No. SOH-III/8-89/2015 dated 27/01/2016, wherein it has been declared that the post of the appellant instructor w.e.f 19/01/2016 already annexed on

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Page-36 of the main service appeal, hence the ex-cadre has been set aside.

7. Incorrect. The respondents are inimical toward the appellant because in one year three time transfer orders passed against appellant and the appellant was too much mentally tortured by the respondent No. 3 and also struck off from her duty. (Copy of duty list is attached as annexure "C").

ON GROUNDS:

- A. Incorrect, the post of Nursing Instructor in Public Health School Hayatabad was created after June 2015, therefore the appellant was rightly adjusted/posted as per office order dated 31/07/2015 duly annexed on the page No. 36 of the main appeal, because of the very fact that appellant was drawing her salary for the post of Instructor of Management in Provincial Health Services Academy. The above adjustment was made by respondent No. 2. Moreover, the post of Nursing Instructor was created by the Finance Department on 01/07/2016, on the request of respondent No. 3. (Copy of pay slip on both

instructors i.e. Dr. Shaima from Medical Manager and appellant are attached as annexure "D" & "E").

- B. Incorrect, the appellant was drawing her salary on the post of Instructor from June 2015 as mentioned in Para A.
- C. Incorrect. Consequent upon creation of post of Nursing Instructor by the Finance Department w.e.f June 2015, respondent No. 2 posted the appellant as Nursing Instructor, PHS Hayatabad against the newly created post on 31/07/2016. When the appellant submitted her charge assumption report, the respondent No. 3 denied to accept the same. Consequently, respondent No. 1 re-notified the posting orders of the appellant as Nursing Instructor on 19/01/2016, (duly annexed on page 38 of the main service appeal). Which is still not implemented by the respondents No. 3. The malafide intention is very much clear under the later issued by the D.G Health for single employee i.e. Margaret Mahi upon which the respondent No. 2 relived not only the required employee Margaret Mahi but also the appellant was relived and transferred as per order

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mentioned on Page No. 40, 41 and 43 of the main service appeal. After that respondents No. 2 and 3 issued an office order and directed the appellant to report to the Office of D.G.Health KPK Peshawar upon which, respondent No. 1 called explanation from respondents No. 2 and 3 upon issuance an office order for the reason that respondents No. 2 and 3 travelled beyond its jurisdiction and the same was not under their competency. (duly annexed on page 39 of the main service appeal). The appellant did not challenged the order dated 19/01/2016 issued by the respondents No. 2 and 3 as the same was cancelled by respondent No. 1. Upon receipt of response of explanation, respondent No. 1 issued another notification under political pressure and posted the appellant in Police Hospital instead of implementation of its earlier notification issued on 19/01/2016. (duly mention on Page No. 38 of service appeal).

D. Incorrect, as narrated in Para-C above.

E&F. Incorrect as narrated in Para-C above.

G. Incorrect, the respondent No. 3 has not entertained the notification dated 19/01/2016 (on Page No. 38 of main service appeal) whereby the appellant was transferred to Police Hospital against the post of Head Nurse issued by respondent No. 1. If he had entertained the notification issued on 19/01/2016, there was no reasons to knock the door of this Hon'ble Tribunal. Respondent No. 3 did not referred the appellant salary case to AG office till date. Now after passage of one year, the appellant was draw pay at her own risk and cost and submitted an affidavit to the AG Office for release of her salary. (Copy of affidavit for drawing salary is attached as annexure "F").

H. Incorrect. The post of Nursing Instructor, Public Health School, Hayatabad (from which the appellant has been transferred) is scheduled post which belongs to Nursing Cadre, as per Rules. (On page No. 56 of the comments).

I. Agreed. The Health Department was required to transfer the appellant against any other schedule

post instead of Head Nurse which is not scheduled post for the appellant.

In the Note, the notification of the Finance Department, Government of KPK Notification No. BOVI/FD/4-1/2014-15/Vol-VII dated 09/09/2016 is regarding the abolishing of post of instructor for WMO Medical Officer/ Manager which is a different cadre post of Medical Officer and not for the Nursing Instructor Post for appellant.

Currently stay order endorsed by the respondent No. 1 on 06/05/2016 under the letter No. SOH-III/8-89/2015 but still not implement by the respondent No. 3, rather the respondent No. 3 denied to honours the order of the respondent No. 1 under Letter No. 22878 dated 26/12/2016. The respondent No. 3 is responsible to obey the stay order rather through futile exercise deceiving the respondent No. 1 against the appellant.

It is, therefore, most humbly prayed that on acceptance of this rejoinder, the main appeal of the appellant may graciously be accepted, moreover the appellant was promoted to BPS-17 in year 2010 while the others were promoted in 2011 in BPS-17

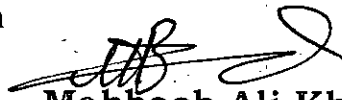
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and now the juniors were promoted in BPS-18 who are too much juniors from the appellant while the appellant was ignored to promote in BPS-18 which is clear cut discrimination on the part of the respondents, hence need to be promoted and considered.

Appellant

Through

Dated: 26/01/2017



Mahboob Ali Khan Khilil
Advocate, High Court
Peshawar.

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 579/2016

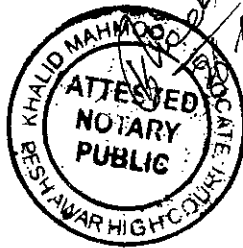
Bibi Sultania.....(Appellant)

VERSUS

The Secretary Health KPK Peshawar
and others.....(Respondents)

AFFIDAVIT

I, **Mahboob Ali Khan Khalil** Advocate Peshawar, as per instructions of my client, do hereby solemnly affirm and declare that the contents of the **Rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.




ADVOCATE



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

NO. BOVI/FD/4-1/2014-15/VOL-VII
DATED PESHAWAR THE 09-09-2016

Annex-A

To

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

Subject: CREATION OF POSTS OF MEDICAL OFFICERS AND HEALTH MANAGERS.

Dear Sir,

I am directed to refer to your letter No. SOB/HD/3-1/General dated 02-08-2016 on the subject noted above and to intimate that in pursuance of approval accorded by the Chief Minister Khyber Pakhtunkhwa on a summary moved by Health Department; Finance Department agrees to **creation of 226 posts, downgradation of 24 posts, conversion of 59 posts of Health Management Cadre; and abolishment of 51 posts of Management/General Cadre Doctors** in the following health institutions during CFY 2016-17, subject to observance of all codal/legal formalities before making appointments/filling of the said posts:

1. CREATION OF POSTS OF MANAGEMENT CADRE

S.No.	DDO Code	Name of Institution	Designation	BPS	No. of posts
1	AD6132	DHO Abbottabad	Coordinator	18	1
2	AD7009	DHQ Abbottabad	Dy. Med. Supdt.	18	1
3	AD4154	PHS Abbottabad	Vice Principal	18	1
4	AD4414	PMI Abbotabad	Principal	19	1
5	AD6242	Havelian Abbottabad (Cat.-D Hospital)	Medical Supdt.	19	1
6	AD6242	Havelian Abbotabad (Cat.-D Hosp.)	Dy. Med. Supdt.	18	1
7	AD6134	Lora Abbotabad (Cat.-D Hosp.)	Medical Supdt.	19	1
8	AD6134	Lora Abbottabad (Cat.-D Hosp.)	Dy. Med. Supdt.	18	1
9	BM6011	DHO Battagram	Coordinator	18	1
10	BM7005	DHQ Battagram	Dy. Med. Supdt.	18	1
11	BM6013	Banna (Cat-D Hsp) Battagram	Medical Supdt.	19	1
12	BM6013	Banna (Cat.-D) Battagram	Dy. Med. Supdt.	18	1
13	BU6327	Kakki (Cat.-D Hosp.) Bannu	Dy. Med. Supdt.	18	1
14	BU6327	Janikhel (Cat.-D Hosp.) Bannu	Medical Supdt.	19	1
15	BU6327	Janikhel (Cat.-D Hosp.)	Dy. Med. Supdt.	18	1
16	BD6068	DHO Buner	Dy. DHO	19	1
17	BD7008	DHQ Buner (Cat.-B)	Dy. Med. Supdt.	18	2
18	BD6071	Pachkaly (Cat.-D) Buner	Medical Supdt.	19	1
19	BD6071	Pachkaly (Cat.-D) Buner	Dy. Med. Supdt.	18	1
20	PR4309	DG Health Services	Addl. DG	20	2
21	PR4309	DG Health Services	Director	19	4
22	PR4309	DG Health Services	Dy. Director	18	14
23	PR4331	PHSA Office Peshawar	Director	19	2
24	CA6112	DHO Charsadda	Coordinator	18	1
25	CA7005	DHQ Charsadda (A)	Dy. Med. Supdt.	19	1
26	CA6226	Shabqadar (Cat.-C Hosp.)	Medical Supdt.	19	1
27	CA6226	Shabqadar (Cat.-C) Charsadda	Dy. Med. Supdt.	18	2
28	CA6109	Tangi (Cat.-C) Charsadda	Medical Supdt.	19	1
29	CA6109	Tangi (Cat.-C.) Charsadda	Dy. Med. Supdt.	18	2
30	CA6115	Jamal Abad Charsadda (Cat.-D Hosp.)	Medical Supdt.	19	1
31	CA6115	Jamal Abad Charsadda (Cat.-D Hosp.)	Dy. Med. Supdt.	18	1
32	CL6020	DHO Chitral	Coordinator	18	1
33	CL7005	DHQ Chitral (Cat. B)	Dy. Med. Supdt.	18	2
34	CL6029	Boni Chitral (Cat.-D Hosp.)	Medical Supdt.	19	1
35	CL6029	Boni Chitral (Cat.-D Hosp.)	Dy. Med. Supdt.	18	1
36	CL6029	THQ Chitral Cat.D Drosh	Medical Supdt.	19	1
37	CL6029	THQ Chitral Cat.D Drosh	Dy. Med. Supdt.	18	1
38	DI4184	PMI D.I.Khan	Vice Principal	18	1
39	DI6128	THQ D.I.Khan Cat.D Kulachi	Medical Supdt.	19	1
40	DI6128	THQ D.I.Khan Cat.D Kulachi	Dy. Med. Supdt.	18	1
41	DI6128	Paharapur (Cat.-D Hosp.) D.I.Khan	Medical Supdt.	19	1
42	DI6128	Paharapur (Cat.-D Hosp.) D.I.Khan	Dy. Med. Supdt.	18	1

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S.No.	DDO Code	Name of Institution	Designation	BPS	No. of posts
43	DI6128	Paroa (Cat.-D Hosp.) D.I.K	Medical Supdt.	19	1
44	DI6128	Paroa (Cat.-D Hosp.) D.I.K	Dy. Med. Supdt.	18	1
45	DI6129	Civil Hospital Panyala D.I.K	Medical Supdt.	19	1
46	DI6129	Civil Hospital Panyala D.I.K	Dy. Med. Supdt.	18	1
47	DP6066	DHO Dir (Upper)	Dy. DHO	19	1
48	DP7005	DHQ Dir (Upper) Cat-8	Dy. Med. Supdt.	18	1
49	DP6133	Wari Dir (Upper) (Cat.-D Hosp.)	Medical Supdt.	19	1
50	DP6133	Wari Dir (Upper) (Cat.-D Hosp.)	Dy. Med. Supdt.	18	1
51	DP6117	Patrak Dir (Upper) Cat-D	Medical Supdt.	19	1
52	DP6117	Patrak Dir (Upper) Cat-D	Dy. Med. Supdt.	18	1
53	DP6134	Barawal Banda cat-D Dir Upper	Medical Supdt.	19	1
54	DP6134	Barawal Banda cat-D Dir Upper	Dy. Med. Supdt.	18	1
55	DA6120	DHO Dir (Lower)	Coordinator	18	1
56	DA6129	Samarbagh Dir (Lower) (THQ Cat. C Hosp.)	Medical Supdt.	19	1
57	DA6129	Samarbagh Dir (Lower) (THQ Cat. C Hosp.)	Dy. Med. Supdt.	18	2
58	DA6129	Chakdara Cat.C Dir Lower	Medical Supdt.	19	1
59	DA6129	Chakdara Cat.C Dir Lower	Dy. Med. Supdt.	18	2
60	DA6131	Mayar Dir (Lower) (Cat.-D Hosp.)	Medical Supdt.	19	1
61	DA6131	Mayar Dir (Lower) (Cat.-D Hosp.)	Dy. Med. Supdt.	18	1
62	DA6131	Lal Qila Dir (Lower) (Cat.-D Hosp.)	Medical Supdt.	19	1
63	DA6131	Lal Qila Dir (Lower) (Cat.-D Hosp.)	Dy. Med. Supdt.	18	1
64	DA6131	Munda Dir (Lower) (Cat.-D Hosp.)	Medical Supdt.	19	1
65	DA6131	Munda Dir (Lower) (Cat.-D Hosp.)	Dy. Med. Supdt.	18	1
66	DA6131	Ziarat Talash (Cat.-D Hosp.)	Medical Supdt.	19	1
67	DA6131	Ziarat Talash (Cat.-D Hosp.)	Dy. Med. Supdt.	18	1
68	HR6113	DHO Haripur	Dy. DHO	19	1
69	HR7008	DHQ Haripur	Dy. Med. Supdt.	18	1
70	HR6222	Khanpur (Cat.-D) Haripur	Medical Supdt.	19	1
71	HR6222	Khanpur (Cat.-D) Haripur	Dy. Med. Supdt.	18	1
72	HR6361	Seri Nlamat Khan (Cat.-D) Haripur	Medical Supdt.	19	1
73	HR6361	Seri Nlamat Khan (Cat.-D) Haripur	Dy. Med. Supdt.	18	1
74	HR6223	Ghazi (Cat.-D) Haripur	Medical Supdt.	19	1
75	HR6223	Ghazi (Cat.-D) Haripur	Dy. Med. Supdt.	18	1
76	HG6034	DHO Hangu	Dy. DHO	19	1
77	HG7009	DHQ Hangu	Medical Supdt.	19	1
78	HG7009	DHQ Hangu	Dy. Med. Supdt.	18	2
79	HG6035	Civil Hosp. Doaba (Cat.-D) Hangu	Medical Supdt.	19	1
80	HG6035	Civil Hosp. Doaba (Cat.-D) Hangu	Dy. Med. Supdt.	18	1
81	HG6035	Civil Hosp. Thall (Cat.-D) Hangu	Medical Supdt.	19	1
82	HG6035	Civil Hosp. Thall (Cat.-D) Hangu	Dy. Med. Supdt.	18	1
83	KK6103	DHO Karak	Coordinator	18	1
84	KK7008	DHQ Karak (Cat. B)	Dy. Med. Supdt.	18	1
85	KK6115	THQ Banda Daud Shah Karak @	Medical Supdt.	19	1
86	KK6115	THQ Banda Daud Shah Karak @	Dy. Med. Supdt.	18	2
87	KK6216	Women & Children Hosp. Karak	Dy. Med. Supdt.	18	1
88	KK6109	Takhte Nusrati (Cat.-D)Karak	Medical Supdt.	19	1
89	KK6109	Takhte Nusrati (Cat.-D)Karak	Dy. Med. Supdt.	18	2
90	KK6109	Latambar (Cat.-D) Karak	Medical Supdt.	19	1
91	KK6109	Latambar (Cat.-D) Karak	Dy. Med. Supdt.	18	1
92	KK6109	Sabir Abad (Cat.-D) Karak	Medical Supdt.	19	1
93	KK6109	Sabir Abad (Cat.-D) Karak	Dy. Med. Supdt.	18	1
94	KT7010	Women & Child. Hosp. Kohat	Dy. Med. Supdt.	18	2
95	KT7009	DHQ Hospital Kohat	Dy. Med. Supdt.	18	1
96	KT6095	Shakardara (Cat.-D) Kohat	Medical Supdt.	19	1
97	KT6095	Shakardara (Cat.-D) Kohat	Dy. Med. Supdt.	18	1
98	KT6095	Lachi (Cat.-D Hosp.) Kohat	Medical Supdt.	19	1
99	KT6095	Lachi (Cat.-D Hosp.) Kohat	Dy. Med. Supdt.	18	1
100	KD6020	DHO Kohistan	Coordinator	18	1
101	LK6066	DHO Lakki	Dy. DHO	19	1
102	LK7007	DHQ Lakki	Dy. Med. Supdt.	18	2
103	LK6076	City Hosp. Lakki (Cat.-C)	Dy. Med. Supdt.	18	2
104	LK6107	Civil Hosp. Tajori Lakki (Cat.-D Hosp.)	Medical Supdt.	19	1
105	LK6107	Civil Hosp. Tajori Lakki (Cat.-D Hosp.)	Dy. Med. Supdt.	18	1
106	LK6107	Civil Hosp. Titter Khel Lakki (Cat.-D Hosp.)	Medical Supdt.	19	1
107	LK6107	Civil Hosp. Titter Khel Lakki (Cat.-D Hosp.)	Dy. Med. Supdt.	18	1

MSB