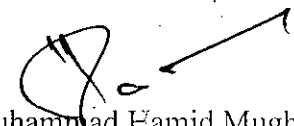


10.07.2018

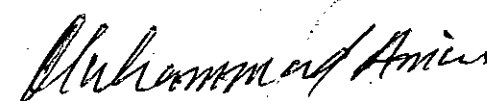
Neither appellant nor his counsel present. Mr. Usman Ghani, District Attorney for respondents present. Adjourned. To come up for arguments on 04.09.2018 before D.B.

  
(Ahmad Hassan)  
Member

  
(Muhammad Hamid Mughal)  
Member

04.09.2018

Appellant absent. Learned counsel for the appellant absent. Mr. Kabir Ullah Khattak learned Additional Advocate General present. Case called for several times but no one appeared on behalf of appellant. Consequently the present service appeal is dismissed in default. No order as to costs. File be consigned to the record room.

  
(Muhammad Amin Kundi)  
Member

  
(Muhammad Hamid Mughal)  
Member

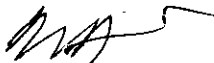
**ANNOUNCED.**

**04.09.2018**

137/2016

16.11.2017

None present on behalf of the appellant. Addl. AG for the respondents present. To come up for arguments on 11.01.2018 before the D.B.

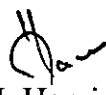
  
Member

  
Chairman

11.01.2018

Learned counsel for the appellant present. Learned Addl: AG for respondents present. Learned counsel for the appellant requested for adjournment. Request accepted. To come up for arguments on 16.02.2018 before D.B.

  
(Ahmad Hassan)  
Member(E)

  
(M. Hamid Mughal)  
Member (J)

16.02.2018

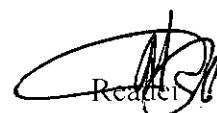
None present on behalf of appellant. Mr. Muhammad Jan, Learned Deputy District Attorney for the respondent present. Notice be issued to the appellant and his counsel. Adjourned. To come up for arguments along with on 25.04.2018 before D.B

  
(Ahmad Hassan)  
Member

  
(Muhammad Hamid Mughal)  
Member

25.04.2018

None for the appellant present. Addl: AG for respondents present. Due to retirement of the worthy Chairman, the Tribunal is incomplete, therefore the case is adjourned. To come up for ~~arguments~~ <sup>same</sup> on 10.07.2018 before D.B

  
Reader

02.02.2017

None for the appellant present. Add: AG for respondents present. Notices be issued to the appellant and his counsel. To come up for rejoinder and arguments on 10.05.2017 before D.B.

Handwritten notes: "Mueed" and "10/05/17" with a signature.

Handwritten signature of Ashfaque Taj.

(ASHFAQUE TAJ)  
MEMBER

(MUHAMMAD AAMIR NAZIR)  
MEMBER

10.05.2017

Clerk to counsel for the appellant and Mr. Hameed ur Rehman, AD (Litigation) alongwith Mr. Usman Ghani, Sr. GP for respondents present. Due to transfer of one of the undersigned as reported in daily "Aaj" dated 10.05.2017, arguments could not be heard. To come up for rejoinder and final hearing on 18.08.2017 before the D.B.

Handwritten signature of a Member.

Member

Handwritten signature of a Chairman.

Chairman

18.08.2017

Clerk to counsel for the appellant and Mr. Muhammad Jan, DDA for respondents present. Clerk to counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 16.11.2017 before D.B.

Handwritten signature of a Member.

Member

Handwritten signature of a Chairman.

Chairman

137/2016

28.4.2016

Agent of counsel for the appellant and Addl. AG for the respondents present. Written reply not submitted. Requested for further adjournment. Written reply not submitted despite last opportunity. Requested for further adjournment. Last opportunity extended subject to payment of cost of Rs. 1000/- which shall be borne by the respondents from their own pockets. To come up for written reply/comment and cost on 04.08.2016 before S.B.

Chairman

04.08.2016

Agent to counsel for the appellant and Mr. Mirzaman, Supdt. alongwith Addl. AG for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing on 27-9-16.

Member

27.09.2016

Counsel for the appellant and Assistant AG for respondents present. Counsel for the appellant requested for adjournment. To come up for rejoinder and final hearing on 02.02.2017 before D.B.

Member

Chairman

NLC, No. 16202-2197185-0  
Health vs. State

MT BMM  
13.10.16

17.02.2016

Counsel for the appellant present. He argued that the appellant was appointed as LHW in the year 2008 on contract basis who was regularized vide notification dated 19.9.2014. It was further submitted that despite the fact the appellant was a civil servant, the respondent-department stopped her salary w.e.f September 2015. He submitted that the appellant is a poor lady and her salary has been unlawfully stopped by the respondent-department. Learned counsel stated that departmental appeal of the appellant was not responded and hence, the present appeal is within time.

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 28.4.2016 before S.B.

Appellant Deposited  
Security & Process Fee

  
Member

03.03.2016

Appellant in person present and submitted application for early fixation of the appeal. Application is accepted. To come up for written reply/comments on 28.3.2016 before S.B instead of 28.4.2016. Respondents be informed accordingly.

  
Chairman

28.03.2016




Appellant in person and Assistant AG for respondents present. Written reply not submitted. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on the date already fixed i.e 28.4.2016 before S.B.

  
Chairman

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_


Case No. 137/2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	08.02.2016	<p>The appeal of Mst. Hasrat Begum resubmitted today by Mr. Javed Iqbal Gulbela Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR-</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>16-2-16</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2	16.02.2016	<p>Appellant in person present. Requested for adjournment as she will made her counsel available tomorrow. To come up for preliminary hearing on <u>17-2-2016</u>.</p> <p style="text-align: right;"> Member</p>

The appeal of Mst. Hasrat Begum wife of Muhammad Nihar received today i.e. on 04.02.2016 is returned to the counsel for the appellant with the direction to submit Two spare copies/sets of the memorandum of appeal along with annexures i.e. complete in all respect within 10 days.

No. 171 /S.T,

Dt. 4-2 /2016.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Javed Iqbal Gulbela Adv. Pesh.

*Reported by,*  
*Submitted after receiving*  
*complaint.*  
*[Signature]*  
*08/02/16.*

**BEFORE THE HONOURABLE SERVICES TRIBUNAL KHYBER**  
**PAKHTUNKHWA PESHAWAR**

Appeal No. 137/2016

Hasrat Begum

**Versus**

Govt of Khyber Pakhtunkhwa & Others

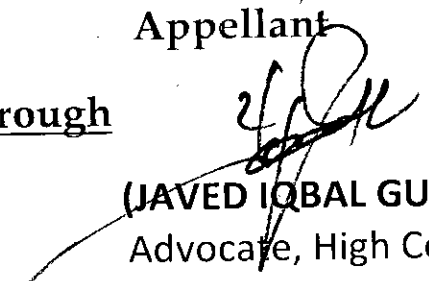
**I N D E X**

S#	Description of Documents	Annexure	Page#
1	Grounds of Appeal		1-4
2	Affidavit		5
3	Addresses of Parties		6
4	Copy of the impugned office order dated 12/10/2015	"A"	7
5	Copy of the appeal	"B"	8-9
6	Other documents	"C" to "D"	10-12
7	Court Fee		—
8	Wakalat Nama		13

DATED 04-02-2016

Appellant

Through

  
(JAVED IQBAL GULBELA)  
Advocate, High Court,  
Peshawar



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**BEFORE THE HON'BLE SERVICES TRIBUNAL KHYBER**  
**PAKHTUNKHWA PESHAWAR**

Appeal No. 137/2016

**G.W.P. Province**  
**Service Tribunal**  
Diary No. 89  
Dated 04-02-2016

Mst. Hasrat Begum W/o Mohammad Nihar R/o Johar Abad,  
Village Ismaila District Swabi.

.....Appellant

**VERSUS**

1. Govt of K.P.K through Deputy Commissioner Swabi.
2. Chief Coordinator National Program for family planning and primary health care, K.P.K, Peshawar.
3. E.D.O Executive District Officer Health District Swabi.
4. District Coordinator LHWS Programme Swabi.
5. District Co-coordinator National Programme Swabi.
6. Incharge Basic Health Unit Village Ismailia, Swabi.

.....Respondents

**SERVICE APPEAL U/S 04 OF THE KHYBER**  
**PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974**  
**AGAINST THE IMPUGNED office order, Dated**  
**12/10/2015 OF THE RESPONDENT NO. 4**  
**WHEREBY SALARY OF THE APPELLANT HAS**  
**ILLEGALLY BEEN STOPPED SINCE SEPTEMBER-**  
**2015 WITHOUT ANY REM OR REASON IN A**  
**CLASSICALLY & ARBITRARY MANNER.**

Filed to-day

4/2/2016

**RESPECTFULLY SHEWETH,**

re-submitted to-day  
and filed.

Registrar

8/2/16

1. That the appellant was appointed as "L.H.W" (Lady Health Worker) on 01/02/2008 for B.H.U Ismaila Swabi.

2

2. That the appellant had been the most sincere and duty full servant and never left any stone unturned in performance of her duties.

3. That inspite of the fact that the appellant is performing her duties regularly & without any break, but even then salary of the appellant has illegally been stopped since September-2015 without any rem or reason or justification office order dated 12/10/2015 of the office of Respondent No. 4 in a classically cursory & whimsical manner. (Copy of the impugned office order dated 12/10/2015 is annexed herewith as Ann- "A")

4. That as the stoppage of salary is illegal, unwarranted, void ab-initio, so a departmental appeal was moved against the same to the learned respondent. No 1 which is till pending and has not been disposed of, inspite of passing of three months i.e statutory period. (Copy of the appeal is annexed as annexure B")

5. That feeling aggrieved on the candid disposal of the departmental presentation of the respondent No. 1, the appellant prefers the instant appeal on the following grounds inter alia:-

**GROUND:-**

A. That the appellant is a naturally born citizen of Islamic Republic of Pakistan and is fully and equally entitled to

all and basic rights as enshrined in the fundamental of the land, interpreted, guaranteed and enforced by the laws of the land.

- B. That salary of the appellant has been estopped plausible reason and without any justification and without and fault on part of the appellant.
- C. That neither any inquiry was ever conducted, nor any notice was ever served upon the appellant nor she was ever heard in person or through counsel prior to illegally stoppage of salary.
- D. That neither the appellant has ever been absented as alleged nor have ever been lethargic or indifferent towards performing her duties & has performed her duties regularly without any break.
- E. That the appellant is a poor widow having little kids, all school going, and the salary of the appellant is the only source of income, which hardly sufficient to meet the needs of here poor family.
- F. That this sole source of lively hood of the appellant has been snatched from her & this poor family has been

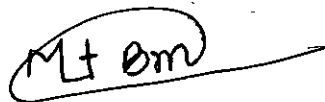
4

pushed to the abysmal depth of sorrows & agonies  
without any fault on her part.

G. That any other ground not raised here specifically would  
be raised at the time of arguments with the permission  
of this Hon'ble Tribunal.

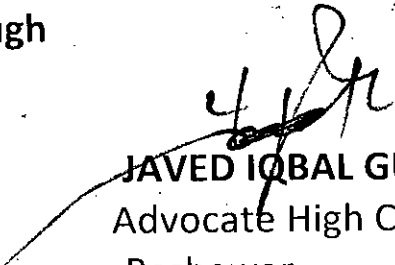
It is, therefore, most humbly prayed that, on  
acceptance of this appeal Impugned office order dated  
12/10/2015 of the learned respondent No. 4 may kindly be  
set aside and the appellant may graciously be released all  
her salaries since September-2015 with all arrears thereof.

DATED 04-02-2016



Appellant

Through

  
JAVED IQBAL GULBELA  
Advocate High Court,  
Peshawar

**Note :**

No such like appeal for the same appellant has earlier been filed by me,  
upon the subject matter, prior to the instant one, before this Hon'ble  
Tribunal.

  
ADVOCATE.

**List of Books Referred:**

1. Civil Servant Act- 1973
2. Case Laws
3. Any other book as per need.

  
ADVOCATE

5

**BEFORE THE HONOURABLE SERVICES TRIBUNAL KHYBER**  
**PAKHTUNKHWA PESHAWAR**

Appeal No. \_\_\_\_\_


Hasrat Begum

**Versus**

Govt of Khyber Pakhtunkhwa & Others

**AFFIDAVIT**

I, Amir Nawaz Advocate Counsel for appellant do hereby solemnly affirm and declare on oath that as per information furnished by my client, all the contents of the Instant appeal are true and correct to the best my knowledge and belief and nothing has been concealed from this honorable Tribunal.

  
DEPONENT



(6)

**BEFORE THE HONOURABLE SERVICES TRIBUNAL KHYBER**  
**PAKHTUNKHWA PESHAWAR**

Appeal No. \_\_\_\_\_

Hasrat Begum

**Versus**

Govt of Khyber Pakhtunkhwa & Others

**ADDRESSES OF PARTIES**

**ADDRESS OF APPELLANT**

Mst. Hasrat Begum W/o Mohammad Nihar R/o Johar Abad,  
Village Ismaila District Swabi.

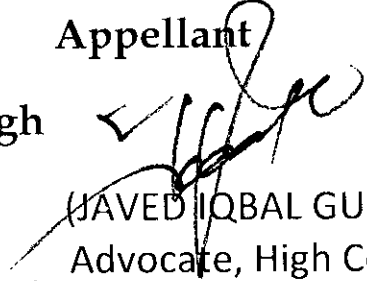
**ADDRESSES OF RESPONDENTS**

1. Govt of K.P.K through Deputy Commissioner Swabi.
2. Chief Coordinator National Program for family planning and primary health care, K.P.K, Peshawar.
3. E.D.O Executive District Officer Health District Swabi.
4. District Coordinator LHWS Programme Swabi.
5. District Co-coordinator National Programme Swabi.
6. Incharge Basic Health Unit Village Ismailia, Swabi.

**DATED 04-02-2016**

**Appellant**

**Through**

  
**(JAVED IQBAL GULBELA)**  
Advocate, High Court,  
Peshawar

7

Amir A  
2

OFFICE OF THE DISTRICT COORDINATOR NP& PHC DISTRICT SWABI

7/11/15 /DHO Swabi Dated The 11/11/2015

To: The District Health Officer,  
Swabi  
The Manager,  
Habib Bank Limited  
Shewa Adla  
Subject: STOPPAGE OF PAY/STIPEND.

Reference pay roll for the month of September 2015.

I have the honor to state that the following LHWs attached to Civil Hospital Kulu Khan have submitted their applications for pre mature retirement and their case is in process. They are also failed to submit their monthly report due to non interest in their duties since long:-

S/No	Name of LHW	Account No
1	Sadaqat Begum W/O Jehad Ali	8139-7
2	Munkkat W/O Mushtaq Ali	8142-5
3	Mehar Angrezo W/O Mir Dad Khan	8143-5
4	Hasrat Begum W/o Nihar Ali	10748-8

Keeping above in view it is requested that their pay for September 2015 may please be stopped and return the same to HBL Arbab Road Peshawar under intimation to all concerned.

An early action is requested please.

DISTRICT HEALTH OFFICER  
SWABI

*[Signature]*  
DISTRICT COORDINATOR  
LIWS PROGRAM-SWABI

**ATTESTED**  
*[Signature]*

18/10/15

(8)

خدمت جناب جی. ڈی. صاحب، صوابی، صوابی، صوابی

صوابیہ ۰۴۰۰۰۰ صاحب کو  
L.H.S کے تحواہ آزار  
کرنے کا حکم و اوافق

جناب عالی

Amir B  
2

(تمام رپورٹ زیریں)

تذراشیں یہ ہے کہ سائلہ ایک بیوہ عورت ذات ہے اور محلہ گوہ ۲ آباد گاؤں اسماعیلہ  
 میں L.H.S کے پوسٹ پتہ ملازمہ ہے۔ سائلہ کو لولینو ڈے کے ڈیوٹی میں صوابیہ ۰۴۰۰۰۰ کو  
 اسماعیلہ سرگرم محنت ن. ۰۳. ۰۴ کے سامنے دشمن نے حملہ کر کے قابلہ نیگی کی اور شدید زخمی  
 حالت میں D.H.S صدر ملا میں پولا اپہ لیشن کیا اور صوت کے صنف میں جا کر نازک  
 حالت کی وجہ سے K.P.H.K.T.H میں 3 ماہ مسلسل زلیہ علاج تھی اور مزید 2 اپہ لیشن  
 کر کے ڈاکٹر صاحبان نے کہا کہ ایک سال کے بعد آگے صحت یاب ہوگی تو مزید  
 چوتھا اپہ لیشن لیا گیا ہے۔ سائلہ نے بہ وقت چوتھا اپہ لیشن رقم  
 نہ ملنے کی وجہ سے نہیں کی اور لپٹی لپہ نیاں ہو گئی اس وجہ سے سائلہ  
 لپٹھکے تکلف زیادہ ہوتی ہے۔ سائلہ کو حسب معمول تحواہ ملتی تھی لیکن  
 بعد L.H.S کہ ہم درخواست دینے کے تحواہ بندہ کر پیتا تو سائلہ D.H.S  
 صاحب کے پاس آ کر تمام ریگاڈ سامنے رکھ کر یہ کہتا کہ سب  
 تک چوتھا اپہ لیشن نہیں ہوگا سائلہ ڈیوٹی کے  
 قابل نہیں ہے

ATTESTED

تب سائلہ ڈیوٹی کرنے کے قابل ہو کر اپنی فہمیا پورہ کریں گی۔



جب یہ ۵۰-۵۱ صاحب نے فرمایا کہ آپ جو تھا ایپیشن کریں گے  
 کہ میں ہم آپ کو صزیہ چھٹی دین گی لیکن سائل نے کہا کہ سہ سائل  
 ایپیشن کے لیے آپے فنڈ کا انتظار ہے خالی ہاتھ سے ایپیشن نہیں لیتا  
 اور یہ درخواست سائل نے مورخہ ۱۷/۸/۱۵ کو دی تھی۔ سائل کو اس کے بعد  
 آگست تک تنخواہ ملتی رہی لیکن ستمبر کے ماہ کے تنخواہ H.B.A. شیوا ڈا  
 میں ہوا تھا لیکن H.B.A. والوں نے دینے سے انکار کیا اور کہا کہ حلقہ  
 سے سائل نے درخواست لیا ہے کہ سائل کا تنخواہ H.B.L. والے فور حلقہ ادارے  
 کو واپس کر میں۔ سائل نے D.H.O صاحب کے دفتر کے ویکلے رکھا لیکن  
 دفتر کے اصفیہ کلر کے اس لیٹر کو دینے سے انکار کیا اور کہا کہ یہ سائل  
 کو میں مل سکتی جناب والا دفتر میں کچھ لوگ ڈیشن کی وجہ سے زیادتی  
 کر رہے ہیں۔ سائل کا سابقہ نام حضرت بیگم کے نام پر تنخواہ آتی ہے اور  
 تمام ریکارڈ میں ۲۰۱۶ میں نام تبدیل کر کے حضرت بیگم کر دیا ہے  
 اور دفتر حلقہ میں صورت بیگم کر دیا ہے۔ اب تک تنخواہ حضرت بیگم کے نام  
 پر آ کر سائل کو حلقہ والوں نے انڈھیپے میں رکھ دیا ہے کہ سہ ماہی کو فریاد  
 ہے اور سائل کے یتیم بیوں کے لیے یہ ملازمت بڑی کھانے کا واحد ذریعہ  
 ہے۔ اور S.H.O صاحب کو سائل کے تنخواہ کرنے کا حکم کر کے یتیم بیوں کے  
 مفاد کے لیے یہ سائل کے حلقہ میں ہے۔

ATTESTED

تبا سائل ڈیوٹی کرنے کے قابل ہو کر اپنی فہرہ پورہ کریں گی۔

(10)

Amir C  
2

10-11-2015



# DEPUTY COMMISSIONER SWABI

Tel #: 0938 - 221300

E-mail: dcswabi@yahoo.com

Fax #: 0938 - 221917 - 221500

No. 2863 /DCS/PS

Dated 27 /10/2015.

To:-


The District Health Officer, Swabi.

Subject:-

APPLICATION.

Memo:-

Enclosed please find herewith an application submitted by Musarat Begum W/O Muhammad Nihar R/O Ismaila (LHW) for necessary action under the law.

  
Deputy Commissioner,  
Swabi.

**ATTACHED**

M  
Co

R  
L

11

**OFFICE OF THE DEPUTY COMMISSIONER, SWABI**

No 3090 /DCS/-EA

Dated 16 /11/2015

To:  
The District Health Officer  
District Swabi

Subject:- Application

Memo:

Enclosed please find herewith an application along with its enclosures submitted by Mst. Mussarat Beg: w/o Late Mohammad Nihar Khan-resident of village Ismaila Tehsil Razar District Swabi which is self explanatory

Please offer your Views/ comments in this regard as early as possible.

  
✓ DEPUTY COMMISSIONER, SWABI

Even No & date:

Copy forwarded to Mst Mussarat Beg: w/o Mohammad Nihar Khan r/o Village Ismaila Tehsil Razar District Swabi for information

  
✓ DEPUTY COMMISSIONER, SWABI

14/EA

**ATTESYED**



23  
26



## وکالت نامہ

بعدالت: صبر بخوشا سرور سز سز سز سز سز  
 منرت سید حسین بنام D.H.O دہلیہ  
 منجانب رہنما دعویٰ S.A  
 تاریخ \_\_\_\_\_

باعث تحریر آنکہ مقدمہ مندرجہ بالا عنوان اپنی طرف کے واسطے پیروی و جوابدہی  
 بمقام کیلے جاوید اقبال گل بیلہ ایڈووکیٹ ہائی کورٹ کو بدین شرط وکیل  
 مقرر کیا ہے۔ کہ میں ہر پیشی کا خود یا بزرگیہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل  
 صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا، اگر پیشی پر من مظهر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے  
 کسی طور پر میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہونگے۔ نیز وکیل صاحب موصوف صدر  
 مقام پکھری کی کسی اور جگہ یا پکھری کے مقررہ اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہونگے۔ اگر  
 مقدمہ علاوہ صدر مقام پکھری کے کسی اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر  
 من مظهر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نہ واپس کرنے کے بھی  
 صاحب موصوف ذمہ دار نہ ہونگے۔ مجھے کوکل ساختہ پرداختہ صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور  
 صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و  
 تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کے روپیہ وصول کرنے اور رسید دینے اور داخل  
 کرنے اور ہر قسم کے بیان دینے اور سپروائشی و راضی نامہ فیصلہ برخلاف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور  
 بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا تفرقی یا گرفتاری قبل از اجراء ڈگری بھی موصوف  
 کو بشرط ادا نیگی علیحدہ مختار نہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا  
 اس کے کسی جزوی کاروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے دوسرے وکیل یا پیرسٹر کو بجائے اپنے یا اپنے ہمراہ  
 مقرر کریں اور ایسے مشیر قانون کے ہر امر دہی اور ویسے ہی اختیارات حاصل ہونگے جیسے کے صاحب موصوف کو حاصل  
 ہیں۔ اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ اور صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو  
 پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت  
 میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا کہ سندر ہے۔  
 مورخہ 25/5/2016 مضمون مختار نامہ من لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

مقام  
 رشتہ  
 پکھری  
 11  
 1/11/16

M.F.B.M

صبر بخوشا

Accept  
 [Signature]

(علاقہ)

**BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.**

**APPEAL NO. 137/2016.**

**Mst. Husrat Begum Ex-LHW W/O Muhammad Nihar R/O Johar Abad,  
Village Ismaila, Tehsil Razzar & District Swabi.....(Appellant)**

**VERSUS.**

- 1. Govt: of Khyber Pakhtunkhwa, Through Deputy  
Commissioner Swabi.**
- 2. The Chief Coordinator National Program for Family Planning  
& Primary Health Care Khyber Pakhtunkhwa Peshawar.**
- 3. The District Health Officer Swabi.**
- 4. The District Coordinator LHWs Program Swabi.**
- 5. The District Coordinator National Program Swabi.**
- 6. Incharge Basic Health Unit Village Ismaila Swabi.  
.....(Respondents)**

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<b>4</b>	<b>Annexure - B</b>	<b>13</b>
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**DISTRICT HEALTH OFFICER  
SWABI**

**BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR**

**APPEAL NO. 137/2016**

Mst. Husrat Begum Ex-LHW W/O Muhammad Nihar R/O Johar Abad, Village Ismaila, Tehsil Razzar & District Swabi..... (Appellant)

**VERSUS**

1. Govt: of Khyber Pakhtunkhwa, through Deputy Commissioner Swabi.
2. The Chief Coordinator National Program for family planning and primary health care, Khyber Pakhtunkhwa, Peshawar.
3. The District Health Officer, District Swabi.
4. The District Coordinator LHWS Programme Swabi.
5. The District Coordinator National Programme Swabi.
6. Incharge Basic Health Unit village Ismaila, Swabi.

..... (Respondents)

**WIRTTEN STATEMENT ON BEHALF OF THE RESPONDENTS PRELIMINARY  
OBJECTIONS**

**Respectfully Sheweth:**

1. That the appellant have no cause of action/ locus stand.
2. That the appellant have deliberately concealed the material facts from this Honorable Tribunal, hence liable to be dismissed.
3. That the appellant have not come to this tribunal with clean hands.
4. That the appellant have filed the instant appeal just to pressurize the respondents.
5. That the appellant have filed the instant appeal on malafide motives.
6. That the instant petition is against the prevailing Law and Rules.
7. That the appellant is not maintainable in the present form and also in the present circumstances of the issue.

**FACTS:**

1. Correct, Ex-LHW Musarrat Begum appointed as LHW w.e.f 23.01.2008 and was terminated from duty due to NR (not resident) vide No.2104-05/EDO dated.10.10.2009. Later on as per directive by Provincial Coordinator vide No.1683/PC dated 13.11.2010 her case for reappointment submitted and was reinstated vide No.1796/PC dated 28.10.2010 (copy attached Annex-A). On 15.11.2011, LHS of the said LHW reported regarding her irregularities and explanation to this effect was issued vide No.2254-

55/EDO dated 16.11.2010 (copy attached Annex-B). Reply not received in March and April 2011.

FPO (representative of PPIU) visited her health house and reported about her during review monthly meeting upon which, the provincial Coordinator recommended her termination, and issued termination order vide 3522-25/PC dated 16.06.2011 (copy attached Annex-C).

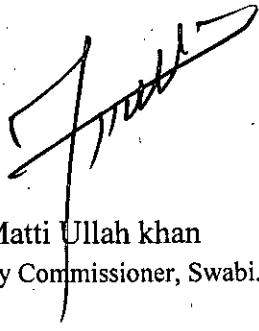
2. Incorrect. She was not sincere to her duties and not obliged to her senior as it is evident from her file.
3. Incorrect, she is irregular in her duties and several explanations in this regard have been issued to her vide No.78/DHO dated 26.01.2015, No.239/DHO dated 11.05.2015 and No.250/DHO dated 27.05.2015 (copy attached Annex-D) and but she did not replied, Pay of irregular LHW's were stopped vide this office order No. 7481/DHO dated.12.10.2015 (copy attached Annex-E).
4. Incorrect, Respondent No.1 (Deputy commissioner) sent her case to DHO vide letter No.2863/DCS/Ps dated 27.10.2015 and was responded by the office concerned vide No.7720 /DHO dated 30.10.2015 (copies attached Annex-F)
5. No. Comments.

**OBJECTION TO GROUNDS:**

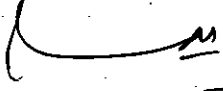
- A. Correct.
- B. Incorrect, as in para 3 above.
- C. Incorrect, she was directed through explanations to attend the office but she neither attended the office nor submitted any reply.
- D. Incorrect, she is irregular in her duties and does not submit her monthly reports nor take part in any activities since long. (photo copies of monthly reports attached Annex-G).
- E. Correct, but she is not interested to take part in her duties.
- F. As per serial "E" above.
- G. Incorrect, she was directed by DHO verbally during personal hearing that her pay will be released on improving of her performance in the next one month, otherwise she will be terminated. Even then she failed to improve her performance till now.

Keeping in view the facts and grounds it is humbly prayed the appeal may please be rejected/dismissed with cost.





Mr. Matti Ullah Khan  
Deputy Commissioner, Swabi.



Dr. Niaz Mohammad  
District Health Office,  
District Swabi.



Dr. Raheel Shehzad  
Incharge Basic Health Unit,  
Village Ismaila, Swabi.

5  


Dr. Fahim Hussain Khan  
Provincial Coordinator LHW's Programme  
Peshawar.



Dr. Mohammad Tariq  
District Coordinator LHWS Programme Swabi.  
District Coordinator National Programme Swabi.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**

**APPEAL NO. 137/2016**

Mst. Hasrat Begum Ex-LHW W/O Muhammad Nihar R/O Johar Abad village Ismaila Teshil Razzar and District Swabi

.....(Appellant)

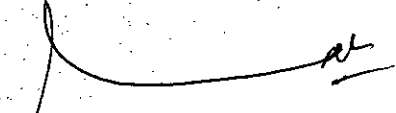
**VERSUS**

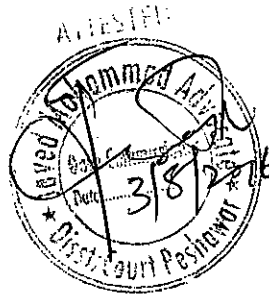
1. Govt: Khyber Pakhtunkhwa through Deputy Commissioner Swabi
2. Chief Coordinator National Program Khyber Pakhtunkhwa
3. The District Health Officer, District Swabi
4. The District Coordinator LHW Program Swabi
5. Incharge Basic Health Unit village Ismail Swabi

.....(Respondents)

**AFFIDAVIT**

I, Dr. Niaz Muhammad District Health Officer Swabi do hereby solemnly affirm and declare that the contents of parawise comments /written statement submitted by the respondents are true and correct to the best of my knowledge, record, belief and that nothing has been concealed from Honorable Tribunal.

  
**DISTRICT HEALTH OFFICER,  
 DISTRICT SWABI**





1 A / 9



# Government of Pakistan

Provincial Programme Implementation Unit, NWFP  
National Programme for Family Planning & Primary Health Care

No. 1746 /PC

Date: 28 / 10 / 2010

To

Executive District Officer (Health)  
Swabi

Subject: - REAPPOINTMENT OF EX-LHW HASRAT BEGUM DISTRICT SWABI

Consequent upon the receipt of favourable comments on Re-appointment Proforma vide your letter No.2219/EDO(H) dated 19.10.2010 as well as Field Program Officer Swabi regarding re-appointment of ex-LHW concerned. It has been decided that ex-LHW Hasrat Begum may be re-appointed as LHW.

She will have to submit a fresh surety bond duly attested from class-I magistrate. She will not be entitled for any arrears for the period in which she was not in service.

[Dr. Ihsanullah Turabi]  
Provincial Coordinator

ENDST: OF EVEN No. & DATE.  
Copy forwarded for information to:

1. District Coordinator NP for FP & PHC Swabi
2. Field Program Officer NP for FP & PHC Swabi.
3. Finance Officer PPIU Khyber Pakhtunkhwa
4. MIS-C Section PPIU Khyber Pakhtunkhwa
5. LHW concerned.

C:\Documents and Settings\Administrator\Favorites\2010 letters\Reappoin of Farzana Nooraba

666/1, Younas Road, Off The Mall, Feshawar Cantt. Phone/Fax: 091-9213546-47, E-mail: ppiunwfp@yahoo.com

*Handwritten signatures and stamps at the bottom of the page.*  
MUHAMMAD  
P.H.U



Government of Pakistan  
Provincial Programme Implementation Unit, NWFP  
National Programme for Family Planning & Primary Health Care



No. 1683 /PC  
Dated: 13/10/2010


To District Coordinator  
National Programme for FP & PHC,  
Swabi

Subject: - REAPPOINTMENT OF EX-LHW HASRAT BEGUM OF DISTRICT SWABI

Enclosed please find herewith copy of an application submitted by ex-LHW Hasrat Begum regarding the subject captioned above.

You are requested to send her case on properly filled Re-appointment Proforma duly signed by all signatories to this office on urgent basis to proceed further.

Encl:(AA)

  
(Dr. Ihsanullah Turabi)  
Provincial Coordinator

ENDST: OF EVEN No. & DATE.  
Copy forwarded for information to:

1. Executive District Officer (Health) Swabi.
2. PS to Minister for Health Khyber Pakhtunkhwa, Peshawar w/r to his letter No.PS/Min Health/KPK/1-25/10/1467-69 dated 16.09.2010.
3. PS to DGHS, Khyber Pakhtunkhwa, Peshawar w/r to his letter No.24340/AE-VI dated 05.10.2010.
4. Field Programme Officer, NP for FP & PHC Swabi, for urgent comments.

D:\PC\img\Hassra Bibi reappointment.doc\APC\img\Hassra Bibi reappointment.doc

No. 254-55 EDO (H) Swabi.

Dated the 16/11/2010

From:

The District Coordinator  
National Programme for FP&PHC  
Swabi.

To:

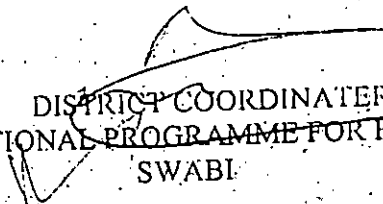
Miss Hasrat Begum, LHW BHU Ismaila

Subject:

EXPLANATION

It has been reported by LHS that you are irregular in your duties. When ordered you to perform your duties you abused and pressurized her that I have been appointed from higher authorities and I will obey their order. You are also quarrelling with her. Which is highly objection and against the programme policy.

The undersigned has taken a serious view of it and you are hereby directed to explanation your position for non compliance of rules/regulations within 03 days after receipt of this letter.

  
DISTRICT COORDINATOR  
NATIONAL PROGRAMME FOR FP&PHC  
SWABI



Government of Pakistan

Provincial Programme Implementation Unit, Khyber Pakhtunkhwa  
National Programme for Family Planning & Primary Health Care

No. 3522-25 /PC

Dated: 16/6/2011

To

Executive District Officer Health  
SWABI

Subject: TERMINATION OF LHW

With reference to the decision made in the minutes of FPOs meeting for the months of April & May 2011 whereby Ms. Hasrat LHW attached to BHU Ismaila, District Swabi has been recommended for termination for the following reasons:

- Mostly remains absent from duty.
- Not following instructions of her LHS.
- Flatly refusal from NIDs duty, which is against the instructions of Competent Authority.
- Making hurdles/problems for other LHWs.

In the light of above facts, the services of Ms. Hasrat LHW attached to BHU Ismaila District Swabi is hereby terminated with immediate effect as per policy of National Program for FP & PHC.

DPIU Swabi may collect program material from the LHW concerned.

(Dr. Hasanullah Turabi)  
Provincial Coordinator

ENDRST OF EVEN No. & DATE:  
Copy forwarded for information to:

1. Finance Officer PPIU to please note.
2. Field Program Officer Swabi
3. District Coordinator NP Swabi

D:\All Documents\Termination\Termination of LHW from PPIU Side-Swabi.doc

666/1, Younas Road, Off The Mall, Peshawar Cantt. Phone/Fax : 9213546-47

Email: [ppiunwfp@yahoo.com](mailto:ppiunwfp@yahoo.com)



Office Of The District Health Officer Swabi

Email ID: [edohealthswabi@yahoo.com](mailto:edohealthswabi@yahoo.com)

Office Tel & Fax: 0938-280008

17

No.

78

/EDO (H) Swabi Dated:



26/1/2015

To : Miss Hassrat Begum, LHW  
BHU Ismaila.

Subject:- EXPLANATION

It has been reported to the undersigned that you are irregular in your duties and not interested in your work. Also your visits in community are totally Nil.



The undersigned has taken a serious view of it and you are hereby directed to explain your position within 01week after receipt of this letter and attend the office of the undersigned along with complete record.

  
DISTRICT COORDINATOR  
LHWS PROGRAMME FOR FP&PHC  
SWABI 

NO 79-80 /DHO SWABI

Copy forwarded to the:-

1. MOIC BHU Ismaila
2. LHS concerned  
(for information)

  
DISTRICT COORDINATOR  
LHWS PROGRAMME FOR FP&PHC  
SWABI 



Office Of The District Health Officer Swabi

Email ID: edohealthswabi@yahoo.com

Office Tel & Fax: 0938-280008

19

No. 239 /EDO (H) Swabi Dated: 11/5/2015

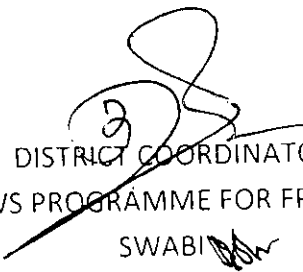
To : Miss Hassrat Begum, LHW  
BHU Ismaila.

Subject:- EXPLANATION.

Reference this office letter No.78/DHO dated 26.01.2015

It has been reported by LHS concerned to the undersigned that you are irregular in your duties and not interested in your work. Also your visits in community are totally Nil. An explanation to this effect has already been asked vide letter under reference.

The undersigned has taken a serious view of it and you are hereby directed to explain your position within 01week after receipt of this letter and attend the office of the undersigned along with complete record. In case of non compliance strict action will be taken against you.

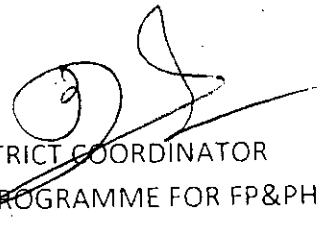
  
DISTRICT COORDINATOR  
LHWS PROGRAMME FOR FP&PHC  
SWABI

NO 240-41 /DHO SWABI

Copy forwarded to the:-

1. MOIC BHU Ismaila
2. LHS concerned

(for information)

  
DISTRICT COORDINATOR  
LHWS PROGRAMME FOR FP&PHC  
SWABI





**Office Of The District Health Officer Swabi**

Email ID: [edohealthswabi@yahoo.com](mailto:edohealthswabi@yahoo.com)

Office Tel & Fax: 0938-280008

21/10/

No. 250 /EDO (H) Swabi Dated: 27/5/2015

**3<sup>rd</sup> EXPLANATION.**


To : Miss Hassrat Begum, LHW  
BHU Ismaila.

Subject: - **EXPLANATION.**

Reference this office letter No.78/DHO dated 26.01.2015 and 239/DHO dated 11.05.2015.

It has been observed from facility monthly report that you have failed to submit your monthly reports since long. You are also irregular in your duties. Explanations to this effect and regarding your irregularities has already been asked vide letters under reference but no positive action has been taken so far.


You are once again directed to explain your position within one week and attend the office of the undersigned alongwith your record, otherwise strict action will be taken against you according to rules/regulation.

  
DISTRICT COORDINATOR  
LHWS PROGRAMME FOR FP&PHC  
SWABI *ph*

NO 251-52 /DHO SWABI

Copy forwarded to the:-

1. MOIC BHU Ismaila
2. LHS concerned  
(for information)

  
DISTRICT COORDINATOR  
LHWS PROGRAMME FOR FP&PHC  
SWABI *ph*

23

**OFFICE OF THE DISTRICT COORDINATOR NP& PHC DISTRICT SWABI.**

No 7981/N-2 /DHO Swabi

Dated The 12/10/2015

From : The Distinct Health Officer  
Swabi

To : The Manager,  
Habib Bank Limited  
Shewa Adda

Subject:- **STOPPAGE OF PAY/STIPEND**

Reference pay roll for the month o September 2015.

I have the honor to state that the following LHWs attached to Civil Hospital Kalu Khan has submitted their applications for pre mature retirement and their case is in process. They are also failed to submit their monthly report due to non interest in their duties since long:-

S/No	Name of LHW	Account No
1	Sadaqat Begum W/O Jehad Ali	8139-7
2	Mumlikat W/O Mushtaq Ali	8142-5
3	Mehar Angreza W/O Mir Dad Khan	8143-3
4	Hasrat Begum W/o Nihar Ali	10748-8

Keeping above in view it is requested that their pay for September 2015 may please be stopped and return the same to HBL Arbab Road Peshawar under intimation to all concerned.

An early action is requested please.

*[Signature]*  
DISTRICT HEALTH OFFICER  
SWABI

*[Signature]*  
for  
DISTRICT COORDINATOR  
LHWs PROGRAMME SWABI

25-1-E

**OFFICE NOTE:-**

Respected Sir,

I have the honor to state that the following LHWs of the facilities as shown against their names are irregular in their duties as per detail given below:-

S/No	Name of LHW	Name of FLCF	Detail of irregularities
1	Sadaqat Begum W/O Jehad Ali	CH Kalu Khan	Submitted their application for premature retirement since five months ago and not performing their duties and not submitting report from the same date.
2	Mumlikat W/O Mushtaq Ali	-do-	-do-
3	Mehar Angreza W/O Mir Dad Khan	-do-	-do-
4	Hasrat Begum W/O Nihar Ali	BHU Ismaila	Irregular in her duties since 02 years. Not performing duties in field and also failed to submit her monthly report from the same date.
5	Fatima D/O Saeed Ul Ahad	BHU Mankai	Not submitted her monthly report sine 03 months.

It is suggested that their pay may please be stopped with immediate effect.

Submitted for orders/information please.

*approved as suggested*

District Health officer

Swabi

*9/10/15*  
District Coordinator LHWs Programme  
Swabi



27

## DEPUTY COMMISSIONER SWABI

Tel #: 0938 - 221300

E-mail: dcswabi@yahoo.com

Fax #: 0938 - 221917 - 2

No. 2863 /DCS/PS

Dated 27 /10/2015.

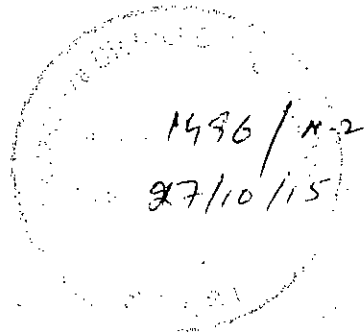
To:-

The District Health Officer, Swabi.

Subject:- APPLICATION.

Memo:-

Enclosed please find herewith an application submitted by Musarat Begum W/O Muhammad Nihar R/O Ismaila (LHW) for necessary action under the law.



  
Deputy Commissioner,  
Swabi.

NP  
Co-ordinator  
for  
Detailed Report

**OFFICE OF THE DISTRICT HEALTH OFFICER SWABI**

Email ID: [edohealthswabi@yahoo.com](mailto:edohealthswabi@yahoo.com)

Office Tel & Fax: 0938-280008

No. 7720/r-2 /DHO Swabi

Dated: 30/10/15




To

The Deputy Commissioner  
Swabi

**SUBJECT: APPLICATOIN**

Sir,

The comments of District Coordinator LHWs Program District Swabi enclosed which is self explanatory for further necessary action.

  
District Health Officer  
Swabi

OFFICE NOTE.Subject: **APPLICATION.**

Sir

It is submitted that LHW Hasrat Bagum (New named Musrat Begum) attached to Basic Health Facility Ismaila got injured on 03.07.2013 and remain under treatment but uptill now she has not applied for any leave. Neither she is punctual in her duties nor submitted any monthly performance report to her LHS at the end of month.

Explanations regarding her irregularities asked vide this office letter No. 78/DHO dated 26.01.2015, letter No. 239/DHO dated 11.05.2015 and letter No.250/DHO dated 27.05.2015 but no reply has been received so far.

In September 2015, pay stopped due to her irregularities and also directed to improve her work.

Her pay will be released on improvement of work and punctual submission of her monthly performance report.

Submitted as desired Please.

*DB*  
*29/10/15*

DISTRICT COORD LHWs PROGRAMME  
SWABI.

*net*  
DISTRICT HEALTH OFFICER  
SWABI.

Health Department, Khyber Pakhtunkhwa  
Lady Health Workers Program  
Provincial Programme Implementation Unit, Peshawar



33

No: 1489

Date: 11/11/2015

To

District Coordinator  
LHWs Program  
Swabi

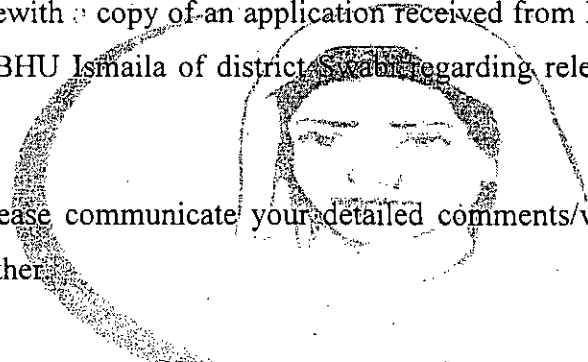
N-2

Subject:

**RELEASE OF SALARIES OF LHW HASRAT BEGUM OF DISTRICT SWABI.**

Enclosed please find herewith a copy of an application received from LHW Hasrat Begum W/O of Nihar Khan of BHU Ismaila of district Swabi regarding releases of her pending salaries.

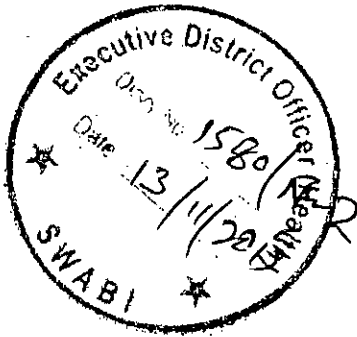
You are requested to please communicate your detailed comments/verification report to this office to proceed further.



*(Signature)*  
(Dr. Fahim Hussain Khan)  
Provincial Coordinator

CC:

1. District Health Officer Swabi.
2. Field Programme Officer, LHWs Program, Swabi with copy of application for early comments.



*N/P*  
*C.C.*  
*Please Comment*



OFFICE OF DISTRICT COORDINATOR LHW PROGRAMME FOR  
FP&PHC Swabi

Office Tel & Fax: 0938 280008

No. 520/DHO/NP Dated 16/11/2015

To

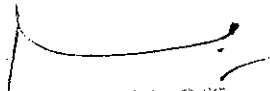
The Provincial Coordinator  
LHW Programme Khyber Pakhtunkhwa  
Peshawar.


Subject:- RELEASE OF SALARY OF LHW HASRAT BEGUM OF DISTRICT  
SWABI.

Memo,

Reference your letter No. 1489 dated 11.11.2015.

A photo copy of detailed comments on the subject is enclosed herewith for  
favour of further necessary action.

  
District Health Officer  
Swabi

  
DISTRICT COORDINATOR  
LHW'S PROGRAMME for FP&PHC  
SWABI



حکومت پنجاب ڈیپارٹمنٹ آف ایجوکیشن، لاہور

جناب عالی

صوبہ پنجاب ڈیپارٹمنٹ آف ایجوکیشن، لاہور

جسٹس بلوچ ایجوکیشن سے ہے وہ ڈیپارٹمنٹ آف ایجوکیشن

1. ایجوکیشن سے ہے ایجوکیشن سے ہے

2. ایجوکیشن سے ہے ایجوکیشن سے ہے

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9. ایجوکیشن سے ہے ایجوکیشن سے ہے

10. ایجوکیشن سے ہے ایجوکیشن سے ہے

Recommended & Forwarded to

DHO for further necessary action

& Suggesting to call an inquiry against

her & inquire the matter either to salary

terminate her or least state her next letter

to her queries as well

الغالب

ایجوکیشن سے ہے ایجوکیشن سے ہے

Date: 3-3-16

03/03/2016

Vertical text on the left margin, possibly a reference or file number.





# لیڈی ہیلتھ ورکرز پروگرام برائے بنیادی صحت خیبر پختونخوا

43 'G'

ماہانہ رپورٹ برائے مرکز صحت

سال: \_\_\_\_\_ نام مرکز صحت: \_\_\_\_\_ کوڈ مرکز صحت: 1 2 3 4 5 6 7 8 9

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Government of Pakistan  
Ministry of Health  
National Program for Family Planning & Primary Health Care  
Provincial Program Implementation Unit (PPIU)



No. 5638 /PC

Dated: 27 / 10 / 2011

To  
Executive District Officer Health  
Swabi

Subject: - RE-APPOINTMENT OF EX-LHW HASRAT BEGUM DISTRICT SWABI

Consequent upon the receipt of her application through the Minister for Health Khyber Pakhtunkhwa Peshawar dated 22/8/2011 and as directed by the Special Secretary Health, Govt. of Khyber Pakhtunkhwa Peshawar dated 04.10.2011 regarding re-appointment of ex-LHW concerned. The ex-LHW Hasrat Begum may be re-appointed. She will be under strict observation for a probation period of 03 months extendable subject to her satisfactory performance to be reported by FPO and DCNP Swabi on monthly basis.

She will have to submit a fresh surety bond duly attested from class-I magistrate ensuring that in future she will perform her duty upto the satisfaction of her superiors. Moreover, she will not be entitled for any arrears for the period in which she was not in service.

NO 39273 /EDO(HEALTH) SWABI DATED THE 11 / 11 / 2011

Copy forwarded to t.e:-

1. MOIC PHU Ismaila
2. LHS Concerned
3. LHW Hasrat Begum for information and she is directed to submit a fresh surety bond duly attested by Class Magisterate.

Dist. Coord. for FSSC

ETAS

EXECUTIVE DISTRICT OFFICER.  
(HEALTH) SWABI

Date of Submission of Application 29-7-2015

Number of Vials 400

Number of 4

2

6

Name of Applicant [Signature]

Date of Completion of Work 29-7-2015

Date of Delivery of Copy 29-7-2015

BEFORE THE HONOURABLE SERVICES TRIBUNAL PESHAWAR

Appeal No. 1714/2011

Mst. Hasrat Begum..... Appellant

VERSUS

Secretary Health K.P.K, Peshawar etc..... Respondents

INDEX

S.No	Description	Annexure	Pages
1.	Grounds of appeal		1-4
2.	Affidavit		5
3.	Addresses of parties		6
4.	Copy of the termination letter	"A"	7
5.	Copy of the appeal	"B"	8
6.	Other documents	"C" & "D"	9-13
7.	Court Fee		
8.	Wakalat Nama		14

Appellant

Through

JAVED IQBAL GULBELA

Advocate, Peshawar

High Court Peshawar

JAVED IQBAL GULBELA

Advocate High Court, Peshawar  
& Federal Shariat Court of Pakistan

Cell # 0345 9405501

Office: - 9/10 Al-Nimra Center, Government College Chowk, Peshawar

(1)

BEFORE THE HONOURABLE SERVICES TRIBUNAL PESHAWAR

Appeal No. 1714/2011

Mst. Hasrat Begum W/o Mohammad Nihar R/o Johar Abad Village  
Ismaila District Swabi



petition  
1657  
11-10-11

VERSUS

1. Secretary Health K.P.K, Peshawar.
  2. Chief Coordinator National Program for family planning and primary health care, K.P.K, Peshawar.
  3. E.D.O Executive District Officer Health District Swabi.
  4. District Coordinator National Program for family planning and primary health Swabi.
  5. Incharge Basic Health unit Village Ismailia, Swabi.
- ..... Respondents

SERVICE APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED OFFICE ORDER NO. 589-90, DATED 22/06/2011 OF THE RESPONDENT NO.3 WHEREBY THE SERVICE OF THE APPELLANT WERE TERMINATED IN A CLASSICALLY ARBITRARY MANNER

ATTESTED  
Khyber Pakhtunkhwa  
Services Tribunal  
Peshawar

Respectfully Sheweth,

1. That the appellant was appointed as "L.H.W" (Lady Health Worker) on 01/02/2008 for B.H.U Ismailia Swabi.
2. That the appellant had been the most sincere and duty full servant and

Filed to-day  
11/10/11

Filed to-day  
18/10/11



(2)

duties to her utmost but even then were terminated vide impugned officer order No. 589-90, dated 22/06/2011. (Copy of the termination letter is annexure "A").

3. That as the termination was illegal, unwarranted, void ab-initio, so a departmental appeal was moved against the same to the learned respondent No.2 which is till pending and has not been disposed of, inspite of passing of three months i.e. statutory period. (Copy of the appeal is annexed as annexure "B")

4. That feeling aggrieved on the candid disposal of the departmental representation of the respondent No.2, the appellant prefers the instant appeal on the following grounds inter alia; -

**GROUNDS: -**

A. That the appellant is a naturally born citizen of Islamic Republic of Pakistan and is fully and equally entitled to all and basic rights as enshrined in the fundamental of the land, interpreted, guaranteed and enforced by the laws of the land.

B. That service of the appellant was terminated without any plausible reason and without any justification and without any fault on part of the appellant.

ATTESTED  
S. ENKESH  
2011

C. That neither any statement of allegations were ever issued nor served upon the appellant for the alleged misconduct or negligence in performance the duties.

D. That neither any charge sheet was issued to the appellant nor was ever asked to explain her position with respect to the alleged absence.

E. That neither any inquiry was ever conducted, nor any notice was ever served upon the appellant nor she was ever heard in person or through counsel prior to hr illegal termination.

F. That neither the appellant has ever been absented as alleged nor have ever been lethargic indifferent towards performing her duties.

G. That the service of the appellant were terminated without any reason and appellant was never allowed to defend her case and condemned unheard.

H. That the appellant is a poor widow having little kids, all school going, and the salary of the appellant was only source of income, which was hardly sufficient to meet the needs of here poor family.

APPEAL  
Khyber Pakhtunkhwa  
Public Tribunal  
Peshawar

I. That this sole source of lively hood of the appellant has been snatched from her & this poor family has been

(4)

- J. That the termination is not only illegal, unwarranted but is highly unjust, ab-initio void and a classical example of arbitration exercise of the discretionary powers vested in the department and is liable to be declared as null & void.
- K. That any other ground not raised here specifically would be raised at the time of arguments with the permission of this Honourable Court.

It is, therefore, most humbly prayed that on acceptance of this appeal impugned office order No. 589-90, dated 22/06/2011 of the learned respondent No.3 may kindly be set aside and the appellant may graciously be reinstated on her post, with all back benefits.

Certified to be true copy

THAKIR  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Through

Appellant

JAVED IQBAL GULBELA  
Advocate, Peshawar  
High Court Peshawar

Certificate: -

No such like appeal has earlier been filed by me for the same appellant.

Advocate

List of Books: -

1. Civil Servant act of 1973.
2. Civil services Tribunal act 1974.
3. Case Laws.
4. Any other book as per need.

5

BEFORE THE HONOURABLE SERVICES TRIBUNAL PESHAWAR

Mst. Hasrat Begum ..... petitioner

**VERSUS**

Secretary Health K.P.K, Peshawar etc..... Respondents

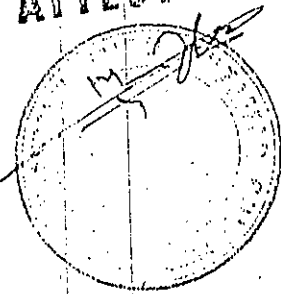
AFFIDAVIT

I, Mst. Hasrat Begum W/o Mohammad Nihar R/o Johar Abad Village Ismaila District Swabi do hereby solemnly affirm and declare on oath that the contents of the instant appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

Deponent

*(Signature)*

**ATTESTED**



10 OCT 2011

8

BEFORE THE HONOURABLE SERVICES TRIBUNAL PESHAWAR

Mst. Hasrat Begum ..... Appellant

VERSUS

Secretary Health K.P.K, Peshawar etc..... Respondents

ADDRESSES OF PARTIES

ADDRESS OF APPELLANT: -

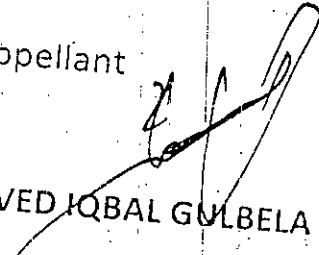
Mst. Hasrat Begum W/o Mohammad Nihar R/o Johar Abad Village  
Ismaila District Swabi

ADDRESSES OF RESPONDENTS: -

1. Secretary Health K.P.K, Peshawar.
2. Chief Coordinator National Program for family planning and primary health care, K.P.K, Peshawar.
3. E.D.O Executive District Officer Health District Swabi.
4. District Coordinator National Program for family planning and primary health Swabi.
5. Incharge Basic Health unit Village Ismailia, Swabi.

Appellant

Through

  
**JAVED IQBAL GULBELA**  
 Advocate, Peshawar  
 High Court Peshawar

7

Government of Pakistan

Provincial Programme Implementation Unit, Khyber Pakhtunkhwa  
National Programme for Family Planning & Primary Health Care

Am-A

Date: 16/6/2011

SWABI

TERMINATION OF LHW

In accordance to the decision made in the minutes of EPOs meeting for the  
date 15/06/2011 whereby Ms. Hadrat LHW attached to BUI Ismaila District  
was recommended for termination for the following reasons:

- Absence from duty
- Lack of instructions of duties
- Absence from duty which is against the instructions of Competent  
Authority
- Absence from duty for other LHWs.

In view of the above services of Ms. Hadrat LHW attached to BUI Ismaila  
District Ismaila, terminated with immediate effect as per policy of National  
Programme for Family Planning & Primary Health Care.  
The same is being reported to the LHW concerned.

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (HEALTH) SWABI

No. 589-90/2011 (Health) Swabi Dated This 22/6/2011

Copy forwarded to the following:-

1. MOJO BUI Ismaila
2. EMS Concerned (She is directed to collect all the items along-  
with accessories.
3. LHW Hasrat Begum BUI Ismaila  
(for information and action).

EXECUTIVE DISTRICT OFFICER  
(HEALTH) SWABI

(7)

Government of Pakistan  
Provincial Programme Implementation Unit, Khyber Pakhtunkhwa  
National Programme for Family Planning & Primary Health Care

3022-25/PC

Dated 16/6/2011

Executive District Officer Health  
SWABI

Subject: - TERMINATION OF LHW

Your reference to the decision made in the minutes of FPOs meeting for the April, & May 2011 whereby Ms. Hasrat LHW attached to BHU Ismaila District has been recommended for termination for the following reasons.

- Mostly remains absent from duty
- Not following instructions of her LHS
- Refusal from NIDs duty which is against the instruction of competent authority
- Manage duties/problems for other LHWs.

In the light of above fact the services of Ms. Hasrat LHW attached to BHU Ismaila District and hereby terminated with immediate effect as per policy of National Programme FP & PHC.

EDO Swabi may collect program material from the LHW concerned/

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (HEALTH) SWABI

NO 589-90/EDO (Health) Swabi Dated the 22/6/2011

Copy forwarded to the following:-

1. MOIC BRU Ismaila
2. LHS Concerned (Sne is directed to collect all the kit items alongwith accessories)
3. LHW Hasrat Begum BHU Ismaila (for information and nec action)

JAVED IQBAL GULBELA  
Advocate High Court, Peshawar  
& Federal Shariat Court of Pakistan

EXECUTIVE DISTRICT OFFICER  
(HEALTH) SWABI

(8)

Ami-B

بخدمت جناب نیشنل پروگرام خاندانی منصوبہ بندی ہیڈ آفس خیبر پختونخواہ پشاور

جناب عالی!

گزارش ہے کہ سائلہ LHW منگہ گوہر آباد گاؤں اسماعیلہ ضلع صوابی میں اپنے یتیم بچوں کے ساتھ رہائش پذیر ہوں اور وہاں کی مستقل باشندہ ہوں۔ وہاں پر 1690 آبادی میں کام کر رہی ہوں۔ زیادہ آبادی ہونے کی وجہ سے ابھی شروع یعنی سائٹ پر کام کر رہی تھی۔

اس دوران مورخہ 7/3/011 کو میں اپنے ایریا میں ڈیوٹی پر موجود تھی، اور سائلہ کے ایل ایچ ایس امریزہ نے آکر ایریا کے آخر میں دو تین گھر دیکھ کر دفتر والوں کو فون کیا کہ ایل ایچ ڈبلیو حسرت بیگم ڈیوٹی پر موجود نہیں ہے۔ حالانکہ من سائلہ اس وقت ایریا کے شروع میں کام میں مصروف تھی۔ ایل ایچ ایس نے من سائلہ کے خلاف جھوٹ بول کر ادارہ سازش کے تحت مجھے ملازمت سے نکلنے کی کوشش کی ہے، اور دوسرے ایل ایچ ڈبلیو کو جھوٹے گواہ بنا کر میرے خلاف جھوٹی سازش کی۔ اس جھوٹ کی بنیاد پر سائلہ کے خلاف ٹرینیشن لیٹر جاری ہوا۔ اس طرح رواں سال کے دو ماہ یعنی مارچ اور اپریل کے تنخواہیں بند کیے۔ حالانکہ میرے ایل ایچ ایس کو میرے آبادی کا علم تھا۔ وہ یہ بھی بول سکتی تھی جو کہ حقیقت ہے کہ وہ زیادہ آبادی ہونے کی وجہ سے ایریا کے آخر تک پہنچی نہیں۔ مگر ایل ایچ ایس نے مجھے اکیلی سمجھ کر حقیقت کے برعکس میرے خلاف جھوٹا پروپیگنڈہ کیا۔ من سائلہ نے ڈیوٹی مورخہ 01/11/10 سے شروع کی ہے اور مورخہ 2/7/11 کے رپورٹ تیار کر کے متعلقہ دفتر میں جمع کی ہے۔ ایل ایچ ایس کی ساری جھوٹی الزامات بے بنیاد ہیں کیونکہ من سائلہ کے پاس تمام کی تمام پو بیو ڈے کے ثبوت موجود ہیں۔ من سائلہ اپنے تمام رپورٹ اور ثبوت اس درخواست کے منسلک کرتی ہوں۔

من سائلہ کی سینئر صاحبان سے التجا ہے کہ من سائلہ کی سچائی کی بنیاد پر من سائلہ کے خلاف جھوٹی اور بے بنیاد الزامات کو ختم کرنے کے سائلہ کے خلاف ٹرینیشن لیٹر ختم کر کے سبالی کالیٹر دیدیں مزید یہ کہ سائلہ کو دو ماہ مندرجہ بالا کی تنخواہیں دینے کے احکامات صادر فرما کر مشکور فرمائیں تاکہ من سائلہ کو انصاف مل سکے۔ من سائلہ اور ان کے چھوٹے چھوٹے یتیم بچے ساری زندگی دعائیں دیتے رہینگے۔

المرقوم: 06/07/2011

العارض

حسرت بیگم بیوہ محمد منگل منگہ گوہر آباد گاؤں اسماعیلہ ضلع صوابی۔

موبائل نمبر: 0305-9552925



# خدمت جناب سپیشل سیکرٹری ہیلتھ صوبہ خیبر پختون خواہ پشاور

Am-c

درخواست برائے بحالی ملازمت ودلانے انصاف

جناب عالی!

کراچی ہے، کہ سائلہ LHW محلہ گوہر آباد گاؤں اسماعیلہ ضلع صوابی میں اپنے یتیم بچوں کے ساتھ رہائش پذیر ہوں۔ اور وہاں کی مستقل باشندہ ہوں، جبکہ سائلہ کا ذریعہ معاش سائلہ کی نوکری بطور L.H.W گاؤں اسماعیلہ میں ہے۔ من سائلہ کو جائیداد کی خاطر اپنے سر سے گھر سے نکال دیا، جس کی وجہ سے سائلہ پشاور آگئی، لیکن انہوں نے پشاور میں بھی سائلہ کا پیچھا نہیں چھوڑا۔ علاوہ ازیں من سائلہ کا جائیداد کے سلسلہ میں اپنے والد اور بھائیوں کے ساتھ تنازعہ چل رہا ہے، اور بھائیوں نے مجھے اور میرے بچوں کو جان سے مارنے کی دھمکی بھی دی ہے۔ جس کی وجہ سے ہر وقت اپنی اور بچوں کی جان کا خطرہ ہوتا ہے۔ اور پورے ضلع صوابی میں من سائلہ کے والد اور بھائیوں نے یہ درخواست دی ہے، کہ من سائلہ کی کوئی شناہائی نہ کی جائے۔ ان ہی ظالموں کی سازشوں کی وجہ سے سائلہ کی نوکری بھی پھین گئی ہے۔ اور اب سائلہ درر کی ٹھوکریں کانے پر مجبور ہو گئی ہوں، سائلہ نے ہر طرح کی مزدوری کر کے اپنے یتیم بچوں کو پالا ہے۔ اب جبکہ من سائلہ نے نوکری کی بحالی کے لئے درخواست دی ہے، تو محکمہ والوں نے سائلہ پر الزام عائد کیا ہے، کہ من سائلہ اپنے ساتھ پستول رکھتی ہوں۔ تو من سائلہ اپنی اور اپنے بچوں کی حفاظت کی خاطر حکومت پاکستان کی اجازت کے بعد پستول ساتھ رکھا ہے۔ اگر سائلہ کسی قسم غیر قانونی یا غیر اخلاقی کام میں ملوث ہوتی، تو سال 2004ء کو من سائلہ کو کونسلر کی نشست نہ دی جاتی۔ اگر انفران بالا مجھ کو اپنی جان کی حفاظت کرنے پر ملزم قرار دیتے ہیں، تو اس کی اجازت تو من سائلہ کو سرکار نے دی ہے۔ سپر وائزر صاحبہ نے من سائلہ کی نوکری ختم کرنے کے لئے بھاری رشوت وصول کی ہے۔ تمام سابقہ درخواست ہاؤڈیگر کاغذات لف درخواست ہذا ہیں۔

جناب عالی!

پورے صوبہ خیبر پختون خواہ میں من سائلہ اور میرے بچوں کے رہنے کے لئے کوئی جگہ نہیں ہے، تو ازراہ کرم آپ صاحبان ہی بتائیں، کہ ہم لوگ کہاں جائیں، اور کس سے انصاف مانگیں۔ ان ظالموں کی وجہ سے من سائلہ نے اپنے بچوں کو گاؤں کے سکول اور کالجوں سے اٹھا کر دوسرے ملائوں میں بٹھائے ہیں۔

لہذا استدعا ہے، کہ سائلہ کے حالات و واقعات کو مد نظر رکھتے ہوئے من سائلہ کو نوکری پر بحالی کرنے میں

مفرا کر مشکور فرمائیں۔

الرقوم:- 22/08/2011

الحاضر:

حسرت بیگم بیوہ محمد نبار

ساکن محلہ گوہر آباد گاؤں اسماعیلہ ضلع صوابی

موبائل: 0305-9552925

pleased  
to  
hear

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فہرست  
سال  
دی کا نم  
بک پختون  
کیا۔ من سائلہ  
رک کے متعلقہ دفتر  
کے پاس تمام کی  
درخواست کے

کے خلاف  
یک مزید  
سائلہ کو

## بخدمت جناب چیف ایگزیکٹو صحت ضلع صوابی

درخواست بہرہ جالی ملازمت

- 1- جناب عالی! سالکہ حسب ذیل عرض رساں ہے۔  
گزارش ہے کہ سالکہ LHW ملکہ گوہر آبادہ کوس اسماعیلہ ضلع صوابی میں اپنے یتیم بچوں کے ساتھ رہائش پذیر ہوں۔ اور وہاں کی مستقل باشندہ ہوں، وہاں پر 1690 آبادی میں کام کرتی ہوں۔
- 2- یہ کہ سالکہ کوس کھڑت اور جھونے الزامات لگا کر مورخہ 16 جون 2011ء کو ملازمت سے برخاست کر دیا گیا ہے۔
- 3- یہ کہ من سالکہ ایک بیوہ عورت ہوں، اور میرے یتیم بچے ہیں، اور غربی اور بے روزگاری کی وجہ سے من سالکہ کی مالی حالت بہت خراب ہو چکی ہے۔ بچوں کو درودت کا کھانا بہت مشکل سے پیدا کرتی ہوں۔ علاوہ از اس ان کا تعلیمی مستقبل بھی تاریک ہوتا نظر آ رہا ہے۔
- 4- یہ کہ من سالکہ کی زندگی جا سیدار ہے، اور نہ ہی اس کو کرنی کے علاوہ کوئی ذریعہ معاش ہے۔ اور نہ ہی اللہ کے علاوہ دوسرا کوئی مذکر کرنے والا ہے۔
- 5- یہ کہ من سالکہ نے ملازمت کی بحالی کے لئے متعلقہ آفسران کو کئی درخواستیں دیں، لیکن اس پر کوئی کارروائی نہیں ہوئی۔
- 6- یہ کہ من سالکہ اپنے خاندان کی وجہ سے ہر طرف سے معیشتوں میں گرفتار ہوں۔

من سالکہ کی سینئر صاحبان سے التجا ہے کہ من سالکہ کی سچائی کی بنیاد پر من سالکہ کے خلاف جھونے اور بے بنیاد الزامات ختم کر کے مجھے بحال کر کے کام پر لائیں۔ سالکہ اور اس کے چھوٹے یتیم بچے آپ کے لئے دعا گو رہیں گے۔

المرقوم: 13/09/2011

Pl. consider  
put to P.C. Khyber Pakhtunkhwa

29/9/11

EDD Smt. Sabir

العارض:

صورت یتیم بیوہ محمد بہار

ساکن ملکہ گوہر آبادہ کوس اسماعیلہ ضلع صوابی

موبائل: 305-9552925

H. Begam

WPC  
Smt. Sabir  
Khyber Pakhtunkhwa

29/9/11

*[Handwritten signature]*

(11)

تصویر نام

Ann-D

تصویر نام ہے کہ صورت 4H نر صوم مار 22 مار 73/11

بچ 7 مار ویسٹ انڈین شریٹ و نرہ و صوم مار 22 مار 73/11

اور 7 مار ویسٹ انڈین شریٹ و نرہ و صوم مار 22 مار 73/11

و نرہ و صوم مار 22 مار 73/11

10/19/2011

Epi Tech

FPH

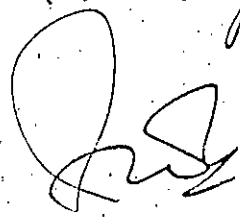
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CERTIFICATE

(12)

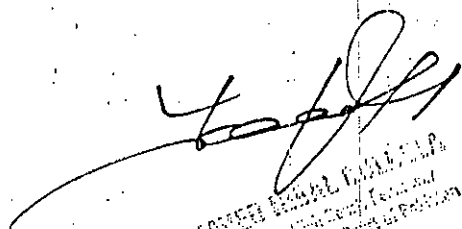
CERTIFIED that Hasrat-Begum  
L-H-W Mohallah Gohar-Abad (Ismaila)  
visited G.P.S Sarak Koroon (Ismaila)  
(Hafiz-Abad) on 7th march 2011  
for the purpose of polio vaccination.

The above statements are correct  
according to my knowledge.



Head Master  
G.P.S Sarak Koroon  
Ismaila (Swabi)

10-9-2011




DISTRICT OFFICER  
Khanan District Council, Ferozabad  
& Federal Board of Control, Pakistan

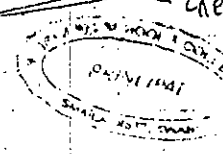
(13)

certified that Hasvath Begum

attendance Islamia P. B School  
Ismail Swabi on 7 March 2011

 Ch. P. D. Khan

Matr. 03068782983

 10-9-11





لہذا اس کے بارے میں طبعاً کوئی درخواست  
نہیں کی جائے گی۔  
فوری انصاف فراہم کیا جائے۔

الذکر  
المرفوع  
25/02/2016

اللہ بذریعہ خود

(H) BM

1



**BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.**

**APPEAL NO. 137/2016.**

**st. Husrat Begum Ex-LHW W/O Muhammad Nihar R/O Johar Abad,  
Village Ismaila, Tehsil Razzar & District Swabi.....(Appellant)**

**VERSUS.**

- 1. Govt: of Khyber Pakhtunkhwa, Through Deputy  
Commissioner Swabi.**
- 2. The Chief Coordinator National Program for Family Planning  
& Primary Health Care Khyber Pakhtunkhwa Peshawar.**
- 3. The District Health Officer Swabi.**
- 4. The District Coordinator LHWs Program Swabi.**
- 5. The District Coordinator National Program Swabi.**
- 6. Incharge Basic Health Unit Village Ismaila Swabi.  
.....(Respondents)**

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**DISTRICT HEALTH OFFICER  
SWABI**

1

**BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR**

**APPEAL NO. 137/2016**

Mst. Husrat Begum Ex-LHW W/O Muhammad Nihar R/O Johar Abad, Village Ismaila, Tehsil Razzar & District Swabi..... (Appellant)

**VERSUS**

1. Govt: of Khyber Pakhtunkhwa, through Deputy Commissioner Swabi.
2. The Chief Coordinator National Program for family planning and primary health care, Khyber Pakhtunkhwa, Peshawar.
3. The District Health Officer, District Swabi.
4. The District Coordinator LHWS Programme Swabi.
5. The District Coordinator National Programme Swabi.
6. Incharge Basic Health Unit village Ismaila, Swabi.

..... (Respondents)

**WITTEN STATEMENT ON BEHALF OF THE RESPONDENTS PRELIMINARY  
OBJECTIONS**

**Respectfully Sheweth:**

1. That the appellant have no cause of action/ locus stand.
2. That the appellant have deliberately concealed the material facts from this Honorable Tribunal, hence liable to be dismissed.
3. That the appellant have not come to this tribunal with clean hands.
4. That the appellant have filed the instant appeal just to pressurize the respondents.
5. That the appellant have filed the instant appeal on malafide motives.
6. That the instant petition is against the prevailing Law and Rules.
7. That the appellant is not maintainable in the present form and also in the present circumstances of the issue.

**FACTS:**

1. Correct, Ex-LHW Musarrat Begum appointed as LHW w.e.f 23.01.2008 and was terminated from duty due to NR (not resident) vide No.2104-05/EDO dated.10.10.2009. Later on as per directive by Provincial Coordinator vide No.1683/PC dated 13.11.2010 her case for reappointment submitted and was reinstated vide No.1796/PC dated 28.10.2010 (copy attached Annex-A). On 15.11.2011, LHS of the said LHW reported regarding her irregularities and explanation to this effect was issued vide No.2254-

55/EDO dated 16.11.2010 (copy attached Annex-B). Reply not received in March and April 2011.

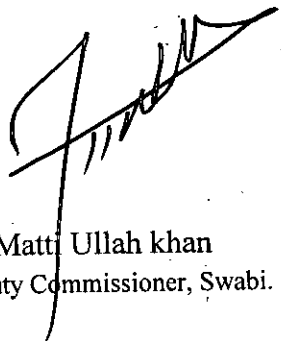
FPO (representative of PPIU) visited her health house and reported about her during review monthly meeting upon which, the provincial Coordinator recommended her termination, and issued termination order vide 3522-25/PC dated 16.06.2011 (copy attached Annex-C).

2. Incorrect. She was not sincere to her duties and not obliged to her senior as it is evident from her file.
3. Incorrect, she is irregular in her duties and several explanations in this regard have been issued to her vide No.78/DHO dated 26.01.2015, No.239/DHO dated 11.05.2015 and No.250/DHO dated.27.05.2015 (copy attached Annex-D) and but she did not replied, Pay of irregular LHW's were stopped vide this office order No. 7481/DHO dated.12.10.2015 (copy attached Annex-E).
4. Incorrect, Respondent No.1 (Deputy commissioner) sent her case to DHO vide letter No.2863/DCS/Ps dated 27.10.2015 and was responded by the office concerned vide No.7720 /DHO dated 30.10.2015 (copies attached Annex-F)
5. No. Comments.

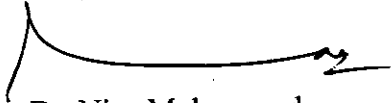
**OBJECTION TO GROUNDS:**

- A. Correct.
- B. Incorrect, as in para 3 above.
- C. Incorrect, she was directed through explanations to attend the office but she neither attended the office nor submitted any reply.
- D. Incorrect, she is irregular in her duties and does not submit her monthly reports nor take part in any activities since long. (photo copies of monthly reports attached Annex-G).
- E. Correct, but she is not interested to take part in her duties.
- F. As per serial "E" above.
- G. Incorrect, she was directed by DHO verbally during personal hearing that her pay will be released on improving of her performance in the next one month, otherwise she will be terminated. Even then she failed to improve her performance till now.


Keeping in view the facts and grounds it is humbly prayed the appeal may please be rejected/dismissed with cost.



Mr. Matti Ullah Khan  
Deputy Commissioner, Swabi.

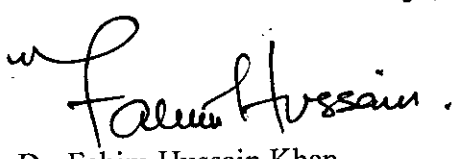


Dr. Niaz Mohammad  
District Health Office,  
District Swabi.

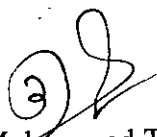


Dr. Raheel Shehzad  
Incharge Basic Health Unit,  
Village Ismaila, Swabi.

5



Dr. Fahim Hussain Khan  
Provincial Coordinator LHW's Programme  
Peshawar.



Dr. Mohammad Tariq  
District Coordinator LHWS Programme Swabi.  
District Coordinator National Programme Swabi.

7

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**APPEAL NO. 137/2016**

Mst. Hasrat Begum Ex-LHW W/O Muhammad Nihar R/O Johar Abad village Ismaila Teshil  
Razzar and District Swabi

.....(Appellant)

**VERSUS**

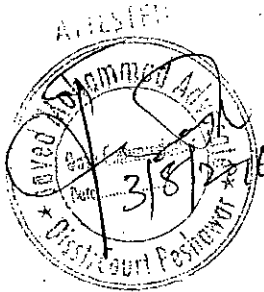
1. Govt: Khyber Pakhtunkhwa through Deputy Commissioner Swabi
2. Chief Coordinator National Program Khyber Pakhtunkhwa
3. The District Health Officer, District Swabi
4. The District Coordinator LHW Program Swabi
5. Incharge Basic Health Unit village Ismail Swabi

.....(Respondents)

**AFFIDAVIT**

I, Dr. Niaz Muhammad District Health Officer Swabi do hereby solemnly affirm and declare that the contents of parwise comments /written statement submitted by the respondents are true and correct to the best of my knowledge, record, belief and that nothing has been concealed from Honorable Tribunal.

  
DISTRICT HEALTH OFFICER,  
DISTRICT SWABI



1 A/9



# Government of Pakistan

Provincial Programme Implementation Unit, NWFP  
National Programme for Family Planning & Primary Health Care



No. 1796 /PC

Dated: 28 / 10 /2010

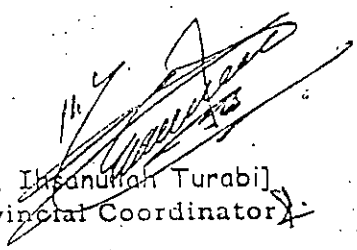
To

Executive District Officer (Health)  
Swabi

Subject: - REAPPOINTMENT OF EX-LHW HASRAT BEGUM DISTRICT SWABI

Consequent upon the receipt of favourable comments on Re-appointment Proforma vide your letter No.2219/EDO(H) dated 19.10.2010 as well as Field Program Officer Swabi regarding re-appointment of ex-LHW concerned. It has been decided that ex-LHW Hasrat Begum may be re-appointed as LHW.

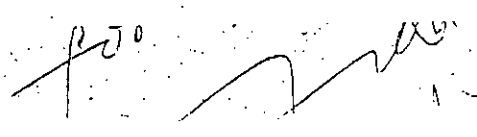
She will have to submit a fresh surety bond duly attested from class-I magistrate. She will not be entitled for any arrears for the period in which she was not in service.

  
[Dr. Ihsanullah Turabi]  
Provincial Coordinator

ENDST: OF EVEN No. & DATE.  
Copy forwarded for information to:

1. District Coordinator NP for FP & PHC Swabi
2. Field Program Officer NP for FP & PHC Swabi.
3. Finance Officer PPIU Khyber Pakhtunkhwa
4. MIS-C Section PPIU Khyber Pakhtunkhwa
5. LHW concerned.

C:\Documents and Settings\Administrator\Favorites\2010 letters\Reappoint of Farzana Noman.doc

  
MUHAMMAD  
P.H.U



**Government of Pakistan**  
 Provincial Programme Implementation Unit, NWFP  
 National Programme for Family Planning & Primary Health Care



No. 1683 /PC  
 Dated: 13/10/2010

To ✓ District Coordinator  
 National Programme for FP & PHC,  
Swabi

Subject: - REAPPOINTMENT OF EX-LHW HASRAT BEGUM OF DISTRICT SWABI

Enclosed please find herewith copy of an application submitted by ex-LHW Hasrat Begum regarding the subject captioned above.

You are requested to send her case on properly filled Re-appointment Proforma duly signed by all signatories to this office on urgent basis to proceed further.

Encl:(AA)

*(Signature)*  
 (Dr. Ihsanullah Turabi)  
 Provincial Coordinator

ENDST: OF EVEN No. & DATE.  
 Copy forwarded for information to:

1. Executive District Officer (Health) Swabi.
2. PS to Minister for Health Khyber Pakhtunkhwa, Peshawar w/r to his letter No.PS/Min Health/KPK/I-25/10/1467-69 dated 16.09.2010.
3. PS to DGHS, Khyber Pakhtunkhwa, Peshawar w/r to his letter No.24340/AE-VI dated 05.10.2010.
4. Field Programme Officer, NP for FP & PHC Swabi, for urgent comments.

D:\PC\img\Hassra Bibi reappointment.doc D:\PC\img\Hassra Bibi reappointment.doc

B13

No. 256-55 EDO (H) Swabi.

Dated the 16/11/2010

From:

The District Coordinator  
National Programme for FP&PHC  
Swabi.

To:

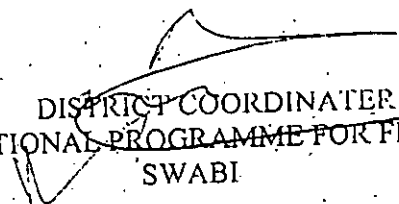
Miss Hasrat Begum, LHW BHU Ismaila

Subject:

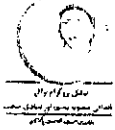
EXPLANATION

It has been reported by LHS that you are irregular in your duties. When ordered you to perform your duties you abused and pressurized her that I have been appointed from higher authorities and I will obey their order. You are also quarrelling with her. Which is highly objection and against the programme policy.

The undersigned has taken a serious view of it and you are hereby directed to explanation your position for non compliance of rules/regulations within 03 days after receipt of this letter.

  
DISTRICT COORDINATOR  
NATIONAL PROGRAMME FOR FP&PHC  
SWABI





Government of Pakistan

Provincial Programme Implementation Unit, Khyber Pakhtunkhwa  
National Programme for Family Planning & Primary Health Care

No. 3522-25 /PC

Dated: 16/6/2011

To

Executive District Officer Health  
**SWABI**

Subject: **TERMINATION OF LHW**

With reference to the decision made in the minutes of FPOs meeting for the months of April & May 2011 whereby Ms. Hasrat LHW attached to BHU Ismaila, District Swabi has been recommended for termination for the following reasons:

- Mostly remains absent from duty.
- Not following instructions of her LHS.
- **Flatly refusal from NIDs duty**, which is against the instructions of Competent Authority.
- Making hurdles/problems for other LHWs.

In the light of above facts, the services of Ms. Hasrat LHW attached to BHU Ismaila District Swabi is hereby terminated with immediate effect as per policy of National Program for FP & PHC.

DPIU Swabi may collect program material from the LHW concerned.

(Dr. Anisullah Turabi)  
Provincial Coordinator

ENDRST OF EVEN No. & DATE:  
Copy forwarded for information to:

1. Finance Officer PPIU to please note.
2. Field Program Officer Swabi
3. District Coordinator NP Swabi

1842  
21-6-11

D:\All Documents\Termination\Termination of LHW from PPIU Side-Swabi.doc

666/1, Younas Road, Off The Mall, Peshawar Cantt. Phone/Fax : 9213546-47  
Email: [ppiunwfp@yahoo.com](mailto:ppiunwfp@yahoo.com)



Office Of The District Health Officer Swabi

Email ID: [edohealthswabi@yahoo.com](mailto:edohealthswabi@yahoo.com)

Office Tel & Fax: 0938-280008



No. 78 /EDO (H) Swabi Dated: 26/11/2015

To : Miss Hassrat Begum, LHW  
BHU Ismaila.

Subject:- EXPLANATION

It has been reported to the undersigned that you are irregular in your duties and not interested in your work. Also your visits in community are totally Nil.



The undersigned has taken a serious view of it and you are hereby directed to explain your position within 01week after receipt of this letter and attend the office of the undersigned along with complete record.

  
DISTRICT COORDINATOR  
LHWS PROGRAMME FOR FP&PHC  
SWABI 

NO 79-80 /DHO SWABI

Copy forwarded to the:-

1. MOIC BHU Ismaila
2. LHS concerned  
(for information)

  
DISTRICT COORDINATOR  
LHWS PROGRAMME FOR FP&PHC  
SWABI 



Office Of The District Health Officer Swabi

Email ID: edohealthswabi@yahoo.com

Office Tel & Fax: 0938-280008

No. 239 /EDO (H) Swabi Dated: 11/5/2015

49


To : Miss Hassrat Begum, LHW  
BHU Ismaila:

Subject:- EXPLANATION.

Reference this office letter No.78/DHO dated 26.01.2015

It has been reported by LHS concerned to the undersigned that you are irregular in your duties and not interested in your work. Also your visits in community are totally Nil. An explanation to this effect has already been asked vide letter under reference.


The undersigned has taken a serious view of it and you are hereby directed to explain your position within 01week after receipt of this letter and attend the office of the undersigned along with complete record. In case of non compliance strict action will be taken against you.

  
DISTRICT COORDINATOR  
LHWS PROGRAMME FOR FP&PHC  
SWABI

NO 240-41 /DHO SWABI

Copy forwarded to the:-

1. MOIC BHU Ismaila
2. LHS concerned  
(for information)

  
DISTRICT COORDINATOR  
LHWS PROGRAMME FOR FP&PHC  
SWABI



**Office Of The District Health Officer Swabi**

Email ID: [edohealthswabi@yahoo.com](mailto:edohealthswabi@yahoo.com)

Office Tel & Fax: 0938-280008

No. 250 /EDO (H) Swabi Dated: 27/5/2015

**3<sup>rd</sup> EXPLANATION.**



To : Miss Hassrat Begum, LHW  
BHU Ismaila.

Subject: - **EXPLANATION.**

Reference this office letter No.78/DHO dated 26.01.2015 and 239/DHO dated 11.05.2015.

It has been observed from facility monthly report that you have failed to submit your monthly reports since long. You are also irregular in your duties. Explanations to this effect and regarding your irregularities has already been asked vide letters under reference but no positive action has been taken so far.



You are once again directed to explain your position within one week and attend the office of the undersigned alongwith your record, otherwise strict action will be taken against you according to rules/regulation.

  
DISTRICT COORDINATOR  
LHWS PROGRAMME FOR FP&PHC  
SWABI 

NO 251-52 /DHO SWABI

Copy forwarded to the:-

1. MOIC BHU Ismaila
2. LHS concerned  
(for information)

  
DISTRICT COORDINATOR  
LHWS PROGRAMME FOR FP&PHC  
SWABI 

93

**OFFICE OF THE DISTRICT COORDINATOR NP& PHC DISTRICT SWABI.**

No 7481/N-2 /DHO Swabi Dated The 12/10/2015

From : The Distinct Health Officer  
Swabi

To : The Manager,  
Habib Bank Limited  
Shewa Adda

Subject:- **STOPPAGE OF PAY/STIPEND**

Reference pay roll for the month o September 2015.

I have the honor to state that the following LHWs attached to Civil Hospital Kalu Khan has submitted their applications for pre mature retirement and their case is in process. They are also failed to submit their monthly report due to non interest in their duties since long:-

S/No	Name of LHW	Account No
1	Sadaqat Begum W/O Jehad Ali	8139-7
2	Mumlikat W/O Mushtaq Ali	8142-5
3	Mehar Angreza W/O Mir Dad Khan	8143-3
4	Hasrat Begum W/o Nihar Ali	10748-8

Keeping above in view it is requested that their pay for September 2015 may please be stopped and return the same to HBL Arbab Road Peshawar under intimation to all concerned.

An early action is requested please.

*[Signature]*  
DISTRICT HEALTH OFFICER  
SWABI

*[Signature]*  
for  
DISTRICT COORDINATOR  
LHWs PROGRAMME SWABI

25/E/1

**OFFICE NOTE:-**

Respected Sir,

I have the honor to state that the following LHWs of the facilities as shown against their names are irregular in their duties as per detail given below:-

S/No	Name of LHW	Name of FLCF	Detail of irregularities
1	Sadaqat Begum W/O Jehad Ali	CH Kalu Khan	Submitted their application for premature retirement since five months ago and not performing their duties and not submitting report from the same date.
2	Mumlikat W/O Mushtaq Ali	-do-	-do-
3	Mehar Angreza W/O Mir Dad Khan	-do-	-do-
4	Hasrat Begum W/O Nihar Ali	BHU Ismaila	Irregular in her duties since 02 years. Not performing duties in field and also failed to submit her monthly report from the same date.
5	Fatima D/O Saeed Ul Ahad	BHU Mankai	Not submitted her monthly report sine 03 months.

It is suggested that their pay may please be stopped with immediate effect.

Submitted for orders/information please.

*approval as suggested*

District Health officer

Swabi

*9/10/15*  
District Coordinator LHWs Programme  
Swabi



27

# DEPUTY COMMISSIONER SWAB

Tel #: 0938 - 221300

E-mail: dcswabi@yahoo.com

Fax #: 0938 - 221917 - 2

No. 2863 1/DCS/PS

Dated 27 /10/2015.

To:-

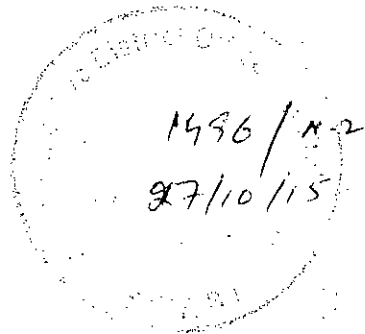
The District Health Officer, Swabi.


Subject:-

APPLICATION.

Memo:-

Enclosed please find herewith an application submitted by Musarat Begum W/O Muhammad Nihar R/O Ismaila (LHW) for necessary action under the law.



  
Deputy Commissioner,  
Swabi.

NP  
Co-ordinator  
for  
Detailed Report  
f

OFFICE OF THE DISTRICT HEALTH OFFICER SWABI

Email ID: [edohealthswabi@yahoo.com](mailto:edohealthswabi@yahoo.com)

Office Tel & Fax: 0938-280008

No. 7720/n-2/DHO Swabi

Dated: 30/10/15




To

The Deputy Commissioner  
Swabi

SUBJECT: APPLICATOIN

Sir,

The comments of District Coordinator LHWs Program District Swabi enclosed which is self explanatory for further necessary action.

  
District Health Officer  
Swabi



31

OFFICE NOTE.

Subject:     **APPLICATION.**

Sir

It is submitted that LHW Hasrat Bagum (New named Musrat Begum) attached to Basic Health Facility Ismaila got injured on 03.07.2013 and remain under treatment but uptill now she has not applied for any leave. Neither she is punctual in her duties nor submitted any monthly performance report to her LHS at the end of month.

Explanations regarding her irregularities asked vide this office letter No. 78/DHO dated 26.01.2015, letter No. 239/DHO dated 11.05.2015 and letter No.250/DHO dated 27.05.2015 but no reply has been received so far.

In September 2015, pay stopped due to her irregularities and also directed to improve her work.

Her pay will be released on improvement of work and punctual submission of her monthly performance report.

Submitted as desired Please.

*DB*  
*29/10/15*

**DISTRICT COORD LHWs PROGRAMME  
SWABI.**

*net*  
**DISTRICT HEALTH OFFICER  
SWABI.**

Health Department, Khyber Pakhtunkhwa  
Lady Health Workers Program  
Provincial Programme Implementation Unit, Peshawar



33

No: 1489

Date: 11/11/2015

To

District Coordinator  
LHWs Program  
Swabi

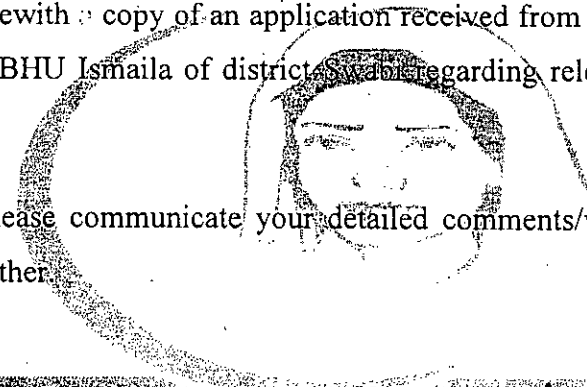
N-2

Subject:

RELEASE OF SALARIES OF LHW HASRAT BEGUM OF DISTRICT SWABI.

Enclosed please find herewith a copy of an application received from LHW Hasrat Begum W/O of Nihar Khan of BHU Ismaila of district Swabi regarding releases of her pending salaries.

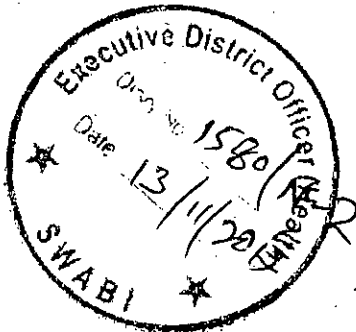
You are requested to please communicate your detailed comments/verification report to this office to proceed further.



*Fahim Hussain Khan*  
(Dr. Fahim Hussain Khan) 10/11/15  
Provincial Coordinator

CC:

1. District Health Officer Swabi.
2. Field Programme Officer, LHWs Program, Swabi with copy of application for early comments.



*N/P*  
*Co-ordinator*  
*to please comment*



OFFICE OF DISTRICT COORDINATOR LHW PROGRAMME FOR  
FP&PHC Swabi

Office Tel & Fax: 0938-280008

No. 520/DHO/NP Dated 16/11 /2015.

To


The Provincial Coordinator  
LHW Programme Khyber Pakhtunkhwa  
Peshawar.


Subject:- RELEASE OF SALARY OF LHW HASRAT BEGUM OF DISTRICT  
SWABI.

Memo.

Reference your letter No. 1489 dated 11.11.2015.

A photo copy of detailed comments on the subject is enclosed herewith for  
favour of further necessary action.

  
District Health Officer  
Swabi

  
DISTRICT COORDINATOR  
LHW'S PROGRAMME for PF&PHC  
SWABI

محکمہ صحت پنجاب ڈسٹرکٹ ہسپتال کوٹلیہ ضلع جہلم

جناب عالی

موجودہ ذرا نیچے کی جگہ سے 14 مارچ 1973ء کو

جنگل لڈلٹ Billa اسرار علی سے 14 مارچ سے غیر حاضر ہوئے

1. عادیہ منہ شہد سے غیر حاضر ہوئے

2. الخلاء جیلے کے باوجود راجندر سنگھ نے 14 مارچ سے

3. 14 مارچ سے غیر حاضر ہوئے

4. زینب خانم وائرس کے بارے میں 14 مارچ سے غیر حاضر ہوئے

5. جڈلٹ پروگرام میں دیا

6. 14 مارچ سے غیر حاضر ہوئے

7. جناح کے پتوں کے مقام سے خدمات اٹھانے دیا

8. 14 مارچ سے غیر حاضر ہوئے

9. 14 مارچ سے غیر حاضر ہوئے

10. 14 مارچ سے غیر حاضر ہوئے

Recommended & Forwarded to

DHO for further necessary action

& suggesting to call an inquiry against

her & inquire the matter either to salary

terminate her or least state her and letter

to her queries as well

14/3/73

Date: 3-3-73

03/03/2016

7-4-73  
7/4/73  
7/4/73





# لیڈی ہیلتھ ورکرز پروگرام برائے بنیادی صحت خیبر پختونخوا

## ماہانہ رپورٹ برائے مرکز صحت

ماہ نومبر سال ۲۰۱۵ء نام مرکز صحت اسماعیلہ BH-۱۱ کوڈ مرکز صحت

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			نمبر مریضین	196		5	13	10	22	10	12	12	30	28																						
			نمبر مریضین	37		5	3	6	3	2	2	2	5	5																						

بکے پانی کے ذریعہ استعمال ذرا بخ

مان جہاں اس قسم کا پانی نہ ملے گا ایک چمک چمک کر پینے سے روکنے سے

پانی سے لگاتار

پانی سے لگاتار



جناب عالی

(تمام رپورٹ زیر لفظ)

درخواست لبریح انصاف  
تخواہ آذاد اور جلد فیصلہ  
کرنے کا حکم دیں کہ انصاف

گزارش یہ ہے کہ سائلہ منجہ صوای لاؤن اسماعیلہ محلہ گوہر آباد B.H. 110 اسماعیلہ  
میں ذیہ ڈیوٹی ہے۔ تخواہ بندہ کرنے لپہ سائلہ کا مقدمہ پیشی سروس لٹر ایبلول عدالت  
میں صوفہ 2/16 کو حاضر ہی ہوئی سائلہ کے لپہ سٹین نہ ہوئے وجہ سے پیٹ میں  
درد اور تکلیف لپہ ہلکہ علاج نہ کرنے کی وجہ سے سرجن صاحبان پاس نہ جانے کی وجہ  
وجہ کا ماہ کے تخواہ بندہ ہے سائلہ یہ ماہ دو اکھا کہ گنہ ارہ ہوتا تھا، یعنی کو آٹکھ  
کے لپہ سٹین لپہ وقت نہ سہیا تکلیف لپہ ہلکہ درد ہوتا ہے، یتیم بچوں کے سائلہ  
اقتمان سر لپہ ہے، نہ بچاں ہے، اور نہ پیٹ پالک کے پیے رقم اور بچوں کے سخت  
بھوک میں بچاں اور بیماری کی وجہ سے متاثر ہو کہ لپہ اجال ہے،  
ایک بیوہ ماں جو ڈیوٹی کے دوران ڈشمن نے کالیہ ٹیگ کر کے زخمی کیا، اور وہ ماں

صہور بن کر یتیم بچوں کے پیے اپنا طرہ ضہ بنا کہ سخت حالات میں ڈیوٹی کر کے  
یہ صلہ ملتا ہے، یہ ملازمت یتیم بچوں کے روزی خانے کا واحد ذریعہ ہے،  
سائلہ کے علاج لپہ حولا کہ سے زیادہ رقم خرچ ہو، صیقلہ والوں نے نہ منڈہ دیا اور  
نہ علاج کہہ دیا، ڈشمن سائلہ کے دوسرے بچے کو اعتماد میں لے کر رات کے اندر ہی  
تک اٹھتا ہے، اگر ماں اپنی بچے کو آواز دیتا ہے، تو بیٹے زور ڈشمن یتیم بچے کو نقصان

سائلہ کو صوای میں ڈیوٹی کرنا چاہوں طرہ ڈشمن نے حال بچھایا ہے، سائلہ  
کے مقدمہ کا فیصلہ بنداز چند کرنے کا حکم دیں کہ تخواہ آذاد کرنے کا حکم دیں کہ انصاف  
بقول ڈشمن کہ دولت قانون ہے، جو ہمدادی انشالوں لپہ چل کر تا بہ رہے،  
صیقلہ والوں نے رشتہ میں ایسی طرہ بیان بنا کہ سائلہ ملازمت کے بھانگی  
میں اپنے بچوں سے بے فیہ ہو کہ ڈشمن نے لپہ بار کر دیا، اب لپہ ڈشمن سائلہ  
کا صافی صیقلہ ادارے سے ملکہ دو بار لپہ کے پیے



سائلہ اس حالت میں اس پر باد صحت کو لے کر اپنی یتیم بچوں کو لھوکی سے بچوں  
 یا بیماری سے بچاؤ یا جبرائت کے اندھیروں سے بچاؤ، ڈیشنوں سے بچاؤ، گوہ میں  
 کچھ نہیں ہے، تو سائلہ اس حالت میں فالی ہاتھ کی وجہ سے کس کس کا جواب  
 دیں گا، بقول ڈیشن کہ تعلیم سائلہ کے خاندان کا ڈیشن ہے اور یہی نکل  
 سائلہ اپنی بچوں کو کاؤں سے نہ نکلے، تو عام راستہ لٹا فائے یو پیڈا ہوگا  
 سائلہ اپنی ملازمت کی خاطر فیصلہ والوں کی وجہ ڈیشن کے ہاتھوں سے  
 22 سال جوان بیٹا قابل اعماد ادارے میں گھوڑا، اس وقت بھی ڈیشن  
 رٹھ میں ملازمت فتم کرنے پر ڈیشن بن کر کوڑے تھے،

سائلہ اپنی یتیم بچوں کو ڈیشن کے نظروں سے دورے جا کر تعلیم کے نام پر زندہ رہنے  
 کا حق چاہتا ہے، اور اس حق کے لیے سائلہ کا ملازمت کا مسئلہ جتنی جلد  
 ہو سکے چھٹا ہانہ کے مدد سے اٹھا کر کے حل کرپیں سائلہ ڈخانیوں دیں گی۔  
 لیے سولہ خزانہ کرپیں سائلہ کا دوسرہ بیٹا جو سائلہ کے فائے الہ کے آفری شانی  
 ہے اللہ زندگی دیں، ڈیشن راستے میں دیوار بن کر کوڑے ہے صطہ لاقول  
 ڈیشن اپنی موہر مانہ کردار کو چوٹ کے لیے ہیلتھ کا بہانہ بنا کر سائلہ  
 کو درستی سے ہٹانے میں فود کو کا صیاب بنانا چاہتا ہے  
 سائلہ کے خاندان کو زندہ رہنے کا حق تعلیم کا حق صحت کا حق اندھیروں سے نکلنے  
 کا حق دیں کہ سائلہ کے بچوں کو خواہ آڈاڈ کرنے کا اور مقہرہ صدفتم کرنے کا  
 یتیم بچے اور بیوہ ماں تاحیات ڈی میں دیں گی سائلہ ہائی کوٹ محمد امین سے ڈیشن کو پانڈا  
 (جناب کا اقبال بلڈ یو)

مورخہ 18-2-18

السارحی

حضرت بیگم بیوہ محمد نواز خان محلہ گولہ آبارن B.H. اسماعیل تحصیل رتھ صوبہ  
 H+BM  
 لکھا 11 مارچ 32

# DAILY EXPRESS



شمارہ 11، شہر روڈ سے بیک وقت شائع ہونے والا واحد اخبار  
27 | جمرات 24 شعبان 1434ھ 4 جولائی 2013ء صفحات 12 قیمت 12 روپے

کوہ پور اسپتال سکولائزنگ کاروبار (بائی سٹوڈ 5 نمبر 3)  
**صوبائی ایگزیکٹو ہسپتالہ ورکرز کے  
بھائیوں نے گولی مار دی، شدید زخمی**  
صوبائی (رائنڈ) اسپتال میں (اسامیلہ) ضلع صوبائی میں  
جائیداد خازنہ پر ایگزیکٹو ہسپتالہ ورکرز کے بھائیوں نے گولی مار کر  
شدید زخمی کر دیا، پولیس تمام کالوں کی رپورٹ کے  
مطابق بی ایچ ایس (بائی سٹوڈ 5 نمبر 4)

ان روزوں کے میں سرور ہوں ہے۔  
لڑائی و لڑائی کوئی  
منا کرتے ہیں، ہسپتالہ ورکرز نے ایف آئی آر درج  
کے لئے تیار کر دیا، کمرے کی کمرے لکھ کر جاری کی  
لی اس کے بھائیوں متاثر ہوئی آئین ہسپتال میں  
نے تازگی کر دی جس سے وہ زخمی ہو گئی، مجروح  
روزانہ کے سلسلے ہسپتال منتقل کر دیا گیا۔  
شوکت علی  
یاد رکھو کہ ان کے وہ ان علاقوں پر زیادہ توجہ



The  
**PESHAWAR HIGH COURT**  
Peshawar

All communications should be addressed to the Registrar Peshawar High Court, Peshawar and not to any official by name.

Exch: 9210149-58  
Off: 9210135  
Fax: 9210170

www.peshawarhighcourt.gov.pk  
info@peshawarhighcourt.gov.pk  
phcpsh@gmail.com

No.                      /HRD

Dated Peshawar, the                     

From:

The Director-II,  
Human Rights Directorate,  
Peshawar High Court,  
Peshawar.

To:

The District Police Officer,  
Swabi.

Subject:

COMPLAINT (#7165)

I am directed to forward herewith a copy of a complaint, submitted by Mst. Musarat Begum, for necessary action, and if need, be take preventive measures u/s 107/151 Cr.PC, please.

Director-II,  
Human Rights Directorate

Encl. No 1653 /HRD

Dated Peshawar, the 9/6/15

Copy forwarded for information to:

Mst. Musarat Begum Wd/O Muhammad Niaz Khan R/O Mohallah Gohar Abad,  
Ismaila, Tehsil Razar District Swabi. Mob: 0303-2921130.

  
Director-II,  
Human Rights Directorate



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

No. SOH (Lit-I)12(1)498/2014  
Dated Peshawar, the 23<sup>rd</sup> April, 2014

To,

The Provincial Program Coordinator/Manager,  
National Program Family Planning  
and Child Health.

Subject:- **COMPLAINT(#3864).**

I am directed to refer to the subject noted above and to forward herewith self explanatory application in respect of Mst. Hasrat Begum LHW code No.32 BHU Ismail, district Swabi alongwith Peshawar High Court Peshawar letter No.1626/HRD dated 29/03/2014 for further necessary action on sympathetic ground under intimation to this Department.

**Enclosed as above.**

Section Officer (Lit-I)

**Endst: No. & date even**

Copy is forwarded to P.S to Secretary Health Department.

Section Officer (Lit-I)

RESUME

# Jawad Khan

Contact #:

Present Address : Vill P.O Ismaila Moh : Gohar Abad Distt Swabi Tehsil Razzar

## Personal:

Father Name: Muhammad Nehar Khan  
Date of Birth: 20-04-1991  
Sex: Male  
Marital Status: Unmarried  
Nationality: Pakistani  
Religion: Islam  
CNIC: 16202-5106718-1



Permanent address: Present Address : Vill P.O Ismaila Moh : Gohar Abad Distt Swabi Tehsil Razzar

## Academic:

Certificate/Degree	Marks	Session	Division	Board/University
S.S.C	454/ 900	2007	2 <sup>nd</sup>	BISE Mardan
F.Sc (Pre-Med)	529/1100	2009	2 <sup>nd</sup>	BISE Mardan
B.Sc	145/ 285	2011	2 <sup>nd</sup>	AWKU Mardan

## Computer Knowledge:

- Microsoft windows 98 and Microsoft Windows XP as well as :
- Microsoft Word.
- Microsoft Excel.
- Internet

## Experience:

- 1 year experience as Customer Service Representative/Telephone Operator and KPO with Mobilink Pakistan from 05-09-2009 to 07-10-2010.
- 2 years experience as Teacher in Private Public School in Peshawar.

## Language:

- Pashto
- Urdu
- English

District Headquarter

Discharge Card

Surgical-B Unit

Consultant Surgeon

Dr. Sajjad Hussain

FCPS

General & Laposcopic Surgeon

Medical Officers

Dr. Sibghatullah Afridi MBBS, MS

Dr. Nadir Ali Shuja MBBS

Dr. Ashiq Muhammad MBBS, MS

Dr. Asghar Khan MBBS, MD, MSI

Pt's Name Hasrat Begum S/O M/s Saad

Age 45 yrs Sex F

Ad.No 2106/39 Bed No. \_\_\_\_\_

D.O.A. 03/7/13 D.O.O. 3/7/13 D.O.D. 5/7/13

Finding:

FAT Laprotomy done,  
Perforation in Rectum

Operation:

Mesent  
RT Ovarian Injury  
two perforation in Cecum  
Perforation closed in two layers.  
P. Cavity washed with NSS.

TREATMENT FOR HOME

گھر کیلئے علاج

Tab. Augmentin 625 - 1200

Tab. Nektza 600mg - 1200

Tab. Metformin 1000mg - 1200

Tab. Lap. Rizala 1000mg - 1200

Name of TMO

Name of HO

تاریخ کو نکالیں -

Jr. Registrar  
Surgical "B" Ward  
Khyber Teaching Hospital  
Peshawar

☆ زخم کی صفائی اور پٹی روزانہ کریں۔

☆ بھاری کام سے پرہیز کریں۔

☆ اچھی، صاف اور متوازن غذا استعمال کریں۔

معاہدہ (OPD) کے ایام

آپریشن کے ایام

دوبارہ معائنے کیلئے صرف OPD کے دن تشریف لائیں

Roucephin 1000mg IV  
(Ceftriaxone)

Orpase 400mg t.b  
(Cefixime)

Toradolim IV  
(Ketorolac)

**OPERATION NOTES**

Operation Ausultation - GA  
Laparotomy + Proctostomy

Findings Injury of the intestine

Procedure Laparotomy done  
Proctostomy done

**TREATMENT IN HOSPITAL**

- Inf. R/L ICTDS
- Inf. Benzene 2 gm BID
- Inf. Teradol TDS
- Inf. Flapril TDS
- Inf. Ciprofloxacin TDS
- Inf. Risperidone 4mg QD
- Inf. Phenobarbital 100mg BID

**Hospital**

Ref. Hemo cck  
 Ref. Flapril 100mg in 305  
 Ref. Decodan 100 in 305  
 Cck  
 Ref. Zentac  
 Ref. Amofedol in

**Treatment at Home**

Rx  
 Ref to KTAL/221  
 Surgical department  
 for further management  
 as at own request

Signature lines

Adm No. 2563141013

Bed No. 19

# KHYBER TEACHING HOSPITAL PESHAWAR

## DISCHARGE SLIP

Surgical 3 Ward

<b>Professor / Incharge</b> <i>Dr. Atta-ur-Rehman Khalil</i> FCPS (PAK), FACS (USA)	<b>Associate Professor</b> <i>Dr. Qutb-i-Alam Jan</i> FCPS (PAK), FCPS (UK)
<b>Assistant Professor</b> <i>Dr. Muhammad Naeem Khattak</i> MBBS, FCPS	<b>Senior Registrar</b> <i>Dr. Muhammad Yunas Khan</i> FCPS (PAK), FACS (USA)
<b>Registrar</b> <i>Dr. S. Iftikhar Alam</i> MBBS, MCPS, FCPS	<b>Acting Senior Registrar</b> <i>Dr. Wagma Nisar</i> MBBS, MCPS, FCPS

### TMO'S

<i>Dr. Monin Khan</i>	<i>Dr. Qaiser Khan</i>	<i>Dr. Imran</i>
<i>Dr. Abdul Rauf</i>	<i>Dr. Liaqat Khan Terkalani</i>	<i>Dr. Farooq</i>
<i>Dr. Fahad</i>	<i>Dr. Nasir Bakhtiar</i>	<i>Dr. Humayoon Tahir</i>
<i>Dr. Imad Afridi</i>	<i>Dr. Mohib</i>	<i>Dr. Malghalara</i>
<i>Dr. Fazal Hussain Khalil</i>	<i>Dr. Rashid</i>	<i>Dr. Ismail</i>
<i>Dr. Shafi Illah Khalil</i>	<i>Dr. Nisar Shah</i>	<i>Dr. Bahi</i>
<i>Dr. Nadia Gulnaz</i>	<i>Dr. Khawar</i>	<i>Dr. Ahsan</i>
<i>Dr. Asaf Shah</i>	<i>Dr. Ghzzan</i>	<i>Dr. Waqar</i>

Patient's Name Mirza Age/Sex: 45/F

D/A: 5-7-13 D/O: 6/7/13 D/D: 17-7-13

Disease: FAI

Operation: Laparotomy



# TREATMENT FOR HOME

گھر کیلئے علاج

- ① Tab Avlox 400mg ~~1x1~~ <sup>1x1</sup> - 7 دن
- ② Tab Neztid 600mg
- ③ Tab Maxalon 10mg <sup>1x1</sup> - 6 دن
- ④ Tab Simlac 150mg <sup>1x1</sup> - 2 دن سے آدھا ڈونٹ
- ⑤ Tab Suksox-Z <sup>1x1</sup> - 1 دن
- ⑥ Tab Abarel folio <sup>1x1</sup> - 1 دن

Name of TMO

Name of HO

Registrar  
Surgical 'B' Ward  
Khyber Teaching Hospital  
Peshawar

☆ تاریخ کو نکالیں۔

☆ زخم کی صفائی اور پٹی روزانہ کریں۔

☆ بھاری کام سے پرہیز کریں۔

☆ اچھی، صاف اور متوازن غذا استعمال کریں۔

☆ مہینہ (OPD) کے ایام: منگل / جمعہ

☆ آپریشن کے ایام: بدھ / ہفتہ

☆ دوبارہ معائنے کیلئے صرف OPD کے دن تشریف لائیں۔

3-11-13  
12-7-13

Adm No. 2563191013

Bed No. 19

## KHYBER TEACHING HOSPITAL PESHAWAR

### DISCHARGE SLIP

#### Surgical 'B' Ward

Professor in Charge  
Dr. Atta-ur-Rehman Khalil  
FCPS (PAK), FACS (USA)

Associate Professor  
Dr. Qutb-i-Alam Jan  
FCPS (PAK), FCPS (UK)

Assistant Professor  
Dr. Muhammad Naeem Khattak  
MBBS, FCPS

Senior Registrar  
Dr. Muhammad Yunus Khan  
FCPS (PAK), FACS (USA)

Registrar  
Dr. S. Iftikhar Alam  
MBBS, MCPS, FCPS

Acting Senior Registrar  
Dr. Wagma Nisar  
MBBS, MCPS, FCPS

#### TMO'S

- |                  |                 |                           |
|------------------|-----------------|---------------------------|
| Dr. Dawood Shah  | Dr. Uzair Ahmad | Dr. Imran                 |
| Dr. Ijaz         | Dr. Khawar      | Dr. Ghazan                |
| Dr. Momin Khan   | Dr. Fahad       | Dr. Shafi Ullah Khalil    |
| Dr. Abdul Rauf   | Dr. Nisar Shah  | Dr. Fazal Hussain Khalil  |
| Dr. Nadia Gulnaz | Dr. Waheed      | Dr. Asaf Shah             |
| Dr. Imad Afridi  | Dr. Rashid      | Dr. Nasir Bakhtiar        |
| Dr. Uzair Khalil | Dr. Mohib       | Dr. Liaqat Khan Terkalani |
|                  |                 | Dr. Qaisar Khan           |

Patient's Name: Hasrat Age/Sex: 45/F

D/A: 25/10/13 D/O: 30/11/13 D/D: 7/12/13

Disease: \_\_\_\_\_

Operation: Gleostomy reversal

Benzone Inj

Inj. Benzone 2gm  
Cefoperazone + Sulbactam

کالا PS

for immediate

کے لئے - اور جس کے لئے

23074  
AJMAL TAHIR  
Judicial Magistrate  
Syahi

صفحہ نمبر

درخواست نمبر اور قانون کاروں کی طرف سے  
درخواست کی تاریخ اور عمل کے لئے  
15 اور 14 صبر اور عمل کے لئے  
میں اور عمل کے لئے

یہ کہ سیکشن کے تحت  
تعداد میں ہے۔ عمل کے لئے  
کاروں کے لئے اور عمل کے لئے  
کے لئے اور عمل کے لئے  
یہ کہ سیکشن کے لئے اور عمل کے لئے

کی طرف سے اور عمل کے لئے

کے لئے اور عمل کے لئے  
237  
14

کے لئے اور عمل کے لئے  
(HBM)