



MOST IMMEDIATE.
COURT MATTER.

GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

NO. SOH (Lit-I)12-1139/2012
Dated Pesh: the, 18th Jan, 2012

To

The Director General,
Health Services Khyber Pakhtunkhwa,
Peshawar.

120
Annexure
"P"

Subject:- WRIT PETITION NO. 2525/2010- MUHAMMAD ARSHAD & OTHER
VERSUS GOVERNMENT OF KHYBER PAKHTUNKHWA & OTHERS.

I am directed to refer to this office letter of even No. dated 26-12-2012 and to forward herewith a copy of a representation made to Secretary Health by All J/Clinical Technician Radiographer Senior Most Radiographer wherein they have presented the decision of the Hon'ble Peshawar High Court Peshawar for necessary compliance regarding upgradation as per length of services/First date of appointment of the requisite seniority list as order by the Hon'ble Court.

It is therefore, directed that as and when the working paper for seniority is preparing, ensure the above court order to avoid unnecessary litigation.

Being Court matter may please be treated as Most Urgent

Encl. a.a.

(Signature)
(DILAWAR KHAN)
SECTION OFFICER (LIT-I)
Phone No. 091-9210872

Endst. No. and date a.a.

Copy forwarded to :-

1. The Addl; Registrar, Peshawar High Court Peshawar with reference to the above for information.
2. P.S to Secretary Health, for information please.
3. P.A to Deputy Secretary-II Health, Department for information please.

(Signature)
SECTION OFFICER (LIT-I)

(Large Signature)



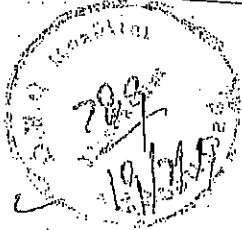
121

Annex 'B'

DIRECTORATE GENERAL HEALTH SERVICES, KHYBER PAKHTUNKHWA, PESHAWAR

No. 12403-16 /AE-VII, Dated Peshawar the: 23 10/2011

- 1 The Medical Superintendent, Govt. LRH, KTH, HMC Peshawar.
- 2 The Principal, KMC Peshawar.
- 3 The Principal, PIMT Swat.
- 4 The Medical Superintendents, DHQ Hospitals, KDA Kohat, D. Khan, Abbottabad, ATH Abbottabad & Mardan.
- 5 The Medical Superintendent, King Abdullah Teaching Hospital Manshehra.
- 6 The Executive District Officers, (Health) Manshehra & Charsadda.
- The Agency Surgeon, NW Agency Miranshah.



Subject: PROVISIONAL SENIORITY LIST OF CLINICAL TECHNICIANS (RADIOLOGY) BPS-12 IN KHYBER PAKHTUNKHWA.

Dear Sir,

Pleased find enclosed a copy of Provisional Seniority List of Clinical Tech: (Radiology) BPS-12 prepared by this Directorate General Health Services, KPK Peshawar with the request that it should be brought into the notice of each and every Clinical Tech: (Radiology) BPS-12 working under your control. Observations, if any, thereto may be intimated within one month of the issuance of this Seniority List, after which no excuse will be accepted and the Final Seniority List will be issued. Please acknowledge the receipt.

No. 12417-18 /AE-VII
Copy forwarded to the:-
1. PS to Secretary to Govt. of KPK, Health Department Peshawar.
2. President, PMA, KPK Peshawar.
For information.

Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.
12/10/2011

Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.
12/10/2011

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Circulate to all

DC T (Radiology) BPS - SNO - 14917
Till hospital of 14917 hospitals

Abbottabad for information
4/11/11

Handwritten signatures and dates: 19-7-2011

clear violation to the said notification. However, subsequent

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Provisional Seniority List of Clinical Technician (Radiology) BPS 12 in the Health Department K.P.A. as stood on 01.02.2011

S.No.	Name/Father's Name	Old Nomenclature With BPS	Date of Joining Govt Service	New Nomenclature With BPS	Date of Upgradation / New Nomenclature	Place of Present Posting	Date of Birth Domicile	Date of Retirement
1.	Alfzalur Rehman	X-Ray Tech B 09 Clinic: Tech B 12	12/12/1989 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	09/05/1966 Swabi	08/05/2020
2.	Gul Sher Khattak	X-Ray Tech B 09 Clinic: Tech B 12	03.03.1994 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	01.10.1971 Peshawar	30.09.2031
3.	Razeem Khan	X-Ray Tech B 09 Clinic: Tech B 12	04.03.1991 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	04.12.1967 Mardan	03.12.2027
4.	Islamuddin	X-Ray Tech B 09 Clinic: Tech B 12	11.04.1991 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	20.03.1971 Malakand	19.03.2031
5.	Jamil Khan S/O Muhammad Amir Khan	X-Ray Tech B 09 Clinic: Tech B 12	18/03/1993 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KTH Peshawar	01/01/1989 NW Agency	31/12/2029
6.	Muhammad Alam S/O Habibur Rehman	X-Ray Tech B 09 Clinic: Tech B 12	12/03/1999 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	FHMT Swat	28/04/1971	27/04/2031
7.	Abdur Rahman S/O Gul Hassan Badshah	R.Graher BS 06 X-Ray Tech B 09 Clinic: Tech B 12	27.12.1994 31.03.2000 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQH KDA Kohat	25.09.1973 Kohat	24.09.2033
8.	Syed Hamid Noor S/O Syed Manoor	X-Ray Tech B 09 Clinic: Tech B 12	25/10/2003 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	ASNW Miranshah	10/03/1984 NW Agency	09/03/2041
9.	Mohiuddin	R.Graher BS 06 X-Ray Tech B 09 Clinic: Tech B 12	10.10.1988 27.12.2003 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQH D.I.Khan	16.03.1968 Karak	15.03.2028
10.	Khurshid	X-Ray Tech: B 9 Clinic: Tech B 12	22.09.2004 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	FAT Hospital Mansehra	07.05.1963 Mansehra	06.05.2023
11.	Saifur Rehman	R.Graher BS 06 Clinic: Tech B 12	14.09.1976 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Mansehra	19-01-1957 Mansehra	18-01-2017
12.	Muhammad Arshad	R.Graher BS 06 Clinic: Tech B 12	19-01-1978 20.04.2010	J. Clinical Technician (Radiology)	25-08-2006	LBH Peshawar	15-09-1958 Peshawar	14-09-2018

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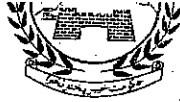
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13.	Ijaz Muhammad S/O Ghulam Miskeen	R. Grapher BS 06 Clinic: Tech B 12	28-02-1978 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	ATH A. Abad	17-09-1958 Abbottabad	16-09-2018
14.	Riaz Akhtar S/O Muhammad Rafiq	R. Grapher BS 06 Clinic: Tech B 12	18/04/1978 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	BBSII Abbottabad	03/08/1958 Abbottabad	02/08-2018
15.	Mutahir Shah S/O Syed Muhammad Karim Shah	R. Grapher BS 06 Clinic: Tech B 12	20-05-1978 20.04.2010	J. Clinical Technician (Radiology) BPS-09	02.12.2006	DHQH Mardan	24-11-1955 Mardan	23-11-2018
16.	Mushtaq Ahmed S/O Abdul Ghani	R. Grapher BS 06 Clinic: Tech B 12	01-01-1979 20.04.2010	J. Clinical Technician (Radiology) BPS-09	02.12.2006	DHQH Mardan	01-05-1953 Mardan	01-05-2013
17.	Abdul Aziz S/O Hajj Fazal Ahmad	R. Grapher BS 06 Clinic: Tech B 12	13-06-1979 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	BBSH Abbottabad	21-03-1959 Abbottabad	20-03-2019
18.	Zard Ali Khan	R. Grapher BS 06 Clinic: Tech B 12	26-07-1979 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	LRH Peshawar	20-04-1957 Peshawar	20-04-2017
19.	Mubasherin	R. Grapher BS 06 Clinic: Tech B 12	09-03-1980 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Charsada	07-04-1959 Charsadda	07-04-2019
20.	Asfar Khan	R. Grapher BS 06 Clinic: Tech B 12	18-03-1980 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	HNCC Peshawar	07-05-1955 Peshawar	07-05-2015

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Director General Health Services,
Khyber Pakhtunkhwa, Peshawar
10/5
18/12/2011

No.



DIRECTORATE GENERAL HEALTH SERVICES, KHYBER PAKHTUNKHWA, PESHAWAR

No. 15472-500 /AE-VII,

Dated Peshawar the: 30 /05/2012

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Annexure
"R"

To

- 1 The Principal, KMC/ KCD Peshawar.
- 2 The Principal, AMC Abbottabad.
- 3 The Principal, GMC D.I.Khan.
- 4 The Principal, BMC Bannu.
- 5 The Principal, Bacha Khan Medical College Mardan.
- 6 The Director PHSA, Khyber Pakhtunkhwa, Peshawar.
- 7 The Director, Health Services, FATA, Peshawar.
- 8 The Medical Superintendent, KTH, LRH and HMC Peshawar.
- 9 The Medical Superintendent, SGTH Swat.
- 10 The Medical Superintendent, ATH Abbottabad.
- 11 The Medical Superintendent, KGN Teaching Hospital, Bannu.
- 12 The Medical Superintendent, Mufti Mahmood Memorial Teaching Hospital, D.I.Khan.
- 13 The Medical Superintendent, ID Children Hospital Peshawar.
- 14 The Medical Superintendent, W&C Hospital GT Road Peshawar.
- 15 The Medical Superintendent, Govt: City Hospital Kohat Road Peshawar.
- 16 The Medical Superintendent, Police & Services Hospital Peshawar.
- 17 The Medical Superintendent, MMC Mardan.
- 18 The Medical Superintendent, Sarhad Hospital for Psychiatric Diseases, Peshawar.
- 19 The Medical Superintendent, Govt: Mental & General Hospital Dadar, Mansehra.
- 20 The All Medical Superintendents, DHQH/ AHQH in KPK/ FATA.
- 21 The All Agency Surgeons in FATA/ FRs.
- 22 The Incharge Gynaecologist, Govt: Maternity Hospital Peshawar.
- 23 The Analyst, Drug Testing Laboratory Peshawar.
- 24 The Analyst, Food Laboratory Peshawar.
- 25 The All Executive District Officers (Health) in Khyber Pakhtunkhwa.
- 26 The Principals, Public Health School, Nishtarabad/ Hayatabad Peshawar.
- 27 The Principals, Public Health School, Abbottabad, Mardan, Swat, Bannu and D.I.Khan.

Subject: -
Memo,

PROVISIONAL SENIORITY LIST OF JCT (RADIOLOGY) BPS-09 IN KHYBER PAKHTUNKHWA.

Pleased find enclosed a copy of Provisional Seniority List of JCT (Radiology) BPS-09 prepared by this Directorate General Health Services, KPK Peshawar with the request that it should be brought into the notice of each every JCT (Radiology) BPS-09 working under your control. Observations, if any, thereto may be intimated within one month of the issuance of this Seniority Lists, after which no excuse will be accepted and the Final Seniority Lists of all Paramedical Staff will be issued accordingly.

The Seniority Lists can also be downloaded from the Website www.epikp.gov.pk and all the paramedics working under your control may be informed to check the entries therein and observations with regard to, Name, Father's Name, Date of Birth/Domicile, Nomenclature, Date of joining service and Date of promotion (if any) or omission of their names from the S/List must be submitted through their respective controlling officers, alongwith attested documentary evidences as under: -

- i) Matric Certificates.
- ii) Technical Education as Certificate or Diploma etc. from Medical Faculty Peshawar etc.
- iii) 1st offer of appointment or subsequently appointment in other cadre within the Health Department.
- iv) Name with Father's Name, Domicile and Date of birth.
- v) 1st arrival report.
- vi) Photocopies of Service Books.

N.B/

1. Only Civil Servants will be included in the list.
2. Only those paramedics will be considered for upgradation on seniority basis as per Govt: of Khyber Pakhtunkhwa Notification notified vide No. SOH-III/8-60/05(Paramedics) dated 09.05.2012 whose names are available in the S/Lists.

Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

No. 15501-05 /AE-VII

Copy forwarded to the: -

1. Secretary to Govt: of Khyber Pakhtunkhwa, Health Department Peshawar.
 2. Assistant Director (P-II) DGHS Office Peshawar.
 3. PA to DGHS, Khyber Pakhtunkhwa, Peshawar.
 4. PA to Director (Administration) DGHS Khyber Pakhtunkhwa, Peshawar.
 5. President, Provincial Paramedical Association, Govt: LRH Peshawar.
- For information.

Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

**Provisional Seniority List of Junior Clinical Technician (Radiology) BPS 09
in the Health Department KPK As stood on 01.05.2012**

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S.No	Name/Father's Name	Old Nomenclature With BPS	Date of Joining Govt: Service	Place of Present Posting	Date of Birth Domicile	Date of Retirement
1.	S.Hasnain S/O S.M Sibtain	Radiog: BPS 06 XRay Tech: BPS 09	27-12-1994 21-08-2003	THQ Sadda	01-04-1973	31-03-2033
2.	Wahidullah S/O Fazal Dad	X-Ray Tech: B-09	22.08.2003	DHQTH D.I.Khan	01.04.1962 D.I.Khan	31.03.2022
3.	Faheem Ullah S/O Mumtullah Khan	X-Ray Tech: BPS-09	08/12/2005	DHQH Bannu	05/06/1978 Bannu	04/06/2038
4.	Rizwan Ullah Khan	Radiog: BPS 06 XRay Tech: BPS 09	16.04.1995 03.03.2006	KGNTH Bannu	04/03/1971 Bannu	03/03/2031
5.	Rashid Muhammad S/O Gul Muhammad	X-Ray Tech: BPS-09	04.03.2006	EDO (H) L/Marwat	15.09.1981 L/Marwat	14.09.2041
6.	Muhammad Hussain	Dietician BS 06 XRay Tech: BS 09	09.04.2004 01.04.2006	DHQTH DI Khan	01.04.1983 DI Khan	31.03.2043
7.	Ghulam Akhtar	Radiog: BPS 06 XRay Tech:BS-09	31-08-1989 22-05-2006	EDOH Abbottabad	30-01-1963 Haripur	29-01-2023
8.	Saifur Rehman	R.Grapher BS 06	14-09-1976	EDO Mansehra	19-01-1957 Mansehra	18-01-2017
9.	Sair Gul	Radiographer BPS-06	06-02-1979	EDO Bajour	01-09-1960 Bajour	01-09-2020
10.	Ghulam Hazrat	Radiographer BPS-06	14-04-1979	EDO Bajour	21-03-1959 Bajour	21-03-2019
11.	Zaitullah	Radiographer BPS-06	01-08-1981	Buner	30-12-1962 Charsadda	29-12-2022
12.	Zaitullah	Radiographer BPS-06	05-04-1982	DHQ Kohat	20-03-1962 Kohat	20-03-2022
13.	Haroon Rashid	Radiographer BPS-06	01-06-1982	STH Swat	07-08-1954 Swat	07-08-2014
14.	Jamil Ahmed	Radiographer BPS-06	22-03-1983	LRH Peshawar	15-02-1961 Peshawar	15-02-2021
15.	M. Akram Khan	Radiographer BPS-06	22-01-1984	EDO Mansehra	22-05-1965 Mansehra	22-05-2025
16.	Hamdullah	Radiographer BPS-06	10-02-1984	LRH Peshawar	01-09-1959 Nowshetra	01-09-2019
17.	Muhammad Shafi S/O Amir Khisro	Radiographer BPS-06	15-03-1984	IDC Hosp: Peshawar	01-04-1963 Charsadda	01-04-2023
18.	Muhammad Ishaq	Radiographer BPS-06	01-12-1984	KTH Peshawar	22-09-1964 Charsadda	21-09-2024
19.	Fazli Elahi	Radiographer BPS-06	14-10-1985	EDO Chatral	04-04-1964 Chitral	04-04-2024
20.	Sultanullah	Radiographer BPS-06	27-01-1986	KTH Peshawar	21-03-1964 Bannu	20-03-2024
21.	Javed Sultan S/O Muhammad Din	Radiographer BPS-06	27-09-1986	BBSH Abbottabad	13-03-1966 Abbottabad	13-03-2026
22.	Ghulam Sarwar	Radiographer BPS-06	11-04-1987	DHQ Chitral	16-03-1966 Chitral	15-03-2026
23.	Zakir Ali S/O Ghulam Rehmani	Radiographer BPS-06	12-04-1987	HMC Peshawar	01-01-1968 Peshawar	31-12-2028
24.	Muhammad Wisal	Radiographer BPS-06	13-04-1987	MMC Mardan	28-04-1968 Mardan	27-04-2028
25.	Behramand	Radiographer BPS-06	27-04-1987	DHQH Charsadda	02-10-1969 Charsadda	01-10-2029
26.	Qazi Mohd Tariq	Radiographer BPS-06	04-05-1987	PH Peshawar	12-02-1964 Peshawar	11-02-2024
27.	Abdul Hameed	Radiographer BPS-06	05-05-1987	DHQ Haripur	10-03-1965 Haripur	09-03-2025
28.	Noorul Wahab S/O Noor u.	Radiographer BPS-06	24-05-1987	LRH Peshawar	03-03-1959 Charsadda	02-03-2029
29.	Hidayat Shah S/O S. Mehboob Shah	DRA BPS-05 Radiographer BS-06	28-02-1984 24-05-1987	LRH Peshawar	15-04-1963 Charsadda	14-04-2023
30.	Zaheen Khan	Radiographer BPS-06	24-05-1987	LRH Peshawar	24-03-1968 Nowshetra	24-03-2028
31.	Fazli Hakeem	Radiographer BPS-06	25-05-1987	LRH Peshawar	16-04-1958 Charsadda	15-04-2028
32.	Noor Khaliq	Radiographer BPS-06	25-05-1987	RHC Batagram	01-09-1967 Charsadda	31-08-2027
33.	Jamil-ur- Rahman S/O Aziz-ur-Rehman	Radiographer BPS-06	15-08-1987	DHQH Charsadda	13-04-1964 Charsadda	12-04-2024
34.	Shakeel Akhtar	Radiographer BPS-06	14-01-1988	EDO Mansehra	01-0-1957 Mansehra	31-12-2017
35.	Zulfiqar S/O Fazal Ilahi	Radiographer BPS-06	04.04.1988	ATU	10/11/1960	31-12-2028

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37.	Javed Iqbal	Radiographer BPS-06	18-04-1988	STH Swat	Swat	03-03-2025
		Radiographer BPS-06	20-04-1988	STH Swat	01-05-1965	30-04-2025
38.	Abdullah	Radiographer BPS-06	21-04-1988	KTH Peshawar	08-01-1958	07-01-2018
39.	Taj Muhammad S/O Wazir Muhammad	Radiographer BPS-06	21-04-1988	DHQH Mardan	21-04-1970	20-04-2030
40.	Shamriaz Gul	Radiographer BPS-06	28-04-1988	TBC A. Abad	04-03-1965	03-03-2025
41.	Sajjad Ahmed	Radiographer BPS-06	03-05-1988	CH Kohat Rd Peshawar	01-12-1966	30-11-2026
42.	Ibrahim	Radiographer BPS-06	04-05-1988	EDO Buner	01-03-1969	28-02-2029
43.	Hassan Sher S/O	W.Ordaly Radiographer BS-06	1978	LRH Peshawar	15-10-1967	14-10-2027
44.	Irfanullah S/O Maghfoor Shah	Radiographer BPS-06	24-05-1988	EDO Nowshetra	02-10-1968	01-10-2028
45.	Ifthikhar Ahmed S/O Shams ur Rehman	Radiographer BPS-06	28-05-1988	LRH Peshawar	19-02-1969	18-05-2029
46.	Afsar Ali	Radiographer BPS-06	31-05-1988	LRH Peshawar	31-03-1967	30-03-2027
47.	Jehangir Khan	Radiographer BPS-06	31-05-1988	LRH Peshawar	13-04-1969	12-04-2029
48.	Azmat Khan	Radiographer BPS-06	11-06-1988	KTH Peshawar	06-01-1954	05-01-2014
49.	Obaidul Haq	Radiographer BPS-06	09-07-1988	RHC Dir	02-02-1968	02-02-2028
50.	Mujeebur Rehman	Radiographer BPS-06	30-08-1988	HMC Peshawar	01-05-1964	30-04-2024
51.	Momin Khan S/O Abdullah Jan	Radiographer BPS-06	30-08-1988	City Hospital Kohat Rd. Pesh	15.02.1968	14.02.2028
52.	Abid Kamal	Radiographer BPS-06	31-08-1988	LRH Peshawar	12-09-1966	11-09-2026
53.	Mohd. Miskeen	Radiographer BPS-06	31-08-1988	PS Peshawar	11-04-1967	10-04-2027
54.	Azizullah	Radiographer BPS-06	01-09-1988	LRH Peshawar	15-05-1965	14-05-2025
55.	Salim Khan S/O Asfandyar Khan	Radiographer BPS-06	03-09-1988	RHC Shrgarh	07-01-1969	07-01-2029
56.	Johar Ali S/O Ghulam Rahmani	Radiographer BPS-06	04-09-1988	LRH Peshawar	01-06-1965	31-05-2025
57.	Maha-ud-Din	Radiographer BPS-06	10-10-1988	DHQ DI Khan	16-03-1968	15-03-2028
58.	Ikramullah	Radiographer BPS-06	18-10-1988	KTH Peshawar	15-04-1965	14-04-2025
59.	Sher Alam	Radiographer BPS-06	29-10-1988	KTH Peshawar	15-09-1965	14-09-2025
60.	Asifullah S/O Abdul Samand	Radiographer BPS-06	29-10-1988	LRH Peshawar	05-04-1966	04-04-2026
61.	Shukar Batti	Radiographer BPS-06	29-10-1988	KTH Peshawar	06-08-1966	05-08-2025
62.	Bawar Khan	Radiographer BPS-06	31-10-1988	KTH Peshawar	20-05-1966	19-05-2026
63.	Faridullah	Radiographer BPS-06	01-11-1988	HMC Peshawar	13-09-1953	12-09-2013
64.	Bakhtiar Ali	Radiographer BPS-06	08-11-1988	KTH Peshawar	17-09-1968	16-09-2028
65.	Muhammad Tariq	Radiographer BPS-06	22-11-1988	STH Swat	01-04-1966	31-03-2026
66.	S.Mir Azam Shah S/O S. Muzayan Shah	Radiographer BPS-06	26-11-1988	LRH Peshawar	14-07-1966	13-07-2026
67.	Dad Khan	Radiographer BPS-06	01-12-1988	RHC Spinwam	02-05-1968	01-05-2028
68.	Abdul Khaliq	Radiographer BPS-06	05-12-1988	DTO Peshawar	13-06-1966	12-06-2026
69.	Farhad Shehzad	Radiographer BPS-06	06-12-1988	EDO Swat	11-12-1968	10-12-2028
70.	Muhammad Ayaz S/O Noshad	Radiographer BPS-06	08-12-1988	KTH Peshawar	16-01-1970	15-01-2030
71.	Fareedullah	Radiographer BPS-06	11-12-1988	DHQ Mardan	01-0-1957	31-12-2017
72.	Raza Khan	Radiographer BPS-06	12-07-1989	EDO Swat	02-05-1960	01-05-2020
73.	Abdur Rab Nishtar	Radiographer BPS-06	08-08-1989	DHQ.H.A.abad	30-03-1965	29-03-2025
74.	Khalilur Rehman S/O Wai Dad Khan	Radiographer BPS-06	21-08-1989	BBSH	15-11-1970	14-11-2030

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76.	Iftikhar Ahmed	Radiographer BPS-06	30-09-1989	Peshawar	04-06-1969 Peshawar	03-06-2029
77.	Rehanatullah	Radiographer BPS-06	03-10-1989	HMC Peshawar	02-06-1965 Karak	01-06-2025
78.	Zarnoosh Khan	Radiographer BPS-06	09-10-1989	Charsadda	08-02-1969 Charsadda	07-02-2029
79.	Wajid Ali Shah S/O Muhammad Shah	Radiographer BPS-06	10-10-1989	KTH Peshawar	01-02-1971 Charsadda	31-01-2031
80.	Waliur Rahman	Radiographer BPS-06	13-11-1989	Peshawar	05-04-1966 Landikotal	04-04-2026
81.	Maazullah	Radiographer BPS-06	16-11-1989	Peshawar	06-02-1969 Charsadda	05-02-2029
82.	Syed Mehfooz	Radiographer BPS-06	16-11-1989	Swabi	30-07-1969 Swabi	29-07-2029
83.	Saeeduddin	Radiographer BPS-06	29-11-1989	Peshawar	19-03-1969 Peshawar	19-03-2029
84.	M.Arshad	Radiographer BPS-06	30-11-1989	EDO Mansehra	19-04-1965 Mansehra	18-04-2025
85.	Muhammad Asif	DRA BPS-5 Radiographer BPS-06	01-10-1987 27-11-1990	LRH Peshawar	22-08-1970 Mardan	21-08-2030
86.	Iftikhar Ahmed	Radiographer BPS-06	09-01-1990	Mental.H. Pesh	14-05-1963 Mansehra	13-05-2023
87.	Shakirullah S/O Sultan Saeed	Radiographer BPS-06	13-01-1990	DHQH Lower Dir	01-08-1967 RHC Dir	31-07-2027
88.	Zaheer Ahmed	Radiographer BPS-06	25-01-1990	EDO. A.Abad	24-02-1966 Abbottabad	23-02-2023
89.	Mohd. Asif S/O Umar Gul Khan	Radiographer BPS-06	08-06-1990	DHQH Bannu	04-01-1971 Bannu	03-01-2031
90.	Mohd.Munir S/O Jehangir Khan	Radiographer BPS-06	13-06-1990	BBSH Abbottabad	08-01-1969 Abbottabad	07-01-2029
91.	Waheedullah	Radiographer BPS-06	13-06-1990	EDO (H) Bannu	10-04-1972 Bannu	09-04-2032
92.	Jan Bahadar Khan S/O Muhammad Yar Khan	Radiographer BPS-06	17-06-1990	EDO (H) Bannu	07-02-1963 Bannu	16-02-2023
93.	Wajid Ali	Radiographer BPS-06	01-07-1990	LRH.peshawar	12-05-1969 Charsadda	11-05-2029
94.	Falak Naz S/O Behram Khan	Radiographer BPS-06	22-07-1990	DHQH Mardan	02-01-1970 Mardan	01-01-2030
95.	Noor Jehan Shah	Radiographer BPS-06	26-07-1990	DHQ Laki	25-01-1966 Bannu	24-01-2026
96.	Mukhtiar Hussain	Radiographer BPS-06	26-07-1990	DHQ Laki	15-08-1969 Bannu	14-08-2029
97.	Noor Sadat	Radiographer BPS-06	30-07-1990	EDO Hangu	01-07-1967 Karak	30-06-2027
98.	Zainullah	Radiographer BPS-06	31-07-1990	EDO Malakand	01-04-1965 Malakand	31-03-2025
99.	Mudasar Shah	Radiographer BPS-06	08-08-1990	DHQ Swabi	02-02-1965 Swabi	01-02-2025
100.	Rashid Mohammad S/O Wali Mohammad	Radiographer BPS-06	08-08-1990	EDO Nawshera	03-04-1970 Charsadda	02-04-2030
101.	Nehar Ali	Radiographer BPS-06	11-08-1990	DHQ Swabi	15-04-1971 Swabi	14-04-2031
102.	Siraj Hussain S/O Karim	Radiographer BPS-06	12-08-1990	DHQH Mardan	11-02-1972 Mardan	10-02-2032
103.	Mohd Irshad	Radiographer BPS-06	16-08-1990	EDO Mansehra	01-04-1979 Mansehra	31-03-2039
104.	Tariq Shah	Radiographer BPS-06	18-08-1990	DHQ KOhat	13-02-1969 Kohat	12-02-2029
105.	Munir Husain S/O Dawat Hussain	Radiographer BPS-06	18-08-1990	AHQ Parachinar	20-04-1970 Kurram	19-04-2030
106.	Abdul Haq	Radiographer BPS-06	19-08-1990	DHQ Karak	02-10-1972 Karak	01-10-2032
107.	Abdul Ghafoor	Radiographer BPS-06	22-08-1990	KTH Peshawar	30-12-1979 Peshawar	29-12-2039
108.	Rahimullah	Radiographer BPS-06	22-08-1990	EDO DI Khan	16-08-1971 DI Khan	16-08-1971
109.	Inayatullah	Radiographer BPS-06	01-09-1990	STH Swat	15-04-1969 Swat	14-04-2029
110.	Sardar Ali	Radiographer BPS-06	01-09-1990	EDO Swat	01-05-1972 Swat	30-04-2032
111.	Mohd Habib	Radiographer BPS-06	02-09-1990	EDO Swat	01-02-1964 Swat	31-01-2034
	Rahim Shah	Radiographer BPS-06	09-09-1992	EDO Swat	01-04-1971 Swat	31-03-2031
113.	Rahim Zeb	Radiographer BPS-06	10-09-1990	EDO Dir	01-06-1970 Dir	31-05-2030

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115	Shahwazir Khan	Radiographer BPS-06	13-09-1990	EDO Buner	09-01-1969 Buner	08-01-2029
116	Muhammad Saeed Shah S/O Muhammad Aslam Shah	Radiographer BPS-06	07-10-1990	DHQH Haripur	06-04-1969 Haripur	05-04-2029
117	Fazal Rahim S/O Sad ur Din	Radiographer BPS-06	11-10-1990	EDO A.Abad	15-08-1967 Abbottabad	14-08-2027
118	Inamullah	Radiographer BPS-06	23-10-1990	HMC Peshawar	04-04-1969 Peshawar	03-04-2029
119	Mohd.Asif	Radiographer BPS-06	27-11-1990	LRH Peshawar	12-08-1979 Swabi	11-08-2029
120	M. Ibrahim S/O Ittibar Khan	DRABPS-05 Radiographer BPS-06	07-08-1978 1990 ?	EDO Charsadda	05/05/1961 Charsadda	04/05/2021
121	Mohd.Safir	Radiographer BPS-06	25-01-1991	DHQ A.Abad	01-01-1954 Abbottabad	31-12-2014
122	Shakil Akhtar	Radiographer BPS-06	30-03-1991	DHQ A.Abad	20-03-1968 Abbottabad	19-03-2028
123	Rabnawaz S/O Abdul jabber	Radiographer BPS-06	30-03-1991	DHQ A.Abad	22-03-1973 Abbottabad	21-03-2033
124	Raja Shakeel Akhtar S/O Raja Safdar Zaman	Radiographer BPS-06	16/06/1991	BBSH Abbottabad	20/03/1968 Abbottabad	19/03/2028
125	Afaud-Ud-Din	Radiographer BPS-06	20-06-1991	T.B.C. Chitral	20-01-1979 Chitral	19-01-2029
126	Fazal Haider	Radiographer BPS-06	29-10-1991	STH Swat	01-06-1979 Swat	31-05-2030
127	Hanifullah S/O Asari Gul	Radiographer BPS-06	21-11-1991	City Hosp: L/ Marwat	20-04-1971 L/Marwat	19-04-2031
128	Abdulhamid	Radiographer BPS-06	02-12-1991	DHQ Haripur	10-03-1965 Haripur	09-03-2025
129	Gulzar Hussain	Radiographer BPS-06	16-01-1992	EDO D.I.Khan	15-04-2066 DI Khan	14-04-2026
130	M.Shahid	Radiographer BPS-06	22-01-1992	TBC A.Abad	02-06-1972 Abbottabad	01-06-2032
131	Irshad Ahmed	Radiographer BPS-06	22-02-1992	EDO Karak	05-03-1972 Karak	04-03-2032
132	Azmat Ali	Radiographer BPS-06	23-02-1992	A/S Parachinar	05-03-1973 Kurram	04-03-2033
133	Zarin Gul	X.Ray At:BPS 02 Radiographer BPS-06	20-12-1980 01-03-1992	DHQ Buner	10-10-1962 Daggar	10-10-2022
134	Shah Hussain	Radiographer BPS-06	01-03-1992	EDO Karak	04-01-1972 Karak	04-04-2023
135	S.Zia Hussain	Radiographer BPS-06	01-03-1992	parachinar	07-05-1973 Kurram	06-05-2033
136	Niaz Mohd.	Radiographer BPS-06	11-03-1992	DHO Haripur	13-03-1973 Haripur	12-03-2033
137	Mudasir Khan S/O Shakirullah	Radiographer BPS-06	12-03-1992	TBC Swat	15-12-1968 Swat	14-12-2028
138	Ijaz Hussain	Radiographer BPS-06	12-03-1992	EDO A.Abad	04-01-1973 Abbottabad	03-01-2033
139	Barkat Ali	Radiographer BS-06	14-03-1992	STH Swat	10-06-1973 Swat	09-06-2033
140	Azat Shah	Radiographer BPS-06	15-03-1992	RHC Dir Khas	01-01-1979 Malakand	31-12-2030
141	Ghulam Hussain	Radiographer BPS-06	15-03-1992	CH Samar Bagh	28-10-1979 Dir	27-10-2030
142	Rahmat Khan	Radiographer BPS-06	17-03-1992	EDO Chitral	10-05-1967 Chitral	09-05-2027
143	Nadar Khan	Radiographer BPS-06	18-03-1992	AHQ Batkhela	15-03-1973 Malakand	14-03-2032
144	Inayatullah	X-Ray Attendant Radiographer BPS-06	13-07-1978 05/04/1992	EDO Karak	08-05-1955 Karak	07-05-2015
145	Malik Sohail Ahad	Radiographer BPS-06	13-04-1992	TBC Mansehra	14-04-1974 Mansehra	13-04-2034
146	Mohd Ishaq	Radiographer BPS-06	26-04-1992	CH Kalya	06-04-1965 Bannu	05-04-2025
147	Sher Faraz	Radiographer BPS-06	04-05-1992	EDO Chitral	03-02-1966 Chitral	02-02-2026
148	Noor Madad Khan S/O Mir Sade Khan	Radiographer BPS-06	05-05-1992	AHQH Miranshah	20-05-1972 NWA	19-05-2032
149	Tahir Afsar S/O Ali Akbar	Radiographer BPS-06	24-06-1992	EDO A.Abad	16-02-1970 Abbottabad	15-02-2030
150	Sartaj Hussain	Radiographer BPS-06	04-07-1992	AHQ Ghalanai	19-04-1969 Mohmand	18-04-2028
151	Zaheerud Din	Radiographer BPS-06	05-07-1992	DHQ Chitral	16-03-1966 Chitral	15-03-2026
152	Abdul Wahid	Radiographer BPS-06	05-07-1992	KTH Peshawar	10-11-1968 Peshawar	09-11-2028
153	Jamil Khan	Radiographer BPS-06	07-07-1992	CH Jammud	09-02-1972	08-02-2032

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155	Inayatullah S/O Muhammad Amir	Radiographer BPS-06	27/02-1973	AS Khyber Agency	Peshawar 01/07/1953 KhyberAgy	30/06/2013
156	Aftab Rehman	Radiographer BPS-06	30-07-1992	HMC Peshawar	15-04-1971 Dir	14-04-2031
157	Amer Khan	Radiographer BPS-06	04-08-1992	TBC Noshera	06-09-1965 Mardan	05-09-2025
158	Attaullah Khan S/O Ikramullah	Radiographer BPS-06	06-08-1992	EDO (H) Mardan	28-04-1968 Mardan	27-04-2028
159	Hameedullah S/O Amir Bacha	Radiographer BPS-06	09/09/1992	AHQH Khar Bajor	06/06/1966 Bajor	05/06/2026
160	Zarin Zada	Radiographer BPS-06	09-09-1992	EDO Buner	15-03-1967 Bunner	14-03-2027
161	Nasruddin	Radiographer BPS-06	09-09-1992	AS Bajor	03/01/1970 Bajor	02/01/2030
162	Rahim Shah	Radiographer BPS-06	09-09-1992	EDO Swat	01-04-1971 Swat	31-03-2031
163	Yad Gul	Radiographer BPS-06	09-09-1992	AHQ Bajour	09-07-1979 Bajour	08-07-2039
164	Rahim Shah	Radiographer BPS-06	09-09-1992	EDO Swat	01-04-1971 Swat	31-03-2031
165	Rahbar Saeed	Radiographer BPS-06	15-09-1992	EDO Swat	01-04-1974 Swat	31-03-2034
166	Haq Nawaz S/O Ubaidullah	Radiographer BPS-06	22-09-1992	EDO (H) Peshawar	01-02-1972 Peshawar	31-01-2032
167	Behramand S/O Abdul Qadim	Radiographer BPS-06	27-09-1992	KTH Peshawar	01-02-1968 Charsadda	28-02-2032
168	Nasruminalah	Radiographer BPS-06	05-11-1992	Charsadda	11-03-1972 Charsadda	10-03-2032
169	M.Tariq	Radiographer BPS-06	11-11-1992	LRH Peshawar	15-02-1972 Peshawar	14-02-2032
170	Ashraf Ali	Radiographer BPS-06	30-12-1992	AHQ Wana	12-05-1971 SWA	14-05-2032
171	Hanif Ullah	Radiographer BPS-06	03-01-1993	CH Lodha	20-03-1973 SWA	25-03-2033
172	Abdul Nasir S/O Muhammad Sultan	Radiographer BPS-06	06/01/1993	EDO Bannu	01/04/1970 F.R Bannu	31/03/2030
173	Mir Zaman	Radiographer BPS-06	07-01-1993	AHQ Wana	13-05-1972 SWA	12-05-2032
174	Muhammad Naeem	Radiographer BPS-06	11-01-1993	EDO DIKhan	31-11-1968 DI Khan	12-11-2028
175	Muhammad Mushtaq Ahmed	Radiographer BPS-06	17-01-1993	KTH Peshawar	16-04-1975 Karak	16-04-2035
176	Raziq Dad S/O Khuda Dad	Disp; BPS-6 Radiographer BPS-06	01-03-1986 23-1-1993	AS Parachinar	01-07-1965 Parachinar	30-06-2025
177	Farid Nawaz	Radiographer BPS-06	18-03-1993	EDO Karak	15-03-1969 Karak	14-03-2029
178	Wajid Khan	Radiographer BPS-06	22-03-1993	DHQ Kohat	19-04-1971 Kohat	18-04-2032
179	M. Zaigham Abbas	Radiographer BPS-06	18-08-1993	DHQ DIKhan	03-04-1972 DI Khan	02-04-2032
180	Ahad Zaile	Radiographer BPS-06	18-08-1993	EDO DI Khan	31-01-1973 DI Khan	30-01-2033
181	Amir Kalim	Radiographer BPS-06	29-11-1993	EDO Mansehra	21-03-2073 Mansehra	20-03-2033
182	Bakhtiar Shah	Radiographer BPS-06	1994	EDO Nowshera	03-01-1966 Nowshera	03-01-2026
183	Muhammad Wazir Khan	Radiographer BPS-06	15/04/1994	EDO (H) Chitral	08/01/1967 Chitral	07/01/2027
184	Noor Taj S/O Muhammad Ali	Radiographer BPS-06	18/01/1995	AS Hangu	17/01/1975 Orakzai	16/01/2035
185	Abdul Rasheed	Radiographer BPS-06	20-03-1995	DHQ Nowshera	12-04-1972 Charsadda	14-04-2032
186	Muhammad Yousaf S/O Muhammad Gul	Radiographer BPS-06	20/03/1995	AHQH Miranshah	20/04/1972 NWA	19/04/2032
187	S. Munir Hussain Shah S/O S. Nazeer Hussain	Radiographer BPS-06	21/03/1995	BBSH Abbottabad	03/04/1975 Abbottabad	02/04/2035
188	Rasool Marjan S/O Mir Saleem Jan	Radiographer BPS-06	22/03/1995	ASNW Miranshah	01/02/1974 NWA	31/01/2034
189	Fazal Amin S/O Raza Khan	Radiographer BPS-06	29.03.1995	City Hosp: Peshawar	01.01.1969 Khy: Agy:	31.12.2028
190	Noor Wali Jan S/O Badshah Jan	Radiographer BPS-06	03/05/1995	AS NW Agency	08/06/1971 NWA	07/06/2031
191	Sibghatullah	Radiographer BPS-06	04-05-1995	DHQ DI Khan	11-04-1974 DI Khan	10-04-2034
192	Azmin Ali S/O Momin Ali	Radiographer BPS-06	15/05/1995	AS	05/11/1973	04/11/2033

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194	Muhammad Alam Zeb Khan S/O Mira Khan	Radiographer BPS-06	27.05.1995	RHC Toru	20.05.1966 Mardan	29.05.2026
195	Rashid Jehan S/O Noor Jehan	Radiographer BPS-06	21/06/1995	AHQH Miranshah	01/10/1970 NWA	31.09.2030
196	Zahoor Mohd.Khan	DRA BPS-5 Radiographer BPS-06	18-06-1988 10-07-1995	STH Swat	05-05-1965 Swat	04-05-2025
197	Awrangzeeb	Radiographer BPS-06	02-11-1995	EDO Kohistan	15-10-1971 Kohistan	14-10-2031
198	Mohd. Tofail	Radiographer BPS-06	01-12-1995	DHQ Mansehra	10-04-1975 Mansehra	10-04-2035
199	Mohd.Saleem	Radiographer BPS-06	01/12/1995	EDO L/Marwat	25/08/1975 L/Marwat	24/08/2035
200	Ihsanullah S/O Rehman Sharaf	Radiographer BPS-06	07/12/1995	EDOH Malakand	25/04/1970 Malakand	24/04/2030
201	Naseem Khan Durani S/O Saleem Khan	Radiographer BPS-06	22/01/1996	KTH Peshawar	30/04/1973 Charsadda	29/04/2033
202	Muhammad Javed S/O Abdul Ghani	Radiographer BPS-06	23/01/1996	DHQH Battagram	1960 Battagram	2020
203	Mohd.Asif	Radiographer BPS-06	14-02-1996	DHQ Haripur	28-04-1971 Mansehra	27-04-2031
204	Muhammad Tahir S/O Ali Mardan	Radiographer BPS-06	17/04/1996	EDOH Abbottabad	13/02/975 Abbottabad	12/02/2035
205	Sajid Bag S/O Server din	Radiographer BPS-06	12/08/1996	EDOH Abbottabad	04/05/1968 Abbottabad	03/05/2028
206	M. Naseer Khan S/o Khan Saddique	Radiographer BPS-06	08/10/1996	KTH Peshawar	01/09/1989 Charsadda	30/08/2049
207	Waqar-ul-Mulk S/O Nadar Shah	Radiographer BPS-06	03/11/1996	DTBCO Chitral	13/03/1977 Chitral	12/03/2037
208	Abdur Rehman S/O Gul Hassan Badshah	Radiographer BPS-06	07-12-1996	DHQH KDA Kohat	25/09/1973 Kohat	24/09/2033
209	Jan Akbar S/O Zabardast	Radiographer BPS-06	31/08/1998	AHQH Miranshah	20/04/1973 NWA	19/04/2033
210	Allauddin S/O Guldad Shah	Radiographer BPS-06	16-02-1999	HMC Peshawar	14-01-1963 Peshawar	13-01-2023
211	Muhammad Asif Jan S/O Khetab Gul	Radiographer BPS-06	16/02/1999	KTH Peshawar	05/01/1972 Charsadda	04/01/2032
212	Habib Khan	Radiographer BPS-06	16-02-1999	HMC Peshawar	06-04-1972 Charsadda	05-04-2032
213	Farhad Ali S/o Alif Khan	Radiographer BPS-06	16-02-1999	GCH Peshawar	01/12/1972 Peshawar	30/12/2032
214	Suleman Shah	Radiographer BPS-06	16-02-1999	HMC Peshawar	02-01-1975 Charsadda	01-01-2035
215	Muhammad Riaz S/O Said Qamar	Radiographer BPS-06	26-02-1999	MMC Mardan	02-01-1975 Charsadda	01-01-2035
216	Hazrat Rehman s/o Saifur Rehman	Radiographer BPS 06	01/03/1999	SGTH Swat	01/01/1976 Swat	30/12/2036
217	Alamgir Khan S/O Rab Nawaz Khan	Radiographer BPS-06	02/03/1999	KTH Peshawar	08/09/1973 Charsadda	07/09/2033
218	Noor Habib S/O Abdur Rashid	Radiographer BPS-06	05.03.1999	City Hosp: Peshawar	01.08.1972 Peshawar	31.07.2032
219	Nadeem Ahmad Khan	Radiographer BPS-06	20/11/1999	DHQH Chitral	06/11/1976 Chitral	05/11/2036
220	Rahim Khan S/O Zareef Khan	Radiographer BPS-06	28/01/2000	EDOH Malakand	10/04/1975 Malakand	09/04/2035
221	Sadaqat Khan S/O Muhammad Tahir	Radiographer BPS-06	28/01/2000	KTH Peshawar	13/06/1977 Peshawar	12/06/2037
222	Akhtar Muhammad S/O Taj Muhammad	Radiographer BPS-06	06/09/2000	KTH Peshawar	01/09/1974 Peshawar	31/08/2034
223	Umar Muhammad S/O Bakht Zamin	Radiographer BPS 06	01/03/2002	SGTH Swat	01/04/1974 Swat	31/03/2034
224	Mohammad Nabi Khan	Radiographer BPS-06	04-03-2002	DHQH Chitral	20-08-1973	19-08-2033
225	Syed Iftikhar Ali Shah S/o S. Akhtar Ali Shah	Radiographer BPS-06	16/03/2002	KTH Peshawar	10/03/1980 Peshawar	09/03/2040
226	Naseem Ullah S/O Haji Shakir Ullah	Radiographer BPS-06	19/03/2002	KTH Peshawar	05/03/1979 Charsadda	14/03/2039
227	Saeedullah Jan S/O Saif-ur- Rehman	Radiographer BPS-06	01/04/2002	KTH Peshawar	18/01/1979 Charsadda	17/01/2039
228	Zafarullah S/O Inayat Khan	Radiographer BPS-06	04/05/2002	AHQH Miranshah	01/01/1973 NWA	30/12/2032
229	Tjir Hussain	Radiographer BPS-06	11.08.2003	HQH Parachinar	03.04.1976	02.04.2036
230	Ihsanullah S/O Muhammad Darin	Radiographer BPS-06	13/08/2003	ASNW Agency	03/03/1973 NWA	02/03/2033
231	Mehtab Hussain S/O Ghulam Hussain	Radiographer BPS-06	21/08/2003	DHQH Kohat	02/04/1974 Orakzai	01/04/2034
232	Majeedullah S/O Muhammad	Radiographer BPS-06	22/08/2003	AHQH	04/03/1974	03/03/2034

234	Sami Ullah S/O Rehmat Khan	Radiographer BPS-06	05/09/2003	AHQH Khar Bajor	01/05/1971 Bajor	2034
235	Muhammad Irfan S/O Malik Masam Abbas	Radiographer BPS-06	08/09/2003	DHQ H: DI Khan	29/01/1975 DI Khan	
236	Muhammad Saleem S/O M. Bakhsh	Radiographer BPS-06	09/09/2003	EDO (H) D.I.Khan	01/04/1981 D.I.Khan	31/03/2041
237	Usman Iqbal S/O Misal Khan	Radiographer BPS-06	03/12/2003	EDO (H) Hangu	--	--
238	Inayatullah S/O Rafiqullah	Radiographer BPS-06	01/01/2004	DHQH Batagram	25/12/1974 Batagram	24/12/2034
239	Abdul Wahid S/O M. Rahim	Radiographer BPS-06	05/03/2004	KTH Peshawar	01/11/1977 Peshawar	30/10/2037
240	Mohibullah	Radiographer BPS-06	28.04.2004	LRH Peshawar	10.02.1970 Peshawar	09-02-2030
241	Muhammad Saleem S/O Masam Khan	Radiographer BPS-06	01.12.2005	City Hosp: L/ Marwat	25.08.1975	24.08.2035
242	Nusrat Hussain S/O Rab Nawaz	Radiographer BPS-06	02/01/2006	THQH Kulachi	20/04/1972 D.I.Khan	19/04/2032
243	Almas Khan	D.R.A	15/05/1973	LRH Peshawar	10/01/1955 Peshawar	09/01/2015
244	Mehmood	D.R.A	29/09/1983	Mental H Daggar	01/07/1962 Mansehra	30/06/2022
245	Fazal Akbar S/O Mehmood Jan	D.R.A	12/04/1984	KCD Peshawar	14/04/1969 Peshawar	14/04/2029
246	Amir Zaman S/O Sifat Gul	D.R.A	03/10/1985	KCD Peshawar	03/02/1959 Dir	02/02/2019
247	Naseemul Haq	D.R.A	03.10.1985	SGTH Swat	13.04.1964 Swat	12.04.2024
248	Sardar Muhammad	D.R.A	15.03.1986	Child: H Peshawar	26.08.1962 Peshawar	25.08.2022
249	Abdul Shakoor S/O Muhammad Anwar	D.R.A	29.09.1986	BBSH Abbottabad	15.01.1966 Abbottabad	14.01.2026
250	Chiragh	D.R.A	25.11.1986	LRH Peshawar	14.05.1967 Mardan	13.05.2027
251	Muhammad Hanif S/O Muhammad Irfan	D.R.A	30.09.1989	BBSH Abbottabad	04.04.1966 Abbottabad	03.04.2026
252	Jan Muhammad	D.R.A	23.11.1989	DHQH Swat	10.04.1960 Swat	09.04.2020
253	Shafaqat Hussain S/O Abdul Hamid	D.R.A	25.11.1989	BBSH Abbottabad	26.03.1970 Abbottabad	25.03.2030
254	Suleman Shah	D.R.A	27.01.1990	KTH Peshawar	07.11.1965 Nowshera	06.11.2025
255	Fazli Amin S/O Muhammad Amin	D.R.A	11/03/1990	DHQH Charsadda	01/01/1962 Charsadda	30/12/2021
256	Aziz Khan	D.R.A	23.09.1990	KTH Peshawar	06.11.1960 Peshawar	05.11.2020
257	Wareed Khan	D.R.A	01.12.1990	LRH Peshawar	13.04.1970 Charsadda	12.04.2030
258	Anwar Zeb	D.R.A	03.03.1991	DHQH Mardan	01.04.1971 Mardan	31.03.2031
259	Riaz Hussain S/O Nasrullah Khan	D.R.A	01.07.1991	LRH Peshawar	03.09.1962 Peshawar	02.09.2022
260	Barkat Hussain	D.R.A	01.05.1993	LRH Peshawar	01.07.1963 Peshawar	30.06.2023
261	Aleem Ullah	D.R.A	17.07.1994	EDOH Shangla	10.03.1968 Shangla	09.03.2028
262	Attaullah	D.R.A	10.07.1995	DHQH Swat	22.07.1973 Swat	21.07.2033
263	Shakil Ahmad	D.R.A	16.08.1995	LRH Peshawar	10.02.1970 Peshawar	09.02.2030
264	Bashir Muhammad	D.R.A	24.12.1995	EDOH Chitral	10.02.1964 Chitral	09.02.2024
265	Muhammad Irshad S/O Muhammad Ayub	D.R.A	13.03.1996	KMC Peshawar	05.10.1962 Peshawar	04.10.2022
266	Jehan Zeb S/O Bahader Sher	D.R.A	09.05.1996	DHQH Mardan	04.09.1974 Mardan	03.09.2034
267	Fayyaz Khan	D.R.A	01.07.1996	Child: H Peshawar	08.01.1973 Peshawar	07.01.2033
268	Riaz Ali Shah S/O Mian Syed Wahid	D.R.A	01.10.1996	DHQH Swat	01.03.1968 Swat	28.02.2028
269	Azizur Rehman	D.R.A	10.05.1997	DHQH Swat	18.05.1972 Swat	17.05.2032
270	Amjad Ali	D.R.A	12.03.1999	DHQH Swat	10.03.1976 Swat	09.03.2036
271	Hashmat Khan	D.R.A	16.03.1999	LRH Peshawar	20.03.1975 Nowshera	19.03.2035
272	Zafar Khan	D.R.A	17.03.1999	EDOH Swat	01.01.1976	21.12.2025

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274	Muhammad Alghayas	D.R.A	16.02.1999	L. Marwat HMC Peshawar	L. Marwat 16.03.1969 Peshawar	15.03.2029
275	Allah	D.R.A	16.02.1999	HMC Peshawar	07.04.1971 Peshawar	06.04.2031
276	Mumtaz Muhammad	D.R.A	16.02.1999	HMC Peshawar	13.02.1976 Peshawar	12.02.2036
277	Shahid ur Rehman	D.R.A	16.02.1999	HMC Peshawar	24.03.1976 Peshawar	23.03.2036
278	Muhammad Aslam	D.R.A	12.03.1999	HMC Peshawar	06.10.1979 Peshawar	05.10.2039
279	Shafiullah	D.R.A	12.03.1999	HMC Peshawar	26.03.1981 Peshawar	25.03.2041
280	Daud ur Rehman	D.R.A	13.03.1999	HMC Peshawar	10.10.1974 Karak	09.10.2034
281	Sajid Khan S/O Tanoosh Khan	D.R.A	11/03/1999	CH Peshawar	02/11/1970 Peshawar	01/11/2030
282	Faridullah Shah	D.R.A	11/05/1999	KMC Peshawar	5/11/1976	04/11/2036
283	Hidayat Ali	D.R.A	14.06.1999	HMC Peshawar	15.12.1969 Peshawar	14.12.2029
284	Ghulam Mahboob	D.R.A		LRH Peshawar	Mardan	
285	Muhammad Tahir S/O Ali Asghar	JCT Radiology) B-09	18/10/2006	EDOH Abbottabad	10/12/1977 Abbottabad	09/12/2037
286	Sajjad Ali S/O Yaqeen Ali	JCT Radiology) B-09	28/10/2006	RHC Lachi Kohat	18/06/1975 Kohat	17/06/2035
287	Muhammad Musa S/O Muhammad Naseem	JCT Radiology) B-09	13/12/2006	AS NW Agency	14/04/1970 NWA	13/04/2030
288	Taj Mehal S/O Amal Khan	JCT Radiology) B-09	18/12/2006	NW Agency	01/01/1969 NWA	01/01/2029
289	Muzamil Hussain S/O Afzal Hussain	JCT Radiology) B-09	12-01-2007	THQ Alizai	16-03-1972	15-03-2032
290	Ghafoor Ahmad S/O Abdul Karim	JCT Radiology) B-09	01/02/2007	EDOH D.I.Khan	01/05/1988	30/04/2048
291	M. Imtiaz Alam S/O Khurshid Alam	JCT Radiology) B-09	31/08/2007	EDOH D.I.Khan	15/09/1978 D.I.Khan	14/09/2038
292	Baber Shehzad S/O Muhammad Zareen	JCT Radiology) B-09	01/03/2008	EDOH Mansehra	23/11/1973	22/11/2033
293	Muhammad Faheem S/o Muhammad Yaqoob	JCT Radiology) B-09	20/02/2008	EDOH Malakand	01/01/1983	30/12/2042
294	Raheed Khan S/O Hayat Khan	JCT Radiology) B-09	19/04/2008	AS Khyber	10/04/1972 Kohat	09/04/2032
295	Waqas Ahmad S/O Sheer Mohammad	JCT Radiology) B-09	07-11-2008	KDA Kohat	02-09-1985 Kohat	01-09-2045
296	Habibur Wadood	JCT Radiology) B-09	01.04.2009	EDO (H) Dir Upper	01.05.1971	30.04.2031
297	Inayatullah	JCT Radiology) B-09	15.04.2009	EDO (H) Dir Upper	10.04.1973	09.04.2033
298	Muhammad Saeed S/O Muhammad Janan	JCT Radiology B-09	06.06.2009	KTH /KMC Peshawar	12.02.1981	11.02.2041.

The case has already been under trial in the Services Tribunal Peshawar regarding the seniority position.

Director General Health Services,
Khyber Pakhtunkhwa, Peshawar

CTC
AB
Khan



To

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

SUBJECT: ONE TIME UPGRADATION/PROMOTION OF RADIOLOGY & MCH.

I am directed to refer to the subject noted above and to state that the following observation may be clarified which is as under:-

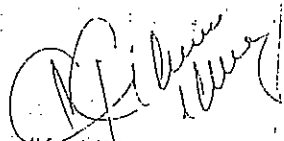
- i. Seniority list of BPS-12 submitted by you indicates that the incumbents were up-graded/promoted to BPS-12 from BPS-09 on 20/01/2010, that the date after approval of paramedics service structure i.e. 10/05/2006. As the incumbents already promoted to BPS-12 as one time exercise as provided in para-5 of the notification dated 10/05/2006 and 14/05/2008.
- ii. As per para-8 (i) read with para-14 of the summary for Chief Minister, Khyber Pakhtunkhwa, the Health Department will prepare stage-wise/category-wise seniority list at the provincial level on the basis of para-4 of the notification dated 09/05/2006, reproduced as under;
"The Cabinet Decision regarding revised service structure for paramedics was arrived in its meeting held on 25/08/2006 while the District cadets have been established on 15/01/2002. Therefore any promotion/placement in senior grades of these paramedics can now only be carried out after District wise seniority lists are framed which negates the very purpose where paramedics with long years in service were supposed to be benefited. The following intervention is therefore required:-
 - (i) Back dating of Cabinet Decision of 25/08/2006 to before 15/01/2002.
 - (ii) Consideration of promotion cases of paramedics on seniority lists prior to 15/01/2002.
 - (iii) Giving these promotions effect from date before 15/01/2002 but without any arrears/increments.
- iii. The seniority list required for the one time exercise as per para-14(ii) of the approved summary, prior to 15/01/2002, while DGHS submitted seniority list of 2013 for one time up-gradation/promotion of left over two sub cadets of paramedics, which also appear defective and against the spirit of section-8 of Khyber Pakhtunkhwa Civil Servants Act 1973 and against the decision made by the competent authority in 2006 and 2009.

GOVT. OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT
No. SOH-III/8-60/2013(Radiology & MCH)
Dated the Peshawar 02nd May 2013

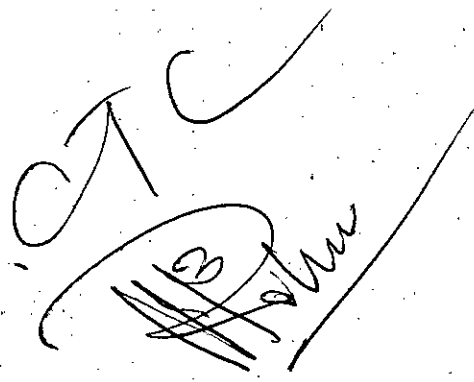
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Annexure
"5"

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- iv. As other 14-paramedics sub cadets upgraded/promoted in August, 2012 with immediate effect without any arrears, Director General Health Services deviated from approved summary 13/01/2009 i.e. instead of providing seniority list prior to 15/01/2002; the incumbents were upgraded/promoted on seniority list of 2012. Which directly affect the incumbents who retired or died in service prior to 2012 and after the approval of new service structure i.e. 10/05/2006.
- v. Before filling all remaining posts of paramedics in BPS-17 from amongst BPS-12 and BPS-14 employees, we may first ensure that all BPS-16 employees of all sub cadets serving as such prior to 10/05/2006 have been granted at least one time Upgradation/promotion as per the decision taken repeatedly.


(Kashif Iqbal Jilani)
Section Officer-III

Ramfo





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

No. 341-200 /AE-VII

Dated. 30 /07/ 2020

(135)
Annexure
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To,

1. The DG PHSA Peshawar.
2. All Sub-Offices of Health Services/Tribal Districts in Khyber Pakhtunkhwa.
3. All Deans/Principals of Medical Colleges in Khyber Pakhtunkhwa.
4. All Hospital Directors (MTIs) in Khyber Pakhtunkhwa.
5. The Director Health Services, Tribal Districts Peshawar.
6. The Medical Superintendent, SGM Hospital, Peshawar.
7. The Medical Superintendent, MASM Hospital GT Road Peshawar.
8. The Medical Superintendent, NKB Memorial Hospital, Kohat Road Peshawar.
9. The Medical Superintendent, Services Hospital, Peshawar.
10. The Medical Superintendent, Sarhad Hospital for Psychiatric Diseases, Peshawar.
11. The Medical Superintendent, General & Mental Hospital Dadar, Mansehra.

Subject: PROVISIONAL SENIORITY LIST OF CLINICAL TECHNICIAN
(RADIOLOGY) BS-12 OF HEALTH DEPARTMENT KHYBER
PAKHTUNKHWA.

Memo:

Enclosed please find Provisional Seniority List of Clinical Technician (Radiology) BS-12 of Health Department Khyber Pakhtunkhwa for information and circulation amongst the officials working under your control.

The same may please be brought into the notice of all concerned and objection/observations if any the same may kindly be sent to this Directorate within one month after the issuance of this letter. No representation will be accepted and the Final Seniority List will be considered as correct and will be issued.

Note:- All the Seniority lists are available on official website of Directorate General Health Services Khyber Pakhtunkhwa www.dghskp.gov.pk.

29/7
DIRECTOR GENERAL HEALTH SERVICES
KHYBER PUKHTUNKHWA, PESHAWAR.

No. _____ /AE-VII

Copy forwarded to the:-

1. PS to Secretary to Govt. of Khyber Pakhtunkhwa, Health Department Peshawar.
2. President, PMA, Khyber Pakhtunkhwa, Health Department Peshawar.

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DIRECTOR GENERAL HEALTH SERVICES
KHYBER PUKHTUNKHWA, PESHAWAR.

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REGIONAL SENIORITY LIST OF CLINICAL TECHNICIAN (RADIOLOGY) BS-12
IN THE HEALTH DEPARTMENT KHYBER PAKHTUNKHWA AS ON 07.2029

S.No	Name/ Father's Name	a (Old Nomenclature With BPS) b New Nomenclature after restructuring	Date of Joining Govt. Service/ promotion/ up-gradation	Place of Present Posting	Date of Birth/ Domicile	Date of Retirement
1	Babar Shezad S/O Muhammad Zbreen	X-Ray Tech: BS.08 JCT (Radiology) B-09 CT (Radiology) B-12	12-08-2004 10-05-2006 11-08-2015	DHO Mansehra	23-11-1973 Mansehra	22-11-2033
2	Muhammad Naeem S/O Muhammad Idrees	X-Ray Tech: BS.08 JCT (Radiology) B-09 CT (Radiology) B-12	12-08-2004 10-05-2006 11-08-2015	KAT Hosp: Mansehra	04-12-1978 Mansehra	03-12-2038
3	Anir Khan S/O Mohabat Shah	Radiographer BS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	07.02.1987 10.05.2006 11.08.2015	TBC Nowshera	06.09.1965 Nowshera	05.09.2025
4	Rehmatullah S/O Pir Shah Jehan	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	03.10.1989 10.05.2006 11.08.2015	DHQ Hosp; Karak.	02.04.1965 Karak	01.04.2025
5	Zarnooosh Khan S/O Han.zullah Khan	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	09-10.1989 10.05.2006 11.08.2015	KTH Peshawar	08.02.1969 Charsadda	07.02.2029
6	Mazrillah S/O Mir Alam Khan	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	16-11.1989 10.05.2006 11.08.2015	DHO Charsadda	06.02.1969 Charsadda	05.02.2029
7	Syed Mehfooz S/O Syed Habib	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	16-11.1989 10.05.2006 11.08.2015	DHO Swabi	30.07.1969 Swabi	29.07.2029
8	Saeeduddin S/O Ilam Din	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	29-11.1989 10.05.2006 11.08.2015	Maternity Hosp; Peshawar	19.03.1969 Peshawar	19.03.2029
9	Muhammad Arshad S/O Noor Rehman	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	30-11.1989 10.05.2006 11.08.2015	DHO Mansehra	19.04.1965 Mansehra	18.04.2025
10	S.Javed Iqbal S/O Muhammad Jan	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	07.12.1989 10.05.2006 11.08.2015	DHO Dir Lower	15.08.1969 Dir Lower	14.08.2029
11	Iftikhar Ahmed S/O Muhammad Younis	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	09.01.1990 10.05.2006 11.08.2015	G&M Hosp: Dadar	14.05.1963 Mansehra	13.05.2023
12	Shakir Ullah S/O Sultan Saeed	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	23.01.1990 10.05.2006 11.08.2015	DHQ Hosp; Timergara Dir Lower	01.08.1967 Dir Lower	31.07.2027
13	Zaheer Ahmed S/O Nazir Ahmad	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	25.01.1990 10.05.2006 11.08.2015	DHQ Hosp: A.Abad	24.02.1966 Abbottabad	23.02.2023
14	Muhammad Asif S/O Umar Gul Khan	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	08.06.1990 10.05.2006 11.08.2015	W & C Hosp: Bannu	04.01.1971 Bannu	03.01.2031
15	Muhammad Munir S/O Jehangir Khan	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	13.06.1990 10.05.2006 11.08.2015	DHQ Hosp; Haripur	08.01.1969 Haripur	07.01.2029
16	Waheedullah	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	13.06.1990 10.05.2006 11.08.2015	W & C Bannu	10.04.1972 Bannu	09.04.2032
17	Wajid Ali S/O Fazal Manan	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	07.07.1990 10.05.2006 11.08.2015	MMC Mardan	12.05.1969 Charsadda	11.05.2029
18	Zain Ullah S/O Muhammad Hanif	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	22.07.1990 10.05.2006 11.08.2015	DHO Malakand	01.04.1965 Malakand	31.03.2025
19	Faiak Naz S/O Behram Khan	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	22.07.1990 10.05.2006 11.08.2015	DHQ Hosp; Mardan	02.01.1970 Mardan	01.01.2030
20	Noor Jehan Shah S/O Khan Badshah	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	26.07.1990 10.05.2006 11.08.2015	City Hosp: Lakki	25.01.1966 Bannu	24.01.2026
21	Mukhtiar Hussain	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	26.07.1990 10.05.2006 11.08.2015	KGN Bannu	15.08.1969 Bannu	14.08.2029
22	Noor Saddat Khan S/O Khan Saddat	Radiographer BPS.06 JCT (Radiology) BS.09 CT (Radiology) B-12	30.07.1990 10.05.2006 11.08.2015	DHO Karak	01.01.1967 Karak	31.12.2026

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23.	Mudasar Shah S/O Azeem Shah	Radiographer BPS.06 JCT(Radiology)BS.09 CT. (Radiology) B-12	08.08.1990 10.05.2006 11.08.2015	DHQ Hosp; Swabi	02.02.1965 Swabi	01.02.2025
24.	Rashid Muhammad S/O Wali Mohamamad	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	08.08.1990 10.05.2006 11.08.2015	KTH Peshawar.	03.04.1970 Charsadda	02.04.2030
25.	Nehar Ali S/O Muhammad Nisar	Radiographer BPS.06 JCT(Radiology)BS.09 CT. (Radiology) B-12	11.08.1990 10.05.2006 11.08.2015	DHQ Hosp; Swabi	15.04.1971 Swabi	14.04.2031
26.	Siraj Hussain S/O Karim	Radiographer BPS.06 JCT(Radiology)BS.09 CT. (Radiology) B-12	12.08.1990 10.05.2006 11.08.2015	DHQ Hosp; Mardan	11.02.1972 Mardan	10.02.2032
X 27.	Muhammad Irshad S/O Masood Khan	Radiographer BPS.06 JCT(Radiology)BS.09 CT. (Radiology) B-12	16.08.1990 10.05.2006 11.08.2015	King Abdullah Teaching Hosp; Mansehra	01.04.1970 Mansehra	31.03.2030
X 28.	Munir Hussain S/O Dawat Hussain	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	18.08.1990 10.05.2006 11.08.2015	AHQ Hosp; Peshawar	20.04.1970 Kurram	19.04.2030
29.	Abdul Haq S/O Shereen Zada	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	19.08.1990 10.05.2006 11.08.2015	W&C Hosp; Karak	02-10.1972 Karak	01-10.2032
30.	Abdul Ghafoor S/O Abdul Qadeem	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	22.08.1990 10.05.2006 11.08.2015	DHQ Hosp; Karak	30-12.1970 Karak	29-12.2030
X 31.	Rahim Ullah S/O Falz Ullah	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	23.08.1990 10.05.2006 11.08.2015	DHO Di Khan	16.08.1971 Di Khan	16.08.1971 15.8.2031
32.	Inayatullah S/O Faridoon	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	01.09.1990 10.05.2006 11.08.2015	SGT Hosp; Swat	15.04.1969 Swat	14.04.2029
33.	Sardar Ali S/O Sardarul Mulk	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	01.09.1990 10.05.2006 11.08.2015	DHO Swat	01.05.1972 Swat	30.04.2032
34.	Muhammad Habib S/O Muhammad Malsar	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	02.09.1990 10.05.2006 11.08.2015	DHO Swat	01.02.1964 Swat	31.01.2034
35.	Raham Zeb S/O Shah Zafin	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	10.09.1990 10.05.2006 11.08.2015	DHQ Hosp; Timergara Dir Lower	01.06.1970 Dir Lower	31.05.2030
36.	Saeedullah S/O Fopra Khan	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	10.09.1990 10.05.2006 11.08.2015	AHQ Hosp; Bajaur	01.05.1968 Bajaur	30.04.2028
X 37.	Muhammad Saeed Shah S/O Muhammad Aslam Shah	Radiographer BPS.06 JCT(Radiology)BS.09 CT. (Radiology) B-12	07-10.1990 10.05.2006 11.08.2015	DHO Haripur	06.04.1969 Haripur	05.04.2029
38.	Fazal Rahim S/O Sadur Din	Radiographer BPS.06 JCT(Radiology)BS.09 CT. (Radiology) B-12	11-10.1990 10.05.2006 11.08.2015	ATH Hosp; Abbottabad	15.08.1967 Abbottabad	14.08.2027
39.	Muhammad Asif S/O Muhammad Zubair	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	27.11.1990 10.05.2006 11.08.2015	LRM Peshawar	12.08.1970 Swabi	11.08.2020
X 40.	Shakil Akhtar	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	30.03.1991 10.05.2006 11.08.2015	DHO Abbottabad	20.03.1968 Abbottabad	19.03.2028
41.	Rabnawaz S/O Abdul Jabbar	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	30.03.1991 10.05.2006 11.08.2015	ATH Hosp; Abbottabad	22.03.1973 Abbottabad	21.03.2033
42.	Raja Shakeel Akhtar S/O Raja Sardar Zaman	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	16.06.1991 10.05.2006 11.08.2015	BBST Hosp; Abbottabad	20.03.1968 Abbottabad	19.03.2028
43.	Ghaffar-Ud-Din Muhammad Nalb Khan	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	20.06.1991 10.05.2006 11.08.2015	T.B.C. Chitral	20.01.1970 Chitral	19.01.2030
44.	Fazal Halder S/O Ali Halder	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	29-10.1991 10.05.2006 11.08.2015	SGT Hosp; Swat	01.06.1970 Swat	31.05.2030
X 45.	Hanifullah S/O Asari Gul	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	21-11.1991 10.05.2006 11.08.2015	DHQ Hosp; Lakki Marwat	20.04.1971 Bannu	19.04.2031
46.	Abdul Hamid S/O Ghulam Muhammad	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	02-12.1991 10.05.2006 11.08.2015	DHQ Hosp; Haripur	10.03.1965 Abbottabad	09.03.2025
47.	Wajid Ali Shah S/O Muhammad Shah	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	11-12.1991 10.05.2006 11.08.2015	KTH Peshawar	01.02.1971 Charsadda	31.01.2031

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	Gulzar Hussain S/O Muhammad Hussain	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	16.01.1992 10.05.2006 11.08.2015	DHO DIKhan	15.04.2066 DI Khan	14.04.2026
	Muhammad Shahid S/O	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	23.01.1992 10.05.2006 11.08.2015	TSC Abbottabad	02.06.1972 Abbottabad	01.06.2032
50.	Wajeed Ahmad S/O Mushtaq Ahmad	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	28.01.1992 10.05.2006 11.08.2015	DHO DIKhan	28.07.1972 DIKhan	27.07.2032
51.	Irshad Ahmad S/O Ali Marjan	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	22.02.1992 10.05.2006 11.08.2015	DHO Karak	05.03.1972 Karak	04.03.2032
52.	Muhammad Saleem S/O Misal Khan	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	23.02.1992 10.05.2006 11.08.2015	AS FR Kohat	05.10.1970 FR Kohat	04.10.2030
53.	Asmat Ali S/O Sadaf Ali	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	23.02.1992 10.05.2006 11.08.2015	AS Kurram Agency	05.03.1973 Kurram	04.03.2033
54.	Shah Hussain S/O Nambali Khan	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	01.03.1992 10.05.2006 11.08.2015	DHO Hangu	04.01.1972 Karak	04.04.2023
55.	S.Zia Hussain S/O S.Ashgar Hussain	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	01.03.1992 10.05.2006 11.08.2015	AHQ Hosp; Parachinar	07.05.1973/ Kurram	06.05.2033
56.	Niaz Muhammad S/O Muhammad Zaman	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	11.03.1992 10.05.2006 11.08.2015	DHO Haripur	13.03.1973 Haripur	12.03.2033
57.	Ijaz Hussain S/O Khani Zaman	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	12.03.1992 10.05.2006 11.08.2015	BBST Hosp; Abbottabad	04.01.1973 Abbottabad	03.01.2033
58.	Mudasir Khan S/O Shakrullah	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	14.03.1992 10.05.2006 11.08.2015	DHO Swat	15.12.1968 Swat	14.12.2028
59.	Barkat Ali S/O Rajjuddin	Radiographer BS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	14.03.1992 10.05.2006 11.08.2015	SGT Hosp; Swat	10.06.1973 Swat	09.06.2033
60.	Izat Shah S/O Momin Shah	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	15.03.1992 10.05.2006 11.08.2015	DHQ Hosp; Batkheila	01.01.1970 Malakand	31-12.2029
61.	Ghulam Hussain S/O Fateh Muhammad	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	15.03.1992 10.05.2006 11.08.2015	DHQ Hosp; Timgara Dir Lower	28.01.1970 Dir Lower	27.10.2030
62.	Rahmat Khan S/O Sherin Khan	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	17.03.1992 10.05.2006 11.08.2015	DHO Chitral	10.05.1957 Chitral	09.05.2027
63.	Nadar Khan S/O Majeed Gul	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	18.03.1992 10.05.2006 11.08.2015	DHQ Hosp; Batkheila	15.03.1972 Malakand	14.03.2032
64.	Zarin Gul S/O Rahim Gul	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	01.04.1992 10.05.2006 11.08.2015	DHQ Hosp; Dage Buner	10.10.1962 Buner	09.10.2022
65.	Malik Sohail Ahmad S/O Muhammad Zubair	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	13.04.1992 10.05.2006 11.08.2015	DHO Mansehra	14.04.1974 Mansehra	13.04.2034
66.	Muhammad Ishaq S/O Gul Rasool	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	26.04.1992 10.05.2006 11.08.2015	AS Orakzla	04.06.1965 Bannu	05.04.2025
67.	Sher Faraz S/O Sher Murad	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	04.05.1992 10.05.2006 11.08.2015	DHO Chitral	03.02.1966 Chitral	02.02.2026
68.	Tahir Afsar S/O Ali Akbar	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	24.06.1992 10.05.2005 11.06.2015	BBST Hosp; Abbottaba d	16.02.1970 Abbottabad	15.02.2030
69.	Muhammad Zaheer ud-Din S/O Siraj-ud- Din	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	05.07.1992 10.05.2005 11.08.2015	DHQ Hosp; Chitral	16.03.1969 Chitral	15.03.2029
70.	Abdul Wahid S/O Mir Rahman Khan	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	05.07.1992 10.05.2005 11.08.2015	KTH Peshawar	10-11.1968 Peshawar	09-11.2026
71.	Jamil Khan S/O Irat Khan	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	07.07.1992 10.05.2006 11.08.2015	AS Khyber	09.03.1972 Khyber	08.03.2032
72.	Aliqur Rehman S/O Fathur Rahman	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	30.07.1992 10.05.2006 11.08.2015	HVC Peshawar	15.04.1971 Dir	14.04.2031

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73	Amir Khan S/O Muhabat Shah	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	05.08.1992 10.05.2006 11.08.2015	DHO Peshawar	06.09.1965 Mardan	05.09.2025
74	Attaullah Khan S/O Ikramullah	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	06.08.1992 10.05.2006 11.08.2015	DHO Mardan	28.04.1968 Mardan	27.04.2028
75	Hameedullah S/O Amir Badshah	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	09.09.1992 10.05.2006 11.08.2015	AHQ Hosp. Bajaur	06.06.1966 Bajaur	05.06.2026
76	Zarif Zada S/O Azad Gul	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	09.09.1992 10.05.2006 11.08.2015	DHO Buner	15.03.1967 Buner	14.03.2027
77	Nasruddin S/O Afsar Khan	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	09.09.1992 10.05.2006 11.08.2015	AS Bajaur	03.01.1970 Bajaur	02.01.2030
78	Yaq Gul S/O Amin Khan	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	09.09.1992 10.05.2006 11.08.2015	AHQ Bajaur	09.07.1970 Bajaur	08.07.2030
79	Rahim Shah S/O Ghulam Subhani	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	09.09.1992 10.05.2006 11.08.2015	DHO Swat	01.04.1971 Swat	31.03.2031
80	Haq Nawaz S/O Ubalduallah	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	22.09.1992 10.05.2006 11.08.2015	DHO Peshawar	01.02.1972 Peshawar	31.01.2032
81	Behramand S/O Abdul Qadim	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	27.09.1992 10.05.2006 11.08.2015	KTH Peshawar	01.02.1968 Charsadda	28.02.2032
82	Nasruminallah S/O Amir Nawaz	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	05.11.1992 10.05.2006 11.08.2015	DHQ Nowshera	11.03.1972 Charsadda	10.03.2032
83	Muhammad Tariq S/O Zamir Gul	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	11.11.1992 10.05.2006 11.08.2015	LRA Peshawar	15.02.1972 Peshawar	14.02.2032
84	Ashraf Ali	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	30.12.1992 10.05.2006 11.08.2015	AHQ Wana	12.05.1971 SWA	14.05.2032
85	Hanif Ullah	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	03.01.1993 10.05.2006 11.08.2015	CH Ladha	20.03.1973 SWA	25.03.2033
86	Abdul Nasir S/O Muhammad Subkhan	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	06.01.1993 10.05.2006 11.08.2015	DHO Bannu	01.04.1970 F.R Bannu	31.03.2030
87	Mir Zaman S/O Kalo Khan	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	07.01.1993 10.05.2006 11.08.2015	AHQ Wana	13.05.1972 SWA	12.05.2032
88	Muhammad Naseem S/O Abdul Hamid	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	10.01.1993 10.05.2006 11.08.2015	MMMTH D.I. Khan	13-11.1968 DF Khan	12-11.2028
89	Mushtaq Ahmad S/O Sawar Khan	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	17.01.1993 10.05.2006 11.08.2015	DHQ Hosp; Karak	16.04.1975 Karak	15.04.2035
90	Raziq Qad S/O Khuda Dad	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	23.01.1993 10.05.2006 11.08.2015	AS Kurram Agency	25.04.1964 Parachinar	24.04.2024
91	Farid Nawaz S/O Mir Ali Shah	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	18.03.1993 10.05.2006 11.08.2015	DHO Karak	15.03.1969 Karak	14.03.2029
92	Walid Khan S/O Musab Khan	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	20.03.1993 10.05.2006 11.08.2015	W&C Hosp; Kohat	19.04.1971 Kohat	18.04.2032
93	Rahbar Saeed S/O Muhammad Sajjad	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	11.08.1993 10.05.2006 11.08.2015	DHO Swat	01.04.1974 Swat	31.03.2034
94	M. Zaigham Abbas S/O Bashir Hussain	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	18.08.1993 10.05.2006 11.08.2015	DHQ DIKhan	03.04.1972 DI Khan	02.04.2032
95	Ahmad Zeb S/O Haji Abdul Rouf	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	18.08.1993 10.05.2006 11.08.2015	DHO DI Khan	31.01.1973 DI Khan	30.01.2033
96	Qadir Nawaz S/O Gharib Nawaz	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	26.08.1993 10.05.2006 11.08.2015	IBBST Hosp; Abbottabad	30.05.1972 Abbottabad	29.05.2032
97	Muhammad Wazir Khan S/O Muhammad Nadir Khan	Radiographer BPS.06 JCT(Radiology)BS.09 CT (Radiology) B-12	16-10.1994 10.05.2006 11.08.2015	DHQ Hosp; Chitral	08.01.1967 Chitral	07.01.2027

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To

The Director General Health Services
Khyber Pakhtunkhwa Peshawar

Annexure (410)
DNO 47676
"U" 43
24/9/202

Subject: - APPEAL FOR THE GRANT OF (BPS-09) FROM THE DATE OF APPOINTMENT IN THE LIGHT OF NOTIFICATION NO. F-4-78/85-HF-II DATED 01.03.1988 ISSUED BY THE MINISTRY OF HEALTH SPECIAL EDUCATION & SOCIAL WELFAIR (HEALTH DIVISION) GOVERNEMENT OF PAKISTAN.

Respected Sir,

We the following Radiographer were appointed in BPS-06 while we were eligible for BPS-09 as we were fulfilling the basic requirement of the of the scale BPS-09 as per Service Rules for the said posts i.e. SSC (with science Subjects) and Certificate from the Medical faculty.

S#	Name with Father name	Qualification	BP S	Date of 1 st appointment
1.	Javed Sultan S/O Muhammad Din	SSC with Science Subjects /Certificate of Medical faculty	06	27.09.1986
2.	Zulfiqar S/O Fazal Elhai	-do-	06	04.04.1988
3.	Shamriaz Gul	-do-	06	28.04.1988
4.	Khalil ur Rehman S/O Wali Dad	-do-	06	21.08.1989
5.	Ghulam Akhtar S/O Karam Baksh	-do-	06	31.08.1989
6.	Abdur Rab Nishtar	-do-	06	08.08.1989
7.	Zaheer Ahmed S/O Nazir Ahmed	-do-	06	25.01.1990
8.	Muhammad Munir S/O Jahangir Khan	-do-	06	13.06.1990
9.	Fazal Raheem S/O Sadurdin	-do-	06	11.10.1990
10.	Rab Nawaz S/O Abdul Jabbar	-do-	06	30.03.1991
11.	Raja Shakeel Akhtar S/O Raja Safdar Zaman	-do-	06	16.06.1991
12.	Muhammad Shahid	-do-	06	23.01.1992
13.	Ejaz Hussain S/O Khanizaman	-do-	06	12.03.1992
14.	Qadeer Nawaz S/O Ghareeb Nawaz	-do-	06	25.08.1993
15.	Muhammad Tahir S/O Ali Mardan	-do-	06	17.04.1996
16.	Sajid Bag S/O Sarwar Din	-do-	06	12.08.1996

Photo copies of the documents, appointment orders and 1st page of the Service books are attached for ready reference.

According to the Notification No. F-4-78/85-hf-ii dated 01.03.1988 issued by the Ministry of Health Special Education & social welfare (health division) Govt: of Pakistan, we are entitle for the award of BPS-09 from the date of appointment according to our eligibility for the post of Radiographer. (Copy attached as Annexure-A)

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Unfortunately we have been deprived due to the unknown reason in spite of the facts we are eligible for the grant of BPS-09 according to the above mentioned service Rules. (Copy attached AS Annexure-B).


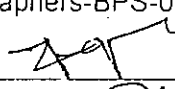



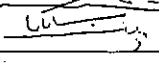
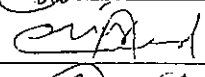
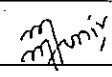

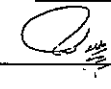

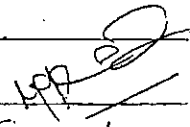
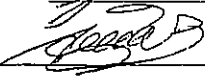

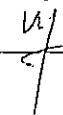
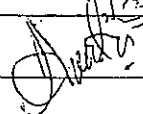
Respected Sir,

In a similar nature of Case Law Department has issued Ruling that "to correct the wrong, if done to a civil servant, there should be no limitation or bar for Government". (Copy attached AS Annexure-C).

Keeping in view the above mentioned facts it is requested that we may be granted BPS-09 from the date of appointment as we fulfill the basic requirements BPS-09 from the date of our entry in to Service and our Seniority may also please be corrected, accordingly, please.

Hopping for favorable and sympathetic consideration, please.

Yours obediently
Paramedics (Radiology)
(Initial Radiographers-BPS-06)

- | | |
|--------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| 1. Javed Sultan.  | 2. Zulfiqar Tanoli.  |
| 3. Shamriaz Gul.  | 4. Khalil ur Rehman.  |
| 5. Ghulam Akhtar.  | 6. Abdur Rab Nishtar.  |
| 7. Zaheer Ahmed.  | 8. Muhammad Munir.  |
| 9. Fazal Raheem.  | 10. Rab Nawaz.  |
| 11. Raja Shakeel Akhtar.  | 12. Muhammad Shahid.  |
| 13. Ejaz Hussain.  | 14. Qadeer Nawaz.  |
| 15. Muhammad tahir.  | 16. Sajid Bag.  |





**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

No. SOH-III/8-89/2020(Mr. Javid Sultan)
Dated the Peshawar 18th December, 2020

149

Annexure
"V"

To

The Director General,
Health Services Khyber Pakhtunkhwa,
Peshawar.

Subject: APPEAL FOR THE GRANT OF (BS-09) FROM DATE OF APPOINTMENT IN THE LIGHT OF NOTIFICATION NO. F-478/85-HF-IL DATED 01-03-1988 ISSUED BY THE MINISTRY OF HEALTH SPECIAL EDUCATION & SOCIAL WELFARE (HEALTH) GOVERNMENT OF PAKISTAN.

I am directed to refer to your letter No. 7655/AE-VI, dated 22-10-2020 on the subject noted above and to state that to proceed further in the matter, the following documents may be provided:-

- i) Under which rules Notification of Ministry of Health, Special Welfare (Health Division) Islamabad on dated 01-03-1988 is applicable which is not addressed to Health Department, Govt. of Khyber Pakhtunkhwa. Legible copy of the said Notification duly authenticated/verified by the Ministry concerned may be provided.
- ii) Seniority list of the Junior Clinical Technicians Radiology was prepared after restructuring in light of Health Department Notification dated 10-05-2006, the same seniority list of JCT Radiology alongwith first Appointment Orders, first two page of the Service Book with Matric Certificates may be provided.
- iii) A certificate may be given to the effect that seniority list was prepared at that time in light of Para-4 of Health Department Notification dated 10-05-2006.
- iv) Details of existing 57 different categories of paramedics and restructured into 14 cadres may be provided.
- v) Is there any legal precedent to support that after passing of 34 years, the Radiology Technicians may be granted BS-09 from the date of their first appointments instead of BS-06.
- vi) Clear point in which advice is required may also be indicated.

DD(P)
24/03

Encls: of even no & date.

Copy forwarded to PS to Secretary Health, Khyber Pakhtunkhwa.

Section Officer-III

Section Officer-III

[Handwritten signature and scribbles]



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

143

Office Ph# 091 - 9210269 Exchange# 091 - 9210187, 091 - 9210196, Fax #091 - 9210230
All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.

No. 7655 /AE-VI

Dated 22 / 11 / 2020

To

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

Annexure
7655
22/11/20

Subject: APPEAL FOR THE GRANT OF (BPS-09) FROM DATE OF APPOINTMENT IN THE LIGHT OF NOTIFICATION NO F-478/85-HF-II DATED 01.03.1988 ISSUED BY THE MINISTRY OF HEALTH SPECIAL EDUCATION & SOCIAL WELFAIR (HEALTH DIVISION) GOVERNMENT OF PAKISTAN.

Sir,

Kindly refer to the subject noted above and to submit a copy of joint application alongwith its enclosures in respect of Mr. Javid Sultan Chief clinical Technician Radiology BS-16 attached to King Abdullah Teaching Hospital Mansehra and others which is self explanatory.

The applicants have requested for grant of BS-09 instead of BS-06 from the date of 1st appointment, in light of Government of Pakistan Ministry of Health ,Special Welfare (Health Division) Islamabad letter No. F-4-78/85-WF-II dated 01-03-1988 (Annex-A).

It is stated that before approval of Service Structure of Paramedics i.e 25.08.2006, the Post of Radiographer was in (BS-06), Senior Radiographer was in (BS-07), X-Ray Technician was in BS-09 and Chief Radiographer was in BS-16, and after approval of the Service Structure, all the Posts in BS-06 to BS-09 have been renomenclatured as JCT Radiology (BS-09). Copy of old Service Rules are attached (Annex-B).

The Seniority list of the Junior Clinical Technicians Radiology was prepared in light of Government of Khyber Pakhtunkhwa Health Department Notification No. SOH-III/8-60/05 (Paramedics) dated 10.05.2006 (Para.4)(Annex-C).

It is requested that necessary advice of the Government in the matter may please be conveyed, So as to proceed further.

SSA-ExA
DS-Ad
SO-III

DIRECTOR GENERAL HEALTH
SERVICES KPK, PESHAWAR.

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

All communications should be addressed to the Director General Health Services Peshawar and not to any official by name
Office Ph# 091 - 9210269 Exchange# 091 - 9210187, 091 - 9210196, Fax #091 - 9210230

No. 1437 /AE-VI,

Dated 01/10/2021

Annexure 10
(144)

10,

The Secretary to Government
of Khyber Pakhtunkhwa Health Department
Peshawar

D.No. 2584
2-4-21
DSC (Admin)

Subject: APPEAL FOR THE GRANT OF (BS-09) FROM DATED OF APPOINTMENT IN THE LIGHT OF NOTIFICATION NO. F-478/85-HF-II, DATED 01-03-1988 ISSUED BY THE MINISTRY OF HEALTH SPECIAL EDUCATION & SOCIAL WELFARE (HEALTH) GOVERNMENT OF PAKISTAN.

Kindly refer to your letter No. SOH-III/8-89/2020 (Mr. Javid Sultan) dated 18.12.2020 on the subject noted above and to submit Para wise reply as under:-

- (i) The Notification of Ministry of Health, Special Education and Social Welfare (Health Division) Islamabad dated 01-03-1988 has not been implemented. Legible copy of the Notification is attached.
- (ii) Seniority Lists with other documents are attached.
- (iii) The seniority list was prepared at that time in light of Para-04 of Health Department Notified dated: 10-05-2006.
- (iv) Details of existing 57 categories of paramedics and restructured in to 14 cadres is attached.
- (v) There is no such precedent.
- (vi) Advice of the Government regarding implementation of the Notification dated 1/03/1988 is required.

For

[Signature]
DIRECTOR GENERAL
HEALTH SERVICES KHYBER PAKHTUNKHWA, PESHAWAR

[Handwritten notes and signatures]



**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

No. SOH-III/8-89/2020(Mr. Javid Sultan)
Dated the Peshawar 27th July, 2021

C145

To

The Secretary to,
Govt. of Khyber Pakhtunkhwa,
Finance Department.

Subject:

APPEAL FOR THE GRANT OF (BS-09) FROM DATE OF APPOINTMENT IN THE LIGHT OF NOTIFICATION NO. F-478/85-HF-II, DATED 01-03-1988 ISSUED BY THE MINISTRY OF HEALTH SPECIAL EDUCATION & SOCIAL WELFARE (HEALTH) GOVERNMENT OF PAKISTAN.

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith copy of letter No. 7655/AE-VI, dated 22-10-2020 & other enclosures alongwith copy of joint application alongwith its enclosures in respect of Mr. Javid Sultan, Chief Clinical Technician (Radiology) BS-16 attached to King Abdullah Teaching Hospital, Mansehra & others which is self-explanatory.

It is, therefore, requested that necessary advice for grant of BS-09 instead of BS-06 alongwith seniority/promotion from the date of 1st appointment, in light of Government of Pakistan of Pakistan. Ministry of Health, Special Welfare (Health Division) Islamabad letter No. F-4-78/85-WF-II, dated 01-03-1988 (copy enclosed) may kindly be conveyed, to proceed further in the matter.

Encl: As above.

Yours faithfully,

Naseer Ahmad
(Naseer Ahmad)
Section Officer-III

Endst: of even no & date.

Copy forwarded to the:-

PS to Secretary Health, Khyber Pakhtunkhwa.

Received

F.S/No 14727

29/7/21

*S. Finance
KPMG*

Naseer Ahmad
Section Officer-III

OT



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR.

All Communication should be addressed to the Director General Health Services, Khyber Pakhtunkhwa and not to any official
by name. DG, Office III, No. 091-9210269 Fax No. 091-9210267 Telephone No. 091-9210269, Email: dghs@kpk.gov.pk
dghs@kpk.gov.pk

No. 18692 /E-IV

Dated: 28/12/2021

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

Attention: Section Officer-III

Subject:- APPEAL FOR THE GRANT OF [BS-09] FROM DATE OF APPOINTMENT IN THE LIGHT OF NOTIFICATION NO. F-478/85-HF-II, DATED 01.03.1988 ISSUED BY THE MINISTRY OF HEALTH SPECIAL EDUCATION & SOCIAL WELFARE (HEALTH) GOVERNMENT OF PAKISTAN.

Kindly refer to your letter No. SOH-III/8-89/2020(Mr. Javid Sultan) dated 03.11.2021, on the subject noted above, the case is resubmitted with the following submissions/grievances of the appellants:-

- 1) In the service rules of paramedics, the mandatory requirements for appointment of X-Ray Technicians and radiographers were the same before the restructuring of paramedics in 2006, while their scales were 9 & 6 respectively. (Copy of service rules are attached as (Annex- A)). This was an injustice to paramedics with radiographers.
- 2) The Finance Department Government of NWFP vide Scheme of Basic Pay and Fringe Benefits of Provincial Civil Servants, 1983 through Circular No. FD (SR-I) 1-67/82 Dated 24th Aug. 1983 had revised the scale of different Cadres of civil servants including Paramedics of Health Department in which X-Ray Technicians and Radiographers were not included which was another injustice with the radiographers. (Circular attached as (Annex: AII)).
- 3) The same anomaly of scales of Radiographers and X-Ray Technicians was existing in the Federal Government Health system as well. The Ministry of Health, Special Education and Social welfare (Health Division) Government of Pakistan in its letter dated 6th March 1988 (copy attached as (Annex: B) removed the anomaly in scales of X-Ray Technicians and Radiographers and granted BS-9 to both the cadres. The letter was communicated to Accountant General Peshawar besides others. The said rectification was required to be implemented by the Health Department Khyber Pakhtunkhwa as well but was not implemented. However the Administrator of Khyber Teaching Hospital (the then Hayat Shaheed Teaching Hospital) Peshawar, vide letter No.

C147

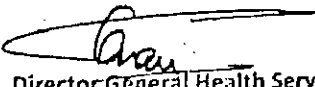
22745/HSTH/E dated 15-11-94 requested Secretary Health, Govt. of NWFP(KPK) Peshawar to amalgamate the posts of X-Ray Technicians and Radiographers in the same scale (BS-09) on the analogy of Federal Government letter. (Copy attached As (Annex- C).

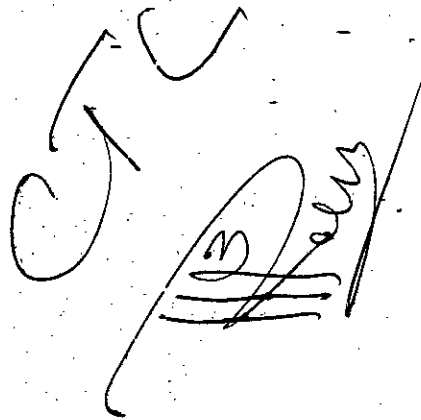
- 4) The Health Department took up the matter with Finance Department vide No SO (H) III/7-317/94 dated 15.1.1995. In response Finance Department KP raised some observations/queries in its letter addressed to SO III Health Department Dated 15-02-1995 (Copy attached as (Annex-D). Record of further progress in the case is not available with us.
- 5) After restructuring of Paramedics in 2006, Radiographers and X-Ray Technicians were given the same scale (BS-9), however Radiographers were placed at the bottom in the seniority list of CT Radiology even those radiographers who were appointed much earlier than the X-ray Technicians.
- 6) Feel aggrieved, some of the Radiographers filed a Writ Petition in Peshawar High Court for redressal of their grievances, The Honorable Peshawar High Court directed the Health Department to reckon the seniority from dates of their initial appointment. Consequently Health Department, vide letter No. SOH (Lit-I) 12-1139/2012 Dated 18 Jan 2012, directed the Director General Health Services KP to implement the court judgment in future when preparing working papers for seniority lists for up gradation.(Copy attached as (Annex-F).
- 7) In para ii, sub para ii of Health Department Letter No. SOH-III/8-60/2013(Radiology & MCH) dated 3rd May 2013, addressed to DG Health KP, envisaged consideration of promotion cases of paramedics on seniority list prior to 15-01-2002 but radiographers have been unlawfully and illegally deprived of the same. (Copy attached as Annex-H).
- 8) The seniority of civil servants, as per rules, shall be reckoned from dates of initial appointment. (Copy of Rules attached as Annex- I)
- 9) The Government may rectify its uncertain wrong done to civil servants and there is no limitation or bar upon government as per ruling of Govt of NWFP (KPK) Law Department. (Copy attached as Annex -J).
- 10) Foregoing view and in the best interests of justice, the Notification of 1988 is required to be implemented upon Radiographers and we may kindly be placed in BPS-09 from our respective dates of initial appointments. Grievances of the appellants are submitted to the concerned authorities.

Handwritten signature and initials.

1148

In view of the above the matter may be considered at Department level as granting BS-09 to Radiographer is beyond the competency of this directorate.


Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.





GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)

649 S.H.
649
Annexure 17.8.21
"Y"

Finance Department Civil Secretariat Peshawar

<http://www.finance.gkp.pk>

[facebook.com/GoKFPD](https://www.facebook.com/GoKFPD)

twitter.com/GoKFPD

No.SO(FR)FD/7-3/2021/Health Dept:

Dated the Peshawar the 17-08-2021

To

The Secretary to Govt: of Kyhber Pakhtunkhwa,
Health Department, Peshawar.

Subject: - APPEAL FOR THE GRANT OF (BS-09) FROM DATE OF APPOINTMENT IN THE LIGHT OF NOTIFICATION NO. F-478/85-HF-11, DATED 01-03-1988 ISSUED BY THE MINISTRY OF HEALTH SPECIAL EDUCATION & WELEFARE (HELATH) GOVERNMENT OF PAKISTAN

Dear Sir,

I am directed to refer to your letter No.SOH-III/8-89/2020(Mr. Javid sultan) dated 27-07-2021 on the subject noted above and to state that the instant case is returned in original with the advice that settlement of seniority issue is the domain of Establishment Department, therefore the case may be taken up with Establishment Department for guidance please.

Yours faithfully


(Tariq Mehmood Khattak)
SECTION OFFICER (FR)



159

Subject: APPEAL FOR THE GRANT OF (BS-09) FROM DATE OF APPOINTMENT IN THE LIGHT OF NOTIFICATION NO. F. 478/86-111 (H) DATED 01-03-1988 ISSUED BY THE MINISTRY OF HEALTH SPECIAL EDUCATION & SOCIAL WELFARE (HEALTH) GOVERNMENT OF PAKISTAN.

Secretary of Health Department has forwarded a letter alongwith copy of notification of 1988 and its enclosures in respect of Mr. David Sultan, Chief Clinical Technologist Radiology Dept. attached to King Abdulaziz Teaching Hospital, Muzaffargarh & others.

Ref. to P.O. No. 103 stated that posts of Para-medical cadres were upgraded vide Section 4 of Basic Pay & fringe benefits Provincial Civil Servants 1988 (copy attached) while the Radiographers were left abandoned.

However, the posts of X-RAY & Radiographer were also upgraded to BPS-09 vide another notification of 1988. Whereas an anomaly arised when Health Department, while adopting/implementing said Notification of 1988, made initial appointments of X-Ray technicians in BPS-9 while ignoring the Radiographers. Although the said notification was required to be implemented in its letter and spirit as Administration.

Moreover, the Health department vide letter No. 22745/HS/11/88 dated 18-11-1994 addressed to Secretary, Health, Government of NWFP (KPK) Peshawar requesting to amalgamate post of X-Ray technician and Radiographers in BPS-09 in the light of Notification of 1988 as the notification of 1988 has already been implemented upon few persons. (Copy of letter attached). That, vide Endst. No. SO (H) 1117-317/04 dated 15-02-1995 Finance department, NWFP (KPK) conveyed about the matter-subjudice. (Copy attached).

According to the service rules of 07-11-1988 the Radiographers were entitled and deserved for BPS-09. (Service Rules of 1988 attached).

Aforementioned, the request has been made that the Government may rectify its wrong done to a civil servant in the light of ruling of Government of NWFP (KPK), Law department and there is no limitation or bar upon government (copy attached) and the implementation of Notification of 1988 has been required to be made upon Radiographer and they may be placed in BPS-09.

Foregoing in view, It is proposed that the case in hand may be marked to Establishment Department being the settler of Service of Rules and above mentioned case also comes under domain of Establishment Department.

Copy para 7/W

J. CHAN (FR)

SO(FR)

Settlement of Seniority issue is the sole domain of Establishment Department. Therefore if

(15)

agreed, we may ask the department to take up
the case with Establishment Department for
guidance please.

16/8/2011

2

DSCR-V

Ref: Para 1 to 7/N

PUC at Page-1/C

para-8/N is submitted for
approval, please.

M. J. S
DSCR-I
16-08-21

ASR

As proposed

1/8/18

DSCR-I

1/8/18



**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

158

No. SOH-III/8-89/2020(Mr. Javid Sultan)
Dated the Peshawar 31th August, 2021

To

✓
The Secretary to,
Govt. of Khyber Pakhtunkhwa,
Establishment Department.

Subject:

APPEAL FOR THE GRANT OF (BS-09) FROM DATE OF APPOINTMENT IN THE LIGHT OF NOTIFICATION NO. F-478/85-HF-II, DATED 01-03-1988 ISSUED BY THE MINISTRY OF HEALTH SPECIAL EDUCATION & SOCIAL WELFARE (HEALTH) GOVERNMENT OF PAKISTAN.

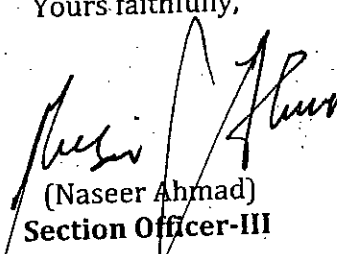
Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith copy of letter No. 7655/AE-VI, dated 22-10-2020 & other enclosures alongwith copy of joint application alongwith its enclosures in respect of Mr. Javid Sultan, Chief Clinical Technician (Radiology) BS-16 attached to King Abdullah Teaching Hospital, Mansehra & others which is self-explanatory.

It is, therefore, requested that necessary advice for grant of BS-09 instead of BS-06 alongwith seniority/promotion from the date of 1st appointment, in light of Government of Pakistan of Pakistan. Ministry of Health, Special Welfare (Health Division) Islamabad letter No. F-4-78/85-WF-II, dated 01-03-1988 (copy enclosed) may kindly be conveyed, to proceed further in the matter.

Encl: As above.

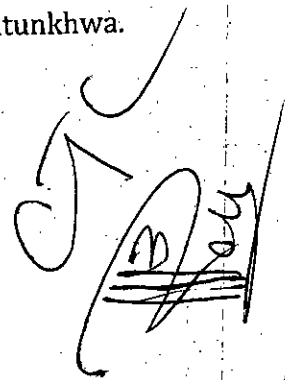
Yours faithfully,


(Naseer Ahmad)
Section Officer-III

Endst: of even no & date.

Copy forwarded to the:-

PS to Secretary Health, Khyber Pakhtunkhwa.


Section Officer-III



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)

153

Finance Department Civil Secretariat Peshawar <http://www.finance.gkp.pk> [facebook.com/GoKPFED](https://www.facebook.com/GoKPFED) twitter.com/GoKPFED
No.SO(FR)FD/7-3/2022/Health Deptt. Dated the Peshawar the 07-04-2022

To
The Secretary to Govt: of Kyhber Pakhtunkhwa,
Health Department, Peshawar.

Subject: - APPEAL FOR THE GRANT OF (BS-09) FROM DATE OF APPOINTMENT IN THE LIGHT OF NOTIFICATION NO. F-478/85-HE-II, DATED 01-03-1988 ISSUED BY THE MINISTRY OF HEALTH SPECIAL EDUCATION & SOCIAL WELFARE (HEALTH) GOVERNMENT OF PAKISTAN.

Dear Sir,

I am directed to refer to your Department letter No. SOH-III/8-89/2020(Mr. Javid Sultan) dated 07-03-2022 on the subject noted above and to state that the Notification No. F-478/85-HE-II, DATED 01-03-1988 Issued by the Ministry of Health Special Education & Social Welfare (Health) Government of Pakistan has not been adopted by Government of Khyber Pakhtunkhwa Finance Department . However, the Administrative Department is requested that if any such record exists at their end then the same may be intimated to this Department, please.

Your's faithfully

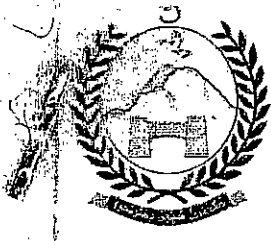
(MUHAMMAD NADIR)
SECTION OFFICER (ER)

As convene meeting on this issue. Also advise in write (DS tones) about this case.

2/4/22

*SS
Pax
SO/III*

[Handwritten signature]



**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

No. SOH-III/8-89/2020(Mr. Javid Sultan)
Dated the Peshawar 21st July, 2022

154

To

**The Secretary to,
Govt. of Khyber Pakhtunkhwa,
Establishment Department.**

PS/Secy E&AD
Dir. No. 5945/114
FTS No. _____
Date 21-7-22

Subject: APPEAL FOR THE GRANT OF (BS-09) FROM DATE OF APPOINTMENT IN THE LIGHT OF NOTIFICATION NO. F-478/85-HF-II, DATED 01-03-1988 ISSUED BY THE MINISTRY OF HEALTH SPECIAL EDUCATION & SOCIAL WELFARE (HEALTH) GOVERNMENT OF PAKISTAN.

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith copy of letter No. 7655/AE-VI, dated 22-10-2020 & other enclosures in respect of Mr. Javid Sultan, Chief Clinical Technician (Radiology) BS-16 attached to King Abdullah Teaching Hospital, Mansehra & others requesting for correction of seniority from the date of their first appointment.

It is added that while merging the cadres of Radiographers (BS-06) and X-Ray Technician (BS-09) during restructuring in 2006, a joint seniority list of both the cadres was prepared in which Radiographers (BS-06) was placed in bottom of the seniority list even those Radiographers (BS-06) were appointed much earlier than the X-Ray Technicians (BS-09). Feeling aggrieved by this, they filed writ petition in Peshawar High Court, Peshawar. The Hon'ble court directed to Health Department to reckon the seniority from the dates of their initial appointment (**Annex-I**). Consequently Health Department directed the Director General, Health Services, Khyber Pakhtunkhwa to implement the court judgment in future when preparing seniority lists for their up-gradation.

It is, therefore, requested that necessary advice may kindly be provided to this Department as to whether the procedure adopted while preparing of seniority list after merger of both the cadres {Radiographer (BS-6) and X-Ray Technician (BS-9)} in upgraded post of Clinical Technician (Radiology) (BS-12) was in accordance to the relevant rules/policy or otherwise, Please.

Encl: As above.

Yours faithfully,

S.O. (R-II) SPS 21/7

(Signature)
(Naseer Ahmad)
Section Officer-III

(Signature) 21/7/2022

(Signature)

(155) Annexure
"Z"



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT & ADMN: DEPARTMENT
(REGULATION WING)

NO. SOR-II (E&AD) 1-20/2021 (A)
Dated Peshawar the 7th September 2021

To:

The Secretary to Govt. of Khyber Pakhtunkhwa,
Health Department

Subject: -

APPEAL FOR THE GRANT OF (BS-09) FROM THE DATE OF APPOINTMENT
IN THE LIGHT OF NOTIFICATION NO. F-478/85-HF-II DATED 01.03.1988
ISSUED BY THE MINISTRY OF HEALTH SPECIAL EDUCATION & SOCIAL
WELFARE (HEALTH) GOVERNMENT OF PAKISTAN

Dear Sir,

I am directed to refer to your letter NO. SOH-III/8-89/2020 (Mr. Javid Sultan) dated 31st August 2021 on the captioned subject and to state that Health Department has referred the cases to Establishment Department without examining the same at their own level in light of relevant Policy Instruction etc which is against the spirits of Establishment Department Policy Instructions dated 17.02.1991 and 27.01.2020 (copy enclosed). The Administrative Department must examine the case and share its own views/comments on the matter while referring the case to this Department for advice. The case in hand pertains to placement of X-Ray Technician and Radiographer in (BS-09) with 1/3rd post which is the domain of Finance Department. Finance Department Khyber Pakhtunkhwa may, however confirm as to whether the notification NO. F-4-78/85-MP-II dated 1st March 1988 issued by Govt. of Pakistan Ministry of Health, Special Education and Social Welfare (Health Division) Islamabad has been adopted by the Finance Department, Khyber Pakhtunkhwa or otherwise.

2

The documents received with your above quoted letter are returned herewith in original

copy as above.

Yours faithfully

(ABDUL AHAD)

SECTION OFFICER (R...)
Phone NO 9211760

8/9

POST IMMEDIATE



**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

No. SOH-III/8-89/2020(Mr. Javid Sultan)
Dated the Peshawar 03rd November, 2021

156

To

**The Director General,
Health Services, Khyber Pakhtunkhwa,
Peshawar.**

Subject: APPEAL FOR THE GRANT OF (BS-09) FROM DATE OF APPOINTMENT IN THE LIGHT OF NOTIFICATION NO. F-478/85-HF-II, DATED 01.07.2011 ISSUED BY THE MINISTRY OF HEALTH SPECIAL EDUCATION SERVICES AND WELFARE (HEALTH) GOVERNMENT OF PAKISTAN.

I am directed to refer to your letter No. 1437/AE-VI, dated 01.07.2021 on the subject noted above and to state that Seven (07) set of working paper copy in respect duly flagged may be submitted to this department at the earliest, so that the same could be conveyed in the instant case, please.

(Naseer Ahmad)
Section Officer II

Endst: of even no & date.

Copy forwarded to the:-

PS to Secretary Health, Khyber Pakhtunkhwa.

Section Officer II

Handwritten signature and initials.



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT & ADMN: DEPARTMENT
(REGULATION WING)

(157)

Annex
"AA"

NO. SOR-II (E&AD) 1-20/2021 (A)
Dated Peshawar the 02nd August, 2022

To, s

The Secretary to Govt. of Khyber Pakhtunkhwa,
Health Department

Subject: - APPEAL FOR THE GRANT OF (BS-09) FROM THE DATE OF APPOINTMENT IN THE LIGHT OF NOTIFICATION NO. F-478/85-HF-II DATED 01.03.1988 ISSUED BY THE MINISTRY OF HEALTH SPECIAL EDUCATION & SOCIAL WELFARE (HEALTH) GOVERNMENT OF PAKISTAN

Dear Sir,

In continuation of this department's letter of even number dated 7th September dated 2021; I am directed to refer to your letter NO. SOH-III/8-89/2020 (Mr. Javid Sultan) dated 21st July, 2022 on the captioned subject and to state that as far as the determination of seniority is concerned, the appointing authority as specified in Rule-4 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 is empowered to determine seniority list of the cadre/posts in BS-16 & below in light of Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 and Section-8 of Khyber Pakhtunkhwa Civil Servants Act, 1973, therefore, Health Department may determine the seniority list of both the cadres at their own level accordingly.

2. I am further directed to request that Health Department in consultation with MS/DHO concerned and DGHS Khyber Pakhtunkhwa may examine such like cases at their own level in light of clear Policy Instructions dated 17.02.1991 and 27.01.2020 (copies enclosed). The documents received with your above quoted letter are returned herewith in original.

Encl: as above.

Yours faithfully,

(ABDUL AHAD)
SECTION OFFICER (R-II)
Phone NO.9211785

(158)

Cases seeking advice of E&AD.

I am directed to say that under sub-rule (4) of Rule 9 of the NWFP Rules of Business, 1985, interpretation of rules and orders relating to service matters, other than rules and orders, issued by the Finance Department, has been assigned to this Department. In pursuance of this, this Department has in addition to publishing and supplying copies of the Establishment Manual (Vol.1), also issued from time to time, a large number of instructions covering almost all aspects of service matters to all concerned. In this connection, attention is invited to this Department circular letter No.SOR-III(S&GAD)(Misc-G)9(12)/86, dated 1.2.86 and even numbers dated 15.3.87, 30.6.88 and 14.11.89, on the above noted subject. It has, however, been observed that departments continue to refer cases without examination at their own level, for the advice of this Department and that too in an incomplete form and often without specifying point on which advice is required.

2 I am, therefore, directed to request once again that, in future, only those cases may please be referred to S&GAD for advice, where no clear rules/ instructions/clarification are available and the case cannot be decided without advice of this Department. Nevertheless, cases requiring advice of this Department may be referred in future, which may, inter alia require the following information:-

- (i) Subject matter.
- (ii) Detailed background of the case and point for advice.
- (iii) Whether the case was referred earlier to the S&GAD and if so, what advice was given.
- (iv) Whether the case has also been referred to Finance Deptt/Law Deptt for examination and advice.
- (v) Whether the case actually concerns S&GAD and is being referred to S&GAD with the prior approval of Administrative Secretary concerned or otherwise.

Cases which are not referred in the above format alongwith detailed reasons shall be returned straight away without any examination.

I am, therefore, to request that in future the afore mentioned procedure may kindly be followed.

S&GAD letter No.SOR(S&GAD)1-54/87, dated 17.2.1991;



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION WING)

No. SO(Policy)E&AD/1-10/2019
Dated Peshawar, the January 27, 2020

159

To

All Administrative Secretaries to Government of Khyber Pakhtunkhwa.

Subject: SEEKING ADVICE OF ESTABLISHMENT DEPARTMENT/ UPLOADING OF LAWS ON WEBSITES.

Dear Sir,

I am directed to refer to the subject noted above and to state that it has been observed that often incomplete references are being received without proper examination for seeking advice, which create embarrassing situation for this department in disposing of such like cases timely despite availability of clear rules/instructions/clarification.

2. It is worth mentioning that instructions in this regard have already been issued to all Administrative Departments with the request that, in future only those cases may be referred for advice where no clear rules/instructions/clarification are available and the case cannot be decided without advice of this department (copy enclosed).

3. In order to ensure smooth disposal of official business of the Administrative Departments the Competent Authority has directed that the following instructions be brought into the notice of your subordinates for strict compliance:-

- i) All Administrative Departments shall upload the Esta Code on their Website for facilitation of the general public.
- ii) All Administrative Departments shall ensure examination of the cases at their own level under the relevant rules/policy instructions/clarification and thereafter, if necessary, refer the case to Establishment Department for advice/opinion.
- iii) Administrative Departments shall not refer the case to Establishment Department where clear rules /policy instructions are available and not unnecessarily make a reference in violation of the Khyber Pakhtunkhwa Rules of Business, 1985 which if done repeatedly would be brought into the notice of higher ups.

159
21

4. I am further directed to request that all Administrative Departments shall formally establish, update their websites on regular basis to facilitate the public to bring transparency in the system and promote good governance across the Province. Moreover all laws, notifications, service rules, policies, bye laws duly notified may also be uploaded on regular basis.

5. All the Administrative Department may also issue the above instructions to all attached departments and autonomous/ semi-autonomous bodies for compliance.

Yours faithfully,

(MUHAMMAD SHOAB)
DEPUTY SECRETARY (POLICY)

ENDST: NO. & DATE EVEN

Copy forwarded to:

1. The Principal Secretary to Governor, Khyber Pakhtunkhwa
2. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. The Registrar, Khyber Pakhtunkhwa Service Tribunal.
4. All Heads of Attached Departments / Autonomous, Semi-Autonomous bodies in Khyber Pakhtunkhwa.
5. All Special Secretaries/ Additional Secretaries / Deputy Secretaries / DD (IT) / Section Officers Establishment & Administration Department.
6. The Secretary, Khyber Pakhtunkhwa Public Service Commission
7. PS to Chief Secretary Khyber Pakhtunkhwa.
8. PS to Secretary Establishment Department.

SECTION OFFICER (POLICY)
27/1/2020

[Handwritten signature]

(160) (160)
ANNEXURE
"BB"

1 | Page

THE ¹[KHYBER PAKHTUNKHWA] CIVIL SERVANTS ACT, 1973.

**²[KHYBER PAKHTUNKHWA] ACT NO. XVIII OF 1973)
[11th November, 1973].**

CONTENTS

PREAMBLE

SECTIONS

1. Short title, extend and commencement.
2. Definitions.
3. Terms & Conditions.
4. Tenure of office of civil servants.
5. Appointment.
6. Probation.
7. Confirmation.
8. Seniority.
9. Promotion.
10. Posting and transfers.
11. Termination of services.
- ³[11A. Absorption of civil servants rendered surplus.
- ⁴[11B. Absorption or appointment of Federal employees.
12. Reversion to a lower 3 post.
- ¹[12A. Certain persons to be liable to removal or reversion.

¹ Subs Vide the Khyber Pakhtunkhwa Act. IV of 2011.
² Subs Vide the Khyber Pakhtunkhwa Act. IV of 2011.
³ Inserted vide the Khyber Pakhtunkhwa Ordinance No. VI of 2001.
⁴ Inserted vide the Khyber Pakhtunkhwa Act No. XXXVIII of 2015.

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1.61

**THE ¹KHYBER PAKHTUNKHWA CIVIL SERVANTS
(APPOINTMENT, PROMOTION & TRANSFER) RULES, 1989**

PART-I

GENERAL

1. **Short title and commencement:** - (1) These rules may be called the ²[Khyber Pakhtunkhwa] Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.

(2) They shall come into force at once.

2. **Definitions:-**(1) In these rules, unless the context otherwise requires:-

(a) "Appointing Authority" in relation to a post, means the persons authorized under rule 4 to make appointment to that post;

(b) "Basic Pay Scale" means the Basic Pay Scale for the time being sanctioned by Government, in which a post or a group of posts is placed;

(c) "Commission" means the ³[Khyber Pakhtunkhwa] Public Service Commission;

⁴(d) "Departmental Promotion Committee" means a committee constituted for making selection for promotion or transfer to such posts under a Department, or offices of Government, which do not fall within the purview of the Provincial Selection Board;

⁵(dd) "Departmental Selection Board" means a Board constituted for the purpose of making selection for initial recruitment /appointment to posts under a Department or office of Government in Basic Pay Scale 17 not falling within the purview of the Commission:

Provided that more than one such committees may be constituted for civil servants holding different scales of pay".

(e) "Departmental Selection Committee" means a committee constituted for the purpose of making selection for initial appointment to posts under a department, or office of Government [in Basic Pay Scale 17 and below not falling within the purview of the Commission];

(f) "Post" means a post sanctioned in connection with the affairs of the Province, but not allocated to all Pakistan Unified Grades; and

¹ For the words "NWFP" or "North-West Frontier Province", wherever occurred, the words "Khyber Pakhtunkhwa" substituted by the Khyber Pakhtunkhwa Laws (Amendment) Act, 2011 (Khyber Pakhtunkhwa Act No. IV of 2011) published in the Khyber Pakhtunkhwa Government Gazette Extraordinary dated 2nd April, 2011

² Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

³ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

⁴ Substituted by Clause (d) of sub-rule (1) of Rule 2 vide Notification No. SOR-I (S&GAD) 4-1/80 (Vol-II) dated 14-01-92.

⁵ Clause (dd) added by Notification No. SOR-III (S&GAD) 2-7/86, dated 8-12-1994

PSIC-8 Khyber Pakhtunkhwa

Diary No. 3965 W/E

Date: 30-11-2010

To,

The Worthy Chief Secretary,
Khyber Pakhtunkhwa.

For immediate (162)
as per rules, please

Annexure 2
ZC

Subject:- APEAL FOR GRANT OF SENIORITY AND PROMOTUION.

Respected Sir,

Sec. Health

30.11.22

With humbly request it is stated that we are the Radiographer of Health Department and would like to present the following few points for your kind consideration please:-

C.S.O to C.S.
Govt. of Khyber Pakh

- i) That we were appointed as Radiographer in BS-6 in 1986.
- ii) On 1.3.1988, Ministry of Health Govt. of Pakistan Islamabad vide Circular No. F.4-78/85-HF-II had granted BS-9 to X-Ray Tech. & Radiographers in Federal Government (copy enclosed).
- iii) However, this Provincial Government did not implement the said facility in this Provincial Government, but Health Department appointed following X-Ray Tech. in BS-9, on the analogy of Federal Govt. policy by ignoring the fact that Finance Department, Khyber Pakhtunkhwa has not yet notified the said policy:-

- i. Mr. Afzal Ur Rehman
- ii. Gul Sher Khalil
- iii. Mr. Ramiz Khan
- iv. Islam ud Din
- v. Mr. Jamil Khan and 8 others whose names are mentioned in Seniority list.

- iv) On 25.8.2006, this Provincial Govt. has introduced/approve 8-stage service structure for Paramedics of Khyber Pakhtunkhwa and reduced 57-different categories of Paramedics into 14-cadres and also given us Junior Clinical Technicians (Radiology) (JCT) nomenclature and granted BS-9 (copy enclosed).
- v) On 7.10.2009, Health Department issued a seniority list of JCT (Radiology) BS-9 and mentioned the names of above mentioned officials (who were appointed after us in 1988 under Federal Govt. policy which was not adopted by this Provincial Govt.) at the top of our seniority list (first page enclosed which clearly describes that appointee of 1988 are senior to appointee of 1986)
- vi) Consequently, JCT (Radiology) made a representation in Health Department that names of 1986 appointee may be mentioned over the names of X-Ray Tech. appointed in 1988.
- vii) When Health Department did not entertain the request, then, JCT (Radiology) challenged the same before PHC through W.P No. 2525/2010 and PHC had decided the case in favour of our cadre.

Receiving
Secy Health D No 4131-3965
30-11-22

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2525/2010 and PHC had decided the case in favour of our cadre.

- viii) Consequently, Health Department vide letter No.SOH(Lit.I)/12-1139/2012 dated 18.1.2012 had categorically communicated the decision of Honourable, PHC to DG Health Services for necessary compliance (copy enclosed) but DG Health Services did not make any decision till date and made the matter rolling stone.
- ix) Instead of correcting our s/list, Health Department made promotion of above mentioned X-Ray Tech. on the basis of this disputed s/list:-
 - i. Promoted them from BS-9 to BS-12 w.e.f. 20.4.2010
 - ii. Promoted them from BS-12 to BS-17 w.e.f. 19.8.2013
 - iii. Promoted them from BS-17 to BS-18 w.e.f. 28.9.2021
- x) We have submitted several applications/representation to Health Department for correcting S/List and mentioning our names over the names of those X-Ray Tech. who were appointed after us in 1988, but in vain.
- xi) on 28.12.2021, in response of our appeal, office of DG health Services claimed that Health Department made injustices with Radiographers on different times (copy of Health Department attached for ready reference).

2. Now the X-Ray Tech. appointed in 1988 (on the basis of illegal Fed. Govt. Circular) reached to BS-17/18 (their names are mentioned in Para-1 Sr. iii) and we are in BS-16 despite the fact that we were appointed in 1986, therefore, it is requested that Health Department may kindly be directed to take following actions and submit report:-

a- Correct our list and give us seniority position over X-Ray Tech. whose names are mentioned in Para-1 Sr. iii)

AND

b- Also grant us promotion to the following grades from the dates as mentioned below:-

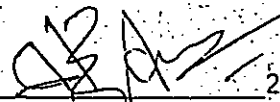



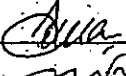
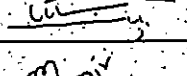
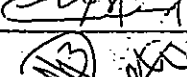
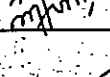


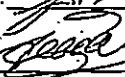

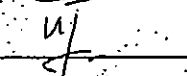
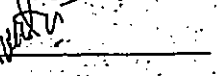


- i. Promotion to BS-12 w.e.f. 20.4.2010 (the date when above mentioned X-Ray Tech.) were granted BS-12
- ii. Promotion to BS-17 w.e.f. 19.8.2013 (the date when above mentioned X-Ray Tech.) were granted BS-17
- iii. Promotion to BS-18 w.e.f. 28.9.2021 (the date when above mentioned X-Ray Tech.) were granted BS-18

Your's faithfully

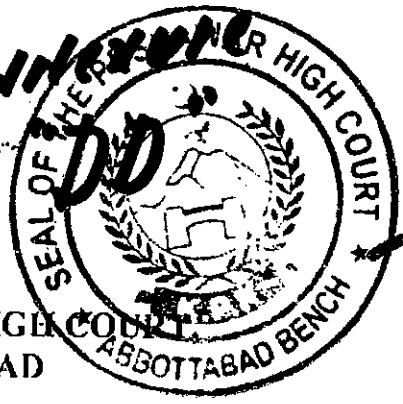
Appellants (copy enclosed)

163A)

Yours obediently
Paramedics (Radiology)
(Initial Radiographers-BPS-06)

- | | |
|--------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| 1. Javed Sultan.  | 2. Zulfiqar Tanoli.  |
| 3. Shamriaz Gul.  | 4. Khalil ur Rehman.  |
| 5. Ghulam Akhtar.  | 6. Abdur Rab Nishtar.  |
| 7. Zaheer Ahmed.  | 8. Muhammad Munir.  |
| 9. Fazal Raheem.  | 10. Rab Nawaz.  |
| 11. Raja Shakeel Akhtar.  | 12. Muhammad Shahid.  |
| 13. Ejaz Hussain.  | 14. Qadeer Nawaz.  |
| 15. Muhammad tahir.  | 16. Sajid Bag.  |





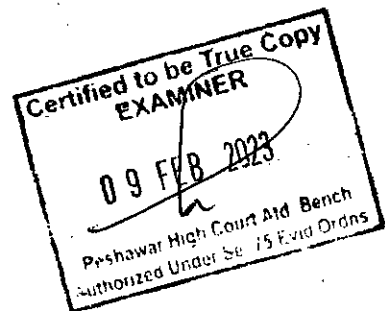
BEFORE THE PESHAWAR HIGH COURT
BENCH ABBOTTABAD

W.P No. 157-A of 2023

1. Javaid Sultan son of Muhammad Din, presently working as Chief Technologist, King Abdullah Teaching Hospital, Mansehra.
 2. Shamraiz Gul son of Muhammad Younis, presently Working as Chief Clinical Technician, Benazir Bhutto Shaheed, Hospital, Abbottabad.
 3. Khalil-ur-Rehman son of Wali Dad presently working as Chief Clinical Technician, Benazir Bhutto Shaheed, Hospital, Abbottabad.
 4. Fazal Raheem son of Sadar-ud-Din presently working as Chief Clinical Technician, Benazir Bhutto Shaheed, Hospital, Abbottabad.
 5. Munir Khan son of Jehangir Khan, presently working as Chief Clinical Technician, District Headquarter Hospital, Haripur.
 6. Zulfiqar son of Fazal Elahi presently working as Chief Clinical Technician, Ayub Teaching Hospital, Abbottabad.
-PETITIONERS

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Health, Peshawar.



~~FILED TODAY~~
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
W.M.

185

2. Director General Health, Khyber Pakhtunkhwa, Peshawar.
3. Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
4. Secretary Finance, Health, Department, Khyber Pakhtunkhwa, Peshawar
5. Secretary Establishment Khyber Pakhtunkhwa, Peshawar.

...RESPONDENTS.

WRIT PETITION UNDER ARTICLE 199 OF
THE CONSTITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN, 1973 FOR A
DECLARATION TO THE EFFECT THAT
THE PETITIONERS BEING SENIOR MOST
ARE ENTITLED FOR THE PROMOTION
FROM BPS-9 TO BPS-12 W.E.F. 19.08.2013
AND FROM BPS-17 TO BPS-18 W.E.F.
28.09.2021 AND ALSO ENTITLED
FOR RELEVANT BENEFITS KEEPING IN
VIEW THE RELEVANT LAW, RULES AND
REGULATIONS AS WELL AS
NOTIFICATION ON THE SUBJECT. NON-
CONSIDERING THE PETITIONERS FOR
THE PURPOSE OF PROMOTION, NON-
PROMOTING THE PETITIONERS TO
HIGHER SCALES BY THE RESPONDENTS,
NON-IMPLEMENTATION OF THE
RELEVANT LAW, RULES, REGULATIONS
AS WELL AS NOTIFICATION
BY THE RESPONDENTS REGARDING

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EXAMINER
09 FEB 2023
Peshawar High Court Atd Bench
Authorized Under Sec 75 Evid Ordns

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
24/2/23

C186
- 3

THE PROMOTION OF THE
PETITIONERS, NON-DECIDING THE
FATE OF THE DEPARTMENTAL
APPEALS OF THE PETITIONERS,
REFUSAL OF THE RESPONDENTS
FROM MODIFYING THE SENIORITY
LIST OF THE PETITIONERS AND
CONSEQUENTLY IMPUGNED SENIORITY
LIST COMPILED BY THE RESPONDENTS
WHEREBY THE PETITIONERS
WERE KEPT UNDER THE JUNIOR
EMPLOYEES ARE WRONG, ILLEGAL,
AGAINST THE LAW AND FACTS,
ARBITRARY, FANCIFUL, PERVERSE,
AGAINST THE RELEVANT LAW,
RULES, REGULATIONS AS WELL
AS NOTIFICATIONS ON THE
SUBJECT, AGAINST THE FUNDAMENTAL
RIGHTS OF THE PETITIONERS
HENCE BEING UNCONSTITUTIONAL,
LIABLE TO BE STRUCK DOWN.

Certified to be True Copy
EXAMINER
09 FEB 2023
Peshawar High Court Atd Bench
Abbottabad Bench

PRAYER: -

On acceptance of the instant Writ
Petition:-

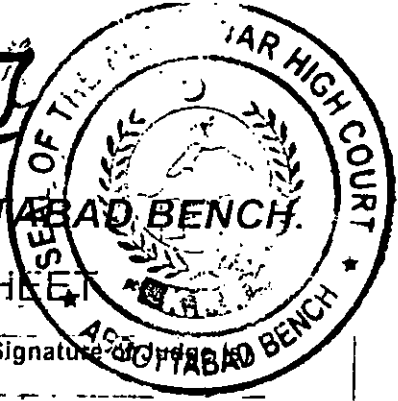
- i. Non-considering the petitioners for the purpose of promotion, non-promoting the petitioners to higher scales by the respondents, non-implementation of the relevant law,



FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH

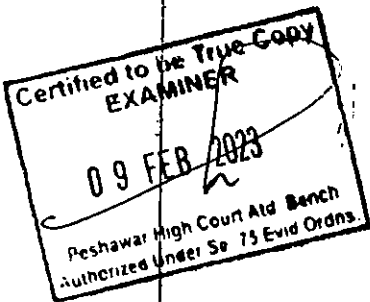
157

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET



Date of Order of Proceedings	Order or other Proceedings with Signature
1	2
08.02.2023	<p><u>W.P.No. 157-A/2023.</u></p> <p>Present: Mr. Junaid Anwar Khan, Advocate, for the petitioners.</p> <p>***</p> <p><u>WIQAR AHMAD, J.-</u> Learned Assistant Advocate General (Mr. Sajid-ur-Rehman Khan) accepted notice on behalf of respondents. Learned counsel for the petitioners after arguing the case for a while stated that petitioners would not press this petition any further provided a direction is issued for deciding appeal, annexed with the instant writ petition as Annexure-U at page 143.</p> <p>We, in the circumstances, direct respondent No.1 to decide appeal of the petitioners within two (02) months after receipt of order of this court. Petition stands disposed of accordingly.</p> <p style="text-align: right;">  JUDGE  JUDGE </p>



Self. GS.

Hon'ble Mr. Justice Wiqar Ahmad
Hon'ble Mr. Justice Fazal Subhan



Government of Khyber Pakhtunkhwa
Health Department

168 Annexure "EE"

Dated the Peshawar 28th March, 2023

No. SOH-III/8-89/2020(Mr. Javid Sultan).

WHEREAS, Mr. Javed Sultan & Others submitted an appeal to Secretary Health for grant of BS-09 instead of BS-06 from their initial date of appointment in light of Notification No. F-478/85-HF-II, dated 01-03-1988 issued by Govt. of Pakistan, Ministry of Health, Special Education and Social Welfare (Health Division) Islamabad.

AND WHEREAS, the case was referred to Finance Department with the request as to whether Notification No. F-478/85-HF-II, dated 01-03-1988 issued by Govt. of Pakistan, Ministry of Health, Special Education and Social Welfare (Health Division) Islamabad, has been adopted by Govt. of Khyber Pakhtunkhwa, Finance Department or otherwise, wherein, Finance Department vide letter No. SO(FR)FD/7-3/2022/Health Department, dated 07-04-2022 informed that the Notification/ibid has not been adopted by Govt. of Khyber Pakhtunkhwa, Finance Department.

NOW THEREFORE, the Competent Authority (Secretary Health) after going through the Finance Department response and available record has been pleased to regret the appeal, being devoid of any merit as Notification No. F-478/85-HF-II, dated 01-03-1988 issued by Govt. of Pakistan, Ministry of Health, Special Education and Social Welfare (Health Division) Islamabad is not applicable to the appellants.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Endst: even no & date.

Copy forwarded for information & necessary action:-

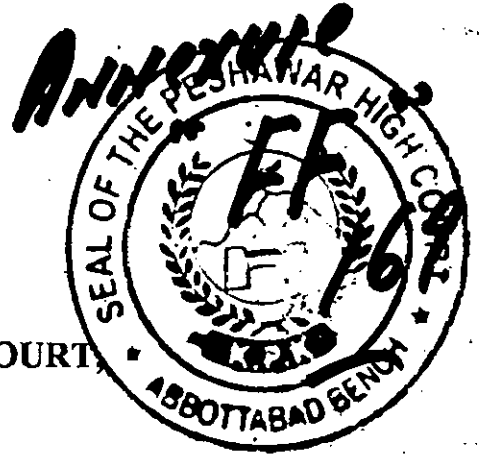
1. The Additional Registrar, Peshawar High Court, Abbottabad Bench.
2. The Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
3. The Section Officer (Lit-I) Health Department.
4. PS to Secretary Health, Khyber Pakhtunkhwa.
5. PA to Deputy Secretary (Litigation) Health, Khyber Pakhtunkhwa.
6. Appellants Concerned.

(Naseer Ahmad)
(Section Officer-III)

C.T.C

113
M.M.

①



BEFORE THE PESHAWAR HIGH COURT,
BENCH ABBOTTABAD

W.P No. 474 of 2023

1. Javaid Sultan son of Muhammad Din, presently working as Chief Technologist, King Abdullah Teaching Hospital, Mansehra.
 2. Shamraiz Gul son of Muhammad Younis, presently Working as Chief Clinical Technician, Benazir Bhutto Shaheed, Hospital, Abbottabad.
 3. Khalil-ur-Rehman son of Wali Dad presently working as Chief Clinical Technician, Benazir Bhutto Shaheed, Hospital, Abbottabad.
 4. Fazal Raheem son of Sadar-ud-Din presently working as Chief Clinical Technician, Benazir Bhutto Shaheed, Hospital, Abbottabad.
 5. Munir Khan son of Jehangir Khan, presently working as Chief Clinical Technician, District Headquarter Hospital, Haripur.
 6. Zulfiqar son of Fazal Elahi presently working as Chief Clinical Technician, Ayub Teaching Hospital, Abbottabad.
-PETITIONERS

VERSUS

1. Government of Khyber Pakitunkhwa through Secretary Health, Peshawar.



FILED TODAY
V.D. REGISTRAR
P.C. ABBOTTABAD BENCH
02/11/23

(2)

170
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2. Director General Health, Khyber Pakhtunkhwa, Peshawar.
3. Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
4. Secretary Finance, Health Department, Khyber Pakhtunkhwa, Peshawar
5. Secretary Establishment, Khyber Pakhtunkhwa, PeshawarRESPONDENTS.

WRIT PETITION UNDER ARTICLE
199 OF THE CONSTITUTION OF
ISLAMIC REPUBLIC OF PAKISTAN,
1973 FOR A DECLARATION TO THE
EFFECT THAT THE PETITIONERS
BEING SENIOR MOST ARE ENTITLED
FOR THE PROMOTION FROM BPS-9
TO BPS-12 W.E.F. 20.04.2010, FROM
BPS-12 TO BPS-17 W.E.F. 19.08.2013
AND FROM BPS-17 TO BPS-18 W.E.F.
28.09.2021 AND ALSO ENTITLED
FOR RELEVANT BENEFITS KEEPING
IN VIEW THE RELEVANT LAW,
RULES AND REGULATIONS AS
WELL AS NOTIFICATION ON THE
SUBJECT. NON-CONSIDERING THE
PETITIONERS FOR THE PURPOSE
OF PROMOTION, NON-PROMOTING
THE PETITIONERS TO HIGHER
SCALES BY THE RESPONDENTS,
NON-IMPLEMENTATION OF THE
RELEVANT LAW, RULES, REGULATIONS
AS WELL AS NOTIFICATION BY

Certified to the
EXAMINER
13 NOV 2023
Peshawar High Court 4th Bench
Authorized Under Sec. 75 C & D Ord.

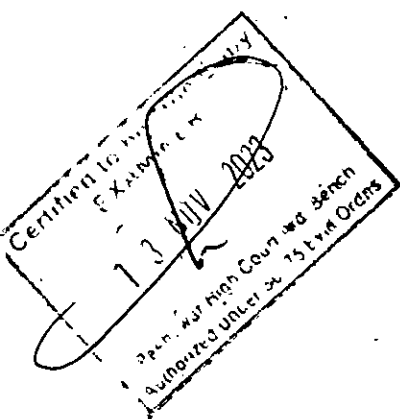
FILED TODAY

WWW.RECORDER
PAC.ABOTTABAD BENCH
8/6/23

(3)

171
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THE RESPONDENTS REGARDING
THE PROMOTION OF THE
PETITIONERS, REFUSAL OF THE
RESPONDENTS FROM MODIFYING
THE SENIORITY LIST OF THE
PETITIONERS, IMPUGNED SENIORITY
LIST COMPILED BY THE RESPONDENTS
WHEREBY THE PETITIONERS
WERE KEPT UNDER THE JUNIOR
EMPLOYEES AND CONSEQUENTLY
IMPUGNED ORDER BEARING
NO.SOH-III/8-89/ 2020 (MR. JAVID
SULTAN) DATED 28.03.2023 WHEREBY
DEPARTMENTAL APPEAL FILED BY
THE PETITIONERS WERE DISMISSED
ARE WRONG, ILLEGAL, AGAINST
THE LAW AND FACTS, ARBITRARY,
FANCIFUL, PERVERSE, AGAINST
THE RELEVANT LAW, RULES,
REGULATIONS AS WELL AS
NOTIFICATIONS ON THE SUBJECT,
AGAINST THE FUNDAMENTAL RIGHTS
OF THE PETITIONER HENCE BEING
UNCONSTITUTIONAL, LIABLE TO
BE STRUCK DOWN.



PRAYER: -

On acceptance of the instant Writ
Petition:-

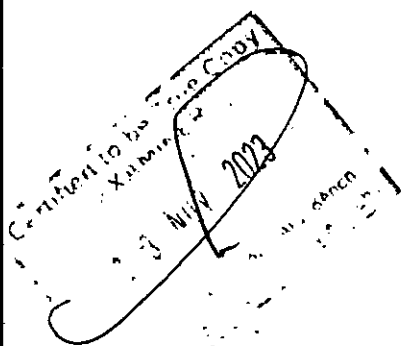
FILED TODAY
100:REGISTRAR
P.C. ABBOTABAD BENCH
02/05/23

(4)

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i. Non-considering the petitioners for the purpose of promotion, non-promoting the petitioners to higher scales by the respondents, non-implementation of the relevant law, rules, regulations as well as notification by the respondents regarding the promotion of the petitioners, refusal of the respondents from modifying the seniority list of the petitioners, impugned seniority list compiled by the respondents whereby the petitioners were kept under the junior employees and consequently impugned order bearing No.SOH-III/8-89/ 2020 (Mr. javid sultan) dated 28.03.2023 whereby departmental appeal filed by the petitioners were dismissed may please be declared as wrong, illegal, against the law and facts, arbitrary, fanciful, perverse, against the relevant law, rules, regulations as well as notifications on the subject, against the fundamental rights of the petitioner hence being unconstitutional, be struck down.

ii. The petitioners may please be ordered to be promoted in BPS-09 in view of the notification dated



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ADD: REGISTRAR
FIG. ARMOYTABAD BENCH
6/4/23

(5)

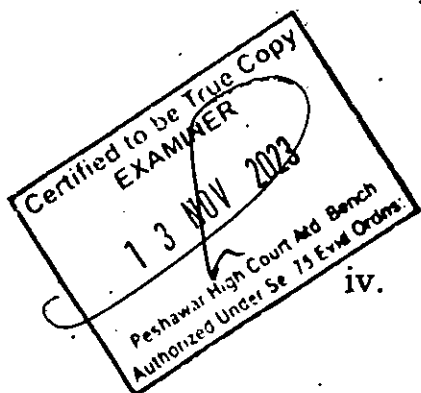
173
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01.03.1986 alike other employees and on the basis of the same, the petitioners may also be ordered to be further promoted from BPS-09 to BPS-12 w.e.f. 10.04.2010, from BPS-12 to BPS-17 w.e.f. 19.08.2013, from BPS-17 to BPS-18 w.e.f. 28.09.2021 and the relevant benefits may also be ordered to be issued in favour of the petitioners.

iii. The respondents may also be ordered to decide the fate of the departmental appeal of the petitioners in accordance with law, rules, regulations as well as notification on the subject.

iv. The respondents may also be ordered to rectify/modify the seniority list prepared/compiled for X-ray Technician by placing the names of the petitioners at correct/proper position according to their service.

v. Or any other writ, order or relief as this Honourable Court deems fit and appropriate in the



FILED TODAY

10/11/2023
JUDGE
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
8/11/23

(6)

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circumstances of the case, may also be issued/passed.

Respectfully Sheweth!

1. That, the petitioners are the residents of Hazara Division.

(Copies of the CNICs of the petitioners are annexed as annexure "A").

2. That, the petitioners are qualified upto the mark having requisite qualification.

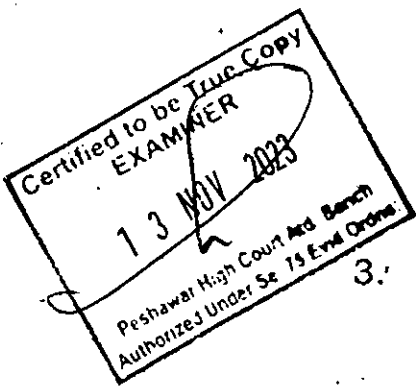
(Copies of the testimonials of the petitioners are annexed as annexure "B").

3. That, the petitioners duly approached the respondents for their appointment and after requisite test/interview, the petitioners were appointed as Radiographer (BPS-06) in the respondents' department.

(Copies of the appointment orders of the petitioners are annexed as annexure "C").

FILED TODAY

DR. NAUSIYAK
PESHAWAR BENCH
6/11/2023



(7)

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4. That, at the time of appointment of the petitioners, the law governing the appointment was NWFP Civil Services, Pay Revise Rules, 1978.

(Copy of the NWFP Civil Services Pay Revise rules, 1978 is annexed as annexure "D").

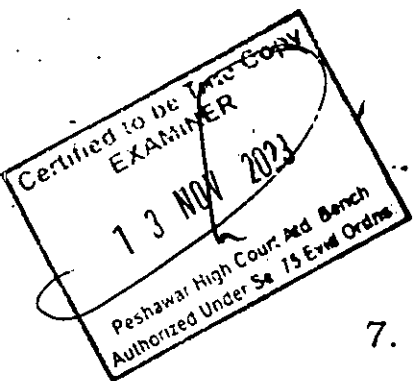
5. That, in the meanwhile, Government of NWFP introduced the scheme of Basic Pay Scale and Firing Benefits of Provincial Civil Servants, 1983.

(Copy of the Scheme is annexed as annexure "E").

6. That, it is very astonishing that only the petitioners' cadre was not dealt with by the respondents and list of all the cadres were given new/higher grades.

7. That, in the year 1988, the respondents department issued a circular for the petitioners' cadre and anomaly was removed and the petitioners were also placed at BPS-09.

(Copy of the circular is annexed as annexure "F").



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ADD. REGISTRAR
BENCH
MIRANSHAPUR BENCH

8

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8. That, after the issuance of circle in the year 1988, blue eyed were appointment on the basis of the above mentioned notification but a clear cut discrimination was done with the petitioners and the petitioners were not given the benefit of the same.

(Copies of the A.C.Rs are annexed as annexure "G").

9. That, Hayat Shaheed Teaching Hospital, Peshawar also wrote a letter to the Government for the needful and finance department also make observations on the same.

(Copies of the letter is annexed as annexure "H").

10. That, in the year 1988, a new notification was issued in which criteria was again laid down and the petitioners' qualification fulfills the same as well.

(Copy of the notification is annexed as annexure "I").

11. That, in the year, 2002, respondents' department issued

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EXAMINER
13 NOV 2023
Peshawar High Court And Bench
Authorized Under Sec 14 F & Ordns

FILED TODAY
JUD. KEN. IS. I. KAK
PESHAWAR BENCH
6/11/23

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seniority list according to the services of the employees in which the petitioners were placed in BPS-06.

(Copy of the seniority list is annexed as annexure "J").

12. That, similarly, another seniority list was prepared in the year 2006 by the respondents department.

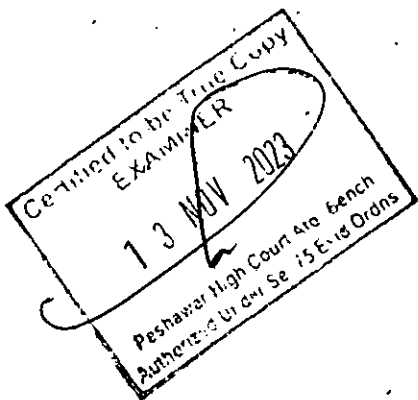
(Copy of the seniority list of 2006 is annexed as annexure "K").

13. That, in the year 2006, a new service structure was introduced by the Government in which nomenclature of the cadres of the petitioners alongwith others was changed.

(Copy of the new service structure of 2006 is annexed as annexure "L").

14. That, the respondents later on issued a notification regarding implementation of the new service structure on 17.01.2009.

(Copy of the notification dated 17.01.2009 is annexed as annexure "M").



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REGISTRAR
HC ABOTTABAD BENCH
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15. That, later on, final seniority list was published by the respondents' department and juniors than the petitioners were placed at higher place than the petitioners.

(Copy of the final seniority list is annexed as annexure "N").

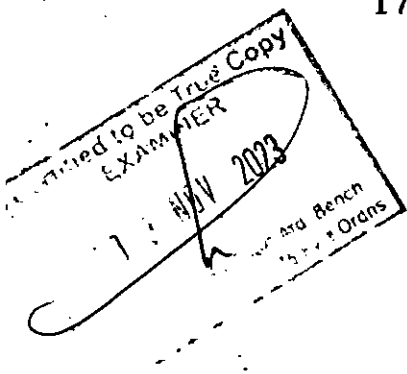
16. That, some of the employees feeling aggrieved filed a Writ Petition bearing No.25 before the Honourable Peshawar High Court, Peshawar which was decided on 12.12.2012.

(Copies of Writ Petition alongwith order dated 12.12.2012 are annexed as annexure "O").

17. That, later on, the respondents' department wrote a letter to Director General Health for implementation but in vain.

(Copy of the letter is annexed as annexure "P").

18. That, the seniority list was issued in the year 2011 and notification was implemented to the extent of some of the employees whereas in



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REGISTRAR
PESHAWAR BENCH

(11)

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case of the petitioner, the same was refused.

(Copy of the seniority list is annexed as annexure "Q").

19. That, in the year 2012, the respondents also issued provisional seniority list by implementing the notification but ever then the petitioners were deprived from their right of promotion.

(Copy of the provisional seniority list of 2012 is annexed as annexure "R").

20. That, the Government of Khyber Pakhtunkhwa issued notification/ letter dated 03.05.2013 for one time upgradation.

(Copy of the notification/letter is annexed as annexure "S").

21. That, after the above said notification/letter dated 03.05.2013, seniority list was issued on 30.07.2020.

(Copy of the seniority list dated 30.07.2020 is annexed as annexure "T").

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JUDGE, HIGH COURT
PESHAWAR BENCH
08/07/20

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22. That, the petitioners alongwith the other employees feeling aggrieved from above said seniority list filed their department appeals before the competent authority.

(Copy of the departmental appeal is annexed as annexure "U").

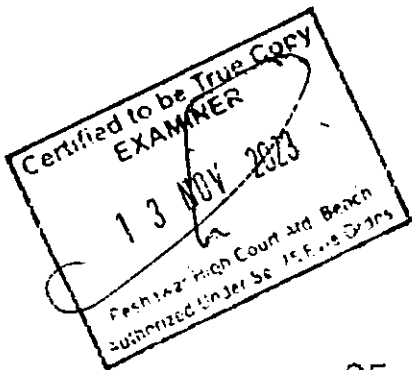
23. That, the parawise comments were called and the respondents submitted reply to the appeals of the petitioners and other employees.

(Copy of the parawise comments alongwith reply are annexed as annexure "V&W").

24. That, the Director General Health also wrote a letter to the Secretary Health, Peshawar for awarding BPS-09 to the petitioners.

(Copy of the letter is annexed as annexure "X").

25. That, later on, the Finance Department issued a letter dated 17.08.2021 regarding returning the case in original with the advice that the settlement of seniority issue is the domain of



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Establishment Department, therefore, the case may be taken up with Establishment Department for guidance please.

(Copy of the letter dated 17.08.2021 is annexed as annexure "Y").

26. That, on the basis of above said letter, the Establishment Department wrote a letter to Secretary to Government of Khyber Pakhtunkhwa Health Department on 07.09.2021 whereby it was declared that the case in hand pertains to placement of X-ray Technician and Radiographer in (BPS-09) with 1/3rd post which is the domain of Finance Department. Finance Department Khyber Pakhtunkhwa may, however, confirm as to whether the notification No.F.4-78/85-MP-II dated 01st March, 1988 issued by Government of Pakistan, Ministry of Health, Special Education and Social Welfare (Health Division), Islamabad has been adopted by the Finance Department, Khyber Pakhtunkhwa or otherwise.

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EXAMINER
13 NOV 2023
Peshawar High Court Bench
Authorized Signer

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EDUCATION
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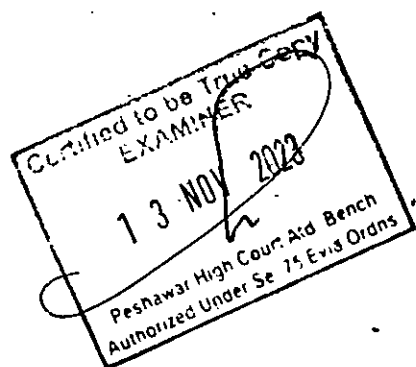
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*(Copy of the letter dated 07.09.2021
is annexed as annexure "Z").*

27. That, the Establishment Department by way of letter dated 02.08.2022 submitted reply to the letter dated 07.09.2021 held that as the appointing authority as specific in rule-4 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 is empowered to determine seniority list of the cadre/posts in BS-16 and below in light of Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and section-B of Khyber Pakhtunkhwa Civil Servants Act, 1973, therefore, Health Department may determine the seniority list of both the cadres at their own level accordingly.

*(Copy of the reply dated 02.08.2022
is annexed as annexure "AA").*

28. That, the Khyber Pakhtunkhwa Civil Servant Act, 1973 is very much clear on the subject regarding seniority.



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P. B. ABBOTTABAD BENCH
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(Copy of the Khyber Pakhtunkhwa Civil Servant Act, 1973 is annexed as annexure "BB").

29. That, the petitioners being aggrieved submitted departmental appeal with the respondents' department upon which the comments were sought which favours the contention of the petitioners but despite that fact, neither the fate of the appeal of the petitioners was decided by the respondents' department nor the grievances of the petitioners were redressed.

(Copy of the appeal is annexed as annexure "CC").

30. That, the petitioners being aggrieved filed a Writ Petition before this Honourable Court and this Honourable Court vide order dated 08.02.2023 directed the respondent No.1 to decide the appeal of the petitioners within two (02) months after receipt of the order of this Court.

Court Order
13 NOV 2023
Peshawar High Court Alta Bench
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H.C. ABBOTTABAD BENCH
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(Attested copy of the order dated 08.02.2023 is annexed as annexure "DD").

31. That, after the order passed by this Honourable court, respondents straightaway dismissed the departmental appeal filed by the petitioners vide impugned order dated 28.03.2023.

(Copy of the order dated 28.03.2023 is annexed as annexure "EE").

32. That, the petitioners being aggrieved from the impugned actions/in-actions of the respondents, petitioners having no other adequate, alternate, efficacious or speedy remedy except to invoke the constitutional jurisdiction of this Honourable Court by way of instant Writ Petition, inter alia, on the following grounds: -

GROUND

- i. That, non-considering the petitioners for the purpose of promotion, non-promoting the petitioners to higher scales by the

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HON. JUDGE
OUR SEC. ARMO
DEPT. OF JUSTICE
P.O. NO. 100/2023

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respondents, non-implementation of the relevant law, rules, regulations as well as notification by the respondents regarding the promotion of the petitioners, refusal of the respondents from modifying the seniority list of the petitioners, impugned seniority list compiled by the respondents whereby the petitioners were kept under the junior employees and impugned order bearing No.SOH-III/8-89/ 2020 (Mr. javid sultan) dated 28.03.2023 whereby departmental appeal filed by the petitioners were dismissed are wrong, illegal, against the law and facts, arbitrary, fanciful, perverse, against the relevant law, rules, regulations as well as notifications on the subject, against the fundamental rights of the petitioners hence being unconstitutional, liable to be struck down.

- ii. That, admittedly the petitioners were appointed in the respondents' department during the years 1986 to 1990 and the petitioners served

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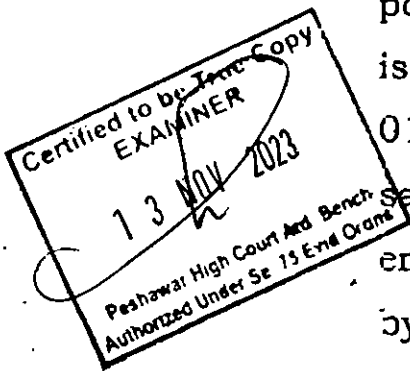
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the respondents' department with great zeal and zest and given their golden period of life to the respondents' department hence keeping in view the long service of the petitioners, the petitioners are senior most candidates.

iii. That, long standing service of the petitioners accrues legal, legitimate and valid right in favour of the petitioners for the purpose of promotion and the relevant law, rules and regulations on the subject clearly supports the contentions of the petitioners regarding their promotion.

iv. That, it is also an admitted position that the respondents issued notification dated 01.03.1988 whereas in view of the said notification, same like employees have been compensated by giving them promotion whereas in case of the petitioners, the same treatment has been refused hence the petitioners have been discriminated with by the respondents in a sheer malafide manner.



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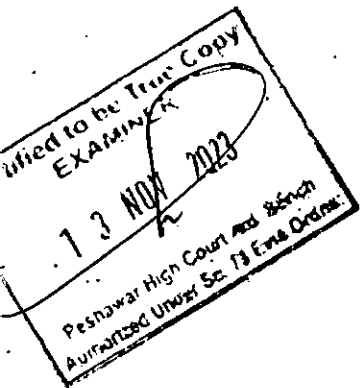
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- v. That, no legal, valid or justified reasons have been given by the respondents regarding refusal to the promotion by the respondents whereas the petitioners are at par with the employee who have been given the benefit of the notification dated 01.03.1988 but non-treating the petitioner alike similarly placed employees does not appeal to a prudent mind rather smacks malafide on the part of the respondents.

(Copy of the record regarding promotion of juniors than the petitioners are annexed as annexure "FF").

- vi. That, as per law, when any notification has been issued, the same has been implemented in its true letter and spirit to all the employees of the department and no employee can be deprived from his legal, valid or legitimate right but in the instant case, the respondents have decorated their blue eyed chaps whereas the petitioners have been left over by the respondents.



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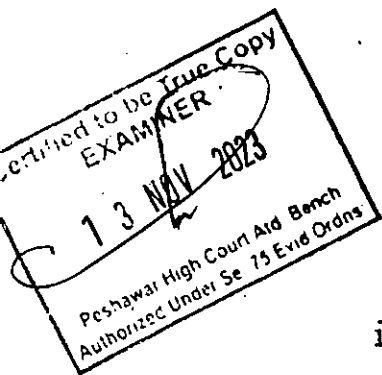
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vii. That, the petitioners are running from pillar to post from a considerable time but despite hectic efforts, the petitioners have been made rolling stone by the respondents in a sheer malafide manner and legal right of the petitioners is being infringed by the respondents in a sheer malafide manner.

viii. That, as the petitioners have not been given the benefit of notification dated 01.03.1988 due to this reason, the petitioners have been made juniors than the employees who were appointed much after the petitioners which is also a height of injustice with the petitioners.

ix. That, the seniority lists so prepared by the respondents is also in sheer violation of the relevant law, rules and regulations as well as notifications issued by the respondents themselves whereas the respondents were duty bound to compile/prepare the seniority list in accordance with relevant law, rules, regulations as



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well as notification on the subject but the acts of the respondents clearly comes within the ambit of resale from the relevant law, rules, regulations as well as notification making the impugned seniority lists as nullity in the eyes of law.

x. That, the petitioners have also filed department appeals with the respondents' department upon which the comments were also called from different officers/ departments and the said comments also favours the contention of the petitioners but despite that facts, the respondents have not decided the fate of the appeals of the petitioners nor redressed the genuine grievances of the petitioners.

xi. That, the Ministry of Health, Special Education and Social Welfare (Health Division) Government of Pakistan in its letter dated 01st March, 1988 removed the anomaly in scales of X-ray Technicians and Radiographers and granted BPS-09 to both the cadres. The said letter

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POST OFFICE High Court and Bench
Aurangabad District 15 E-15 Orans

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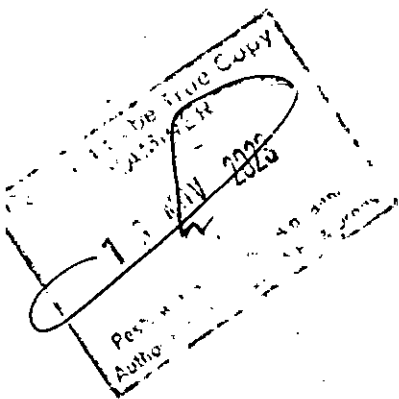
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was communicated to Accountant General Peshawar besides others. The said rectification was required to be implemented by the health Department Khyber Pakhtunkhwa as well as but was not implemented whereas the implementation of the said letter was the responsibility of the respondents' department but for the reasons best known to them, the respondents have not implemented the same.

xii. That, after restructuring of paramedics in 2006, Radiographers and X-ray Technicians were given the same scale (BPS-09), however, Radiographers were placed at the bottom in the seniority list of CT Radiology even those radiographers i.e. petitioners who were appointed much earlier than the X-ray Technicians hence the relevant law, rules, regulations as well as notification have blatantly been violated by the respondents.

xii. That, as per true letter and spirit of Khyber Pakhtunkhwa Civil Servant Act, seniority of Civil servants shall



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be reckoned from dates of initial appointment and the respondents' department is bound to rectify its uncertain wrongs done to Civil servants/petitioners and there is no limitation or bar upon department as per ruling of government of NWFP (KPK) Law Department.

xiii. That, another glaring aspect of the instant case is that some of the radiographers filed a Writ Petition in Honourable Peshawar High Court for redressal of their grievances and the Honourable Peshawar high Court directed the Health Department to reckon the seniority from dates of their initial appointment. Consequently Health Department vide letter dated 18.01.2012, directed the Director General Health Services Khyber Pakhtunkhwa to implement the court judgment in future when preparing working papers for seniority lists for upgradation. In para No.(ii), sub para (ii) of health Department letter dated 03.05.2013, addressed to Director

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Peshawar High Court 1st Bench
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General Health Khyber Pakhtunkhwa envisaged consideration of promotion cases of paramedics on seniority list prior to 15.01.2002 but radiographers have been unlawfully and illegally deprived of the same.

xiv. That, the impugned actions/inactions of the respondents offends all norms of justice, fair play, equity, good conscious and also comes within the ambit of sheer violation of the fundamental rights of the petitioners hence the interference of this Honourable Court in its writ jurisdiction is being solicited.

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EXAMINER
13 NOV 2023
Bench

xiii. That, the powers or jurisdiction are vested in an authority to exercise it justly, fairly, honestly, judiciously and in accordance with law, rules and regulations whereas the respondents have transgressed upon their powers while dealing with the matter in hand.

xv. That, it is an inalienable right of the petitioners to enjoy the protection of law and to be treated

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in accordance with law, rules and regulations on the subject whereas such right of the petitioners is being infringed by the respondents in a sheer malafide manner.

xvi. That, keeping in view the peculiar facts and circumstance of the case, notification dated 01.03.1988 is applicable to the case of the petitioners but the respondent No.1 while dismissing the departmental appeal have wrongly and illegally declared the same as not applicable to the petitioners which shows that the respondent No.1 decided the matter in hand in hap hazard and haste off manner.

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EX-115-111R
13 NOV 2023
Peshawar High Court Aid Bench
Authorized Under Sec 75 Evid Ordns

.....PRAYER.....

It is, therefore, most humbly prayed that on acceptance of the instant Writ Petition:-

i. Non-considering the petitioners for the purpose of promotion, non-promoting the petitioners to higher scales by the respondents, non-implementation of the relevant law, rules, regulations as well as notification by the respondents

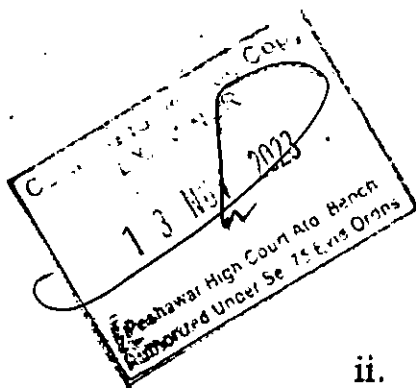
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P.C. MOTTABAD BENCH
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regarding the promotion of the petitioners, refusal of the respondents from modifying the seniority list of the petitioners, impugned seniority list compiled by the respondents whereby the petitioners were kept under the junior employees and consequently impugned order bearing No SOH-III/8-89/ 2020 (Mr. javid sultan) dated 28.03.2023 whereby departmental appeal filed by the petitioners were dismissed are wrong, illegal, against the law and facts, arbitrary, fanciful, perverse, against the relevant law, rules, regulations as well as notifications on the subject, against the fundamental rights of the petitioner hence being unconstitutional, liable to be struck down.

- ii. The petitioners may please be ordered to be promoted in BPS-09 in view of the notification dated 01.03.1988 alike other employees and on the basis of the same, the petitioners may also be ordered to be further promoted from BPS-09 to BPS-12 w.e.f. 10.04.2010, from BPS-12 to BPS-17 w.e.f.



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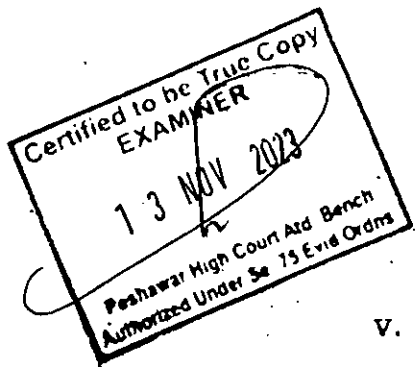
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19.08.2013, from BPS-17 to BPS-18 w.e.f. 28.09.2021 and the relevant benefits may also be ordered to be issued in favour of the petitioners.

- iii. The respondents may also please be ordered to decide the fate of the departmental appeal of the petitioners in accordance with law, rules, regulations as well as notification on the subject.
- iv. The respondents may also graciously be ordered to rectify/modify the seniority list prepared/compiled for X-ray Technician by placing the names of the petitioners at correct/proper position according to their service.
- v. Or any other writ, order or relief as this Honourable Court deems fit and appropriate in the circumstances of the case, may also be issued/passed.

INTERIM RELIEF.

It is further prayed that the operation of the impugned seniority list may please be suspended and the respondents may please be



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PJC, PESHAWAR BENCH
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restrained from promoting any other employee on the basis of impugned seniority list or doing any other act detrimental to the rights of the petitioners till the disposal of the titled Writ Petition.

Dated 03.04.2023

Javaid Sultan etc.
.....Petitioners

Through

JUNAID ANWAR KHAN,
Advocate Supreme Court,
Of Pakistan.

AFFIDAVIT

I, Shamraiz Gul son of Muhammad Younis presently working as Chief Clinical Technician, Benazir Bhutto Shaheed Hospital, Abbottabad, petitioner No.2, do hereby solemnly affirm and declare on oath that the contents of the foregoing Writ Petition are true and correct and nothing has been concealed from this Honourable Court.

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EXAMINER
13 NOV 2023
Peshawar High Court and Bench
Authorized Under Sec 75 F. & 76

13101-0931723-5

Dated 03.04.2023

AFFIDAVIT

S.No: 2147/16 Receipt No: 16

(DEPONENT)

Certified that the above was verified on Solemn affirmation ATD before me on this 3 day of APR 2023 by Shamraiz Gul s/o Muhammad Younis who was identified by ATD who is personally known to me

Oath Commissioner
(Additional Registrar)
Peshawar High Court Abbottabad Bench

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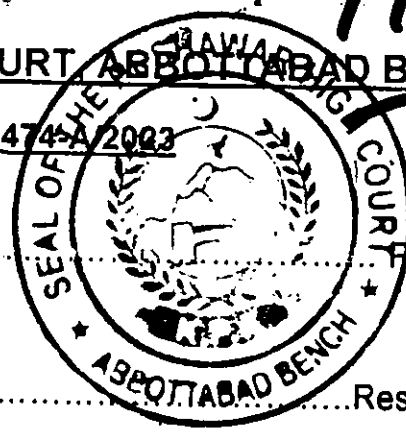
BEFORE THE PESHAWAR HIGH COURT ABBOTTABAD BENCH

WRIT PETITION NO. 474-A/2023

Javed Sultan & Others Petitioners

Versus

Govt. of Khyber Pakhtunkhwa and others Respondents.

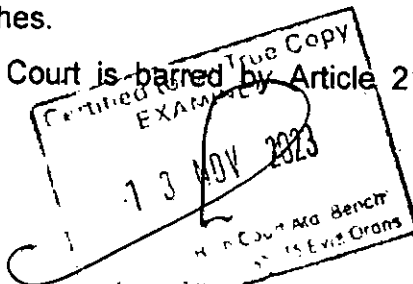


PARA WISE COMMENTS ON BEHALF OF RESPONDENT NO. 01, 02 & 04

RESPECTFULLY SHEWETH:

PRELIMINARY OBJECTIONS:-

1. That the Petitioners have got no cause of action / locus standi to file the instant Petition.
2. That the Petitioners have deliberately concealed the material facts from the Honorable Court, hence, liable to be dismissed.
3. That the Petitioners have filed the instant petition just to pressurize the respondents.
4. That the Petitioners have filed the instant Petition with mala-fide intention hence the petitioners have not come to Court with clean hands.
5. That the instant Petition is against the prevailing Law and Rules.
6. That the Petition is not maintainable in its present form and also in the present circumstances of the case.
7. That the Petition is bad due to non-joinder of necessary and mis-joinder of unnecessary parties.
8. That the instant petition is hit by laches.
9. That jurisdiction of the honorable Court is barred by Article 212 of Constitution of Islamic Republic of Pakistan 1973.



FACTS:

1. Needs no comments to be offered.
2. Pertains to the academic / professional qualification of the petitioners, therefore, needs no comments to be offered.
3. Pertains to the Service Record.
4. Pertains to record.
5. Pertains to record.
6. Incorrect. The petitioners have been dealt with in accordance with law, rules and principle of natural justice hence, denied.
7. Incorrect, misleading, the quote circular of 01-03-1988 was issued by Govt. of Pakistan Ministry of Health & Special Education (Health Division) Islamabad, which was applicable to the Federal Employees and not to the petitioners as the circular dated 01-03-1988 was not adopted by respondent No. 04 which is evident from the Finance Department, KP letter No. SO(FR)FD/7-3/2022/Health Deptt

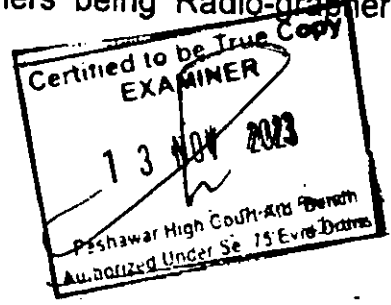
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dated 07-04-2022 which clarified that the respondent No. 04 has not adopted the above mentioned circular (Annexure-A).

Incorrect, misleading and concocted hence denied. The petitioners have not been subjected to discrimination. In fact only X-ray technicians were granted BPS-09 as per their service rules. However, the petitioners being Radiographer BPS-06 were not granted EPS-09.



- 9. Pertains to record.
- 10. Pertains to record.
- 11. Pertains to record.
- 12. Pertains to record.

13. Correct to the extent that with the introduction of new Service Structure in 2006 all the existing cadres were amalgamated in one Cadre under the nomenclature of Junior Clinical Technician in Radiology with Uniform pay scale of BS-09 by merging the existing Cadre under the nomenclature of Radiographer X-Ray Technician etc.

14. Correct.

15. Pertains to record. However, the replying respondents vide Notification dated 10-05-2006 merged 57 different categories of paramedics into 14 cadres and under para 04 of the Notification dated 10-05-2006 seniority of the incumbents of the post in the 14 cadres so merged shall be caused on the basis of scale wise seniority as well as date of regular appointment in the pay scale e.g. in joint seniority list of BPS-12 the Petitioners already in BPS-12 will be placed on the top of the list and the Petitioners in the lower pay scale shall be accordingly placed step by step in the list, invariably keeping intact the inter-se-seniority of the incumbents in the same pay scale. It is worth to mention that the seniority list was issued in the year 2009. However, till date the petitioners did not challenge the same before any forum nor did the alleged junior has been cited in the instant case.

16. Pertains to Court record. However, it is evident from the judgment of the Peshawar high Court dated 12-12-2012 in WP No. 2525-P/2010 that due to up gradation of the petitioner of that WP, the WP was disposed of.

- 17. Pertains to record.
- 18. Pertains to record.

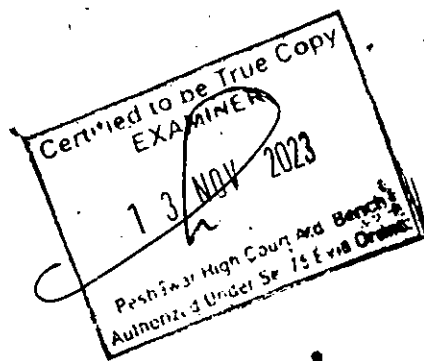
19. Pertains to record. However, none of the seniority list has been challenged before proper forum which is sufficient to prove that the seniority list was issued in accordance with law and rules.

- 20. Pertains to record.
- 21. Correct to the extent of issuing seniority list.
- 22. Pertains to record.
- 23. Pertains to record.

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ADD. REGISTRAR
P.H.C. ABBOTTABAD DISTRICT

5/9/23



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24. Pertains to record.
25. Pertains to record.
26. As explained in Para 7.
27. Pertains to record.
28. Correct to the extent of Khyber Pakhtunkhwa Civil Servant Act 1973 however detail reply has been given in para 15 above.
29. Pertains to record. However, seniority of all the 14 cadres of paramedics was prepared in light of the Notification dated 10-05-2006.
30. Pertains to Court record.
31. Correct to the extent of Notification dated 28-03-2023 already annexed as Annexure "EE" whereby respondent No. 01 decided departmental appeal of the petitioners on the grounds that the Notification issued by Govt. of Pakistan Ministry Health, Special Education and Social Welfare (Health Division) Islamabad has not been adopted by respondent No. 04. Therefore, the same is not applicable to the petitioners.
32. Incorrect. The petitioners are not aggrieved persons within the meaning of Article 199 of Constitution of Islamic Republic of Pakistan 1973. However, the petitioners are Civil Servant, therefore, jurisdiction of this Honorable Court is barred by Article 212 of Constitution of Islamic Republic of Pakistan 1973.

GROUNDS:

- i. Incorrect. The replying respondents acted as per law, rules and principle of natural justice. No vested right of the petitioners have been violated by the replying respondents.
- ii. Incorrect. Already replied in para 15 of the facts.
- iii. Incorrect and misleading. For the purpose of promotion of the petitioners the laid down criteria would be fulfilled as per respective Service Rules, the promotion cases of the petitioners will be processed in accordance with their service rules.
- iv. Already replied in para 31 of the facts.
- v. Incorrect. The departmental appeal of the petitioner has been rejected through a speaking order dated 28-03-2023 in accordance with law and rules attached at (Annexure-B). It is further to clarify that the petitioners being employees of the Health Department Khyber Pakhtunkhwa are not deserving to be treated alike with the employees of the Health Division Islamabad as they are not similarly placed employees.
- vi. Incorrect. Already replied in para 31 of the facts.
- vii. Incorrect. Already replied in para "i" of the grounds.
- viii. Incorrect. Already replied in para 31 of the facts.
- ix. Incorrect. Already replied in para 15 of the facts.

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- x. Incorrect. Already replied in para 31 of the facts.
- xi. Incorrect. Already replied in para 07 & 31 of the facts.
- xii. Incorrect. Already replied in para 15 of the facts.
- xiii. Incorrect. Already replied in para 15 of the facts.
- xiv. Incorrect. No such proof has been annexed by the petitioners in support of their claim.
- xv. Incorrect. As per Para "i".
- xvi. Incorrect. As per Para "i".
- xvii. Incorrect, as explained in preceding paras.
- xviii. As explained in Para 7.

PRAYER:

In light of the above, it is most humbly prayed that this petition being devoid of merits, may kindly be dismissed with cost.

[Signature]
 Director General Health Service
 Khyber Pakhtunkhwa, Peshawar
 (Responded No.02)

[Signature]
 Secretary Health
 Govt. of Khyber Pakhtunkhwa Peshawar
 (Respondent No. 01)

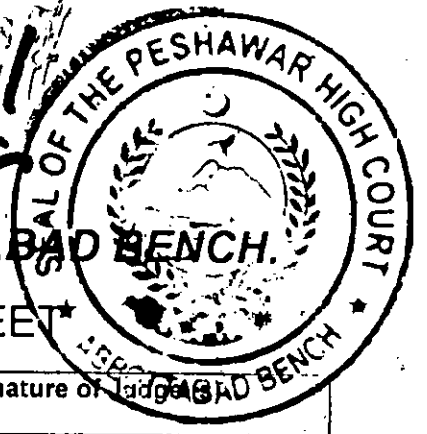
[Signature]
 Secretary Finance
 Govt. of Khyber Pakhtunkhwa
 (Respondent No. 04)

Vetted by
[Signature]
 Additional Advocate
 General Khyber Pakhtunkhwa
 Abbottabad
 26/11/23

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 EXAMINER
 13 NOV 2023
 Peshawar High Court Atd Bench
 Authorized Under Sec 13 Evd Ordns.

FILED TODAY
[Signature]
 ADDL REGISTRAR
 PIR, ABBOTTABAD BENCH
 29/11/23

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PESHAWAR HIGH COURT, ABBOTTABAD BENCH.
FORM OF ORDER SHEET

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge
1	2
07.11.2023	<p><u>W.P No. 474-A/2023.</u></p> <p>Present: M/s. Junaid Anwar Khan and Muhammad Waqas, Advocates, for the petitioner.</p> <p>Mr. Wajahat Hussain Shah, Assistant A.G alongwith Asif Mukhtiar Superintendent and Usman Ali Shah, Deputy Secretary.</p> <p>****</p> <p><u>KAMRAN HAYAT MIANKHEL, J.-</u> Through this and the connected W.P.No. 650-A/2023 titled "Zaheer Ahmad & 04 others Vs. Government of Khyber Pakhtunkhwa through its Chief Secretary & 04 others" the petitioners have approached this court with the following prayers: -</p> <p><i>"It is, therefore, most humbly prayed that on acceptance of the instant writ petition: -</i></p> <ol style="list-style-type: none"><li data-bbox="739 1528 1428 2216">i. <i>Non-considering the petitioners for the purpose of promotion, non-promoting the petitioners to higher scales by the respondents, non-implementation of the relevant law, rules, regulations as well as notification by the respondents regarding the promotion of the petitioners, refusal of the respondents from modifying the seniority list of the petitioners, impugned seniority list compiled by the respondents whereby the</i>

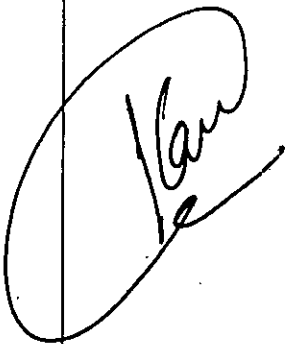
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13 NOV 2023
Peshawar High Court and Bench
Authorised Under Sec. 75 Evils Ordns.

petitioners were kept under the junior employees and consequently impugned order bearing No. SOH-III/8-89/2020 (Mr. Javed Sultan) dated 28.03.2023 whereby departmental appeal filed by the petitioners were dismissed are wrong, illegal, against the law and facts, arbitrary, fanciful, perverse, against the relevant law, rules, regulations as well as notifications on the subject, against the fundamental rights of the petitioner hence being unconstitutional, liable to be struck down.

- ii. The petitioners may please be ordered to be promoted in BPS-09 in view of the notification dated 01.03.1988 alike other employees and on the basis of the same, the petitioners may also be ordered to be further promoted from BPS-09 to BPS-12 w.e.f 10.04.2010 from BPS-12 to BPS-17 w.e.f 19.08.2013, from BPS-17 to BPS-18 w.e.f 28.09.2021 and the relevant benefits may also be ordered to be issued in favour of the petitioners.
- iii. The respondents may also please be ordered to decide the fate of the departmental appeal of the petitioners in accordance with law, rules, regulations as well as

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Peshawar High Court Aid Bench
Authorized Under Sec. 75 Evd Ords.

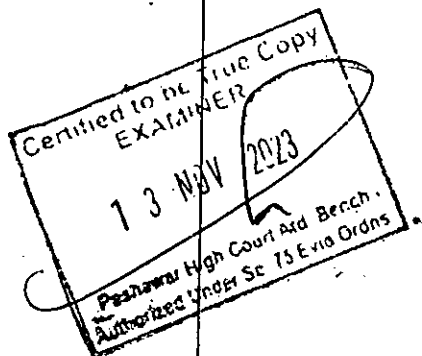


notification on the subject.

- iv. The respondents may also graciously be ordered to rectify/ modify the seniority list prepared / compiled for X-Ray Technician by placing the names of the petitioners at correct / proper position according to their service.
- v. Or any other writ, order or relief as this Hon'ble Court deems fit and appropriate in the circumstances of the case, may also be issued / passed."

2. These cases were argued at considerable length, however, it has been admitted by learned counsel for the petitioners at the bar that petitioners are civil servants but their stance was that since they seek enforcement of notification dated 01.03.1988, therefore, this court has the jurisdiction to entertain these writ petitions but such stance was seriously opposed by learned Assistant Advocate General.

3. We have gone through the prayer made by the petitioners before this court. The same revolves around of their promotion from BPS-06 to BPS-09 as per the notification dated 01.03.1988, therefore, we understand that it is a controversy which pertains to the terms and conditions of service of the petitioners and thus as per the

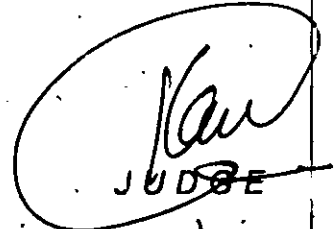
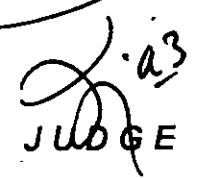


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mandate of Constitution the same could only be adjudged by the Khyber Pakhtunkhwa Service Tribunal

4. Accordingly, we transmit this and the connected writ petition to the worthy Chairman Khyber Pakhtunkhwa Service Tribunal, Peshawar, who shall treat the same as service appeals and shall decide the same in accordance with law. The office is directed to retain photocopies of the writ petitions alongwith record, if any, and transmit the original files to the Service Tribunal forthwith.


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13 NOV 2023
Peshawar High Court Adl Bench
Authorized Under Sec 75 Evid Ordns



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ANNEXURE
65

DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

No. ~~33570-651~~ 33570-651

Dated 26/11/2018.

شیرت
پرورش
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To,

1. The Principals, KMC/ KCD Peshawar.
2. The Principal, AMC Abbottabad.
3. The Principal Sacha Khan Medical College, Mardan.
4. The Director Health Services, FATA Peshawar.
5. The Medical Superintendents,
Govt: LRH, KTH, HMC Peshawar.
6. The Medical Superintendent,
Saidu Group of Teaching Hospital Swat.
7. The Medical Superintendent,
Ayub Teaching Hospital Abbottabad.
8. The Medical Superintendent,
Khaiifa Gul Nawaz Teaching Hospital, Bannu.
9. The Medical Superintendent,
Mufti Mahmood Memorial Teaching Hospital D.I. Khan
10. The Medical Superintendent,
ID Children Hospital, Peshawar.
11. The Medical Superintendent,
Women & Children Hospital, GT Road Peshawar.
12. The Medical Superintendent,
Govt: City Hospital, Kohat Road Peshawar.
13. The Medical Superintendent,
Police and Services Hospital, Peshawar.
14. The Medical Superintendent,
Mardan Medical Complex, Mardan.
15. The Medical Superintendent, Sarhad Hospital for Psychiatric Diseases,
Peshawar.
16. The Medical Superintendent, General & Mental Hospital Dadar, Mansehra.
17. The All Medical Superintendents, DHQ/ AHQ Hospital in KPK/FATA.
18. The All Agency Surgeons in FATA/ FRs.
19. The All District Officers (Health) in Khyber Pakhtunkhwa Province.

SUBJECT: PROVISIONAL SENIORITY LIST OF CLINICAL TECHNOLOGISTS
(BS-17) IN THE HEALTH DEPARTMENT, KHYBER PAKHTUNKHWA.

1. Please find enclose a copy of Provisional Seniority List of Clinical Technologists (BS-17) prepared by this Directorate General Health Services, Khyber Pakhtunkhwa Peshawar with the request that it should be brought into the notice of each and every Clinical Technologists (BS-17) for their information and record.

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PROVISIONAL JOINT SENIORITY LIST OF TECHNOLOGIST BPS-17 IN VARIOUS CADRES IN THE HEALTH DEPARTMENT KPK

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Two years

Five years

Direct appointment
Direct appointment

S.No	Name of Official with Father Name	Old Nomenclature with BPS	Date of 1st Appointment	Place of Present Posting	Date of Birth/ Domicile	Date of Retirement
1.	Najma Parveen D/O M. Halim	a. Med: Tech: BS-16 b. Med: Tech: BS-17	a. 03.03.1981 b. 01.01.1994	KTH Peshawar	31.08.1954	<i>Retired</i> 30.03.2014
2.	Rufaq Ahmad S/O Bashirul Haq	Audiologist BS-17	06.03.1994	LRH Peshawar	01.02.1965 Swabi	31.01.2025
3.	Mufarrig Shah S/O Wahid Gul	Refractionist BS-17	19.09.1995	HMC Peshawar	10.04.1967 Charsadda	09.04.2027
4.	Niaz Muhanamad S/O Nauroz Khan	a. Lab: Tech: BS-09 b. Chief Lab: Tech: BS-16 c. Med: Tech: BS-17	a. 20.10.1984 b. 25.11.1990 c. 04.01.2005	LRH Peshawar	31.05.1956 Peshawar	30.05.2016
5.	Muhammad Riaz S/O Mir Salim Khan	a. Lab Tech: BS-09 b. Chief Lab: Tech: BS-16 c. Clinical Technologist BS-17	a. 25.11.1986 b. 28.09.1993 c. 04.01.2005	KTH Peshawar	15.03.1965 Karak	14.03.2025
6.	Muhammad Tayyab S/O Ghulam Sarwar	a. Lab Tech: BS-09 b. Nuclear Tech: (Cardiology) BS-16 c. Clinical Tech: (Cardiology) BS-17	a. 09.09.1992 b. 08.05.1994 c. 04.01.2005	LRH Peshawar	26.01.1957	25.01.2017
7.	Awal Badshah S/O Sharbat Khan	a. Lab Tech: BS-09 b. Med: Tech: BS-17	a. 21.07.1988 b. 04.01.2005	HMC Peshawar	15.03.1960 Karak	14.03.2020
8.	Sanaullah S/O Habibullah	a. Lab Tech: BS-09 b. Med: Tech: BS-17	a. 15.05.1991 b. 04.01.2005	KTH Peshawar	01.10.1970 Dir Upper	30.09.2030

Wills

etc

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9.	Imtiaz Khan S/O Abdul Manan	a. BB Tech: BS-09 b. Med: Tech: BS-17	a. 13.07.1992 b. 04.01.2005	Govt: Maternity Hosp: Peshawar	16.01.1966 Charsadda	15.01.2026
10.	Sirajuddin S/O Khewa Din	a. Dispenser BS-06 b. Dialysis BS-11 c. Chief Dialysis Tech: BS-16 d. Clinical Tech: (Dialysis) BS-17	a. 13.01.1981 b. 10.10.1982 c. 25.02.1990 d. 23.02.2009	LRH Peshawar	01.08.1956 Peshawar	30.07.2016
11.	Ahsan Saeed S/O M. Saeed Gul	a. Audiometrician BS-16 b. Clinical Technologist BS-17	a. 23.05.1992 b. 23.06.2009	KTH Peshawar	16.05.1966 Nowshera	15.05.2026
12.	Shiraz Khan S/O Nameedullah	a. Speech Therapist BS-16 b. Clinical Technologist BS-17	a. 11.01.1994 b. 23.06.2009	KMC Peshawar	15.03.1969 Charsadda	14.03.2029
13.	Waheed Ahmad S/O Atta Muhammad	a. OTA BS-5 b. Chief OTT BS-16 c. Technologist BS-17	a. 11.01.1977 b. 13.01.1991 c. 29.06.2009	KTH Peshawar	13.02.1954 Peshawar	12.02.2014
14.	Pir Muhammad S/O Haji Muhammad Shah	a. Sp. Therapist BS-16 b. Tech: BS-17	a. 20.12.1995 b. 02.09.2009	MMC Mardan	02.03.1973 Swabi	01.03.2033
15.	Khairul Aman	a. Audiometrician BS-16 b. Clinical Tech: BS-17	a. 12.07.1999 b. 02.09.2009	MMC Mardan	02.04.1973 Swabi	01.04.2033
16.	Muhammad Haroon S/O Muhammad Yaqub	a. Chief PHC Tech: (MP) BS-16 b. Technologist PHC (MP) BS-17	a. 20.02.1991 b. 15.03.2010	DHO Abbottabad	23.05.1956 A/ Abad	22.05.2016
17.	Fazal Haq S/O Abdullah Jan	a. Chief Tech: (Cardiac) BS-16 b. Technologist (Cardiac) BS-17	a. 15.01.1995 b. 15.03.2010	LRH Peshawar	06.03.1958 Peshawar	05.03.2018

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18.	Didar Muhammad S/O Abdul Hanan	a. Chief Dispenser BS-16 b. Technologist (Pharmacy) BS-17	a. 11.08.1998 b. 15.03.2010	DHQH Nowshera	15.09.1954 Peshawar	14.09.2014
19.	Fasiud Din S/O Inwanud Din	a. Chief Dispenser BS-16 b. Technologist (Pharmacy) BS-17	a. 11.08.1998 b. 15.03.2010	KTH Peshawar	01.05.1956 Peshawar	30.04.2016
20.	Akbar Ali	a. Chief Clinical Tech (Opth:/Otorhi:) BS-16 b. Clinical Tech: (Opth:/Otorhi:) BS- 17	a. 04.09.1999 b. 15.03.2010	KTH Peshawar	02.03.1957 Charsadda	01.03.2017
21.	Muhammad Siyar S/O Amir Zada	a Dental Tech: B-09 b C. Dent Tech: B- 16 c Dental Technologist B-17	02.04.1974 26.05.1992 22.01.2011	Govt: LRH Peshawar	04.06.1955 Charsadda	03.06.2015
22.	Muhammad Ayaz S/O Muhibullah	a Dental Tech: B-09 b C. Dent Tech: B- 16 c Dental Technologist B-17	24.05.1974 26.05.1992 22.01.2011	Govt: LRH Peshawar	27.06.1954 Charsadda	26.06.2014
23.	Niaz Muhammad	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	01.10.1978 26.12.1990 28.04.2010 11.05.2012	PMI Saidu Sharif Swat	08.04.1960 Peshawar	07.04.2020
24.	Khadim Ahmad	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	04.05.1980 26.12.1990 28.04.2010 11.05.2012	DHO Dir Lower	04.01.1957 Dir Upper	03.01.2017

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25.	Khalid Mehmood	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	26.07.1980 02.05.1992 28.04.2010 11.05.2012	DHO Mansehra	04.05.1956 Mansehra	03.05.2016
26.	Muhammad Shamim	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	03.01.1981 02.05.1992 28.04.2010 11.05.2012	DHO Battagram	04.05.1956 Battagram	03.05.2016
27.	Akhtar Zaman	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	07.01.1981 02.05.1992 28.04.2010 11.05.2012	DHO Mansehra	01.04.1954 Mansehra	31.03.2014
28.	Ghulam Habib	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	07.01.1981 02.05.1992 28.04.2010 11.05.2012	DHO Dir Lower	20.06.1954 Mansehra	19.06.2014
29.	Tajammul Hussain	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	07.01.1981 08.11.1993 28.04.2010 11.05.2012	DHO Shangla	02.02.1958 Mansehra	01.02.2018
30.	Said Rehman	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	06.01.1981 06.01.1997 28.04.2010 11.05.2012	DHO Mardan	06.03.1962 Mardan	05.03.2022

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31.	Abdul Karim	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	10.01.1981 22.03.1999 28.04.2010 11.05.2012	DHO Abbottabad	15.05.1960 Haripur	14.05.2020
32.	Barakatullah S/O Muhammad Jan	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	12.01.1981 22.03.1999 28.04.2010 11.05.2012	PMI Abbottabad	15.12.1958 Mansehra	14.12.2018
33.	Matiur Rehman	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	15.01.1981 09.05.2003 28.04.2010 11.05.2012	DHO Swat	08.11.1953 Haripur	07.11.2013
34.	Muhammad Saeedullah	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	01.02.1981 09.05.2003 28.04.2010 11.05.2012	DHO Shangla	15.07.1955 Shangla	14.07.2015
35.	Murad Ali S/O Abdul Said	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	27.08.1982 11.09.2006 28.04.2010 11.05.2012	DHO Buner	01.02.1961 Buner	31.01.2021
36.	Khalil ur Rehman S/O Said Aman Khan	Lep: Tech: BS-07 DLS BPS-14 PHC Technologist BS-17	08.03.1981 08.09.2008 11.05.2012	DHO Chitral	10.04.1957 Chitral	09.04.2017
37.	Muhammad Iqbal S/O Abdul Latif	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS- 14 PHC Technologist BS-17	30.10.1975 14.07.1991 28.04.2010 11.05.2012	DHO Abbottabad	03.02.1954 Abbottabad	02.02.2014

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38.	Parvez Khan S/O Wazir Gul	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	09.06.1981 14.07.1991 28.04.2010 11.05.2012	DHO Mardan	04.03.1955 Mardan	03.03.2015
39.	Iqbal Ahmad S/O Muhammad Rajab Khan	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	14.02.1982 14.07.1991 28.04.2010 11.05.2012	DHO D.I.Khan	14.04.1955 Abbottabad	13.04.2015
40.	Shahid Ahmad S/O Aftab Ahmad	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	15.02.1982 14.07.1991 28.04.2010 11.05.2012	FMI Saidu Sharif Swat	01.04.1964 Abbottabad	31.03.2024
41.	Sajjad Hussain S/O Mubarak Hussain	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	16.02.1982 14.07.1991 28.04.2010 11.05.2012	DHO Chitral	12.12.1957 Mardan	11.12.2017
42.	Mrs. Naheed Aziz D/O Azizur Rehman	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	16.02.1982 14.07.1991 28.04.2010 11.05.2012	DHO Haripur	01.05.1959 Haripur	30.04.2019
43.	Muhammad Ihsan S/O Ashiq Hussain	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	16.02.1982 14.07.1991 28.04.2010 11.05.2012	PGPI LRH Peshawar	27.02.1961 Peshawar	26.02.2021

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44.	Riaz Ahmad S/O Rahimullah	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	16.02.1982 14.07.1991 28.04.2010 11.05.2012	DHO Peshawar	15.09.1961 Charsadda	14.09.2021
45.	Gul Zaman S/O Haji Zarif Khan	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	17.02.1982 14.07.1991 28.04.2010 11.05.2012	PGPI LRH Peshawar	18.06.1957 Peshawar	17.06.2017
46.	Muhammad Kalim S/O Sher Gul	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	17.02.1982 14.07.1991 28.04.2010 11.05.2012	DHO Tank	25.04.1959 Haripur	24.04.2019
47.	Zahir Shah	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	17.02.1982 14.07.1991 28.04.2010 11.05.2012	DHO Charsadda	28.04.1960 Charsadda	27.04.2020
48.	Anisur Rehman S/O Rizwanullah	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	17.02.1982 14.07.1991 28.04.2010 11.05.2012	DHO Malakand	22.04.1961 Charsadda	21.04.2021
49.	Liaqat Ali S/O Khiewa Gul	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	17.02.1982 14.07.1991 28.04.2010 11.05.2012	DHO Nowshera	04.12.1963 Peshawar	03.12.2023

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50.	Shamsur Rehman S/O Jan Nisar	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS- 14 PHC Technologist BS-17	18.02.1982 14.07.1991 28.04.2010 11.05.2012	DHO Kohistan	18.09.1956 Mansehra	17.09.2016
51.	Muhammad Nasim S/O Abdul Razaq	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS- 14 PHC Technologist BS-17	18.02.1982 14.07.1991 28.04.2010 11.05.2012	DHO Haripur	10.04.1957 Haripur	09.04.2017
52.	Shuaibur Rehman S/O Abdur Rehman	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS- 14 PHC Technologist BS-17	18.02.1982 14.07.1991 28.04.2010 11.05.2012	PMI Swat	13.05.1958 Abbottabad	12.05.2018
53.	Taj Elahi S/O Karam Elahi	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS- 14 PHC Technologist BS-17	18.02.1982 14.07.1991 28.04.2010 11.05.2012	DHO Haripur	05.10.1958 Haripur	04.10.2018
54.	Habibur Rehman S/O Muhammad Zaman	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS- 14 PHC Technologist BS-17	18.02.1982 14.07.1991 28.04.2010 11.05.2012	DHO Mansehra	28.04.1959 Mansehra	27.04.2019
55.	Abdur Rashid S/O Abdul Hamid	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS- 14 PHC Technologist BS-17	18.02.1982 14.07.1991 28.04.2010 11.05.2012	DHO Haripur	16.03.1962 Haripur	15.03.2022

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25.	Khalid Mehmood	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	26.07.1980 02.05.1992 28.04.2010 11.05.2012	DHO Mansehra	04.05.1956 Mansehra	03.05.2016
26.	Muhammad Shamim	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	03.01.1981 02.05.1992 28.04.2010 11.05.2012	DHO Battagram	04.05.1956 Battagram	03.05.2016
27.	Akhtar Zaman	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	07.01.1981 02.05.1992 28.04.2010 11.05.2012	DHO Mansehra	01.04.1954 Mansehra	31.03.2014
28.	Ghulam Habib	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	07.01.1981 02.05.1992 28.04.2010 11.05.2012	DHO Dir Lower	20.06.1954 Mansehra	19.06.2014
29.	Tajammul Hussain	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	07.01.1981 08.11.1993 28.04.2010 11.05.2012	DHO Shangla	02.02.1958 Mansehra	01.02.2018
30.	Said Rehman	Lep: Tech: BPS-07 DLS BPS-14 Chief PHC Tech: BS-16 PHC Technologist BS-17	06.01.1981 06.01.1997 28.04.2010 11.05.2012	DHO Mardan	06.03.1962 Mardan	05.03.2022

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56.	Akram Sher S/O Mir Abaz.	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	18.02.1982 03.12.1997 28.04.2010 11.05.2012	DHO Peshawar	05.03.1964 Peshawar	04.03.2024
57.	Fazli Rabbi S/O Hazrat Hussain	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	20.02.1982 03.12.1997 28.04.2010 11.05.2012	PMI Saidu Sharif Swat	30.04.1957 Swat	29.04.2017
58.	Fazli Nawaz S/O Mula Jan	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	20.02.1982 03.12.1997 28.04.2010 11.05.2012	District Kohat	15.12.1957 Karak	14.12.2017
59.	Rehman ud Din S/O Sarfaraz Khan	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	20.02.1982 03.12.1997 28.04.2010 11.05.2012	DHO Kohistan	30.04.1958 Nowshera	29.04.2018
60.	Israrul Haq S/O Fazli Haq	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	20.02.1982 03.12.1997 28.04.2010 11.05.2012	DHO Barnu	05.11.1961 Barnu	05.11.2021
61.	Nawaz Khan	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	20.02.1982 30.09.1999 28.04.2010 11.05.2012	DHO D.I.Khan	01.06.1959 D.I.Khan	31.05.2019

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62.	Rehmatullah	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	20.02.1982 30.09.1999 28.04.2010 11.05.2012	DHO D.I.Khan	01.01.1955 D.I.Khan	31.12.2014
63.	Bashir Ahmad S/O Taj Muhammad	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	20.02.1982 30.09.1999 28.04.2010 11.05.2012	DHO Swabi	24.04.1960 Swabi	23.04.2020
64.	Ghulam Gillani S/O Muhammad Zaman	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	20.02.1982 30.09.1999 28.04.2010 11.05.2012	DHO Bannu	01.08.1960 Bannu	31.07.2020
65.	Rifat Sultana D/O Mian Hasan	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	21.02.1982 30.09.1999 28.04.2010 11.05.2012	DHO Nowshera	01.01.1961 Nowshera	31.12.2020
66.	Shahid Saleem S/O Raza Khan	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	22.02.1982 30.09.1999 28.04.2010 11.05.2012	DHO Mardan	20.05.1960 Charsadda	19.06.2020
67.	Sher Jan Ali S/O Hassan Ali Hassan Ali	MT BPS-09 SMT BPS-12 Sr. PHC Tech: BPS-14 PHC Technologist BS-17	20.02.1982 30.09.1999 28.04.2010 11.05.2012	DHO Hangu	12.05.1963 Hangu	11.05.2023

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73.	Muhammad Tariq S/O S. Mubarak Hussain	FSV BS-07 TSV BS-09 DSV BPS-11 PHC Tech: BS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	26.10.1983 04.05.1986 25.05.1992 25.08.2006 28.04.2010 11.05.2012	PMI D.I.Khan	18.05.1963 Mardan	17.05.2023
74.	Johar Muhammad S/O Faiz Muhammad	FSV BPS-07 TSV BPS-09 DSV BPS-11 PHC Tech: BS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	01.11.1983 04.05.1986 25.05.1992 25.08.2006 28.04.2010 11.05.2012	DHO Malakand	25.04.1962 Charsadda	24.04.2022
75.	Sajid Ali S/O Habibullah Khan	FSV BS-07 TSV BS-09 DSV BPS-11 PHC Tech: BS-12 Sr. PHC Tech: BS-14 PHC Technologist BS-17	01.11.1983 04.05.1986 25.05.1992 25.08.2006 28.04.2010 11.05.2012	DHO Swat	10.04.1963 Charsadda	09.04.2023
76.	Ghayas Baig	Chief Anaesthesia Tech C/ Technologist BS-17	31/11/1974 11/10/1980 08/04/1990 02.08.2012	PMI Swat	12/11/1954 Chitral	11.11.2014
77.	Mohammad Irshad	Chief Anaesthesia Tech C/ Technologist BS-17	A.01/02/1976 B.13/10/1980 C.12/05/1991 02.08.2012	Services placed at the disposal of DHS FATA for further posting within FATA.	14/02/1957 Khy. Agency	13.02.2017

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78.	Hafeez ur Rahman	Chief Anaesthesia Tech. C/ Technologist BS-17	A.01/08/1978 B.13/10/1980 C.12/05/1991 02.08.2012	Govt: LRH Peshawar	20/10/1956 Peshawar	19.10.2016
79.	Said Nabi	Chief Anaesthesia Tech C/ Technologist BS-17	A.01/08/1978 B.21/04/1985 C.12/05/1991 02.08.2012	Govt: LRH Peshawar	01.01.1954 Charsadda	31.12.2013
80.	Salim Shah	Chief Anaesthesia Tech C/ Technologist BS-17	A.01/08/1978 B.21/04/1985 C.12/05/1991 D.02.08.2012	KTH Peshawar	01/01/1960 Peshawar	31.12.2019
81.	Akhtar Ali	Chief Anaesthesia Tech	A.12/10/1976 B.12/10/1986 C.26/05/1992 D.02.08.2012	Govt: LRH Peshawar	20/09/1957 Peshawar	19.09.2017
82.	Saidan Shah	ECG Tech: B-09 C/Tech: BS-12 Technologist B-17	16.11.1976 20.05.2010 02.08.2012	LRH Peshawar	17.05.1956	16.05.2016
83.	Gulzar Muhammad	ECG Tech: BS09 C/Tech: BS-12 Technologist B-17	10/02/1977 20.05.2010 02.08.2012	LRH Peshawar	15/04/1956 Peshawar	14.04.2016
84.	Nauman Shah	Dental Tech: B-09 Chief Dental B-16 Technologist B-17	22.01.1978 30.08.2012	KCD Peshawar	13.03.1957 Peshawar	12.03.2017
85.	Nisar Muhammad	Dispenser BS 06 Dialysis Tech B 11 Sr. Cl: Tech: BS 14 C/ Technologist B-17	25.03.1980 07.07.1986 20.04.2010 02.08.2012	KTH Peshawar	01.05.1956 Charsadda	30.04.2016
86.	Gulab Shah	Flourescient Angio Tech. B-11 Sr. Clinical Tech: BPS-14 Clinical Technologist BS-17	25.09.1990 15.02.2010 02.08.2012	KTH Peshawar	05.01.1955 Peshawar	04.01.2015
87.	Mian Ziaul	Laser Tech. B-11	05.07.1992	LRH	25.12.1965	24.12.2025

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	Haq	Sr. Clinical Tech: BPS-14 Clinical Technologist BS-17	15.02.2010 02.08.2012	Peshawar	Peshawar	
88.	Sheraz Khan	Sr. Clinical Tech: BS-14 Clinical Technologist BS-17	06.03.1999 02.08.2012	HMC Peshawar	15.03.1973 Charsadda	14.03.2033
89.	Sayyar Muhammad S/O Saifur Rehman	a. Lab Asstt: BS 05 b. Sr. Head L/Asst B 06 c. Lab: Tech: BS 09 d. Chief Lab Tech B 16 C/ Technologist BS-17	a. 01.01.1978 b. c. 20.10.1984 d. 25.11.1990 02.08.2012	KTH Peshawar	15.07.1956 Charsadda	14.07.2016
90.	Muhammad Mursalin S/O Muhammad Ibrahim	a. Lab Asstt: BS 05 b. Sr. Head L/Asst B 06 c. Lab: Tech: BS 09 d. Chief Lab Tech B 16 C/ Technologist BS-17	a. 14.06.1975 b. c. 10.05.1979 d. 12.01.1991 02.08.2012	DHQH Mardan	02.03.1957 Mardan	01.03.2017
91.	Muhammad Zulfiqar	Ch: Clinical Tech: B 16 C/ Technologist BS-17	09.01.1996 02.08.2012	HMC Peshawar	25.12.1963 Karak	24.12.2023
92.	Syed Fazal Shah	Ch: Clinical Tech: B 16 C/ Technologist BS-17	14.01.1996 02.08.2012	DHQH Charsadda	15.05.1955 Peshawar	14.05.2015
93.	Ghulam Rabbani	Ch: Clinical Tech: B 16 C/ Technologist BS-17	14.01.1996 02.08.2012	SGTH Swat	15.02.1954 Chitral	14.02.2014
94.	Muhammad Tariq	Ch: Clinical Tech: B 16 C/ Technologist BS-17	17.09.1996 02.08.2012	DHQH Mardan	17.04.1955 Mardan	16.04.2015

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95.	Amanul Haq	Ch: Clinical Tech: B 16 C/ Technologist BS-17	17.09.1996 02.08.2012	KTH Peshawar	21.04.1956 Peshawar	20.04.2016
96.	Riaz Khan	Ch: Clinical Tech: B 16 C/ Technologist BS-17	17.09.1996 02.08.2012	LRH Peshawar	22.05.1956	21.05.2016
97.	Gul Hakim	Ch: Clinical Tech: B 16 C/ Technologist BS-17	17.09.1996 02.08.2012	AHQH Bajuar	15.03.1958 Bajuar Agy	14.03.2018
98.	Abdul Latif	Ch: Clinical Tech: B 16 C/ Technologist BS-17	17.09.1996 02.08.2012	KTH Peshawar	01.06.1959 Peshawar	31.05.2019
99.	Raj Wali	Ch: Clinical Tech: B 16 C/ Technologist BS-17	17.09.1996 02.08.2012	LRH Peshawar	01.01.1957 Charsadda	31.12.2016
100.	Mehboobur Rehman S/O Faizur Rehman	a. Lab Asstt: BS 05 b. Sr. Head L/Asst. B 06 c. Lab: Tech: BS 09 d. Chief Lab Tech B 16 C/ Technologist BS-17	a. 12.12.1978 b. c. 24.01.1984 d. 21.11.2003 02.08.2012	KMC Peshawar	15.10.1955 Peshawar	14.10.2015
101.	Ashfaq Ullah S/O Safid Ullah Khan	Modler BPS-11 Sr. C. Tech: BS-14 Technologist BS-17	03-03-1991 06.03.2010 02.08.2012	DHQH Nowshera	01-08-1965 Nowshera	31-07- 2025
102.	Tajmir Shah S/O Fazli Hakeem	ECT Tech: BPS-11 Sr. C. Tech: BS-14 Technologist BS-17	01.07.1992 06.03.2010 02.08.2012	Govt: LRH Peshawar.	19.03.1963 Charsudda	18.03.2023
103.	Muhammad Jamshed S/O Ghulam Qasim	Modler BPS-11 CT Phar: BPS-12 Technologist BS-17	26.06.1999 25.08.2006 02.08.2012	DHQH D.I.Khan	20.05.1975 D.I.Khan	19.05.2036
104.	Nusrat Gul S/O	ECG Tech; BS 09 EEG Tech; BS 09	11.11.1990 29.03.1995	Govt: LRH Peshawar	15.03.1969	14.03.2029

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	Ebad Gul	C. Tech BS-12 Technologist BS-17	02.03.2010 02.08.2012			
105.	Khalid Khan S/O Waheedullah	EEG Tech: BS 09 C. Tech BS-12 Technologist BS-17	26.08.1995 02.03.2010 02.08.2012	HMC Peshawar	01.01.1976	31.12.2036
106.	Kiramat Shah S/O Munawar Shah	Dispenser BS 06 ECI Tech; BS 09 C. Tech BS-12 Technologist BS-17	01.08.1980 06.04.1995 02.03.2010 02.08.2012	DHQB Mardan	11.03.1957 Mardan	10.03.2017
107.	Mohammad Ibrahim S/O Mir Saeed Shah	PRA BPS 05 PR Tech BPS 07 C. Tech BS-12 Technologist BS-17	04/05/1977 25/05/1991 02.03.2010 02.08.2012	District Mardan	20/10/1955 Bannu	19.10.2015
108.	Mrs. Kalsoom Bibi D/O Azizur Rehman	Dispenser BPS 06 C. Tech BS-12 Technologist BS-17	01.06.1973 02.03.2010 02.08.2012	DHQB Haripur	20.01.1954 Haripur	19.01.2014
109.	Mukhtar Ahmad S/O Bustan Khan	Dispenser BPS 06 C. Tech BS-12 Technologist BS-17	01.02.1974 02.03.2010 02.08.2012	District Mansehra	06.04.1954 Mansehra	05.04.2014
110.	Nasrullah Jan S/O Lal Din	Dispenser BPS 06 C. Tech BS-12 Technologist BS-17	18.11.1974 02.03.2010 02.08.2012	DHQB Kohat	15.04.1954 Karak	14.04.2014
111.	Muhammad Ayaz S/O Yar Khan	Dispenser BPS 06 C. Tech BS-12 Technologist BS-17	29.11.1974 02.03.2010 02.08.2012	District Tank	12.12.1954 Tank	11.12.2014
112.	Rustam Khan S/O Sheikh Behram	Dispenser BPS 06 C. Tech: BPS-12 Technologist BS-17	28.07.1975 02.03.2010 02.08.2012	District Chitral	04.04.1955 Tank	03.04.2015
113.	Badshah Rauf S/O Bakhmal Khan	Dispenser BPS 06 C. Tech BS 12 Technologist BS-17	01.09.1975 02.03.2010 02.08.2012	AS N. Waziristan Agy	12.04.1955 NWA	11.04.2015
114.	Muhammad Karim S/O Sadullah Khan	Dispenser BPS 06 C. Tech: BPS-12 Technologist BS-17	01.10.1975 02.03.2010 02.08.2012	District Shangla	06.06.1954 Shangla	05.06.2014
115.	Muhammad Yousaf S/O	Dispenser BPS 06 C. Tech BS-12	03.11.1975 02.03.2010	District Abbottabad	05.11.1956 Mansehra	04.11.2016

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	Rehmatullah	Technologist BS-17	02.08.2012			
116.	Munsif Hussain S/O Hidayatullah	Disp: BS-06 Technologist BS-17	13.11.1975 02.08.2012	District Mansehra	05.11.1956 Mansehra	04.11.2016
117.	Muhammad Nazir S/O Said Amir	Dispenser BPS 06 C. Tech BS-12 Technologist BS-17	08.01.1976 02.03.2010 02.08.2012	DHQH Lakki Marwat	11.11.1955 Lakki	10.11.2015
118.	Sartaj Bahadar S/O Khan Bahadar	b)Pulmonary Function Test Tech: BPS 09 Clinical Tech: B-12 Technologist BS-17	15/02/1984 05.03.2010 02.08.2012	KTH Peshawar	05/11/1962 Peshawar	04.11.2022
119.	Gul Rehman S/O Haji Abdul Hameed	a)Dispenser BPS 06 b)Pulmonary Function Test Tech: BPS 09 Clinical Tech: B-12 Technologist BS-17	28/05/1988 20/07/1992 05.03.2010 02.08.2012	LRH Peshawar	03/05/1961 Charsadda	02.05.2021
120.	Abdul Ghyais S/O Roidad Khan	O.T Assitt BPS-05 Chief OTT BPS-16 C/ Technologist BS-17	01/10/1978 12/08/1998 02.08.2012	KTH Peshawar	01/11/1953 Peshawar	31.10.2013
121.	Darwaish Khan S/O Amin Khan	O.T Assitt BPS-05 O.T. Tech; BPS-09 Chief OTT BPS-16 C/ Technologist BS-17	02/12/1979 01/09/1981 12/08/1998 02.08.2012	PMI Saidu Sharif Swat	22/12/1956 Peshawar	21.12.2016
122.	Qayyum Jan S/O Taj Muhammad	O.T Assitt BPS-05 O.T. Tech; BPS-09 Chief OTT BPS-16 C/ Technologist BS-17	19/04/1980 14/02/1983 12/08/1998 02.08.2012	HMC Peshawar	01/10/1960 Peshawar	30.09.2020
123.	Liaqat Ali S/O Rahmat Gul	O.T Assitt BPS-05 O.T. Tech; BPS-09 Chief OTT BPS-16 C/ Technologist BS-17	23/04/1980 14/02/1983 12/08/1998 02.08.2012	Ayub Teaching Hospital Abbottabad	02/05/1957 Peshawar	01.05.2017

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Muhammad
Gul Mir

124.	Isam Gul S/O Gul Mir	O.T Assitt BPS-05 O.T. Tech; BPS-09 Chief OTT BPS-16 C/ Technologist BS-17	02/10/1980 14/02/1983 12/08/1998 02.08.2012	LRH Peshawar	10/06/1960 Peshawar	09.06.2020
125.	Kishwar D/O Sakhi Marjan	LHV BPS 09 AIHS BPS12 Sr PHC Tech B 14 PHC Technologist (MCH) BS-17	17/04/1975 26/06/2003 29.04.2010 19.08.2013	DHO Bannu	09/02/1957 Bannu	08.02.2017
126.	Fehmida Begum D/O Ghulam Rasool	LHV BPS 09 AIHS BPS12 Sr PHC Tech B 14 PHC Technologist (MCH) BS-17	21/03/1977 26/06/2003 29.04.2010 19.08.2013	DHO Mardan	04.04.1958 Mardan	03.04.2018
127.	Tahira Jabeen D/O Faqir Muhammad	LHV BPS-09 AIHS BPS-12 Sr PHC Tech B 14 PHC Technologist (MCH) BS-17	04/10/1977 26/06/2003 29.04.2010 19.08.2013	DHO Nowshera	14/04/1957 Peshawar	13.04.2017
128.	Rukhsana Shaheen W/O Sikandar Ali	LHV BPS 09 AIHS BPS 12 Sr PHC Tech B 14 PHC Technologist (MCH) BS-17	29/01/1979 15/07/2004 29.04.2010 19.08.2013	DHO Peshawar	14/08/1956 Peshawar	13.08.2016
129.	Farah deeba D/O Muhammad Nawaz	LHV BPS 09 AIHS BPS12 Sr PHC Tech B 14 PHC Technologist (MCH) BS-17	17/02/1979 15/07/2004 29.04.2010 19.08.2013	DHO Bannu	17/11/1959 Bannu	16.11.2019
130.	Fehmida Begam D/O Muhammad Sarwar	LHV BPS-09 AIHS BPS-12 Sr PHC Tech B 14 PHC Technologist (MCH) BS-17	21/02/1979 15/07/2004 29.04.2010 19.08.2013	DHO Abbottabad	02/04/1954 Abbottabad	01.04.2011
131.	Yasmin Akhtar D/O Sharifullah	LHV BPS-09 AIHS BPS-12 Sr PHC Tech B 14 PHC Technologist (MCH) BS-17	07/01/1977 15/07/2004 29.04.2010 19.08.2013	DHO Peshawar	01/04/1955 Peshawar	31.03.2015

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132.	Nasreen Zia D/O Muhammad Sadiq	LHV BPS-9 AIHS BPS-12 Sr. PHC Tech B 14 PHC Technologist (MCH) BS-17	01.12.1982 14.10.2005 29.04.2010 19.08.2013	DHO Charsadda	10.01.1957 Charsadda	09.01.2017
133.	Jahan Ara D/O Faizullah	LHV BPS 09 PHC Tech: B 12 PHC Technologist (MCH) BS-17	31.01.1979 29.04.2010 19.08.2013	DHO Malakand	25.11.1956 Malakand	24.11.2016
134.	Tasleem Sharif D/O Sharifullah	LHV BPS 09 PHC Tech: B 12 PHC Technologist (MCH) BS-17	01.03.1979 29.04.2010 19.08.2013	DHPH Hangu	01.01.1955 Hangu	31.12.2014
135.	Shaheen Gul D/O Abdul Rahim	LHV BPS 09 PHC Tech: B 12 PHC Technologist (MCH) BS-17	01.03.1979 29.04.2010 19.08.2013	DHO Peshawar	23.07.1956 Peshawar	22.07.2016
135.	Tasleem D/O Habibullah	LHV BPS 09 PHC Tech: B 12 PHC Technologist (MCH) BS-17	01.03.1979 29.04.2010 19.08.2013	DHO Nowshera	30.09.1959 Nowshera	29.09.2019
137.	Khalida Parveen D/O Karim Bakhsh	LHV BPS 09 PHC Tech: B-12 PHC Technologist (MCH) BS-17	03.03.1979 29.04.2010 19.08.2013	DHO Hangu	13.05.1960 Peshawar	12.05.2020
138.	Azra Yasmin D/O Mian Muhammad	LHV BPS 09 PHC Tech: B 12 PHC Technologist (MCH) BS-17	12.04.1979 29.04.2010 19.08.2013	PHS Nisht/ Peshawar	26.10.1958 Peshawar	25.10.2018
139.	Misarat Begum D/O Shafiqullah	LHV BPS-09 AIHS BPS 12 PHC Technologist (MCH) BS-17	31/03/1974 26/06/2003 19.08.2013	DHO Malakand	04/04/1954 Malakand	03.04.2014
140.	Gul Naz Sethi D/O Abdul Wahid	LHV BPS-09 AIHS BPS-12 PHC Technologist (MCH) BS-17	12/06/1976 26/03/2003 19.08.2013	DHO Kohat	11/06/1955 Peshawar	10.06.2013

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Qualification of
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141.	Imraj Begum D/O Rahim Khan	LHV BPS-09 AIHS BPS-12 PHC Technologist (MCH) BS-17	29.09.1977 15/07/2004 19.08.2013	DHO U. Dir	11.03.1956 Mardan	10.03.2016
142.	Jamila Bibi D/O Sultanuddin	LHV BPS 09 PHC Technologist (MCH) BS-17	18.02.1979 19.08.2013	DHO Peshawar	25.09.1954 Peshawar	24.06.2014
143.	Nighat Rashid D/O Abdul Ashid	LHV BPS 09 PHC Technologist (MCH) BS-17	01.03.1979 19.08.2013	PHS Nishtar: Peshawar	27.04.1960 Peshawar	26.04.2020
144.	Fehmida Begum D/O Muhammad Iqbal	LHV BPS 09 PHC Technologist (MCH) BS-17	05.03.1979 19.08.2013	DHO Peshawar	18.02.1958 Peshawar	17.02.2018
145.	Nasim Akhtar D/O Behram Khan.	LHV BPS 09 PHC Technologist (MCH) BS-17	23.04.1979 19.08.2013	DHO Haripur	23.08.1957 Abbotabad	22.08.2017
146.	Shahi Arab D/O Hayadi Mir	LHV BPS 09 PHC Technologist (MCH) BS-17	28.04.1979 19.08.2013	DHO Charsadda	16.04.1959 Peshawar	15.04.2019
147.	Afzal ur Rehman	X-Ray Tech B 09 Clinic: Tech B 12 CT (Radiologist) BS- 17	12/12/1989 20.04.2010 19.08.2013	LRH Peshawar	09/05/1966 Swabi	08.05.2026
148.	Gul Sher Khalil	X-Ray Tech B 09 Clinic: Tech B 12 CT (Radiologist) BS- 17	03.03.1991 20.04.2010 19.08.2013	KTH Peshawar	01.10.1971 Peshawar	30.09.2031
149.	Razeeq Khan	X-Ray Tech B 09 Clinic: Tech B 12 CT (Radiologist) BS- 17	04.03.1991 20.04.2010 19.08.2013	LRH Peshawar	04.12.1967 Mardan	03.12.2027
150.	Jamil Khan S/O Muhammad Amir Khan	X-Ray Tech B 09 Clinic: Tech B 12 CT (Radiologist) BS- 17	18/03/1993 20.04.2010 19.08.2013	KTH Peshawar	01/01/1969 NW Agency	31.12.2029
151.	Muhammad Alan S/O Habibur Rehman	X-Ray Tech B 09 Clinic: Tech B 12 CT (Radiologist) BS- 17	12/03/1999 20.04.2010 19.08.2013	STH Swat.	28/04/1971 Swat	27.04.2031

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152.	Abdur Rahman S/O Gul Hassan Badshah	R. Grapher BS 06 X-Ray Tech B 09 Clinic: Tech B 12 CT (Radiologist) BS- 17	27.12.1994 31.08.2000 20.04.2010 19.08.2013	DHQH KDA Kohat	25.09.1973 Kohat	24.09.2033
153.	Syed Hasnain S/O Syed Muhammad Sibrain	X-Ray Tech B-09 CT (Radiologist) BS- 17	30.08.2003 19.08.2013	AHQH Parachinar	01.04.1973 Kurram	31.03.2033

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Director General Health Services
Khyber Pakhtunkhwa Peshawar
Job
20/11/2013

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FINANCE DEPART

GOVERNMENT OF N.W.F.P.
LAW DEPARTMENT

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The ex-States of Dir, Swat and Chitral were made Districts of the Province of the N.W.F.P. somewhere in the year, 1971. With this action there emerged a question of the absorption of the employees of various categories serving in the former States and the fixation of their seniority with their counterparts already serving in the Province. After a thorough probe into the matter, the Services and General Administration Department issued Integration Order. The question of deciding the case of the treasury staff serving in the former States came up for consideration in the Finance Department where a final order issued on 25.10.1971. The Commissioner, Malakand Division, Saidusharif prepared a seniority list (pages 11.12 of the AD file) regarding employees serving in the treasury Establishment wherein one Mr. Abdul Waseed was shown at S.No. 8 while Mr. Sher Mohd at S.No. 12. Feeling aggrieved by the aforesaid list Sher Mohammad preferred a petition to the Commissioner for giving him due place in the seniority list. His petition came to be dismissed by the Commissioner vide order copy at pages 13-14 of the AD file. Mr. Sher Mohammad has filed a representation before the Secretary Finance Department vide pages 2-4 of the AD file. A perusal of the order of the Commissioner (pages 13-14) dated 10.7.1980 shows that he has dismissed the petition of Mr. Sher Mohammad both on merits as well as on the point of limitation. In his opinion when the tentative seniority list was prepared in the year, 1975, the same was circulated for inviting objections from the concerned officials. Many officials filed objections but Mr. Sher Mohammad failed to do so and as such his petition was time barred. On merits the Commissioner has formed opinion that the service rendered by Sher Mohammad prior to merger of the States into the Province cannot be taken into consideration for determining inter-se-seniority of the employees. As regards the first question it may be stated that the observations made in para 20 directly speak on the subject. ~~It has been emphatically opined therein that "to correct the wrong, if done to a civil servant, there should be no limitation or bar for Government".~~ In the comments of the Commissioner, Malakand Division at pages 32 - 33 of the AD file too, there is nothing to show that the tentative seniority list was actually circulated amongst all the officials concerned or that there is any clear cut proof regarding that with the authorities. As such the plea of limitation should not be allowed to stand in the way of

Mr. Sher Mohd

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وکالت نامہ

بعدالت جناب فیض خٹو خواہ سردس ٹریبونل بنہ اور

فاضل اعظم بنام حکومت و عہدہ

دعوی یا جرم سردس اپیل منجانب ایسڈ جج

باعث تحریر آنکہ مندرجہ بالا عنوان میں اپنی طرف سے بیروی وجود ہی بہ تمام بنہ اور کے لئے

جنید انور خان ایڈووکیٹ سپریم کورٹ آف پاکستان

بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رو برو عدالت حاضر ہوتا ہوں گا۔ اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دے کر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہو اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام کچہری کے کسی اور جگہ سماعت ہونے پر یا بروز کچہری کے اوقات کے آگے یا پیچھے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے واسطے کسی معاوضہ ادا کرنے، مختیار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کل ساختہ پرداخت صاحب مثل کردہ ذات خود منظور و قبول ہو گا۔ اور صاحب موصوف کو عرضی دعوی اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی دائر کرنے، نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہو گا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرانے کا ہر قسم بیان دینے اور سپرد تالی و راضی نامہ و فیصلہ برخلاف کرنے و اقبال دعوی کا اختیار ہو گا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا کٹرفر درخواست حکم اتناعی یا ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا کی علیحدہ بیروی مختیار نامہ کرنے کا مجاز ہو گا اور بصورت ضرورت اپیل اور اپیل کے واسطے کسی دوسرے وکیل یا بیرسٹر کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو، پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی بیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہو گا۔ لہذا مختیار نامہ لکھ دیا ہے کہ سند ہے۔

مضمون مختیار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

المرقوم 22 نومبر 2023

العبد العبد العبد العبد

فاضل اعظم وکیل صدر میں

ACCEPTED

JUNAID ANWAR KHAN,

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