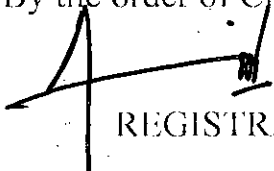


FORM OF ORDER SHEET

Court of _____

Appeal No. 2558/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/12/2023	<p>The appeal of Mst. Neelam resubmitted today by Mr. Ifikhar Ali Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on _____.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mst. Neelam LHW received today i.e on 24.11.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days:

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures.
- 3- Annexures of the appeal are unattested.
- 4- Memorandum of appeal is not signed by the appellant.
- 5- Address of the appellant is incomplete be completed according to rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 6- Departmental appeal is unsigned and undated.
- 7- Annexures-A & B of the appeal are illegible which may be replaced by legible/better one.
- 8- Annexures of the appeal are not in sequence.
- 9- Seven more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3688 /S.T.

Dt. 24-11 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Iftikhar Ali Adv.
High Court Swat.

all the objections are removed

*Iftikhar
Khan,*

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal. 2558 / 2023

Mst, Neelam Appellant
Versus

Govt: of KP and others. Respondents

INDEX

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5.	Copies of appointment order	"A"	8-9
6.	Copies of regularization order, and record of service book	"B"	10-16
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Appellant

Mst. Neelam Neelam

Counsel Iftikhar Ali Khan

Iftikhar Ali Khan

Advocate High Court

Office 3rd Floor, Continental Plaza

Makanbagh, Mingora Swat.

Email: iftikharalikhanadv@gmail.com

Cell No: 0345-9514585

①

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

Service Appeal No. 2558 / 2023

9407
24-11-2023

Mst. Neelam D/o Aitbar Gul R/o Tindodag, Presently Residing
at Gunbad Maira, Mingora, Tehsil Babozai, District Swat. Lady
Health Worker (LHW) (BPS-05).

Place of Posting: Taniq, abad, Tindodag.

... Appellant

- VERSUS -

1. Government of Khyber Pakhtunkhwa through Secretary Health
at Peshawar.
2. Director General Health Services, Government of Khyber
Pakhtunkhwa at Peshawar
3. District Health Officer, Swat at Gulkada, Saidu Sharif, Swat.
4. District Account Officer Swat at Saidu Sharif, Swat.
5. Finance Officer, LHW Program, Khyber Pakhtunkhwa at
Peshawar.

... Respondents

Appeal Under Section 4 of the Service Tribunal Act, 1974.

Respectfully Sheweth;

1. That appellant is the resident of District Swat and was
initially appointed as LHWs in the National Program
Family Planning & Basic Health, Khyber Pakhtunkhwa
(Copy of appointment order is annexure A).
2. That after fulfilling all the codal formalities, appellant
joined her service and perform her duties with zeal and

devotion and no single complaint had ever been made against her in the entire service till now.

3. That later on services of the appellant was regularized under Regulation of LHW's Program & Employees (Regularization & Standardization) Act, 2014 and entries in the service book was made in this regard (Copies of regularization order and record of service book are annexure B).
4. That arrears i.e. (pay & allowance) from the period 01-07-2012 to 30-11-2015 were paid to other LHW's / LHS's of the same department, so appellant also knocked the doors of this high off for her redressal. It is pertinent to mention here that entry were made in the service book of the appellant regarding the payment of arrears but till now not a single penny has been paid to the appellant and uptill now the arrears to the tune of Rs. 1,63,866/- from 01-07-2012 to 30-11-2015, is outstanding against the department / respondents.
5. That the appellant time and again requested the concerned DHO, Swat, for payment of the subject arrears, which was turned down and the appellant has not yet been paid the same, furthermore, the appellant have been directed to approach this office.
6. That thereafter, the appellant filed department appeal to respondent No. 2, vide office diary No. 24836 dated 25-07-2023, however, the grievances of appellant has not been redressed and no opportunity of hearing has been provided to the appellant. Thus, after completion of the specified period, the appellant approaches this Hon'ble tribunal inter alia on the following grounds (Copy of memo of appeal is annexure C).

GROUND:

- i. That the action, inaction and denial of respondents to pay the outstanding arrears / allowance to the appellant, is illegal, unlawful and against the fundamental rights of appellant.
- ii. That clear discrimination has been committed with the appellant, which is in violation of the Articles 4, 25 & 27 of the Constitution of Islamic Republic of Pakistan, 1973.
- iii. That appellant has the accrued right of payment of arrears / allowances already paid to same scale employees of the same department.
- iv. That the very essence of the Constitution of Pakistan, 1973, i.e. equality before law and equal protection of law, has been violated in case of the appellant.
- v. That employees of the same department and of the same BPS have been paid the allowance & arrears of the same period but appellant was neglected and discriminated, therefore, action, inaction and maltreatment is against the law.
- vi. That the same arrears (pay & allowance) were paid to other employees of the same department and of the same rank (BPS). Therefore, appellant may be entitled to be treated alike and may not be discriminated in respect of that arrears / allowances.
- vii. That though the appellant has timely approached the respondents for redressal of her grievances, but till date, the appellant has neither been provided an ample opportunity of hearing nor the appellant has been given her rights i.e. arrears / allowances.

4

Viii. That respondent are not authorized to deny/ refuse the payment of arrears / allowances to appellant.

ix. Any other grounds not specifically raised will be argued with prior permission of this august court.

6. That appellant has filed the department appeal / representation on 25/07/2023 and as per law service appeal is to be filed after 90 day, thus, the instant appeal is filed today, which is well within time.

It is therefore very humbly prayed that, on acceptance of this appeal, the respondent be directed to pay the arrears / allowances of the appellant i.e 1,63,866/- from 01-07-2012 to 30-11-2015 without any delay.

Any other relief which is otherwise deemed proper, lawful, efficacious may also be granted in favour of appellant.

Appellant

Mst. Neelam Neelam

Counsel:

(Iftikhar Ali Khan)

Iftikhar Ali Khan

Advocate High Court

(5)

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . _____ / 2023

Mst, Neelam

..... Appellant
Versus

Govt: of KP and others.

..... Respondents


Certificate

It is certified that no such like other service appeal has earlier
been filed before this Hon'ble Court.

Appellant

Mst, Neelam Neelam

Counsel:



Iffikhar Ali Khan

Advocate High Court

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

Service Appeal No. _____ / 2023

Mst. Neelam.

... Appellant

- VERSUS -

Govt: of KP and others.

... Respondents

Affidavit

I, do hereby solemnly affirm and declares that, all the contents of this service appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed therein from this Hon'ble Tribunal.

ATTESTED

J
558
22.11.2023

Deponent:

Neelam
Neelam

Identified By Counsel:

Iffikhar Ali Khan

**Iffikhar Ali Khan
Advocate High Court**

7

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . _____ / 2023

Mst, Neelam

..... Appellant

Versus

Govt: of KP and others.

..... Respondents

Address of Appellant:

Mst. Neelam D/o Aitbar Gul R/o Tindodag, presently Residing at Gunbad Maira, Mingora District Swat. Lady Health worker (LHW) (BPS-05)

Appellant through Attorney Javed Ali S/o Feroz Shah R/o Gunbad Maira Mingora, Tehsil Babozai District Swat.

CNIC No.15602-4655995-1

Cell No.0345-9191837

Address of Appellants:

1. Government of Khyber PakhtunKhwa through secretary Health at Peshawar.
2. Director General Health Service, government of Khyber PakhtunKhwa at Peshawar.
3. District Health Officer, swat at Gulkada, Saidu Sharif, Swat.
4. District Account Officer Swat at Saidu Sharif swat.
5. Finance Officer, LHW Program, Khyber PakhtunKhwa of Peshawar.

Appellant

Mst, Neelam Neelam

Counsel:

Iffikhar Ali Khan

Iffikhar Ali Khan

Advocate High Court

میشل پروگرام برائے خاندانی منصوبہ بندی و بنیادی صحت صوبہ سرحد

ڈسٹرکٹ پروگرام ایجنسی میٹھیں ریونیو ضلع سوات

2022 تاریخ: 11/9/2022

پیشکش برائے تشریح و تفریحی سہولتیں

میتھیں ریونیو ضلع سوات

میشل پروگرام کی بنیاد پر آپ کے علاقے میں صحت کے شعبے کی طرف سے ایک نیا پروگرام شروع کیا گیا ہے۔ اس پروگرام کے تحت آپ کو طبی سہولتیں فراہم کی جائیں گی۔

1. اس پروگرام کے تحت آپ کو 15 ماہ کی تربیت دی جائے گی۔ پہلے 3 مہینوں میں طبی کے 5 سرکرسٹ میں تربیت حاصل کرنا ہوگی۔ جبکہ اگلے 12 مہینوں کے دوران آپ کو اپنے علاقے میں رہنے کے عین طے پروگرام کے تحت طبی سہولتیں فراہم کی جائیں گی۔

2. اس پروگرام کے تحت آپ کو 50 روپے روزانہ اور اسکے بعد 1700 روپے ماہانہ کے حساب سے معاوضہ دیا جائے گا۔ تمام معاوضے صحت حکومت کی پالیسی کے مطابق روزانہ مل سکتے ہیں۔

3. اس پروگرام کے تحت آپ کو 50 روپے روزانہ اور اسکے بعد 1700 روپے ماہانہ کے حساب سے معاوضہ دیا جائے گا۔ تمام معاوضے صحت حکومت کی پالیسی کے مطابق روزانہ مل سکتے ہیں۔

4. اس پروگرام کے تحت آپ کو 50 روپے روزانہ اور اسکے بعد 1700 روپے ماہانہ کے حساب سے معاوضہ دیا جائے گا۔ تمام معاوضے صحت حکومت کی پالیسی کے مطابق روزانہ مل سکتے ہیں۔

5. اس پروگرام کے تحت آپ کو 50 روپے روزانہ اور اسکے بعد 1700 روپے ماہانہ کے حساب سے معاوضہ دیا جائے گا۔ تمام معاوضے صحت حکومت کی پالیسی کے مطابق روزانہ مل سکتے ہیں۔

6. اس پروگرام کے تحت آپ کو 50 روپے روزانہ اور اسکے بعد 1700 روپے ماہانہ کے حساب سے معاوضہ دیا جائے گا۔ تمام معاوضے صحت حکومت کی پالیسی کے مطابق روزانہ مل سکتے ہیں۔

7. اس پروگرام کے تحت آپ کو 50 روپے روزانہ اور اسکے بعد 1700 روپے ماہانہ کے حساب سے معاوضہ دیا جائے گا۔ تمام معاوضے صحت حکومت کی پالیسی کے مطابق روزانہ مل سکتے ہیں۔

8. اس پروگرام کے تحت آپ کو 50 روپے روزانہ اور اسکے بعد 1700 روپے ماہانہ کے حساب سے معاوضہ دیا جائے گا۔ تمام معاوضے صحت حکومت کی پالیسی کے مطابق روزانہ مل سکتے ہیں۔

9. اس پروگرام کے تحت آپ کو 50 روپے روزانہ اور اسکے بعد 1700 روپے ماہانہ کے حساب سے معاوضہ دیا جائے گا۔ تمام معاوضے صحت حکومت کی پالیسی کے مطابق روزانہ مل سکتے ہیں۔

10. اس پروگرام کے تحت آپ کو 50 روپے روزانہ اور اسکے بعد 1700 روپے ماہانہ کے حساب سے معاوضہ دیا جائے گا۔ تمام معاوضے صحت حکومت کی پالیسی کے مطابق روزانہ مل سکتے ہیں۔

11. اس پروگرام کے تحت آپ کو 50 روپے روزانہ اور اسکے بعد 1700 روپے ماہانہ کے حساب سے معاوضہ دیا جائے گا۔ تمام معاوضے صحت حکومت کی پالیسی کے مطابق روزانہ مل سکتے ہیں۔

12. اس پروگرام کے تحت آپ کو 50 روپے روزانہ اور اسکے بعد 1700 روپے ماہانہ کے حساب سے معاوضہ دیا جائے گا۔ تمام معاوضے صحت حکومت کی پالیسی کے مطابق روزانہ مل سکتے ہیں۔

13. اس پروگرام کے تحت آپ کو 50 روپے روزانہ اور اسکے بعد 1700 روپے ماہانہ کے حساب سے معاوضہ دیا جائے گا۔ تمام معاوضے صحت حکومت کی پالیسی کے مطابق روزانہ مل سکتے ہیں۔

14. اس پروگرام کے تحت آپ کو 50 روپے روزانہ اور اسکے بعد 1700 روپے ماہانہ کے حساب سے معاوضہ دیا جائے گا۔ تمام معاوضے صحت حکومت کی پالیسی کے مطابق روزانہ مل سکتے ہیں۔

15. اس پروگرام کے تحت آپ کو 50 روپے روزانہ اور اسکے بعد 1700 روپے ماہانہ کے حساب سے معاوضہ دیا جائے گا۔ تمام معاوضے صحت حکومت کی پالیسی کے مطابق روزانہ مل سکتے ہیں۔

16. اس پروگرام کے تحت آپ کو 50 روپے روزانہ اور اسکے بعد 1700 روپے ماہانہ کے حساب سے معاوضہ دیا جائے گا۔ تمام معاوضے صحت حکومت کی پالیسی کے مطابق روزانہ مل سکتے ہیں۔

ایگزیکٹو ڈسٹرکٹ آفیسر
ضلع سوات

District Coordinator
LHWs Program
For FIF & IHC
Dist. Swat

کاپی برائے اطلاع

- 1۔ ایجنسی برائے صحت
- 2۔ ایجنسی کاپی

Executive Health Officer,
District Swat
ضلع سوات

Health Department, Khyber Pakhtunkhwa
 District Programme Implementation Unit, Swat
OFFICE OF THE DISTRICT HEALTH OFFICER SWAT

(9)

NOTIFICATION
 In Term of Section 4 (1) read with 1st Provision there under, of the Khyber Pakhtunkhwa Regulation of Lady Health Workers Programme (Regularization and Standardization) Act 2014 Services of the following Lady Health Workers Programme Employees (Regularization and Standardization) Khyber Pakhtoon Khowa are hereby regularized w. e. 1st July 2012. Their terms and conditions of services will be governed under the Khyber Pakhtunkhwa Regulation of Lady Health Workers Programme and Employees (Regularization and Standardization) Act 2014 and rules to be made there. FLCF vice Detail of staff who are to be regularized are given below.

S.No	Name of Embedded Community	Name of Father	Husband Name	Des:	Date of appointment	FLCF	Name of Catchment Area
1	Sheh Zia	F: Muhammad	Muhammad	LHS	01/12/2004	BHU	Village Chalegay Swat, Achallah Kacho Khail Swat
2	Yasmin	F: Saleem				BHU	Village Chalegay Swat, Achallah Kacho Khail Swat
3	Nasreen	F: Mohammad	Mohammad	LHW	17/07/1994	BHU	Village And Post Office Chalegay Mohallah Miramach Khail Swat
4	Shakeela	F: Shah Khan	Shah Khan	LHW	01/08/1995	BHU	Village Chalegay Mohallah Miramach Khail Swat
5	Najma	F: Mohammad	Karimullah	LHW	03/08/1998	BHU	Village Chalegay Mohallah Miramach Khail Swat
6	Abida	F: Iqbal Hussain	Wahid Hussain	LHW	03/08/1998	BHU	Village Chalegay Mohallah Miramach Khail Swat
7	Zakia	F: Zaman Gul	Zaman Gul	LHW	15/04/2002	BHU	Village & Post Office Panjgram Moh. Bar Palo Distt. Swat.
8	Rukhsana	F: Zoor Talab Khan	Zoor Talab Khan	LHW	15/04/2002	BHU	Village Post Office Chalegay Moh. Shagay Distt. Swat.
9	Sange Paras	F: Ihsani Room	Ihsani Room	LHW	15/04/2002	BHU	Village Post Office Manyar Moh. Chhabad Swat.
10	Nargas	F: Gul Habib Naik	Gul Habib Naik	LHW	01/07/2004	BHU	Village Manyar Koz Palow Abad Mohallah Maera Swat
11	Rifat BI BI	F: Hadai Khan	Hadai Khan	LHW	15/05/2005	BHU	Village Chalegay Swat Mohallah Khor Kass
12	Nighal	F: Mohammad	Mohammad	LHW	15/07/2005	BHU	Village Chalegay Swat Mohallah Khor Kass
13	Neelum Begum	F: Ibar Gul	Ibar Gul	LHW	15/07/2005	BHU	Village Chalegay Mohallah Kacho Khail Swat
14	Azra	F: Mohd Ibraheem	Mohd Ibraheem	LHW	15/07/2005	BHU	Village Chalegay Mohallah Kacho Khail Swat
15	Naseem	F: Malik Khan	Malik Khan	LHW	15/07/2005	BHU	Village Chalegay Mohallah Kacho Khail Swat
16	Shuglo	F: Ihtil Khan	Ihtil Khan	LHW	15/05/2006	BHU	Village Chalegay Mohallah Kacho Khail Swat
17	Sulqa	F: Almyfir Khan	Almyfir Khan	LHW	15/10/2010	BHU	Kophar Manyar
18	Unki Nawab	F: Amir Nawab	Amir Nawab	LHW	15/10/2010	BHU	Kophar Manyar
19	Unki Nawab	F: Amir Nawab	Amir Nawab	LHW	08/02/2010	BHU	Tarq Abad Tindodagh Swat

District Health Officer
 Swat At Gulikada

District Coordinator
 LHM's Program
 For F/P & PHG
 Distt Swat

Mullimandi House Street Address Book At Distt Swat

Sub: Issuance of Individual Notification to the Employees of LHWs Programme

In compliance with the decision taken in the meeting under the Chairmanship of Secretary Health Khyber Pakhtunkhwa dated 18/9/2014 and letter No Nil dated nil of the Provincial Coordinator LHW Programme for F/P & PHC KPK Peshawar, Enclosed Please find herewith Facility Wise Notification of the Employees of LHWs Programme for kind information and further necessary action please.

Similarly in exercise of powers conferred under sub section (2) of the Section ibid, the Community Embedded Employees are placed in the following pay Scales .

Name of Post	Basic Pay Scale
Lady Health Supervisor	7
Lady Health Worker	5
Driver	4

[Signature]
District Health Officer
Swat AI Gulkada

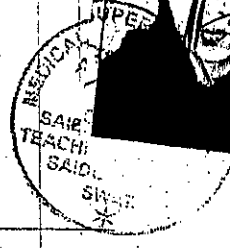
No 11239 /LHW/RI Dated 20/9/2014
Copies forwarded to the :

1. The Director Health Services, Health Directorate, Peshawar for kind information and further necessary action with reference to the meeting held with the Secretary Health Khyber Pakhtunkhwa on 18/9/2014 please.
2. Provincial Coordinator LHW Programme for F/P & PHC KPK Peshawar for kind information and further necessary action with reference to the letter No. nil dated nil please.
3. Incharge of FLCF concerned for information.
4. District Account Officer Swat for information

[Signature]
District Health Officer
Swat AI Gulkada

[Signature]
District Coordinator
LHWs Program
For F/P & PHC
Distt: Swat.

(11)



Health and Age Certificate

Name of Official Neelam

Religious Performed Islam

Resident Village Tendodog P.O. Tendodog Tehsil Babozai District Swat

Father Name Itbar Gul Address Tendodog Swat

Date of Birth (In words & Figure) 1-3-1990 First March To nineteen

Exact high by measurement 5 Feet 3 Inch ninety

Marks of Identification Nil

Signature of Official Neelam

Signature of Head of Office _____
District Health Officer
District Swat

I do hereby certify that I have examined Mr./Miss Mrs. Neelam
Candidate for employment in the office of DHO Swat and cannot discover that her/She
any disease constitution effect body except Nil

I do not certify this disqualification for employment as LHW her according to
her statement 24 year and by appearance is Healthy Form

Left hand thumbs Impression



Done before OK

Examination Medical Officer,

With Official Stamp
Dated 30/1/14

Medical Superintendent
Sahibgang Hospital
Group of Hospitals
Saidul Sharif Swat
Swat
30/1/14

Note: The entries on this page should be re-noved or re-attested at least every five years and the signature to lines 9 and 10 should be dated:

1. Name: Neelam

2. Race: Islam

3. Residence: Village Tindodag Moh Tariq Abad

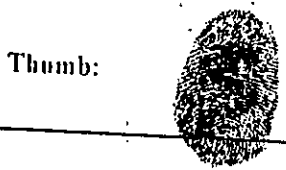
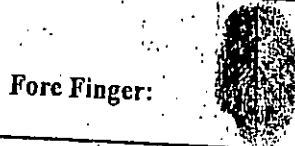
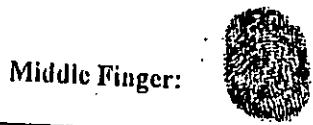
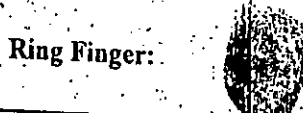
4. Father's Name and residence: Ibbargul Tindodag Moh Tariq Abad

5. Date of birth by christian era as nearly as can be ascertained: First March Nineteen Ninety (1.3.1990)

6. Exact height by measurement: 5 Ft 3 inch

7. Personal marks for identification: Null

8. Left hand thumb and Finger impression of (Non-Gazetted) officer:



9. Signature of Government Servant: Neelam

10. Signature and designation of the Head of the officer, or other Attesting Officer: District Health Officer DISTT-SWAT

(For Use in Police Department Only)

Heirs,

1. _____
2. _____
3. _____

Verification Roll No:

dated

received back

Left Thumb Impression

Qualification Class	Roll No.	Marks	Date Years	Books	Qualification	Date
English 8class					First Arts	
Pushto S.S.C	17009	553	2010	swal	B.L Or B.A	
Urdu F.A / FSC					Pleadership Examination	
Plan-drawing B.A / BSC					Training School Final Examination	
Finger Print M.A / MSC					Other qualification	
Drill Instructing						
Court Duties	Blank DUTY-SWAY.					
Reserve Duties						

N.B. Line to be drawn under the qualification possessed

No. 9 and

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Note: 9 and

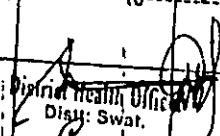



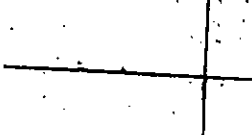
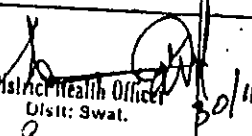
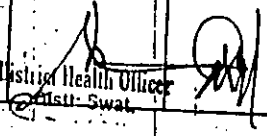
1	2	3	4	5	6	7	8
Name of Post	Substantive whether substantive or officiating and whether permanent or temporary	If officiating state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 CSR	Pay in Substantive Post	Additional pay for officiating	Other emolument falling under the term "Pay"	Day of Appointment	Signature of Governmental servant
LHW Lady Head Work (FIXON)			Rs 1700/- (Exbd)			11/9/2015	FN Herdson
(Rs 300-260-1300)			Rs 5400/pm			1/7/2012	FN reclam
do			Rs 5600/pm			1/12/2012	reclam
do			Rs 5660/pm			1/12/2013	FN reclam
do			Rs 5990/pm			1/12/2013	FN reclam

Signature and Dist of the head of the or other officiating in attesting columns 1 & 2

District Head Dist: S
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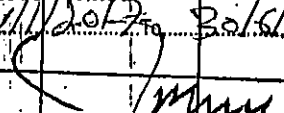
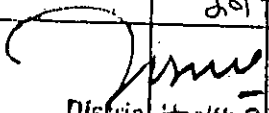
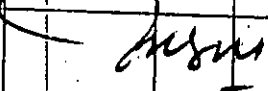
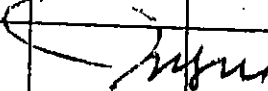

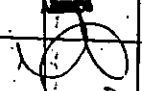

District Head Dist: S
2

District Head Dist: S
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9	10	11	12	13		14	15
Signature and Designation of the head of the office or other attesting officer in attesting of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the (Government Service)
				Nature and duration of leave taken	Allocation of period of leave on average pay up to four months for which leave salary is debit able to another Government		
				Period	Government to which debit is made		
				Appointed as <u>LHW</u> in the NP vide DHO Swat office			
				Order No <u>2072</u> dt <u>11/9/2011</u> and accordingly submitted			
				her arrival Report at BHU/ICD <u>M.A. Nya</u> for duty.			
				Service Verified from <u>11/9/2011</u> to <u>30/6/2012</u>			
				 District Health Officer Distt: Swat.			
				On 22/9/2014 issued Notification order for the			
				Regularization of Staff vide DHO Swat letter No.11 232/LHW			
				W.E.F 17/2012 in view of approval granted by the			
				P.C LHW Programme KH K through letter No 1340/PC			
				Dated: 20/9/2014.			
				 District Health Officer Distt: Swat.			
				Service Verified from <u>11/7/2011</u> to <u>30/11/2012</u>			
				 District Health Officer Distt: Swat.			
				ANN. INC GRANTED			
				Service Verified from <u>11/9/2012</u> to <u>30/11/2013</u>			
				 District Health Officer Distt: Swat.			
				ANN. INC GRANTED			
				Service Verified from <u>11/9/2013</u> to <u>30/11/2014</u>			
				 District Health Officer Distt: Swat.			
				ANN. INC GRANTED			
				Service Verified from <u>11/9/2014</u> to <u>30/11/2014</u>			
				 District Health Officer Distt: Swat.			
				ANN. INC GRANTED			
				 District Health Officer Distt: Swat.			

1	2	3	4	5	6	7	8
Name of Post	Substantive whether substantive or officiating and whether permanent or temporary	If officiating state (i) substantive appointment, or (ii) Whether service credit for pension under Art. 371 CSR	Pay in Substantive Post	Additional pay for officiating	Other emolument falling under the term "Pay"	Day of Appointment	Signature of Government servant
LHO BPS-5			Rs 12260/-			7 2017	
(10260-500-25260)							
do-			Rs 12760/-			12 2017	
		Office of the Accountant General Khyber Pakhtunkhwa Peshawar Pay Fixed in The R.B.P.S. 2017 R.B.P.S. 10260-500-25260 (5)					
D.A.C		At Rs. 12260/- P.M.W.E.F 1.07.2017 With Next Increment On 1.12.2017					
		Accounts Officer, Pay Fixation Party K. Pakhtunkhwa Peshawar					
do~			Rs 13260/-			12 2018	

Signature of the head or other as in column

9	10	11	12	13		14	15
Signature and Designation of the head of the officer or other attesting officer in attesting of rukun 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit able to another Government		
					Period		
	Pay Revised on 17/2/17					Services Verified From 1/1/2017 to 30/6/2017	
							
		District Health Officer District Swat.				District Health Officer District Swat.	
	30/11/2017		Annual Increment Allowed			Services Verified From 1/1/2017 to 30/11/2017	
							
		District Health Officer DIST. SWAT.	District Health Officer DIST. SWAT.			District Health Officer DIST. SWAT.	
				Paid arrears on a/c of Pay & Allowances. w.e.f 01-07-2017 to 30-11-2015 Amounting to Rs. 153864/-			
						Finance Officer LHW Program Peshawar	
	30/11/2018		Annual Increment Allowed			Services Verified From 1/2/2017 to 30/11/2018	
							
		District Health Officer DIST. SWAT.	District Health Officer DIST. SWAT.			District Health Officer District Swat.	

9	10	11	12	13		14	15
Signature and Designation of the head of the office or other attesting officer in attesting of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or reward or parole of the Government Servant
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit able to another Government		
				Period	Government to which debit able		

Pay Revised up graded from BPS..... & BPS
 vide Govt: of Khyber Pakhtunkhwa
 Finance Department Notification
 No.FD/SO/PR-7-20/2015 Dated: 30/06/2015
 and RC/ED/SO(E) 7-20/2015 dt: 27/09/2015

[Signature]
 D.H.O Swat.

30/1
2015

Annual/Increment
 Allowed

Services Verified
 From 1/12/2014 To 30/12/2015

[Signature]
 District Health Officer
 DISTT: SWAT.

[Signature]
 District Health Officer
 DISTT: SWAT.

[Signature]
 District Health Officer
 District Swat.

Pay Revised 2016
 Vide Notification No FN1(2)
 Imp (2016-333 dated 17/2016

Token No: 158
 Dated: 16/9
 Drawn Pay allowed 31-7-2016--31-8-2016

[Signature]
 District Health Officer
 DISTT: SWAT.

[Signature]
 District Health Officer
 DISTT: SWAT.

Gross Am... 3300/-
 Deduction 17 51-
 Net Amount Rs. 31290/-

[Signature]
 D.A.O.
 Swat.
16/9

30/1
2016

Annual/Increment
 Allowed

Services Verified
 From 1/12/2015 To 30/12/2016

[Signature]
 District Health Officer
 DISTT: SWAT.

[Signature]
 District Health Officer
 DISTT: SWAT.

[Signature]
 District Health Officer
 District Swat.

1	2	3	4	5	6	7	8
Name of Post	Substantive whether substantive or officiating and whether permanent or temporary	If officiating state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R	Pay in Substantive Post	Additional pay for officiating	Other emolument falling under the term "Pay"	Day of Appointment	Signature of Government servant
LHW 6985 (Rs 6985-360-718)			Rs 7665/-			11/7/2015 Fri	
do			Rs 8005/-			11/2/2015 Fri	
LHW 6985 (8590-420-2190)			Rs 9850/-			11/7/2015 Fri	
76675							
9850/-							
do			Rs 10270/-			11/2/2016 Fri	
<p>Office of the Accountant General Khyber Peshawar</p> <p>Pay Fixed @ Rs. 6985-360-7185 (5)</p> <p>Pay Fixed @ Rs. 7665-420-2190 (5)</p> <p>R.B.P.S 8590-420-2190 (5)</p> <p>Pay Fixed @ Rs. 9850-420-2190</p> <p>Date of Next increment is on 01-12-2016</p> <p>Accountant General Khyber Peshawar</p>							

Signature and Seal of the head of the or other attesting in attesting columns 1 to

District Officer
DISTT:

Better Copy of Page No.

To.

The Director General, Health Services,
Government of Khyber Pakhtunkhwa
At Peshawar.

Subject: Departmental Appeal for payment of arrears (pay & allowance) from the period effect from 01-07-2012 to 30-11-2015. to the petitioners and treated the petitioners alike on the same yardstick like other employees of the same department.

Respected Sir,

The petitioners submit as under;

1. That petitioners are the resident of District Swat and were initially appointed as LHWs in the National Program Family Planning & Basic Health, Khyber Pakhtunkhwa in the year 2005-06.
2. That after fulfilling all the codal formalities, petitioners join their services and perform their duties with zeal and devotion and no single complaint had ever been made against them in the entire service till now.
3. That later on services of the petitioners were regularized under Regulation of LHW's Program & Employees (Regularization & Standardization) Act, 2014 and entries in the service book were made in this regard.
4. That arrears i.e. (pay & allowance) from the period 01-07-2012 to 30-11-2015 were paid to other LHW's / LHS's of the same department, so petitioners also knocked the doors of this High office for their redressal. It is pertinent to mention here that entry was made in the service books of the petitioners regarding the payment of arrears but till now not a single penny were paid to the petitioners.

5. That employees of the same department and of the same BPS have been paid the allowance & arrears of the same period but petitioners were neglected and discriminated, therefore, action, inaction and maltreatment is against the law.
6. That the same arrears (pay & allowance) were paid to other employees of the same department and of the same rank (BPS), therefore, petitioners may be treated alike and may not be discriminated in respect of that arrears / allowances.
7. That the petitioners time and again requested the concerned DHO, Swat, for payment of the subject arrears, which was turned down and the petitioners have not yet been paid the same, furthermore, the petitioners have been directed to approach this office.
8. That the instant request may please be considered as departmental appeal / representation.

It is therefore, humbly requested that on acceptance of the subject appeal, arrears i.e. pay & allowance of the petitioners, may kindly be handed over to them.

Any other remedy to which the petitioners are entitled, may also be awarded.

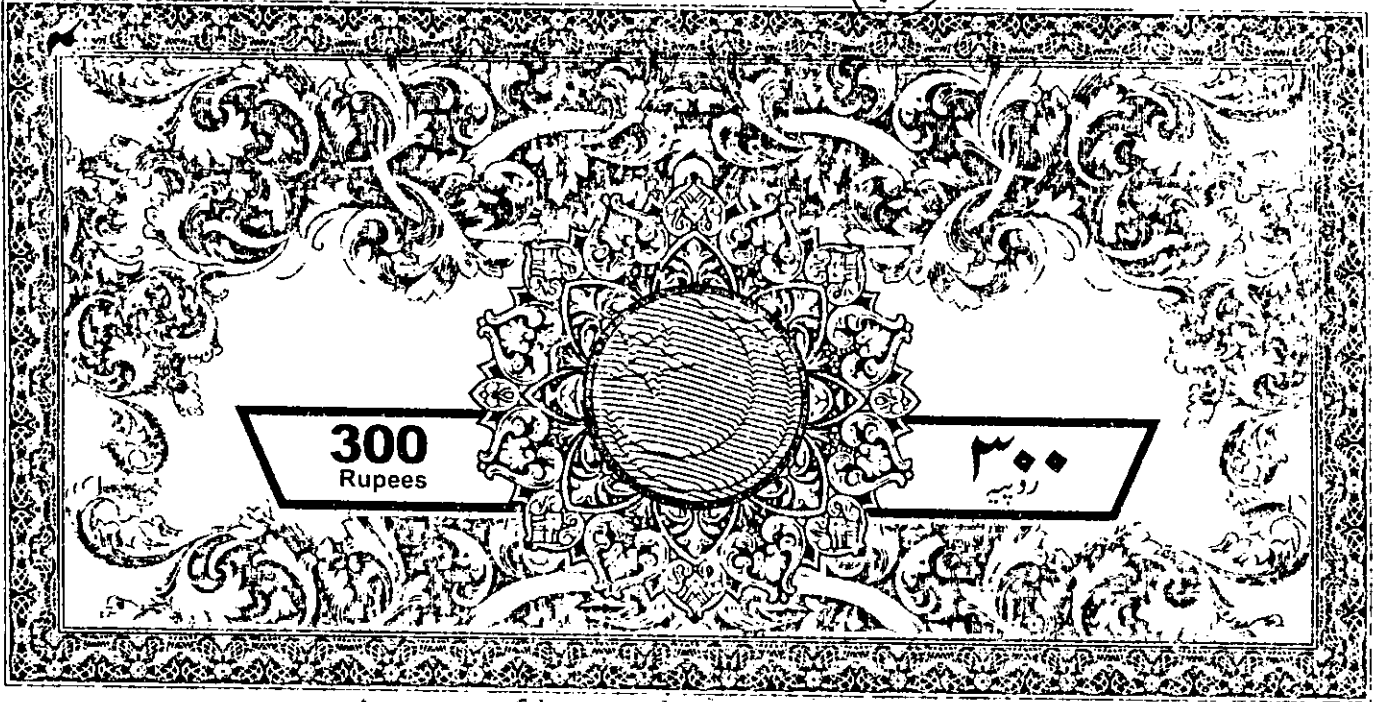
Petitioners

- | | | | |
|------------------------|-------------------------|------------------------|------------------------|
| 1) Mst. Maryam | (2) Mst. Shehnaz | (3) Mst. Saima | (4) Mst. Jehan Sifat |
| 5) Mst. Rawasia | (6) Mst. Arabistan Bibi | (7) Mst. Ashrafia Bibi | (8) Mst. Abida |
| 9) Mst. Neelam | (10) Mst. Rabia | (11) Mst. Hussain Pari | (12) Mst. Bacha Zeenal |
| 13) Mst. Waqif Shah | (14) Mst. Farzana | (15) Mst. Saima Bibi | (16) Mst. Farhana |
| 17) Mst. Saleem Akhtar | | | |

Note: List of the amount / arrears of each candidate is attached herewith.

LIST OF ARREARS OF THE PETITIONERS

S.No	Name	Designation	Amount of arrears with period
01.	Mst. Maryam Bibi	LHW (BPS-5)	Rs. 31,290/- from 01-07-2016 to 31-08-2016
02.	Mst. Shehnaz	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
03.	Mst. Saima	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
04.	Mst. Jehan Sifal	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
05.	Mst. Rawasia	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
06.	Mst. Arabistan Bibi	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
07.	Mst. Ashrafia Bibi	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
08.	Mst. Abida	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
09.	Mst. Neelam	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
10.	Mst. Rabia	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
11.	Mst. Hussan Pari	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
12.	Mst. Bacha Zeenal	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
13.	Mst. Waqif Shah	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
14.	Mst. Farzana	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
15.	Mst. Saima Bibi	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
16.	Mst. Farhana	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
17.	Mst. Saleem Akhtar	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015






مختار نامہ خاص


سکہ افتخار ہونے پر منجانب (۱) مسماة سلیم اختر دختر لیاقت علی سکندر خیرین تحصیل خواجہ خیلہ ضلع سوات (۲) مسماة فرزانه دختر امیرزادہ سکند گاڑی گھڑی شہزادی تحصیل خواجہ خیلہ ضلع سوات (۳) مسماة واقف شاہ دختر سر بالا میاں سکندر خیرین تیرات تحصیل بجرین ضلع سوات (۴) مسماة نرانیہ بی بی دختر پیر رحمان سکندہ ڈس لڈیکس تحصیل خواجہ خیلہ ضلع سوات (۵) مسماة باچا زینت دختر شیرین سکندہ ملا بابا گٹ بر شور تحصیل مہ ضلع سوات (۶) مسماة حسن پری دختر عبدالنور سکندر چنہ جماعت میانم تحصیل خواجہ خیلہ ضلع سوات (۷) مسماة سلیم دختر بقا باگل سکندر ندوڈاگ (حال) گنبد میرہ پیادہ تحصیل بابوزئی ضلع سوات (۸) مسماة عربستان بی بی دختر سلطان باچا سکندہ خڑہ تحصیل مہ ضلع سوات (۹) مسماة روسیہ دختر زرمیوش سکندر نیو کالونی تحصیل مہ ضلع سوات (۱۰) مسماة جهان صفت دختر عبداللہ جان سکندر املی مدین تحصیل بجرین ضلع سوات (۱۱) مسماة مریم بی بی دختر پروان صاحب سکندہ کوز پلو باہم خیلہ تحصیل مہ ضلع سوات (۱۲) مسماة فرحانہ زوجہ محمد انور سکندر شلتا کو تحصیل چار باغ ضلع سوات (۱۳) مسماة شہن ز بی بی دختر خیر خان سکندر محلہ بڑے کچھ تحصیل خواجہ خیلہ ضلع سوات (۱۴) مسماة عابدہ دختر محمد سکندر خزانہ دیوٹی تحصیل کل ضلع سوات (۱۵) مسماة صائمہ دختر بخت روان سکندر محلہ بڑے کچھ تحصیل مہ ضلع سوات (۱۶) مسماة رابعہ دختر فضل حسین سکندر میانم تحصیل خواجہ خیلہ ضلع سوات (۱۷) مسماة صائمہ بی بی دختر بخت روان سکندر ماکنڈیکلام تحصیل چار باغ ضلع سوات کے ہیں۔ اندر میں دقت بھاگی، دوش و جواں شہہ برنامندی بخوشی اقرار کر کے لکھ دیتے ہیں۔ کہ من مقرران ایک سروں اچلی سروں ٹریبول میں دائر کرنا چاہتے ہیں، چونکہ مقدمات بوجہ مصروفیات و زمانہ ذات اچیل ہڈا کی اصالتا کے پیروی سے قاصر ہیں۔ بدیں وجہ ماتمرات اپنی جانب سے کسی جاوید علی ولد فیروز شاہ سکندر گنبد میرہ پیادہ تحصیل بابوزئی ضلع سوات کو مختار خاص مقرر کر کے اختیار دیتے ہیں۔ کہ وہ ہڈا تہی یا بذریعہ وکیل ایریٹرا عدالت ابتدائی سروں ٹریبول تا عدالت عظمی سپریم کورٹ آف پاکستان یا دیگر عدالت ہائے مروج کرے اور کروائے، درخواست ہائے جواب درخواست ہائے، جواب الجواب یا دیگر درخواست ہائے دیوے۔ اپیل۔ نگرانی۔ نظر ثانی۔ رٹ پیشیں دائر کرے اور کروائیں یا مقدمہ ہڈا کروائے، دئے کے صورت میں ماتحت عدالت میں کارروائی کرنے۔ دکالیت نامہ تصدیق کرنے، عرائش کی تصدیق کریں، درخواست فریق مقدمہ وغیرہ دائر کریں، درخواست اخراج مقدمہ دائر کریں۔ فہرست گواہان داخل کریں شہادت پیش کریں، اپیل کمیشن مقرر کریں، اپیل کمیشن کے ساتھ بر موقع کارروائی عمل میں لائیں، عدالت داخل کریں، مختاران خاتون یا مقرران کی طرف سے راضی نامہ کریں ثالثی قبول کریں، مصلح مقرر کریں بیان ملٹی دیوے / تخریر و زبانی بیان دیوے / ترمیمی جواب دیوے / فیصلہ ڈگری دونے کی صورت میں کارروائی ابراء دائر کریں۔ عدالت موصوف کے علاوہ پشاور ہائی کورٹ، اور عدالت عظمی سپریم کورٹ آف پاکستان جو بھی ضروری اور قانونی کارروائی ہو عمل میں لائیں۔ مقدمہ ریٹائر ہونے کی صورت میں مختاران موصوف وغیرہ اپنی تمام اختیارات ابراء۔ مسماہ صل جوں کے بڑے آج مختاران موصوف کو دئے گئے۔ انفرش جملہ کارروائی بہت مقدمہ۔ جہذا من مقرر کتوال منظور ہوگی۔ لہذا مختار نامہ سند تحریر ہے۔ الرقوم: 16/11/2023



الع ... بد ... مسماة واقف شاہ
 الع ... بد ... مسماة فرزانه
 الع ... بد ... مسماة سلیم اختر
 الع ... بد ... مسماة نرانیہ بی بی
 الع ... بد ... مسماة حسن پری
 الع ... بد ... مسماة باچا زینت
 الع ... بد ... مسماة شیرین سکندر
 الع ... بد ... مسماة عالیہ
 الع ... بد ... مسماة حسنہ
 الع ... بد ... مسماة ارمیا
 الع ... بد ... مسماہ صائمہ بی بی
 الع ... بد ... مسماہ کوز پلو
 الع ... بد ... مسماہ فرحانہ
 الع ... بد ... مسماہ عابدہ
 الع ... بد ... مسماہ رابعہ
 الع ... بد ... مسماہ صائمہ بی بی
 الع ... بد ... مسماہ رابعہ
 الع ... بد ... مسماہ صائمہ بی بی

<p>بار کونسل نمبر: 225/11-2011</p> <p>بار ایسوسی ایشن نمبر: 1303</p> <p>رابطہ نمبر: 03459514585</p> <p>ای میل ایڈریس: ۷۷</p>	  <p>132027</p>  <p>ڈسٹرکٹ بار ایسوسی ایشن سوات</p>
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بعدالت جناب: مسروس ٹریبونل مقام سوات

<p>منجانب: ایبلاٹ</p>  <p>محلہ نیلم</p> <p>حکومت وغیرہ</p>	<p>دعویٰ اور خواست: مسروس ایبلاٹ</p> <p>علت نمبر:</p> <p>مورخہ:</p> <p>جرم:</p> <p>تھانہ:</p>
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باعت حیوانہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام مسروس ٹریبونل کیلئے افتخاری خان الودین صاحبی ٹورٹ کو مقرر کر کے اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کارروائی کو مکمل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ پیش کرنے و تقرر ثالث کرنے، دعویٰ، جواب دعویٰ، اقبال دعویٰ اور درخواست برائے سرسنگی مقدمہ، منسوخی ڈگری یکطرفہ، اجراء و پیروی کرنے کا مختار ہوگا۔ نیز دائر کرنے اپیل نگرانی، نظر ثانی و پیروی کرنے کا مختار ہوگا۔ اور مقدمہ مذکورہ کیلئے کل وقتی یا جزوی کارروائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہزارہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پرداختہ منظور قبول ہوگا، بدوران مقدمہ جو خرچہ و ہرجانہ کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا جقدار ہوگا، کوئی تاریخ پیشی مقام مذکورہ بالا سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کسی عدالت میں بعدم پیروی خارج ہونے یا ڈگری یکطرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے، لہذا وکالت نامہ لکھ دیا کہ سدر ہے

مقام مسروس ٹریبونل حیدر خان سوات کے لئے منظور ہے۔

ایبلاٹ بڑیلوہ عنایت خان صاحب سوات



ایڈوکیٹ دستخط:

المقوم: 22/11/23