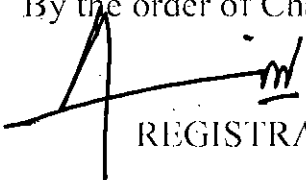


FORM OF ORDER SHEET

Court of _____

Appeal No. 2563/2023

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. Ashrafia Bibi resubmitted today by Mr. Itikhar Ali Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on _____</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

The appeal of Mst. Ashrafia Bibi 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. 3679 /S.T,

Dt. 24-11 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Iftkhar Ali Adv.
High Court Swat.

all the objections are removed

*Ok
Ali*

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

Service Appeal . 2563 / 2023

Mst, Ashrafia Bibi Appellant

Versus

Govt: of KP and others. Respondents

INDEX

S#	Documents	Annex	Pages
1.	Memorandum of service appeal		1-4
2.	Certificate		5
3.	Affidavit		6
4.	Memo of address		7
5.	Copies of appointment order	"A"	8, 9
6.	Copies of regularization order and record of service book	"B"	10, 16
7.	Copy of memo of appeal	"C"	17, 19
8.	Power of Attorney		20
9.	Wakalat Nama		21

Appellant

Mst. Ashrafia Bibi

A. Ashrafia

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. 2863 / 2023

9395
24-11-2023

Mst. Ashrafia Bibi D/o Said Rahman R/o Village Landikas, Tehsil
Khwazakhela, District Swat. Lady Health Worker (LHW) (BPS-05).
place of posting Swat Landikae
Tehsil Khwazakhela ... 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.

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

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

6. That appellatant has filed the department appeal / representation on 25/07/2023 and as per law service appeal is to bed 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 appellatant 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 appellatant.

Appellatant

Mst. Ashrafia Bibi

Ashrafia

Counsel:

Iftikhar

Iftikhar Ali Khan

Advocate High Court

(5)

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . _____ / 2023

Mst, Ashrafia Bibi -

..... 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, Ashrafia Bibi -

Ashrafia

Counsel:

Iffikhar Ali Khan

Iffikhar Ali Khan

Advocate High Court

6

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

Service Appeal No. _____ / 2023

Mst. Ashrafia Bibi.

... Appellant

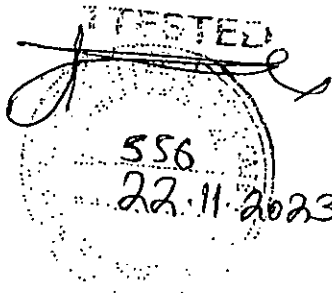
- VERSUS -

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.



Deponent:

A. Shafi
Ashrafia Bibi

Identified By Counsel:

Ifikhar Ali Khan
Advocate High Court

7

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . _____ / 2023

Mst, Ashrafia Bibi Appellant

Versus

Govt: of KP and others. Respondents

Address of Appellant:

Mst. Ashrafia Bibi D/o Said Rahman R/o Village Landikas,
Tehsil Khwazakhela 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, Ashrafia Bibi Ashafi

Counsel:

Iffikhar Ali Khan

Iffikhar Ali Khan

Advocate High Court

8



حکومت پاکستان



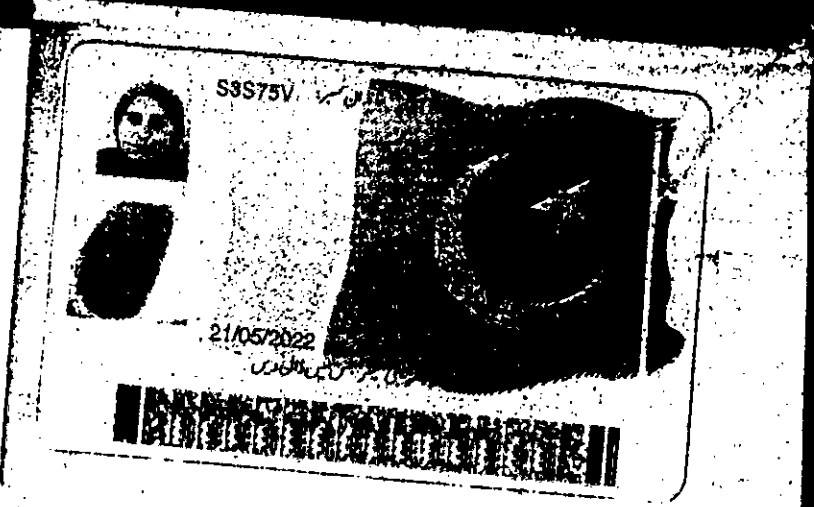
15602/3874934-4

محمد علی

محمد علی

محمد علی

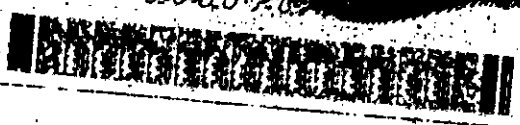
محمد علی



S3S75V



21/05/2022



(A)

میشنری پروگرام برائے خاندانی منصوبہ بندی و بنیادی صحت صوبہ سرحد

ڈسٹرکٹ پروگرام ایبل میٹیشن بوٹ ضلع۔ فیڈیو ایڈیشن

28/3/2009 تاریخ 25-NP/LHA

دہشت گردی کے خلاف ترقی پزیر ایسوسی ایشن کے ساتھ ورکر

میں

اس کی سربراہی کرنے والے ایک سابق ڈیپٹی ڈائریکٹر جنرل صحت ایسوسی ایشن کے صدر اور سرگرمیوں کے ذریعے اس کی سرگرمیوں کو فروغ دینے کے لیے ایک کمیٹی کی تشکیل کی گئی ہے۔

اختیار کے بعد آپ 15 مارچ کی تکلیف دہ میٹنگ کے لیے 3 میٹروں میں، جتنے سے 5 دنوں کے بعد میٹنگ حاصل کریں گی۔ پیک اپ گاڑی۔ 12 میٹروں کے دوران آپ کا یہ محتاطانہ ہونے میں ہر میٹنگ کے لیے اپنی اپنی ذمہ داری کے ساتھ ساتھ 15 مارچ کی میٹنگ کے لیے متعلقہ سرگرمیوں کے ساتھ ساتھ آپ کی میٹنگ کے لیے۔

13 مارچ کی میٹنگ کے دوران آپ کو 50 روپے روزانہ ادائیگی کے لیے 1900 روپے بلانے کے ساتھ ساتھ 2 ماہوں کا اجاڑا گاڑی۔ تمام ماہوں میں حکومت کی پالیسی کے مطابق اسٹیبلشمنٹ کے ساتھ ساتھ آپ کو 50 روپے کے اضافی اجیر پر پیک اپ گاڑی کی ادائیگی کی جائے گی۔

آپ کو اسٹیبلشمنٹ کے ساتھ ساتھ آپ کو روزانہ ایک سال تک پروگرام میں پروگرام پالیسی کے مطابق کام کرنا ہوگا۔ جس کیلئے آپ کو پیک اپ گاڑی شروع کرنے کے لیے 50 روپے کے اضافی اجیر پر پیک اپ گاڑی کی ادائیگی کی جائے گی۔

شواری کی کمی کے لیے آپ کو روزانہ ایک سال تک ان شرائط (اسوائے ٹریڈنگ کی شرائط) پر کام کرنا ہوگا۔ اس کی توجیہ پروگرام برائے خاندانی منصوبہ بندی، بنیادی صحت کے پائلت کی طرف سے ہوتی ہے۔ اس کے لیے آپ کو اس کی ادائیگی کی جائے گی۔

آپ کو پروگرام پالیسی کے مطابق آپ کی کارکردگی کو جانچنے کے لیے میٹیشن پروگرام کے سربراہان آپ کے ساتھ بائیس ڈیڑھ گھنٹہ (20، 20، 20) کے مطابق ایسا جانچا جائے گا۔ جس کے لیے آپ کو اس کی ادائیگی کی جائے گی۔

آپ کی کارکردگی کے ساتھ ساتھ ترقی پزیر ایسوسی ایشن کے ساتھ ساتھ آپ کو اس کی ادائیگی کی جائے گی۔

Executive District Officer (Health) District Swat.

Handwritten signature

ایگزیکٹو ڈسٹرکٹ آفیسر صحت ضلع



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

37	Bakhtawar	Farmanullah		LHW	15/05/2006	CH K.Khela	Village Berarai K.khela
38	Naglina	F:	Bakht Akbar	LHW	15/05/2006	CH K.Khela	Koza K.khela
39	Ruqla	F:	Abdul Jamil	LHW	15/07/2005	CH K.Khela	Village Dohrai Tehsil K.khela Swat
40	Towheed	F:	Kolar Khan	LHW	15/05/2005	CH K.Khela	Langer K.khela
41	Saeeda	Lateef Ullah		LHW	25/08/2007	CH K.Khela	Mohallah Dohrai Baba K.khela
42	Rafat	F:	Zahir Shah	LHW	01/04/2007	CH K.Khela	Bar Kaley K.khela
43	Ayaz Begum	Muhammed Hanif		LHW	01/04/2007	CH K.Khela	Shamee K.khela
44	Nza Begum	Muhammed Rehman		LHW	01/04/2007	CH K.Khela	Village K.khela
45	Shakola	F:	Fath Khan	LHW	02/04/2007	CH K.Khela	Mohallah Gehro K.khela Swat
46	Ashrafia	F:	Said Khan	LHW	01/04/2007	CH K.Khela	Ground Mahallah Dohrai K.khela
47	Safina	F:	Muhammed Roshan	LHW	02/04/2007	CH K.Khela	Ghakor K.khela
48	Robina	F:	Aqul Mand	LHW	30/08/2001	CH K.Khela	Mohallah Landekas K.khela Swat
49	Ishtiaq	F:	Sarfraz Khan	LHW	02/04/2007	CH K.Khela	Tibatat K.khela
50	Nargis	F:	Sultan Sekandar	LHW	12/12/2003	CH K.Khela	Langer K.khela
51	Shabnum	F:	Mohd.Zameer	LHW	17/01/2000	CH K.Khela	Langer K.khela Notanai
52	Sanaullah	Javeed		LHW	15/10/2010	CH K.Khela	Landikas Khwazakhela
53	Riaz Begum	Sajid	Nadar Shah	LHW	15/10/2010	CH K.Khela	Giro Khwazakhela
54	Gul Naz	Abdul Kabir		LHW	15/10/2010	CH K.Khela	Tikdani K.khela
55	Zenab	Jehanzeb		LHW	01/07/2004	CH K.Khela	Village Jano
56	Maryam	Mohd Shear		LHW	01/07/2004	CH K.Khela	Shalpin elmanu
57	Islam Begum	All Nawaz Khan		LHW	15/09/2001	CH K.Khela	Village Jano
58	Akbar Zada	F:	Bakht Mand	Driver	15/06/2004	CH K.Khela	Village K.Khela

District Health Officer
 Swat At Gulkada

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

NOTIFICATION

In Term of Section 4 (1) read with 1st Provision there under, of the Khyber Pakhtunkhwa Regulation of Lady Health Workers Programme and Employees (Regularization and Standardization) Act 2014 Services of the following Lady Health Workers Programme Employees of District Swat Khyber Pakhtoon Khwa are hereby regularized w. e. f. 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 Wise Detail of staff who are to be regularized are given below

Name of Community Embedded	Father Name	Husband Name	Des.	Date of appointment	FLCF	Name of Catchment Area
Nizakat	F:	Zahir Shah	LHS			Village Bar Kaley Khwazakhela
Nazhat	F:	M. Alam	LHS			Bar Kaley Korora Khwaza Khela
Rahmania	F:	Mangawar	LHW	10/10/1994		Ghash Kor Bar Cham
Shaista	F:	Nadar Shah	LHW	10/10/1994		Qala Khwaza Khela.
Shakila Bibi	F:	Sher Zada	LHW	15/09/2001		K. Kaley K. Khela Distt. Swat.
Taiba	F:	Ali Akbar	LHW	10/10/1994		Village Bandai K. Khela
Shenal	F:	Rohe dad Khan	LHW	01/07/2004		Langar K. khela
Khadi Gul	F:	Abdul Malik	LHW	02/05/1998		Tegdari Khwaza Khela.
Mehnaz	F:	Mohammad Zahir	LHW	14/04/2002		Distt. Swat Mohallah Tikdarai K. khela
Sohina Bibi	F:	Rozl Gul	LHW	15/07/2001		Village Titabat Khawaz Khela Swat.
Shukra	Nisar		LHW	01/08/1998		Village Jano
Husan Begum		Moran	LHW	01/07/2004		Village Jano
Shahnoz		Khyber	LHW	01/06/1998		Barkalay Diribaba. K. khela Swat
Bibi Alhummia		Mulla Mohammad	LHW	15/09/2002		Bandai Khwaza Khela.
Radiya		Aicem Shah	LHW	15/04/2002		Titabat Khwaza Khela
Sahiba		Sultan Akbar	LHW	15/04/2002		Langar Khwaza Khela Swat.
Aqloema		Mohammad Ali	LHW	01/04/2002		Landay Kes Khwaza Khela.
Shaheen Akhtar Bibi		Abdullah	LHW	15/09/2001		Vill Berari Teh. Khwaza Khela.
Shamim Akhtar		Ahmad Shah	LHW	01/04/2002		Tegdari Khwaza Khela.
Ghazala		Zahir Shah	LHW	01/02/2003		Village Qala Khwaza Khela Barkali
Zalbun Nisa	F:	Sardar Khan	LHW	01/01/2003		Kozkay Khwaza Khela.
Islam Begum	F:	Amir Noshad	LHW	10/01/2003		Ghash Kor Koz Cham-Khwaza Khela.
Hajree Aswad	Umar Abad		LHW	01/12/2004		Kotana
Farzana	Saleem	Fazal Rabi	LHW	01/12/2003		Gash Kor Khwaza Khela.
Nazla	F:	Zaib Sar Khan	LHW	03/12/2003		Langar K. Khela.
Nazla	F:	Bakht Mand	LHW	01/12/2003		Tec Darai K. Khela
Mumtaz	F:	Dawray	LHW	01/07/2004		K. khela Village Koz Kaley Swat
Yasmin	Sultanat Khan		LHW	01/12/2003		Bar kaley K. Khela
Hemmat	Zafar Ali		LHW	15/07/2005		Koz Keley K. Khela
Sooda Bi Bi	F:	Ghafor Rehman	LHW	15/07/2005		Barkeley K. Khela
Shabana	F:	Mohd. Zahir Khan	LHW	15/07/2005		Bandai K. Khela
Munarat Bi Bi	F:	M. Rahem	LHW	15/07/2005		Bandai K. Khela
Falira Bi Bi	Fazal Khalig		LHW	15/07/2005		Shambahir K. Khela
Soonia Bi Bi	F:	Mandin Khan	LHW	15/07/2005		Barkaley K. Khela
Kaboom Akhtar	F:	M. Akbar	LHW	15/07/2005		Karim abad K. Khela
Naila	F:	Yaqoob Khan	LHW	15/05/2006		Bar Kaley K. khela

ایگزیکٹو ڈسٹرکٹ آفیسر سوات

ضلع

12

Health Department, Khyber Pakhtunkhwa
 Lady Health Workers Program
 District Programme Implementation Unit, Swat
 OFFICE OF THE DISTRICT HEALTH OFFICER 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 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 100, 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

s/ District Health Officer
Swat At Gulkada

No. 11279 (LHWIR) 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

District Health Officer
Swat At Gulkada

Name of Official AK

Religious Performed _____

Resident Village Lahar

Father Name Syed

Date of Birth (In words _____

Exact height by measurement _____

Marks of Identification _____

Signature of Official _____

Signature of Head of Office _____

I do hereby certify Candidate for employment and use of constitution of _____

I do not certify this her statement 23

Left hand thumb impression _____

First Figure _____ Second Figure _____

Taken before AK

Examination Medical Office _____

With Official Stamp _____

Dated 21/11/14

وگزاردکنو دستور کد، آغوسر هیلت

18
Health and Age Certificate



Name of Official Ashrafia Bibi
Religious Performed Islam
Resident Village Landi Kas P.O. K-Khela Tehsil K-Khela District Swat

Father Name Syed Rehman Address Khwaza Khela

Date of Birth (In words & Figure) 7-3-1991 Seven March Ninety one

Exact high by measurement 5 Feet 0 Inch

Marks of Identification Nil

Signature of Official _____

Signature of Head of Office [Signature]
District Swat Office

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

I do not certify this disqualification for employment as a LHW her according to
her statement 23 /year and by appearance is Twenty three years

Left hand thumb's Impression _____

First Figure _____ Second Figure _____ Third Figure _____ Small Figure _____ Thumb _____

Taken before [Signature]

Examination Medical Officer,

With Official Stamp
Dated. 8/1/14

[Signature]
Medical Superintendent
Saidu Group of Hospitals
Saidu Sharif Swat
8-1-14

(For use in Police Department only)

Note: The entries on 9 and 10 should be

Heirs,

- 1. _____
- 2. _____
- 3. _____

Name: _____

Race: _____

Residence: _____

Verification Roll No: _____

dated _____

received back _____

Father's Name: _____

Left Thumb Impression

Date of birth (nearly as can be ascertained)

Exact height (inches)

Personal marks

Left hand thumb of (Non-Gazetted)

Little Finger:

Middle Finger:

Thumb:

Signature of Govt. Officer

Signature and designation of Head of the office Officer:

① Passed SSC Exam under Roll No. 30972 from BISE Saidu Sharif Swat, obtained marks 418/900 English Do Result 2007.

Qualification	Date
First Arts	
B.L. Or B.A	
Pleadership examination	
Training School Final Examination	
Other qualification	

Pushto

B.L. Or B.A

Urdu

Pleadership examination

② Passed F.A Exam under Roll No. 56342 from BISE Saidu Sharif Swat, obtained marks 690/1100

Training School Final Examination

Finger Print

Other qualification

Do Result - 2010

Drill Instructing

Court Duties

[Signature]
District Health Officer
DISTT. SWAT.

Reserve Duties

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

13

The entries on this page should be re-newed or re-attested at least every five years and the signature to lines and 10 should be dated.

Name: ASHRAFIA BIBI

Race: AFGHAN

Residence: VILLAGE LANDIKAS P/O KHAWAZA KHELA SWAT.

Father's Name and residence: SYED RAHMAN

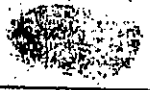
Date of birth by Christian era as nearly as can be ascertained: 07-03-1991
(SEVENTH MARCH N.H. 4 NINETEEN ONE)

Exact height by measurement: 5-0"

Personal marks for identification: NIL

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

Little Finger:



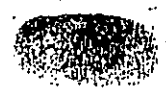
Ring Finger:



Middle Finger:



Fore Finger:



Thumb:



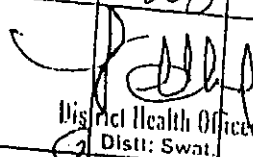
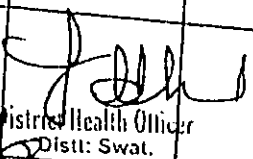
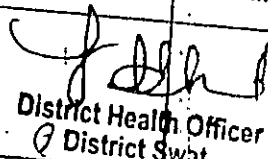
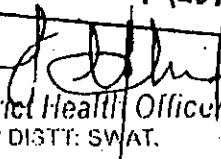
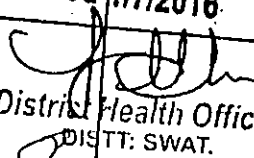


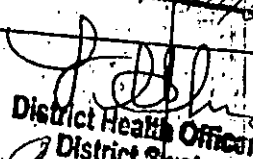
Signature of Government Servant: Ashrafia

Signature and designation of the Head of the officer, or other Attesting Officer:

[Signature]
District Health Officer
DIST: SWAT.

9	10	11	12	13		14	15
Name and Designation of the officer, or attesting officer, attesting of January 1 to 31	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 debitable to another Government		
					Period		
Officer				Appointed as	L.H.W. in the NP vide (P.O. Swat office		
				Order No	S-214/1111 dt. 28/3/2007 and accordingly submitted her arrival Report at BHU CHICD K. K. Kela for duty.		
				Service Verified from	28/3/2007 to 30/11/2011		
				On 22/9/2014 issued Notification order for the Regularization of Staff vide L-49 Swat for No. 11 332/LHW W.E.P. 1/7/2012 in view of award granted by the P.C.I.H.W. Programme through letter No 1340/PC Dated: 20/3/2014.		District Health Officer Distt: Swat.	
Officer	30-11-2012			Service Verified from	1/7/2012 to 30/11/2012	District Health Officer Distt: Swat.	
				Service Verified from	1/12/2012 to 30/11/2013	District Health Officer Distt: Swat.	
Officer	30/11/2013	Annual Increment		Service Verified from	1/12/2012 to 30/11/2013	District Health Officer Distt: Swat.	
	30/11/2014	Annual		Service Verified from	1/12/2012 to 30/11/2013	District Health Officer Distt: Swat.	

1	2	3	4	5	6	7	8	9
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	Signature and Designation of the head of the office or other attesting officer in attesting of columns 1 to 8
LHW								
Lady Health Worker			Rs 1900/pm (Fixed)			28/3/2007	(A) [Signature]	Officer [Signature]
LHW								
Rs 5400-260-13200 BPS-5			Rs 5400/pm			1/7/2012	(A) [Signature]	
-do-			Rs 5400/pm			1/12/2012	(A) [Signature]	Officer Govt. [Signature]
-do-			Rs 5660/pm			1/12/2013	(A) [Signature]	Officer Govt. [Signature]

9	10	11	12	13		14	15
Signature and Designation of the head of the office or other attesting officer in attesting of column 1 to 4				Leave		Signature of the head of the office or other attesting officer.	
Date of termination or appointment				Nature and duration of leave taken		Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
Reason of termination (such as promotion, transfer, dismissal, etc.)				Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
Signature of the head of the office or other attesting officer				Period			
				Government to which debitable			
30/11/2015				Annual/Increment Allowed		Pay Revised up graded from BPS 5 & BPS vide Govt: of Khyber Pakhtunkawa Finance Department Notification No.FD/SO/PR-7-20/2015 Dated: 30/06/2015 and RC/FD/ISO(FR) 7-20/2015 dt: 17/08/2015	
 District Health Officer Distt: Swat.				 District Health Officer Distt: Swat.		Services Verified From 1/1/2014 To 30/11/2015  District Health Officer District Swat.	
Pay Revised 2016 Vide Notification No FN1(2) Imp (2016-333 dated 1/7/2016.				Token No: 327		Dated: 30/8/2016	
 District Health Officer DISTT: SWAT.				 District Health Officer DISTT: SWAT.		Drawn Pay+allowances w.e.f 1-7-2016-31-8-2016 Gross Amount Rs. 33000/- 48509 Deduction Rs. 17167/- 2579 Net Amount Rs. 31290/- 46335 D.A.O Swat.	
30/11/16				Annual/Increment Allowed		Services Verified From 1/1/2015 To 30/11/2016	
 District Health Officer Distt: Swat.				 District Health Officer Distt: Swat.		 District Health Officer District Swat.	

1	2	3	4	5	6	7	8	9
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. 31 of 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	Signature and Design of the head of the office or other attesting officer in attesting of columns 1 to 8
LHW BPS-5 (6985-340-1718)			Rs 7665/-			1/7/2015 Fri		
do			Rs 805/-			1/12/2015 Fri		
LHW BPS-5 85571-420-21180			Rs 9850/-			1/2/2016		
			7665/15					
			9850/16					
do			Rs 9270/-			1/2/2016		

Office of the Accountant General
Khyber Pakhtun Khwa Peshawar
Pay Fixed in the Revised Basic Pay Scales
~~6985-340-1718~~ 5
Pay Fixed in the Revised Basic Pay Scales
Rs 7665/- 07-2015
R.B.P.S. 85571-420-21180
Pay Fixed in the Revised Basic Pay Scales
Rs 9850/- 2015
Date of Next increment: 07-2015

District Health Officer
DISTRICT: SWAT

30
District Health Officer
DISTRICT: SWAT

9	10	11	12	13		14	15	
Name and Designation of head of the officer 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	Nature and duration of leave taken	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
					Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Period Government to which debitable		
	Pay Revised on 1/7/2017		<i>[Signature]</i> District Health Officer District Swat.		Services Verified From 1/11/2017 To 30/6/2017		<i>[Signature]</i> District Health Officer District Swat.	
	30/11/2017	Annual/Increment Allowed	<i>[Signature]</i> District Health Officer DIST: SWAT.		Services Verified From 1/12/2017 To 30/6/2017		<i>[Signature]</i> District Health Officer District Swat.	
	30/11/2018	Annual/Increment Allowed	<i>[Signature]</i> District Health Officer DIST: SWAT.		Services Verified From 1/12/2017 To 30/11/2018		<i>[Signature]</i> District Health Officer District Swat.	
<p>Paid arrears on a/c of Pay & Allowances. w.e.f 01-07-2017 to 30-11-2015 Amounting to Rs. 163866/-</p>								
<p>Finance Officer LHW Program KP. Peshawar</p>								

1	2	3	4	5	6	7	8	9
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	Signature and of the head of or other officer in attested columns
LHW PPS -5 (10260-500-25260)			Rs 12260/-			17 2017		
-do-			Rs 12760/-			12 2017		
<p>2017 Office of the Accountant General Khyber Pakhtunkhwa Peshawar Pay Fixss in The R.B.P.S 2017 R.B.P.S (10260-500-25260)</p>								
<p>At Rs. 13260/- P.M.W.E.F 1.07.2017 With Next Increment On 1.12.2017</p>								
<p>Accounts Officer Pay Fixssion Party K. Pakhtunkhwa Peshawar</p>								
-do-			Rs 13260/-			12 2018		

Historic

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 were 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. Shehraz | (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. Hussan Pari | (12) Mst. Bacha / eenal |
| 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 Sifat	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 Bib	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
07.	Mst. Ashrafic 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. Neeiam	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 Zeenat	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

693

16.11.2017

جہ دینتی منزل حاجی شہرہ نسیم

(Handwritten signature)

Neik Muhammad Yousaf
Sole Proprietor
District Courts Bar.

الع فرخانہ بد مسماة فرخانہ
الع Maryam بد مسماة مریم بی بی
الع Jehan Sifat بد مسماة جهان صفت
الع Suria بد مسماة زوایہ

الع Saima بد مسماة سائما
الع Saima بد مسماة سائما
الع Saima بد مسماة سائما
الع Saima بد مسماة سائما
الع Saima بد مسماة سائما

گواہ شہر افضل خان

شیر افضل خان ولد عزیز الرحمن

شناختی کارڈ: 3-7538465-15602

گواہ شہر افضل خان

امیر علی خان ولد شیر علی خان

شناختی کارڈ: 7-161460-15602

