S.No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
		S as a second of parago where he coosely.
·		
1	2	3
	30.09.2020	<u>Present.</u>
	30.03.2020	
		Mr. SAJID UR REHMAN For appellant Advocate
		Mr. USMAN GHANI,
	į	District Attorney For respondents
		This appeal is also accepted 🚱 as per detailed
	-	judgment of today placed on file in service appeal no.
-		608/2019 titled "Muhammad Safeer -vs- Director Genera
		Health, Khyber Pakhtunkhwa, at Directorate Genera Health Services, Peshawar and four others." Parties are left
		to bear their own costs. File be consigned to the record
,		room.
		<u>ANNOUNCED</u> 30.09.2020
-		
		All All
		(Mian Muhammad) Member (Executive)
		(ROZINA REHMAN)
		Member (Judicial)
	•	

Appellant in person alongwith his counsel Mr. Sajid Ur Rehman, Advocate is present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Mr. Muhammad Bashir, CT Technologist for respondents present.

Learned Assistant Advocate General is seeking time for consulting the authority concerned with regard to some important issue involved in the instant appeal. Learned counsel for the appellant stressed that the appellants have not been adjusted so far since the lapse of eighteen (18) months and they are suffering as such due to non-receipt of their salaries and requested the bench for a short period of time. While keeping in view the issue involved and the sensitivity of the matter and as per request of the learned counsel, the appeal has to be heard at principal seat at Peshawar where the parties and their respective counsels have to appear.

Adjourned to 30.09.2020 for arguments before D.B at

Peshawar.

(Mian Muhammad)

Member(E)

(Mulrammad Jamal)

Member

Camp Court A/Abad

14.09.2020

Appellant in person alongwith his counsel Mr. Sajid Ur Rehman, Advocate is present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Dr. Ijaz, DMS for respondents present.

There is rush of work and almost arguments in four appeals have been concluded. It is now quarter past 4 Oclock. The time of the Tribunal is over, therefore, the appeal is adjourned by tomorrow.

Adjourned to 15.09.2020 for arguments before D.B at camp court Abbottabad.

(Mian Muhammad) Member(E) (Muhammad Jamal)

Member

Camp Court A/Abad

23.01.2020

Appellant in person present. Mr. Muhammad Jan learned Deputy District Attorney alongwith Ahmad Zaman Assistant, Muhammad Bashir Focal Person and Amjid Ali Assistant present. Written reply on behalf of respondent No.5 submitted. Adjourn. To come up for rejoinder if any and arguments on 20.02.2020 before D.B at Camp Court Abbottabad.

Member Camp Court, A/Abad

Due to covid ,19 case to come up for the same on / / at camp court abbottabad.

Reader

Due to summer vacation case to come up for the same on

/4/9/2v at camp court abbottabad.

Reporer

19.11.2019

Ghani learned District Attorney alongwith M/S Amjid Ali Assistant (for respondents No.1 to 3), Adeel Khan Senior Auditor (for respondent No.4) and Ahmad Zaman Assistant (for respondent No.5) present. Reply on behalf of respondents No.1 to 3 already submitted. Today, representative of respondent No.4 submitted written reply. Ahmad Zaman Assistant representative of respondent No.5 seeks adjournment to furnish written reply/comments. Adjourn. To come up for written reply/comments on behalf of respondent No.5 on 18.12.2019 before S.B at Camp Court, Abbottabad.

Member
Camp Court, A/Abad

18.12.2019

Appellant in person present. Mr. Usman Ghani, District Attorney alongwith M/S Muhammad Bashir, C.T Technologist on behalf of respondent No. 2, Muhammad Shahab, Computer Operator on behalf of respondent No. 3 and Ahmad Zaman, Assistant on behalf of respondent No. 5 present. Written reply on behalf of respondents No. 1 to 4 already submitted while representative of respondent No. 5 requested for further time to file written reply. Adjourned to 23.01.2020 for written reply/comments before S.B at Camp Court Abbottabad.

(Muhammad Amin Khan Kundi) Member Camp Court Abbottabad 19.09.2019

Appellant alongwith his counsel present. Mr. Muhammad Bilal, Deputy District Attorney alongwith M/S Muhammad Bashir, C.T Technologist, Muhammad Imran, Senior Clerk and Adeel Khan, Senior Auditor for the respondents present. Learned counsel for the appellant stated that in the instant service appeal, District Health Officer, Haripur is a pecessary party but inadvertently, he was not impleaded in the panel of respondents therefore, requested that he may be impleaded as respondent in the panel of respondents as a necessary party.

Learned Deputy District Attorney expressed no objection. Hence, Muharrar is directed to enter the paper of District Health Officer, Haripur in the panel of respondents and also issue notice to him for written reply/comments. Case to good up for written reply/comments on 23.10.2019 before \$13 at Camp Court Abbottabad.

(Muhamana) (Khan Kundi)

Committeen, Mibottabad

23.10.2019

Counsel for the appellant present. Mr. Usman Ghani, District Attorney present. Mr. Amjad Ali, Assistant for respondent No. 1 present. Dr. Mushtaq, M.S for respondents No. 2 & 3 present. Mr. Ahmad Zaman, Assistant for respondent No. 5 present. Joint parawise comments of respondents No. 1, 2 and 3 furnished, placed on record. No one is present on behalf of respondent No. 4. Fresh notice be issued to respondent No. 4. Representative of respondent No. 5 requests for further time to furnish requisite reply. To come up for written reply/comments of respondents No. 4 & 5 on 19.11.2019 at camp Court, Abbottabad.

Member Camp court, A/Abad 11.07.2019

Appellant alongwith his counsel present. Mr. Muhammad Bilal, Deputy District Attorney alongwith Dr. Dildar Khan, Deputy Medical Officer and Mr. Muhammad Imran, Record Keeper Litigation for the respondents present. Representative of the department and learned Deputy District Attorney requested for adjournment. Last chance is given to the respondents to submit written reply/comments on main appeal as well as reply/arguments on application for suspension of operation of impugned order and release of salary of appellant on 22.08.2019 before S.B at Camp Court Abbottabad.

(Muhammad Amin Khan Kundi)

Member

Camp Court Abbottabad

Contends that relieving/transfer order could not be legally passed as punishment to a civil servant. The order dated 14.01.2019 itself suggested that the appellant was relieved from DHQ Hospital Haripur in consequence to an enquiry wherein he was found guilty by the enquiry committee. On the other hand, such penalty awarded to the appellant, is nowhere provided in the Khyber Pakhtunkhwa Civil Servants Act, 1973 or the rules applicable. Further, on 05.03.2019 an office order was issued by respondent No. 1 whereby the service of appellant was placed at the disposal of DHO Haripur for further posting, however, the appellant has not been posted till date.

In view of the available record and arguments of learned counsel instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 11.07.2019 before S.B at Camp Court Abbottabad.

Alongwith the appeal there is an application for suspension of the operation of impugned order and release of salary of appellant. Notice of application be also given to the respondents for the date fixed.

Chairman Camp court, A/Abad

Security a Process Fee

Form- A FORM OF ORDER SHEET

Court of	
Case No	612 /2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/05/2019	The appeal of Mr. Sajid Ali resubmitted today by Mr. Habit Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. REGISTRAR
2-	15-5-2019	This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on 12-07-2019 CHAIRMAN

ne worky Register, Service Tribunal,

Surgei: Compani as well as humble Affect.

N renevale U six,

Win due nonour, 9i is broyen mis your rend notice, mi almost Di i princh fine when office is samely ling and ommércial objections you no service appel, in mi his me violation of me diam of me suferior covii non snowed re unoud oui non destructions al moi? should re to ældren ne ing you

So gwould hurby submit you Year good self, mei, mis along mein suo me wormy pribmel for no decision on Haiber 1400 Adv 11.0 Polch.

17 04.2019 is in complete on the following score which is returned to the counsel for the appellants for The joint appeal of M/S Iftikhar Ahmad, Muhammad Safeer, Niaz Elahi, Anayatullah, Sajid Ali and completion and resubmission within 15 days.

Awais Tasleem received today i.e. on 08 .04.2019 is in complete on the following score which is returned

to the counsel for the appellants for completion and resubmission within 15 days.

2- Annexures of the appeal may be attested.

1- Memorandum of appeal may be got signed by the appellants.

Annexures of the appeal may be attested 1986 requires that every affected civil servant shall Annexures of the appeal may be flagged. The appeal of the above appellants may be filed \$\text{Sub-rule-2 of rule-3 of the appeal rules 1986 requires that every affected civil servant shall prefer the appeal separately. Therefore, the appeal of the above appellants may be filed separately/individually. \(\text{Accessor} \)

5- Copy of departmental appeal respect of appellant no.6 is not attached with the appeal which may be placed on it posts along with annexions to complete in all respect for tricing

င်) Copy rejection of departmental appeal imentioned in the memo of appeal is not attached with the appeal which may be placed on it.

Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent in each appeal may also be submitted.

No. 1/1/2 /S.T

Dt. $\frac{\mathcal{L}}{\mathcal{L}}$ /2019

Mr. Shahid Ahmad Khan Adv. Higo Court A.Abad

Mr. Habit Khan Adv. High Court A.Abad REGISTRAR
SE VICE TRIBUNAL
KHYE FO KHTUNKHWA
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Objection no. 3 and 7 are still stand therefore, the appeal is again returned to the counsel for the appellant for completion and resubmission with in 15 days.

No. 268 /S.T.

Dt. <u>30-4-</u>/2019

Habit Khan Adv. High Court A.Abad.

Khyber Pakhtunkhwa Service Tribunal

Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 612 /2019

. Sajid Ali

...APPELLANT

VERSUS

DG Health Khyber Pakhtunkhwa and others

... RESPONDENTS

SERVICE APPEAL

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7.	Copy of Departmental appeal / order	"E"	15-16
8.	Vakalat Nama		17

...APPELLANT

Through:

Dated:-<u>4/4</u>/2019

(HABIT KHAN)

Advocate High Court, Abbottabad.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 612 /2019

1. Sajid ali s/o abdul hakeem R/o Haripur present mali at DHQ Hospital Haripur.

...APPELLANT

VERSUS

- 1) DG Health Khyber Pakhtunkhwa, at Directorate General Health Services, Peshawar.
- 2) Medical Superintendent DHQ Hospital Haripur.
- 3) Deputy Medical Superintendent DHQ Hospital Haripur.

19-9-19 4) District Account Office Haripur.

5. District Health Officer, Haripur...RESPONDENTS

Re-submitted to -day and od.

Registrar

9/5/15

*SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER NO.255-7 DATED 07.01.2019, ISSUED BY RESPONDENT NO.2 VIDE WHICH THE APPELLANT WAS ILLEGALLY RELIEVED FROM HIS RESPECTIVE POSITION AND THEREAFTER THE APPELLANT FILED DEPARTMENTAL APPEAL BUT ALL IN VAIN HENCE THIS SERVICE APPEAL.

PRAYER:-

ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE IMPUGNED ORDERS NO.255-60 DATED 07.01.2019, **ISSUED** BY RESPONDENT NO.2 AND ORDER NO. 769 DATED 21.01.2019 ISSUED BY RESPONDENT NO.1 orderd no. 988 dated 06/02/2019, ISSUED BY RESPONDENT NO.2 AND ORDERD NO. 2274-78 DATED 05.02.2019 ISSUED BY RESPONDENT NO.1 MAY KINDLY BE DECLARED NULL AND VOID & APPELLANT ME KINDLY BE RESTORED TO HIS POSITION.

Respectfully Sheweth,

FACTS:

Following facts giving rise to the instant Service

Appeal, are arrayed as under:-

- 1. That, the appellant has been serving in the Health

 Department at DHQ Hospital Haripur.
- 2. That, appellant is law abiding citizen and never been found in any illegal, unprofessional, immoral, unethical and corrupt practices.

- 3. That, due to discriminatory conduct of the Respondent No.3 the union announced the peaceful protest regarding which due notice was served upon the respondent No.2 and other respondent of the district. (Copy of the notice is attached as Annexure "A")
- 4. That, upon assurance of eradication of Mal practice and discrimination the peaceful protest have been withdrawn.
- 5. That, after sometime, Respondent No.2 without conducting proper enquiry relieved the appellant from his position. (Copy of impugned order is annexed as Annexure "B")
- 6. That, the appellant filed Departmental Appeal before the Respondent No.1 which was decided with the direction of proper enquiry should be conducted against the appellant if he is guilty of misconduct. (Copy of Departmental Appeal order is annexed as Annexure "C")
- 7. That the Respondent No.2 instead of complying the order of appellate authority again relived the Appellant. (Copy of impugned order is attached as Annexure "D")
- 8. That, thereafter, the appellant again filed the Departmental Appeal and respondent No.1 decided in

negative hence this service appeal. (Copy of Departmental appeal order is annexed as Annexure "E")

GROUNDS:-

- a) That, the orders No.255-60 dated 07.01.2019, issued by Respondent No.2 is illegal, ultravires, arbitrary, fanciful, perverse, against the principle of natural justice and equity and liable to be set aside on the following grounds.
 - i. That, no proper enquiry has been conducted and appellant has been punished in a brutal way.
 - ii. That the appellant approached this forum for the redressal of his grievance and appeal is well within time and the Court has the jurisdiction to entertain the same.
 - b. That, the action/ order of the respondent No.2 is amounting to discourage the Public Servant from doing his legal functions as assigned to him under the Rules of Business of the Government.
 - c. That the instant service appeal is well within time and Hon'ble Tribunal has the jurisdiction to entertain the same.

PRAYER:

It is, therefore, humbly prayed that on acceptance of the instant Service Appeal, the

impugned orders No.255-60 dated 07.01.2019, issued by Respondent No.2 may kindly be declared null and void.& appellant be restored to his respective position.

Through:

Dated: 0// /2010

..APPELLANTS

(HABIT KHAN)
Advocate High Court, Abbottabad.

VERIFICATION:-

Verified that the contents of the instant Service Appeal are true and correct to the best of my knowledge and belief and that nothing material has been suppressed from this Honorable Court.

Dated:- 4/4 /2019

...APPELLANT

IDENTIFIED BY:-

(HABIT KHAN)

Advocate High Court, Abboottable Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. /2019

Iftikhar Ahmed and others

...APPELLANT

VERSUS

DG Health Khyber Pakhtunkhwa and others

...RESPONDENTS

SERVICE APPEAL CERTIFICATE

Certified that no such Service Appeal has earlier been filed before this Hon'ble Tribunal.

...APPELLANTS

Through:

Dated:- 9/4 /2019

(HABIT KHAN)

Advocate High Court, Abbottabad.

Hailet Khan Advocate High Court & Federal Shariat Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. /2019

Sajid Ali

...APPELLANT

VERSUS

DG Health Khyber Pakhtunkhwa and others

...RESPONDENTS

SERVICE APPEAL

APPLICATION FOR SUSPENSION OF THE OPERATION OF IMPUGNED ORDER AND SIMULTANEOUSLY RESPONDENT NO.4 BE DIRECTED TO RELEASE THE SALARIES OF APPELLANT INCLUDING PENDING ONE, TILL FINAL DISPOSAL OF APPEAL.

Respectfully Sheweth,

- 1. That titled appeal is filed before this Honourable Tribunal Court, the contents of the same may be treated as an integral part of this application.
- 2. That appellant has a good Prima-Facie case and balance of convenience also lies in his favour.
- 3. That if the impugned orders issued by Respondents No.1 & 2 are not suspended then appellant would suffer irreparable loss and the purpose of filing appeal would become infructuous.

4. That the salaries of the Appellant has been stopped due to impugned order and this is absolutely illegal and against the settled law.

It is, therefore, humbly prayed that on acceptance of the foregoing application, the salaries of the Appellant may kindly be released by suspended the impugned orders and respondent No.4 be directed in this regard till final disposal of the titled appeal.

...APPELLANT

Through:

Dated: $\frac{\sqrt{\frac{1}{2019}}}{\sqrt{\frac{1}{2019}}}$

(HABIT KHAN)

Advocate High Court, Abbottabad.

AFFIDAVIT:-

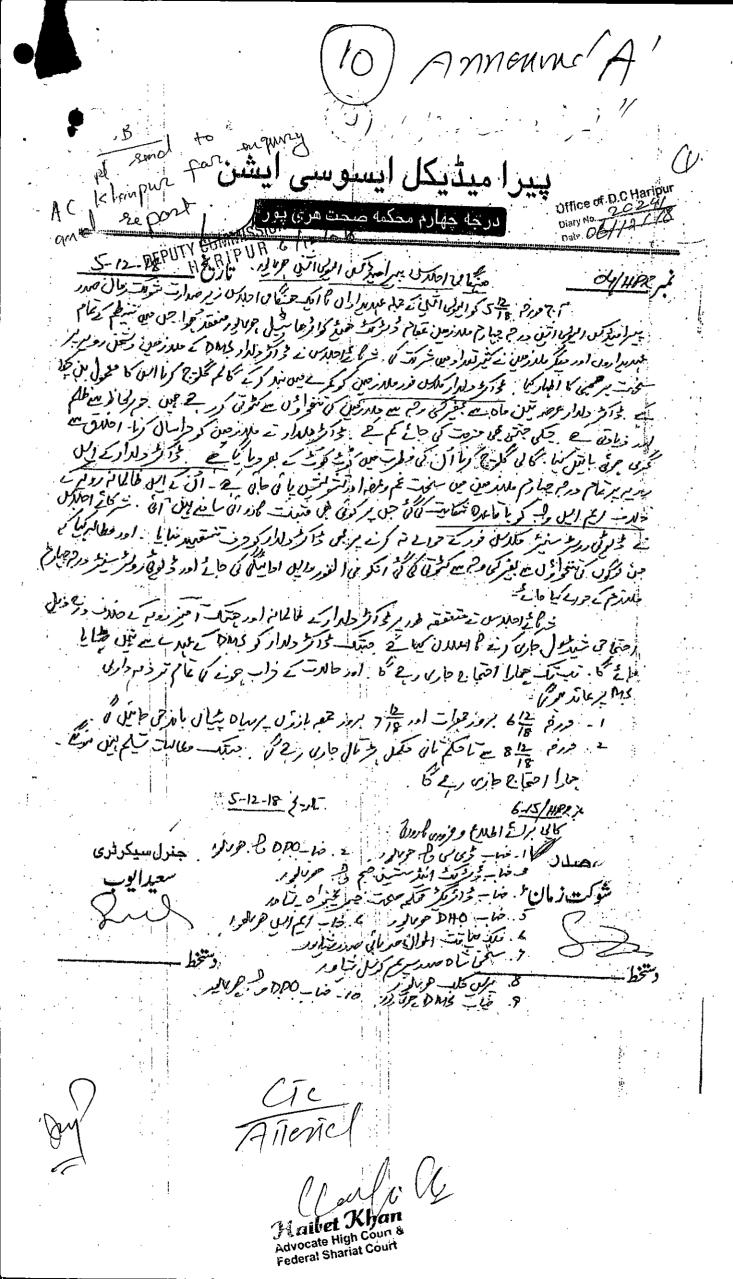
I, Sajid Ali s/o Abdul Hakeem R/o Haripur present Mali at DHQ Hospital Haripur, Appellant, do hereby solemnly affirm and declare on Oath that the contents of instant Application are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

Dated:-____/2019

IDENTIFIED BY:-

Advocate High Court, Abbottabad.

APPELLANT





Annene 13



OFFICE OF THE MEDICAL SUPERINTENDENT DNO TEACHING HOSPITAL HARIPUR

Ph:No. 0995-611850, Fax No.0995-610069

No 255-60 / Dated 07 /01/2019

To.

The Director General Health Services
Khyber Pakhtunkhwa Peshawar.

Subject:

RELIEVING ORDER.

Dear Sir,

Upon the directives of Deputy Commission Haripur vide his office letter No. 1(5)/Misc/App:/AS/DC(H) dated 06-12-2018 and Assistant Commissioner Haripur vide letter No./Reader/09/1300-01/AC(H) dated 14-12-2018, an inquiry was conducted by Inquiry Committee and recommend the Disciplinary action against the officials who were involved illegal unlawful strike on 08/12/2018. They hampered the peaceful atmosphere of the Hospital and provoked the other class IV for strike. Therefore the following class-IV are hereby relieved from their duties with immediate effect and directed to report to your good office for further posting.

- 1. Mr. Niaz Ellahi sweeper
- 2. Mr. Anayat Ward orderly

3. Mr. Sajid Mali

MEDICAL SUPERINTENDENT DHQ HOSPITAL HARIPUR

Cc:

1. Deputy Commissioner Haripur, for information w/r to above please.

2. Account Section undersigned office required action with immediate effect.

MEDICAL SUPERINTENDENT DHQ HOSPITAL HARIPUR

Mary Co

Advocate High Court & Federal Shariat Court

nnew الخدمت مناب دا فرمر في ملف بدي مراس في والحق توال عُولُانا - در فواست مرائع اسل تراسف والي في جائع ئزیہ)کی ہے مناست اعترام كاست كرارش في جات عدد مارون السوسى الي حداك منت عران بس مؤر فعلم محد فيرو و و الله و و و الله على على و الله على و الله DHO حستال مريور كيد عندا فلاق روم النا الرعنية الأن تشوّلون من مواتيا ل كروع ف عد- اعد عدين نور مدر من توسى م على من ساء وي ايد والدر ولدار مدين الى دارس ع فلون في ما و وه مناهب و آماه ساع و من وى على دد آمر سي و اسعام ع الله مامن فراملازمین کے جا اُر حقوق کے معول کیلئے تیرانس علاقتی احتی جے گئرسری کوربر نوالی دیا ک معاده كلاس فور ماورُ من كى تنخ الله لى سى توقى والى كى جائع مورسم بقرا من علافتى فرت لى وَهُ يُورِضُ 7 مِنُورِي 19مِنْ بِحُوامِ آنْدُورِي المُحالِي بَوْلَمُ الْمُدُورِي اللهِ الْمُدَارِي الْمُورِي اللهِ اللهُ اللهِ اللهِ اللهِ اللهِ اللهِ اللهِ اللهِ اللهِ الله فرام الما ما ما ما من فرون من معدد المرام و فراس من مرا مرا مرا الفرلود الرامك مى أكومادان باصرة دندل وما وا دند 9/1/2019 آمع ما ليدار العارص ر المركم المحق م نیازالی موہر ک عناون وارد ارول Upol 100 10 10 10



PIECTORATE GENERAL MEALTH SERVICES MINTER PARATUMENT PESHAWAR

No. 76 / Personnel Dated: 21 /01/2019

The Medical Superintendent DHQ Hospital Haripur

Subject:

RELIEVING ORDER.

Vomo:

I am directed refer to your letter No.255-60 dated 07.01.2019 on the subject

noted above.

You are requested to withdraw the relieving order in respect of Mr. Niaz Ellahi Sweeper, Mr. Anayat Ward Orderly & Mr. Sajid Mali and initiate disciplinary action against them under E&D Rules 2011 if they are guilty of misconduct as relieving/ transfer of unwilling worker as no remody.

ASSISTANT DIRECTOR Ministerial DIRECTORATE GENERAL HEALTH SERVICES, K.P. PESHAWAR:

Trench

Advocato High Court



Ph:No. 0995-611850, Fax No.0995-610069

/ Dated 06 /02/2019

To

The Director General Heatili Services Khyber Pakhtunkhwa Peshawar.

RELIEVING ORDER.

Dear Sig.

With the ref. of your office letter vide ao. 494/personal dated14/01/2019; No. 769 / personal Dated 21/01/2019 and no.1266 /personal 29/01/2019.

I have the honor to state that the following class IV were relieved from this Hospital on administrative ground. These class IV were creating administrative problems for the Hospital administration and also provoking the other class IVs not to perform duties. They were also not performing their own duties and were unwilling workers and proved guilty in the inquiry.

- 1. Mr. Muhammad Safeer ward orderly.
- 2. Mr. Muhanimad Farid X-Ray attendant.
- 3. Mr. Iflikhar ward orderly.
- 4. Mr. Niaz Ellahi sweeper. 🗸
- 5. Mr. Anayat Ward Orderly.
- 6. Mr. Sajid Mali. 🗸
- 7. Mr. Awais Tasleem ward orderly.

You are requested to place them on the disposal of DHO Haripur for further. posting.

Medical superintendent

DHQ Hospital Haripur.

(18:) Annon E

(7 nnew

ڈائر میکٹر جنزل ہیلتھ سروس بیٹا ورخیبر پختونخواہ

عنوان اليدجشمنك آذر

اور دور الیزنبر 769با تاریخ 2019-01-2 کے مطابق آپ نے ہارے آور اور دور الیزنبر 769با تاریخ 2019-01-2 کے مطابق آپ نے ہارے آور الدور مرالیز نبر 769با تاریخ 2019-01-2 کے مطابق آپ نے ہارے آور کی اس کے اور ڈی ای کی جسپتال ہری پور میں تعیناتی کے الیے اتقامات جاری کے تاہم اس کے بعد ہم متعددت بارحاضری کے لیے گئے لیکن ہماری حاضری منظورنا کی گئ اور ناہی ہمیں کوئی تلی بخش جواب دیا گیا ہم بارید کر جمیس سے کر کر نال دیا جاتا ہے ۔ کہ آپ کا جواب ڈی جی آفس کو کیکے دیا گیا آپ لوگ ڈی جی آفس سے جواب آنے تک انظار کریں ۔ ہمارے ساتھ دفتر میں نارواسلوک کیا جاتا ہے ۔ ایم ایس کے ساتھ ملاقات کا موقع نہیں دیا جاتا اور ہر بار تو بین امیزردیا افقیار کر کے ہمیں انتہائی نؤی عزیت اور کوف میں بنتلا کیا جاتا ہے ۔ خطہ کے ہماری دور خواست ہماری داری کریں اور ہماری درخواست ہور کریں ۔ تمام آؤر کی کا بیاں ہمارے درخواست ہماری دادری کریں اور ہماری درخواست ہور کریں ۔ تمام آؤر کی کا بیاں ہمارے درخواست کے ساتھ لف

نام درخواست گزار

فريدخان"أ يمراء الميندنث" وألاف

الْخَارَاحِدِ" واردُيوائية " حَرِيكِ

نیازالی "مویر" منیزالی

محدسفير"وارد بواسي" ميمايية الم

سرا در ماجد"مالی" هرا

عنايت الله "وار دُيواك" عن يُن إلهم في رُ

A Town of Maria Court

DIRECTORATE GENERAL HEAR



OFFICE ORDER

As approved by the compotent authority the services of following Class-IV staff relieved by MS DHQ Hospital Haripur are hereby placed at the disposal of DHO Haripur for further posting under his control against the vacant post in the interest of public service with immediate effect.

- Mr. Muhammed Seleer Ward Ord rily.
- Mr. Muhammad Farid X-Ray Attendant.
- Mr. Iftikhar Ward Orderly.
- Mr. Niaz Elahi Sweeper.
- Mr. Anayal Ward Orderly.
- Mr. Sajid Mali. vii)
 - Mr. Awais Tasleem Ward Orderly.

Arrival/ departure report should be submitted to this Directorate for record.

_{aa} Sd/xxxxxx

DIRECTOR GENERAL HEALTH SEPVICES, K.P. PESHAWAR.

Copy forwarded to the:-

MO Haripur.

- MS DHC Hospital Haripur w/r to his letter No. 988 dated 06.02.2019.
- DAO Haripur.
- P.A to DGHS Khyber Pakhtunkhwa Peshawar
- Officials concerned.

For information and necessary action.

DIRECTOR (HRM)

DIRECTORATE GENERAL HEALT

SERVICES, K.P PESHAWAR.

Acvocate High Court

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Tripuna نوعيت مقدمه: مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب وہی کل کاروائی متعلقہ آل مقام 1) (10 2m/106 ce m 'w of com كودكيل مقرركر كاقراركرتا بهول كهصاحب موصوف كومقدمه كاكل كاروائي كاكامل اختيار موكا نيزوكيل صاحب موصوف كوكرن راضي نامه وتقرر ثالث وفيعله برحلف ودييز اقبال دعوى اوربصورت ويكرؤ كري كراف اجراء وصولى چيك روييه وعرضى دعوى كى نفيدين اوراس يروسخط كرف كا اختيار موكا اور بصورت ضرورت مقدمه مذکور کی کل یاسی جزوی کاروائی کے لئے کسی اور وکیل یا مخارصاحب قانونی کواسین امراه این بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہون کے اور اس کا ساخته برداخته مجه كومنظور وقبول موكار دوران مقدمه جوشرجه وبرجانه التوائي مقدمه كسبب موكاس ك مستحق وكيل صاحب بهول كيه نيز بقايارقم وصول كرنه كالبهي اختيار بهوگار الركوئي بيشي مقام دوره يرجويا حدے باہر ہوتو وکیل صاحب موصوف بابد ہول کے کہ بیروی مقدمہ مذکورہ کریں اور اگر عثار مقرر کردہ میں كوكى جزو بقايا موتووكيل صاحب موصوف مقدمه كى بيروى كے بابندند مول كے فيز درخواست بمراد استجارت نالش بصيغه مفلسي كوائركرن اوراس كى بيروى كالبحى صاحب موصوف كواختيار موكار لبذاوكالت نامة تحريركرديا تاكه سندري بمقام: وقاص نو ٹوسٹیٹ کیجیری (ایسٹ آباد

BEFORE THE HONOURABLE SERVICE TRIBUNAL OF KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 612/2019

	•	
Sajid Ali S/O Abdul Hakeem R/O Hari	pur and 1 others	
		Appellant
	VS	
DG Health Khyber Pakhtunkhwa and	Others.	
	•••••	Respondents-
	INDEX	

Joint Para Wise Comments/Reply on the behalf of Respondent No. 1, 2 and 3

S. no	Description of Documents	Annexure	Pages
1	Reply/comments	A-D	4
2	Affidavit	E	1
3 .	Explanation/warning	1-8	8
4	Enquiry	9-29	21
5 .	DGHS. Letter to take action	30	1
6	MLC	31	1
6	FIR ·	32	1
7	Relieving to DG after FIR .	33 .	1
8	On the Disposal of DHO	34	1
9	Letter to DG no vacant post of the	35	1
	Class-IV in DHQ Teaching Hospital		
	Haripur	,	

Date	•	

Respondents

BEFORE THE HONOURABLE SERVICE TRIBUNAL OF KHYBER PAKHTUNKHWA PESHAWAR

Service A	ppeal	No.	611/	612	2019

-			eem R/O	Haripu	ır ar	nd 1	oth	ers.					
		 -	•						•••••	 ••••••	App	ellan	t

VERSUS

- 1. DG Health Khyber Pakhtunkhwa, at Directorate General Health Services Peshawar.
- 2. Medical Superintendent, DHQ Teaching Hospital Haripur
- 3. Deputy Medical Superintendent DHQ Teaching Hospital Haripur
- 4. District Account Officer Haripur.

	•		
***************************************		Respondents	;-

Service Appeal.

Joint Para Wise Comments/Reply on the Behalf of Respondent No, 1, 2 and 3:

Most Respectfully Sheweth:-

Preliminary objections:

- That the appellant has got no cause of action/locus standi to file the instant appeal.
- That the appellant has not come to this honorable Service Tribunal with clean hands.
- That the appellant has concealed the facts from this
 Honorable Service Tribunal. Hence not entitled for any relief and appeal to be dismissed.
- 4. That the appellant has filed appeal on malafidi.
- 5. That the appeal is against the prevailing law and rules.

- **6.** That the appellant is stopped by his own conduct to file instant appeal.
- 7. That the instant appeal is not maintainable in its present form and also in the present circumstances of the issue.
- **8.** That the appeal is liable to be dismissed due to mis-Joinder and non-joinder of the necessary parties.
- 9. That the competent authority has done all proceeding according to the law & rules therefore appeal is liable to be dismissed.
- **10.**That this Honorable Service Tribunal has no jurisdictions and adjudicates the matte.

Facts:

- 1. It is correct
- 2. Incorrect. That the appellant was involved in unprofessional and unethical activities. He was no dutiful employee.

 Several time verbal and written explanation and warnings were issued to appellant but he did not mend his attitude. (Copies attached
- Incorrect. There was no discriminately conduct of respondent no. 3 respondent no. 3 time and again directed the appellant to be dutiful as per law and follow the professional ethics and service rule for a period of one year during daily morning Hospital round, but he refused to perform his lawful duty and demanded exemption from duty on the basis of being representative of class-iv union which is illegal and against the service rules.

- 4. Incorrect.
- 5. Incorrect. Enquiry was conducted upon the directives of Deputy

 Commissioner Haripur and the appellant was found guilty by the enquiry

 committee and was recommended for disciplinary action. (Copies of 21

 pages attached no. 9-29)
- 6. Incorrect. However a letter was issued by the assistant director (ministerial) requesting, for with drawl of relieving letter and to initiate disciplinary proceeding and to take disciplinary action under E & D rules 2011 against the appellant if he was guilty. (Copy No. 30 attached)

That the appellant enter in the office of respondent no. 02 on 23/02/2019 with the reference of letter of the assistant director (Ministerial) requesting, for with drawl relieving letter and to initiate disciplinary proceedings, they started victory slogans, abused the administration and one appellant namely Mr. Iftikhar Ahmad attacked on the attendant of respondent no. 02 (Medical Superintendent) made him injured (copy no. 31 of MLC report attached) and FIR was lodged against the appellant Mr. Iftikhar in P/S city Haripur (Copy of FIR no. 32 attached) they were not accepted and once again directed to report DGHS Khyber Pakhtunkhwa for further posting (Copy No. 33 attached)

- 7. Incorrect, respondent no. 02 relieved them on administrative ground after fulfillment of legal formalities and directed them to report DGHS Khyber Pakhtunkhwa for further posting.
- 8. Incorrect, respondent no. 01 DGHS Khyber Pakhtunkhwa posted and placed all appellants at the disposal of DHO Haripur for further posting under his control. (Copy of Order No. 34 attached)

Furthermore there is no vacant post of class-iv in DHQ Teaching Hospital Haripur, as informed to DGHS Khyber Pakhtunkhwa through a letter vide No. 5366-68/MS /DHQ /NF, dated: Haripur the 13/07/2019. (Copy No. 35 attached

Grounds:

- a. Incorrect, that order no. 255-60 dated 07-02-2019 issued by respondent no. 02 is legal and lawful under the E&D rules of 2011.
 - i. Enquiry was conducted upon the directives of Deputy Commissioner

 Haripur. Enquiry committee found the appellant guilty and recommended disciplinary action against this Class-IV.
 - ii. Incorrect and denied.
- b. Incorrect as stated. Being public servant the appellant is bound to follow the official norms and in case of any malpractice on his part he was liable to be proceeded according to the Law.
- c. Incorrect; that the instant service appeal is hopelessly time barred at law and this honorable service tribunal has no jurisdiction as was not challenged before the departmental hierarchy.

It is therefore, most respectfully prayed that the appeal of the appellant may graciously dismissed with cost.

Respondents:

1. Medical Superintendent, DHQ Teaching Hospital Haripur Respondent no. 02

2. Director General Health Services Khyber Pakhtunkhwa Peshawar Respondent

No. 01

Dechuse

BEFORE THE HONOURABLE SERVICE TRIBUNAL OF KHYBER PAKHTUNKHWA PESHAWAR

Sajid Ali S/O Abdul Hakeem I	R/O Haripur and 1 others.	
	············	Appellant
	VS	•
DG Health Khyber Pakhtunkh	nwa and Others	
	iva ana others.	-
		Respondents-
	on Behalf of Respondent no. 1, 2	
		Respondents- and 3:

I, Dr. Mushtaq Khan Tanoli Medical Superintendent, DHQ Teaching Hospital Haripur do here by solemnly affirm and declare that contents of fore going comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable court.

Dated_____

Deponent



OFFICE OF THE MEDICAL SUPERINTENDEN DHQ TEACHING HOSPITAL HARIPU

Ph:No. 0995-611850, Fax No.0995-6100

No 1456-58 Dated 07 /03/20

To.

Mr. Safeer W/Orderly DHQ Hospital Haripur.

Subject:

EXPLANATION

Memo:

It is noted with great concerned that under which authority you were change / altered the duties of Awais and Ghulam Mohayu Din W/Orderlies withou any prior permission/information of the undersigned. Your this irresponsible and negative attitude is highly offensive.

Therefore, you are directed to explain your position within three days c receipt of this letter, otherwise stern disciplinary action will be taken agains you.

MEDICAL SUPERINTENDENT DHQ HOSPITAL HARIPUR

Ce:

1. Dr. Dildar khan DMS DHQ Teaching Hospital Haripur.

2. Supervisor Class-IV DHQ Teaching Hospital Haripur

MEDICAL SUPERINTENDENT DHQ HOSPITAL HARIPUR



OFFICE OF THE MEDICAL SUPERINTENDENT DHO TEACHING HOSPITAL HARIPUR

Ph:No. 0995-611850, Fax No.0995-610069

No 4574-75 Dated 29 /06/2018

Ťο,

Mr. Awais TasleemW/Orderly Paeds deptt:

DHQ Teaching Hospital Haripur

Subject:

WARNING

Reference your reply to the explanation bearing dated Nil.

Your reply of Explanation is not satisfactory, you are hereby strictly directed to follows the rules and perform duties with proper uniform, if found without proper uniform in future you will be considered as absent & your pay will be deducted & also stern disciplinary action will be initiated against you.

MEDICAL SUPERINTENDENT DHQ HOSPITAL HARIPUR

Cc:

• DMS DHQ Teaching Hospital Haripur.

MEDICAL SUPERINTENDENT DHQ HOSPITAL HARIPUR



OFFICE THE MEDICAL SUPERINTENDENT

DHQ HOSPITAL HARIPUR

Tel: 0995-611850, Fax #0995-610069

No 6290-93 /Dated 18 /09 /2018.

. To,

1. Mr. Muhammad Safeer ward orderly

2. Mr. Shoukat Zaman ward orderly

3. Mr. Iftikhar ward orderly

Subject:

EXPLANATION

Memo,

It was notice with great concern that you do not perform your lawful duty. You are involved in illegal and unethical practice which is violation of service rules.

You are hereby directed to explain cogent reasons of such unethical attitude and malpractice during your duty hours within three days positively, abstain yourself from illegal and malpractice in future. Otherwise disciplinary proceedings will be initiated against you under the Khyber Pakhtunkhwa Govt: Servants (Efficient and Discipline) rules 2011.

Medical Superintendent

DHQ Hospital Haripur.

Cc:

DMS DHQ Hospital Haripur for information.

Medical Superintendent

DHQ Hospital Haripur.



OFFICE THE MEDICAL SUPERINTENDENT

DHQ HOSPITAL HARIPUR

Tel: 0995-611850, Fax#0995-610069

No 6196 98 /Dated 71/109 /2018.

To

1. Mr. Muhammad Safeer ward orderly

2. Mr. Shoukat Zaman ward orderly

3. Mr. Iftikhar ward orderly

Subject: WARNING:

You are hereby strictly warned to refrain yourself from illegal activities and perform your lawful duties other vise strict disciplinary proceeding under E&D rules of 2011 will be initiated.

Medical Superintendent DHQ Hospital Haripur:

Cc:

DMS DHQ Hospital Haripur for information.

Medical Superintendent DHQ Hospital Haripur.



OFFICE THE MEDICAL SUPERINTENDENT

DHQ HOSPITAL HARIPUR

Tel: 0995-611850, Fax #0995-610069

No 6290-93 /Dated 18 /09 /2018.

To,

1. Mr. Muhammad Safeer ward orderly

2. Mr. Shoukat Zaman ward orderly

3. Mr. Iftikhar ward orderly

Subject:

EXPLANATION

Memo,

It was notice with great concern that you do not perform your lawful duty. You are involved in illegal and unethical practice which is violation of service rules.

You are hereby directed to explain cogent reasons of such unethical attitude and malpractice during your duty hours within three days positively, abstain yourself from illegal and malpractice in future. Otherwise disciplinary proceedings will be initiated against you under the Khyber Pakhtunkhwa Govt: Servants (Efficient and Discipline) rules 2011.

Medical Superintendent

DHQ Hospital Haripur.

Cc:

DMS DHQ Hospital Haripur for information.

Medical Superintendent DHQ Hospital Haripur.



OFFICE OF THE MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL HARIPUR

Ph: No. 0995-611850, Fax No. 0995-6160069 No. 7957-60 Dated 13/1/2018

To

1. Mr. Shoukat Zaman W/ orderly.

2. Mr. Muhammad Safeer W/Orderly.

Mr. Iftikhar W/orderly.DHQ Hospital Haripur.

Subject: WARNING.

It was noted with great concern that inspite of repeated written and verbal directions you are not refraining yourself from unethical and illegal activities. Your this attitude is also encouraging the other staff to disobey the administrative orders.

Once again you are hereby warned to be dutiful and wear proper uniform and refrain yourself from illegal/unethical activities otherwise you will treated with E & D rules of 2011.

Medical Superintendent

DHQ Hospital Haripur.

Cc:

DMS DHQ Hospital Haripur for information.

Medical Superintendent DHQ Hospital Haripur.



OFFICE OF THE MEDICAL SUPERINTENDED DHQ TEACHING HOSPITAL HARIPI

Ph:No. 0995-611850, Fax No.0995-610

No 8917-19 Dated 14/12/2

To.

Mr. Owais Tasleem W/Orderly DHQ Teaching Hospital Haripur.

Subject;

EXPLANATION

Memo::

It is reported by C/Nurse of ICU/CCU on Night Duty that you were four absent from duty for three days, without prior information / permissio You're this act of negligence and irresponsible attitude towards your duties against the service rules.

You are hereby directed to explain regarding irresponsible attitude within three days otherwise strict disciplinary action will be taken against you undo E&D rules 2011.

MEDICAL SUPERINTENDENT DHQ HOSPITAL HARITUR

Cc:

DMS DHQ Teaching Hospital Haripur.

Supervisor Paramedics/Class-IV for information.

MEDICAL SUPERINTENDENT DHQ HOSPITAL HARIPUR



OFFICE OF THE MEDICAL SUPERINTENDEN DHQ TEACHING HOSPITAL HABIPU

Ph:No. 0995-611850, Fax No.0995-6100

To,

No 159-83 /Estab/E/E

₱ Dated 03 /01/20

- 1. Mr. Tariq Ward Orderly, Casualty Unit
- 2. Mr. Sajjad Ali Sweeper Surgical Male Unit
- 3. Mr. Awais Tabasum Ward Orderly CCU Night Shift
- 4. Mr. Anayat Ward Orderly, Paeds Ward

 DHQ Teaching Hospital Haripur.

SUBJECT: Explanation.

Memo:

It has been reported by Incharges of above Department / Wards that you all were not physically present at your place of duty, the dates mentioning in the reports. This shows negligence on your part.

You all are therefore directed to explain reason of your willful absence within three days positively; otherwise strict disciplinary action shall be taken against you under E&D Rules 2011.

MEDICAL SUPERINTENDENT DHQ HOSPITAL HARIPUR

CC

Accounts Section undersigned office with the direction to deduct (02) days salary of the above officials on account of absence and deposit the deducted amount into Government Treasury. Their absence is treated as leave without pay.

MEDICAL SUPERINTENDENT DHQ HOSPITAL HARIPUR To.

The Medical Superintendent, DHQ Teaching Hospital Haripur 19 2019 2019

Sub:

INQUIRY REPORT (CLASS IV ASSOCIATION RESOLUTION ATRICE) DHO HARIPUR

Sir,

With reference to your directive vide letter No.1300-01/AC(H) dated 14/12/2018, the Inquiry Committee comprising of Dr. Waseem Ahmed PMO and Dr. Rafique Tanoli PMO conducted an inquiry regarding subject (annexure C). During the course of inquiry the members of the inquires committee recorded statement of Dr. Dildar DMS, other officials and gathered circumstantial evidences; the findings, conclusions and recommendation are summarized below:

Findings:

- 1. It has been found that the allegations against Dr. Dildar DMS are baseless and fabricated. The fact of the matter is that Dr. Dildar DMS has been found to be a dedicated and dutiful officer, the conduct of said officer has been found modest during the whole episode.
- 2. The crime of Dr. Dildar is that he put his utmost efforts for smooth running of hospital's daily affairs.
- 3. It is the duty of Dr. Dildar DMS to implement the TOR's (duties) of all paramedics & Class-IV, in this context, he persuades class-IV to be dutiful and wear proper uniform (Cap) during duty hours. He reports the officials who remain habitually absent from duty to MS for disciplinary action. Consequently the MS of the hospital does the necessary action which includes deduction of pay under Khyber Pakhtunkhwa (E&D) rules 2011 with the involvement of IMU personnels.
- 4. The inquiry committee probed further and found that "to wear cap during duty hours" is the pivotal point on which class-IV showed concerns and they are not willing to wear proper cap during duty hours as designated by Government of Khyber Pakhtunkhwa Health Department. It is worth mentioning that different colour of caps are allotted to various class-IV as their dress code i.e. black colour cap for Security Guards, green for Sweepers and red for Ward Orderly.
- 5. It has been found that most of the class-IVs take it as a disgrace to wear proper cap during their duties, perhaps they are considered as doctors in their local communities.
- 6. It has been found that they choose wrong way i.e. strike for fulfillment of their un-lawful demands. Consequently they observed strike in DHQ Teaching Hospital Haripur on 08-12-2018. Some of the class-IV took active participation and engaged provincial association in the said strike. As a result the smooth running of hospital hampered and public suffered a lot (Annex 1).
- 7. The names of class-IVs who planned the strike, provoked it and took active participation are
 - Shoukat Zaman Ward Orderly
 - b. Safeer, Ward Orderly
 - c. Iftikhar Ward Orderly
 - d. Awais Tasleem Ward Orderly
 - e. Fareed X Ray Attendant
 - f. Saeed Ayub, Behshti BHU Kokalian Peeran.
 - g. Anayat Ward Orderly
 - h. Sajid, Mali
 - i. Niaz Elahi, Sweeper
- 8. Majority of the class-IVs remained inactive and did not participate in strike, the list of those class-IV is attached (Annex- I to IX)

Conclusions:

- 1. The observed strike was unjustifiable and un-lawful.
- 2. The observed strike brought disgrace to prestige of Dr. Dildar Khan DMS.
- 3. The way, the strike conducted i.e raise of slogans in public against Dr. Dildar, involvement of Provincial Associations and out siders.

Recommendations:

- 1. The Enquiry Committee recommends disciplinary action against the culprit Class-IV.
- 2. Uniform & cap should be provided to all Class IV staff as is practicing in all Teaching Institutes.

Enclosures:

- 1. I-IX, The List (09 pages) of non-strikers (Class IV) who did not participate in strike.
- 2. G, H, I, J (Photos of Class IV observing strike 04 pages).
- 3. A (letter from Assistant Commissioner Haripur to MS DHQ Teaching Hospital Haripur)
- 4. B (letter from Deputy Commissioner Haripur to Assistant Commissioner Haripur)
- 5. C (Resolution letter from Class IV DHQ Teaching Hospital Haripur)
- 6. D (letter from Deputy Commissioner Office Haripur regarding strike)
- 7. E (statement of Dr. Dildar DMS DHQ Teaching Hospital Haripur)
- 8. F (statements of Class IV in response to enquiry conducted by Dr. Rafique & Dr. Tahir Aziz)

Dr. Waseem Ahmed (PMO)

(Enquiry Officer)

DHQ Teaching Hospital Haripur

Dr. Rafique Tanoli (PMO)

(Enquiry Officer)

DHQ Teaching Hospital Haripur

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Deputy Modical Superintendent DITO Teaching Mospiral Hangili

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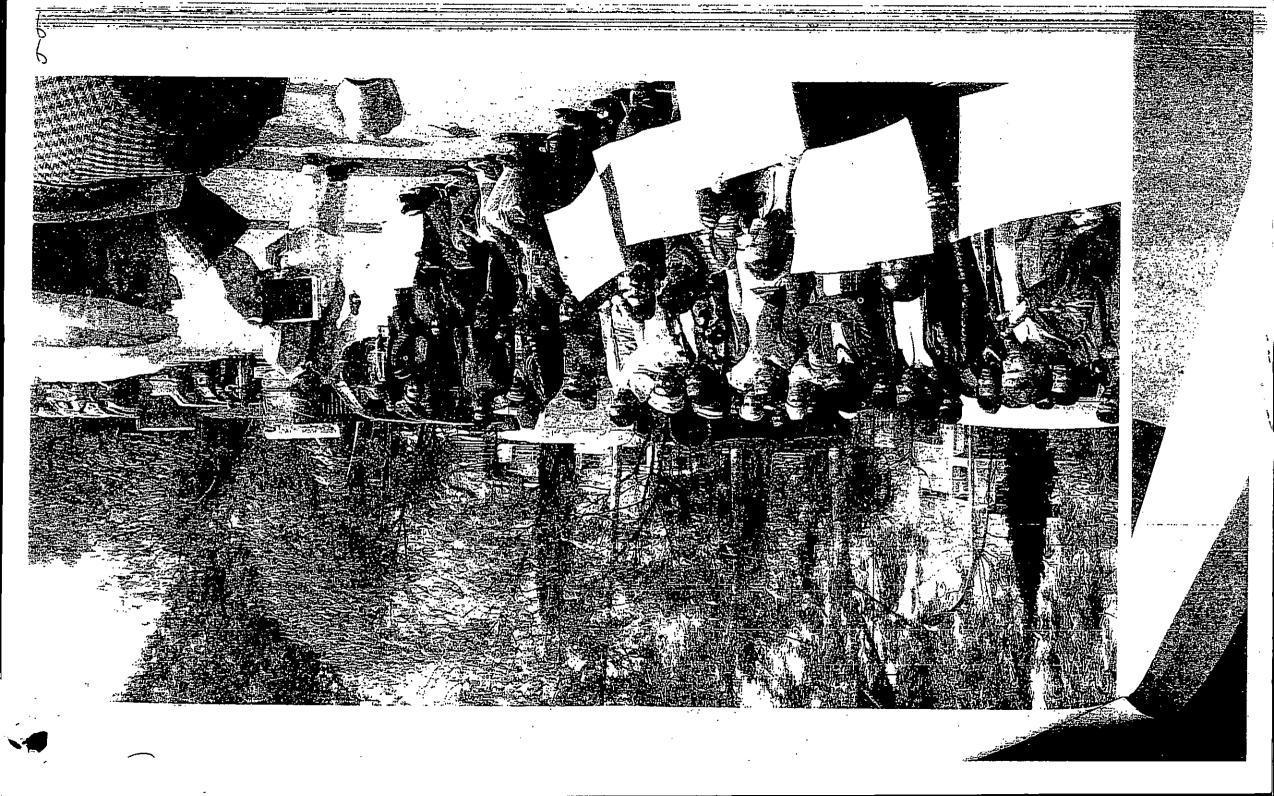
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of



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OFFICE OF THE ASSISTANT COMMISSIONER, HARIPUR

No. /Reader/09/ 1300 - v 4 /AC (H)

Date: 14/12/2018

Phone No: 0995-610455

To,

The Medical Superintendent,

DHQ Hospital,

Haripur,

Subject:

SESSION OF PARA MEDICS ASSOCIATION, HARIPUR.

Enclosed please find herewith letter No. 1(5) /Misc/App: /AS/DC (H) dated 06-12-2018 along with the Rosulation No. 6-15/HPR dated 05-12-2018 of Para Medical Association, Class-VI, Health Department Haripur, received from The Deputy Commissioner Haripur to enquire into the matter and detailed report.

It is requested to inquire into the matter and detailed report and comment at an early date positively for onward submission to Deputy Commissioner Haripur please.

> Assistant Complissioner, Haripur.

The Deputy Commissioner, Haripur for information please.

Mathematical Mathematical

Assistant

Haripur.





Office of the Deputy Commissioner, Haripur

Phone No. 0995 - 613391, 613389 FAX - 615412 No. 1(5) /Misc/App:/AS/DC (H)

Dated: 06 /12/2018

Matter important / urgent

To,

The Assistant Commissioner,

Subject:

SESSION OF PARA MEDICS ASSOCIATION, HARIPUR.

Enclosed please find herewith a copy of memo No. 04/HPR dated 05-12-2018, on the subject noted above from the General Secretary, Para Medical Association, Haripur with the request to inquire into the matter and submitted detailed report at an early date, please..

ENCLS: { 02 ONLY }

AC Office Haripur

Diary No. 1708 De Date: 52-11-doil 2

Deputy Commissioner, Haripur.

Copy to:

The General Secretary, Para Medical Association, Haripur for information with reference to above.

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Deputy Commissioner, Haripur.

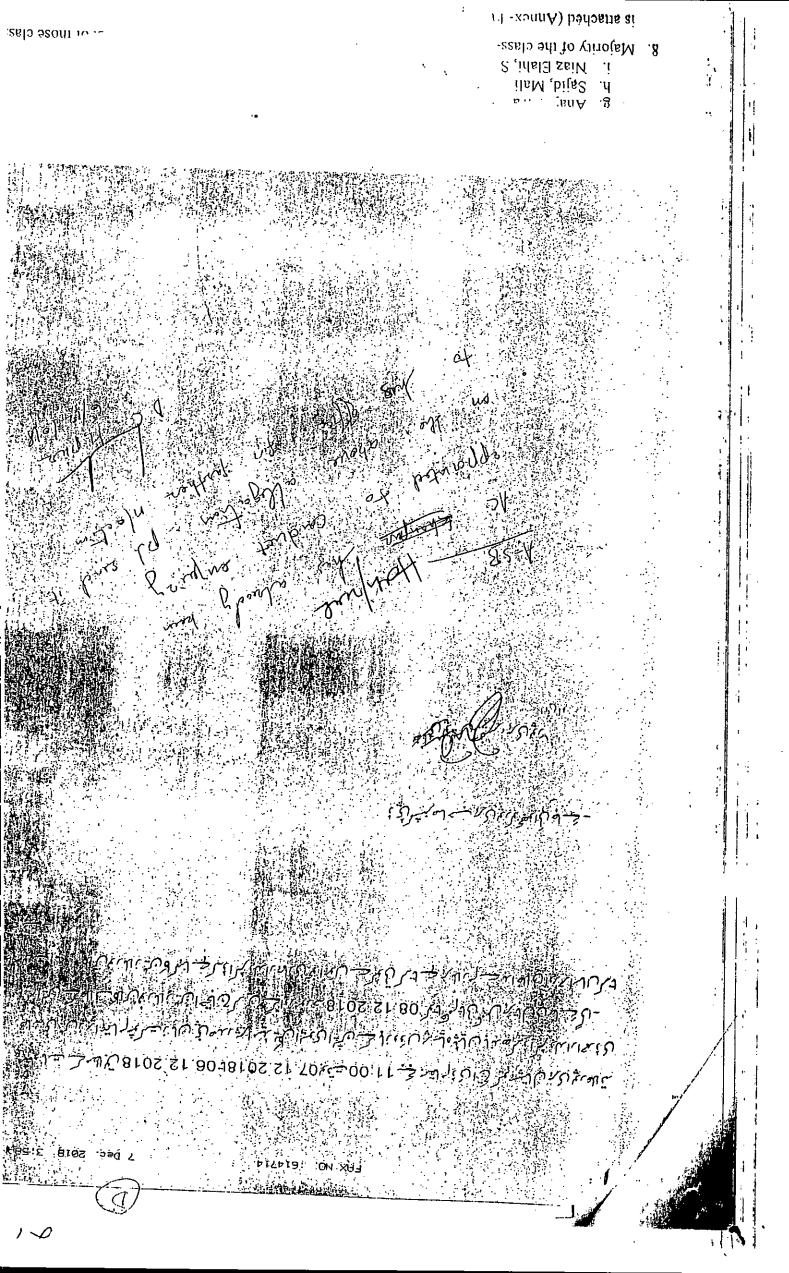
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OFFICE OF THE DEPUTY MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL HARIPUR

Telephone #: 0995-611850, Fax #: 0995-610089 No. \C_1 Dated \(\delta \) \ \ \ /3\(\psi \)/2018

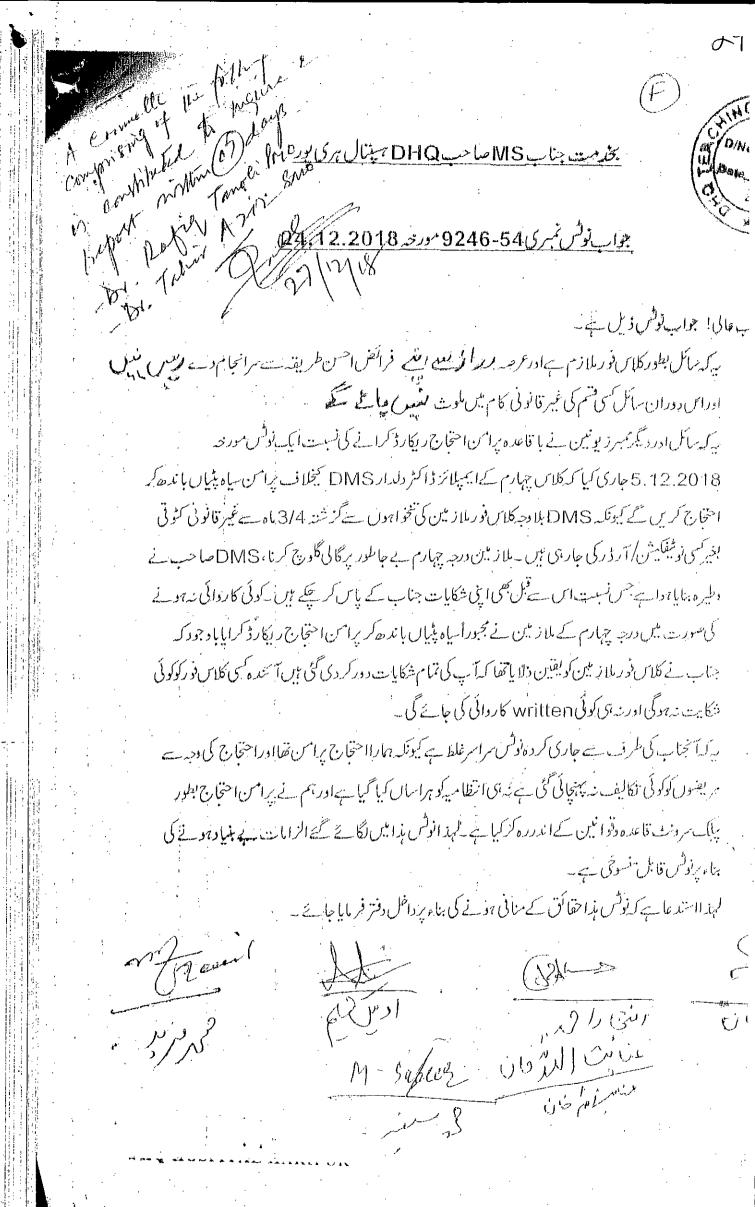
اسلام علیکم ممبرز انکوائری کمیٹی۔۔۔۔۔۔۔

گزارش ہے کہ ہسپتال میں گزشتہ کئی سال سے کچھ کلاس فور ملازمین کا رویہ ٹھیک نہیں تھا ۔ نہ ہی یہ اپنی ڈیوٹی ادا کر رہے تھے اور نہ ہی ڈیوٹی کے دوران ٹوپی پہنتے تھے ۔ یہ لوگ ہسپتال آتے تھے اور ان کا رویہ ایسا تھا جیسے یہ ہسپتال میں بہت بڑے ڈان ہیں جب کسی کو ڈسپلن کی پاپنڈی کرنے اور ٹوپی پہننے کا کہا جاتا تو یہ مداخلت کرتے اور مدمعاشی کرتے تھے۔ اور بیغیر ایم ایس صاحب کی اجزات کے اپنی مرضی سے چھٹی کرتے تھے۔

میں نے ان کی ڈیوٹی لگائی اور ٹوپی پہننے کا کہا اس کے علاوہ جو بغیر ایم ایس صاحب کی منظوری کے غیرحاضر ہوتا اس کی تحریری روپورٹ ایم ایس صاحب کو کرتا جس وجہ سے ان لوگوں کو تکلیف ہوئی کہ ہماری ڈیوٹی ڈی ایم ایس نے کیوں لگائی۔ اس طرح انہوں نے دوسرے لوگوں کو ہڑتال کرنے کے لئے اکسایا۔ اور ناکام ہڑتال کی جبکہ 196 کلاس فور ملازمین میں سے 165 ملازمین نے لکھ کر دیا کہ ہمارا ہڑتال کے ساتھ ہمرا کوئی تعلق ہنیں۔

غیر حاصر لوگوں کے خلاف یا ڈیوٹی نہ کرنے اور ٹوپی نہ پہننے والوں کے خلاف کاروائی کرنا ایم ایس صاحب کو روپوٹ کرنا ہے جو کہ میں نے کی ہے ۔

DEPUTY MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR.



06

DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR



Τo

The Medical Superintendent DHQ Hospital Haripur.

Subject:

RELIEVING ORDER

I am directed refer to your letter No.167/ dated 03.01.2019 on the subject noted

above.

You are requested to withdraw the relieving order in respect of Mr. Muhammad Safeer Ward Orderly, Mr. Iftikhar Ward Orderly & Mr. Muhammad Farld X-Ray Attendant and initiate disciplinary action against them under E&D Rules 2011, if they are guilty of misconduct as relieving/transfer of unwilling worker is no remedy.

ASSISTANTID RECTOR (Ministerial DIRECTORATE GENERAL HEALTH SERVICES, K.P. PESHAWAR.

1/10/12

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كرونست بير لمي جادريان أبر 22286/13 وتر أن آندارك بيادرية و 11 20.06 20 أولا الموارك الموارك كالموارك ر چرل پیش سر پیر طوفان از ۲۳ بر ۲۳ بر روز ل پیش سر پیر طوفان از ۲۳ بر ۲۳ بر كارم نبر ۲۳ ـ ۵ (۱) Fight ابتدائي اطلاعي د بور شدانعيني 010809V-2110 ابتدالًا الله عنست جرم قابل دست اعازى يوسن مراور ف شده زير دفية ١٥١ مج وعضابط فو جداري ١٥١ م ٥٥٤ (٥٥ - (٥٥ ع 243 7 046 43 E 111:10 cing 2 Difficult نام د كون اطلاع دى نده تو توكيف واياهي مراكب فرم مخفر كيفت جرم (معدافه) حال اكر جماليا كما تو بالارتوء فالمسلقات المستحد من المستحد for by filestiget كاروالى يونتش يحتان كالراطان رن ارت ترافقت وادار وجديالوك نفانه نب روا کی کی تاریخ دونت Edit of the sept of the second of the second The own The day of the property of the said the Mis the Spile Con Pilet Pickers - 78030705 15 13 13302 - 0508566- 1-316 0335 The words Ambustile in مع دون ما الرائد المرائد المر The filter of the interesting we wood of the little lite Tisky the Jante Jon 15 11 Cl. 3 Lassivis Topo Contrato Je Bis al Will ニックリング A 1,05 Will with stande (1) = 60 34 de 5 6 016 010 / 10 g word Judge 6 and Star Philip set the is in his few a just feet her man is all in file with the service 20 m solo de 6 Suo To / Supply to a 16 h 10 pa = 100 \$ \$10 4 115. A 116 M 3374 1 - 4 Cuarte of South 27 5 511 White wells and its Mallo 51 ps cm



OFFICE OF THE WEDECAL SUPERINTENDENT

Ph:No. 0995-611850, Fax No. 0995-610069 No 198-1505/Dated 23/02/2019

To

The Director General Health Services Khyber Pakhlunkhwa Peshawar.

Sub:

RELIEVING ORDER.

Dear Sir,

With the ref. of your office letter vide no. 494/personal dated 14/01/2019; No. 769 / personal Dated 21/01/2019 and no.1266 /personal 29/01/2019 and this office vide letter no. 988 dated 06/02/2019.

I have the honor to state that the following class IV were relieved from this Hospital on administrative ground. These class IV were creating administrative problems for the Hospital administration and also provoking the other class IVs not to perform duties. They were also not performing their own duties and were unwilling workers and proved guilty in the inquiry conducted against them vide diary no. 19 dated 02/01/2019. (Copy of inquiry report attached).

- 1. Mr. Muhammad Safeer ward orderly.
- 2. Mr. Muhammad Farid X-Ray attendant.
- 3. Mr. Mikhar word orderly.
- 4. Mr. Niaz Ellahi sweeper.
- 5. Mr. Anayat Ward Orderly.
- 6. Mr. Sajid Mali,
- 7. Mr. Awais Tasleem ward orderly.

Furthermore today they abused the employees on duty in MS office and attacked and injured the person on duty at MS office. This office is unable to accept such employees in this office. You are therefore requested to transfer them out of district.

Medical superintendent DHQ Hospital Haripur.





OFFICE ORDER

As approved by the compotent authority the services of following Class-IV staff: relieved by MS DHQ Pospital Haripur are hereby placed at the disposal of DHO Haripur for further posting under his control against the vacant post in the interest of public service with immediate effect.

Mr. Multanimed Safeer Ward Ord rily.

Mr. Muhammad Farid X-Ray Atlendant.

Mr. Iflikhar Ward Orderly.

Mr. Niaz Elahi Sweeper.

Mr. Anayal Word Orderly. Mr. Sajid Mali.

vi)

Mr. Awais Tasleem Ward Orderly.

Arrival/ departure report should be submitted to this Directorale for record.

DIRECTOR GENERAL HEALTH SEPVICES, K.P. PESHAWAR.

Copy forwarded to the:-

DHO Haripur.

- MS DHC Hospital Haripur w/r to his letter No. 988 dated 06.02.2019.
- DAO Haripur.
- P.A to DGHS Khyber Pakhtunkhwa Peshawar.
- Officials concerned.

For information and necessary action.

DIRECTOR (HRM)

DIRECTORATE GENERAL HEALT



Ph # 0995-611850, Fax # 0995-610069 Email: <u>hrp7008@gmail.com</u>

lo: MS/DHQ/INF

Dated: Haripur the 1/5/07/2019

To,

The Director General Health Services, Khyber Pakhtunkhwa Peshawar.

Subject:

VACANT POST OF CLASS-IV CONSTITUENCY.

Sir,

Reference your letter No. 8548-85/ADMN dated 11-07-2019.

I have the honor to forward herewith the requisite information on prescribed format for your kind information and further necessary action.

S.No	Nama of	Nove of posts	Nt was by a su	r:111	i i
$\frac{n_{s}}{2}$	Name of Facilities	Name of posts	Number of posts	Filled	Vacant
1	DHQ Teaching Hospital Haripur	OT Attendant	, 1	1	0
2		Blood Bank Attendant	1	1	0
3		Dental Attendant	1	1	0
4		Lâb: Attendant	2	2	0
5		X-Ray Attendant	2	2	0
6		Dai	6	6	0
7		Ward Orderly	57	57	0
8		Ward Attendent	51	51	0
9		Ward Aya	1	1	0
10		Baheshti	1	1	
11		Chowkidar	20	20	0 .
12		Mali	10	10	
13		Sweeper	53	53	0
14		Laundry Attendent	2	2	. 0
15		Laundary Operator (Dhobi)	2	2	0
. '	Total		210	210	0

Medical Superintendent DHQ Hospital Haripur

Cc:

1. PS to Minister for Health Khyber Pakhtunkhwa.

2. PS to Sécretary to Govt. Khyber Pakhtunkhwa for information.

Medical Superintendent
DHQ Hospital Haripur