


FORM OF ORDER SHEET

Court of _____

Appeal No. 133 /2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/01/2024	<p>The appeal of Mr. Ayub Khan resubmitted today by Mr. Zartaj Anwar Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____</p> <p>Parcha Peshi is given to counsel for the appellant.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

The appeal of Mr. Ayub Khan received today i.e on 12.01.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- Page nos. 26, 31, 48 & 50 of the appeal are illegible which may be replaced by legible/better one.

No. 104 /S.T.

DI. 15/1 /2024.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Zartaj Anwar Adv.
High Court at Peshawar.

Respected Sir.

*Page nos 26, 31, 48 & 50 has been replaced/attached
eligible copies. therefore resubmitted after due completion.*

Jm. Khan
16/1/2024

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. 133 /2024

Mr Ayub Khan, Superintendent cum P.S. (BPS-17) PGMI
Peshawar..... (Appellant)

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Health
Department Khyber Pakhtunkhwa Civil Secretariat Peshawar and
others..... (Respondents)

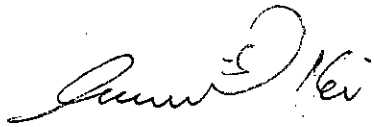
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Appellant

Through



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**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Appeal No. 133 /2024

Mr Ayub Khan, Superintendent cum P.S. (BPS-17) PGMI
Peshawar.

(Appellant)

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Health Department Khyber Pakhtunkhwa Civil Secretariat Peshawar.
2. Director General, Health Department Warsak road Peshawar.
3. CEO/Chairman Executive Council, PGMI Hayatabad Peshawar
4. H.R. Manager Post Graduate Medical Institute (PGMI) Hayatabad Peshawar.

(Respondents)

Service Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, against not releasing the salary of the appellant w.e.f 13 September 2023 till date and onwards, the appellant is still performing his duties, and against which the departmental appeal dated 19.09.2023, which is not yet responded despite the lapse of 90 days statutory period.

Prayer in Appeal: -

On acceptance of this appeal the respondents may kindly be directed to release the salaries of the appellant w.e.f 13.09.2023 till date and onward as the appellant till date regularly performing his duties, the reluctance on the part of the respondents by not releasing the monthly salaries of the appellant is against the law and the fundamental rights secured &

guaranteed under the Constitution of Islamic Republic of Pakistan 1973, thus he is entitled for salaries with all back benefits and arrears furthermore the displacement order of the appellant, while giving the charge to the junior most institutional employee is also be declared illegal based on the ulterior motive and malafide intention with necessary direction to place the appellant in on his due place of posting.

Respectfully Submitted:

1. That the appellant is the law abiding citizen, and his rights are secured and granted under the constitution of Islamic republic of Pakistan. It is pertinent to mention here that ever since his appointment, the appellant has performed his duties as assigned, with great zeal and devotion without any complaint whatsoever regarding his performance.
2. That the Post Graduate Medical Institute (PGMI) is a government institute according to 3(2) PGMI Functions rules 2017 and without Government notification converting its functions like MTI by PGMI administration without any notification of government has created a lot of confusion in all the staff of PGMI. *(Copy of the rules is attached as annexure A).*
3. That The draft regulations 2022 and service rules are attached as ready reference approved by Executive Council & appointments the approval jurisdiction is of government instead of Executive Council being itself a government regulations implementing body as per PGMI Functions rules 2017. *(copy of regulation is attached as annexure B).*
4. That a joint letter by Civil and Institutional representatives were submitted to CEO with copy to Secretary Health & Chairman Service Rules Committee vide letter PGMI Diary No.956/PGMI Dated 15/2/2022 regarding approval of regulations 2022 by E.C. , making service rules at PGMI to avoid Public Service Commission

(PSC) and utilization of draft regulations for promotions to Institutional Employees of PGMI who were lacking it without the approval of the government just like MTI in government institute like PGMI *(Copy of the letter dated 15.02.2022 is attached as annexure C).*

5. That Due to the joint letter the HR Manager (Fixed Pay) on his own signature internally at PGMI issued an order vide No.6184-89/Estt/PGMI ated 25/3/2022 and was placed at Director DME office though having no authority for BPS-17 placement in presence of Health Department order No.118-20/Personnel dated 7/1/2011 both orders are attached at *(Copy of the letter dated 25.03.2022 and office order dated 07.01.2011 are attached as annexure D & E).*
6. That Later on while working as PS to Director DME the AD(Admin) Dr.Siddique while knowing all the previous situation issued Addl. Charge as PS to CEO while working in DME vide No.1153/Estt/PGMI dated 10/8/2022 on which the appellate submitted arrival but later on Manager Human Resource vide order No.11154-60/Estt/PGMI dated 15/8/2022 the HR Manager withdrawn the AD(Admin) order though he was not authorized by any competent authority during that period & also sitting at that time without placement order in PGMI Establishment while selected for Skill Lab in 32nd Executive Council. *(Copy of the office order dated 10.08.2022 and 15.08.2022 are attached as annexure F & G).*
7. That the Ex-Deputy (Dr.Hamid) CEO politically manipulated his Addl. Charge w.e.f. 30/8/2022 to 2/3/2023 while working in DHQ Charsadda in BPS-20 & was given Addl. Charge on lower grade at PGMI (BPS-19) as Deputy CEO against the Addl. Charge rules to be in the same scale & he called 39th Executive Council on 1st September, 2022 on malafide intentions to approve inquiry on civil servant Addl Charge by AD(Admin) while himself on unauthorized illegal Addl. Charge as Deputy CEO & even not member of the Executive Council as per PGMI Functions rules 2017. These facts were brought on the notice of new CEO(Dr.Mehmood Noor) on his arrival 1/1/2022 to review but he continued and done promotions on same draft rules in 2023. *(Copy of the notification dated 29.08.2022 and 28.10.2022 are attached as annexure H & I).*
8. That the Ex-Deputy CEO(Dr.Hamid) before proceeding on premature retirement after doing all irregularities issuing an order by CEO PGMI (Dr.Mehmood Noor) vide No.17753-62/Estt/PGMI

- dated 2/12/2022 to Dr.Farah Sagheer BPS-17 (Demonstrator) as Deputy CEO on BPS-19 without government approval against the Addl. Charge rules to be on the same scales shows that the mal-administration & all irregularities are intentional to create a chaotic situation for all the employees of the PGMI and divide them and rule. *(Copy of the office order dated 02.12.2022 is attached as annexure J).*
9. That the existing CEO issued an order No.121-24/Estt/PGMI dated 5/1/2023 against the approved rules of Private Secretary (BPS-17) (Annexure-11) issued the above placement order by placing a Junior Clerk MrZubair Khan on the post of Private Secretary (BPS-17) with no experience and qualification for the post having poor performance on his post already recovered Rs.1.7 million from his account in 2016 and still under recovery on pay slip in another case. *(Copy of the letter dated 05.01.2023, dated 13.11.2019, dated 22.02.2016 & 26.04.2016 are attached as annexure K,L M & O).*
10. That the Pre-planned malafide intentions of PGMI CEO is evident from a letter sent for promotion/adjustment on the post of Assistant Director being the senior most employee of DGHS. *(Copy of the letter dated 31.03.2022 is attached as annexure P).*
11. That the appellate submitted an Appeal against the malafide intentions and irregularities by ex-administration of PGMI & calling an inquiry on malafide intentions by Deputy CEO having no authority for BPS-17 Civil Servants according to PGMI Functions rules 2017 therefore on arrival of new CEO GMI (Dr Mehmood Noor) he was briefed but he was reluctant to review the irregularities done by his predecessors. An appeal regarding illegal inquiry and other irregularities was made vide No.776/PGMI dated 14/2/2023 addressed to Secretary Health but the present CEO diverted the appeal to Executive Council being party to appeal & in 43rd Executive Council on 1st September, 2023 regretted the appeal asked the appellate to report to DGHS and Services placed at Health Department. *(Copy of the appeal , letter dated 01.09.2022, dated 24.11.2022 are attached as annexure Q, Q1, & Q2).*
12. That after regret of appeal the CEO PGMI vide letter No.9788-93/HR/Deptt dated 12/9/2023 stopped the pay of the appellate on administrative grounds without any justification just on submission of an appeal and directed him to report Director General Health

Services which was obeyed by the appellate and reported to DGHS on 13/9/2022 and also to Secretary Health Office. *(Copy of the letter dated 1212.09.2023 is attached as annexure R).*

13. That representation against the decision of 43rd Executive Council decision and stoppage of pay and displacement without any transfer by CEO PGMI/E.C. was submitted to CEO/Chairman EC vide PGMI Diary No. 5224/PGMI dated 19/9/2023 the reply is still awaited.
14. That the response of Director General Health Services Vide No.6888/Personnel dated SOH-29/11/2023 and Health Department vide No.SOH-VI/HD/4-4/Ministerial/2023 dated 23/11/2023. The appellate appeared before the CEO PGMI on both occasions to allow him for duty and release his pay but was refused by CEO PGMI (Dr.Mehmood Noor) that it will be put up as agenda point to next PGMI Executive Council in mid of December, 2023 but the decision is still awaited.
15. On 1st January, 2024 vide PGMI Diary No.7034/PGMI dated 01/01/2024 was also again sent to CEO/Chairman EC to inform the appellate about the fate of the appeal submitted on 19/9/2023.
16. That it is pertinent to mention that the Appellate is a public office holder as President of PGMI Ministerial Staff Association affiliated with Health Department & cannot be displaced from PGMI during his term of office as President of Ministerial Staff Association.
17. That the appellant has served the department for a long period and ever since his appointment the appellant performing his duties as assigned with zeal and devotion and have never given any chance of complaint whatsoever regarding his performance.
18. That the feeling aggrieved from the actions and omissions, the appellant filed a departmental appeal before the competent authority on 19.09.2023, which still not responded even after laps of statutory period of 90 days *(Copy of the Departmental appeal dated 19.09.2023 is attached as annexure S).*
19. That being aggrieved from the illegal actions the appellant has filed this appeal on the inter alia on following grounds

GROUND OF SERVICE APPEAL

- A. That the appellant has not been treated in accordance with law, hence his rights secured and guaranteed under the law are badly violated.
- B. That the appellant has been denied of his livelihood, which amounts to violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973.
- C. That representation against the decision of 43rd Executive Council decision and stoppage of pay and displacement without any transfer by CEO PGMI/E.C. was submitted to CEO/Chairman EC vide PGMI Diary No. 5224/PGMI dated 19/9/2023 the reply is still awaited.
- D. That the response of Director General Health Services Vide No.6888/Personnel dated SOH-29/11/2023 and Health Department vide No.SOH-VI/HD/4-4/Ministerial/2023 dated 23/11/2023. The appellante appeared before the CEO PGMI on both occasions to allow him for duty and release his pay but was refused by CEO PGMI (Dr.Mehmood Noor) that it will be put up as agenda point to next PGMI Executive Council in mid of December, 2023 but the decision is still awaited.
- E. That the appellant is continuously approaching the concerned authorities for releasing of his salaries, but the respondents turned a deaf ear.
- F. That not releasing salary of the appellant is also violation of section 4 of the Khyber Pakhtunkhwa Civil Servants Act, 1973, besides violation of his fundamental rights guaranteed and secured to his under the Constitution of Pakistan, 1973.
- G. That the appellant throughout agitated the matter of the release of his salary and continuously approached the Respondent department, however his salary has not been released till date.
- H. That the appellant belongs to a poor family and has a large family dependent upon his, moreover the appellant have no other source of income, due to the withholding of his salary his whole family is thus suffering.

- I. That the appellant seeks permission of this Honourable court to rely on additional grounds at the time of hearing of the appeal.

It is, therefore, humbly prayed that On acceptance of this appeal the respondents may kindly be directed to release the salaries of the appellant w.e.f 13.09.2023 till date and onward as the appellant till date regularly performing his duties, the reluctance on the part of the respondents by not releasing the monthly salaries of the appellant is against the law and the fundamental rights secured & guaranteed under the Constitution of Islamic Republic of Pakistan 1973, thus he is entitled for salaries with all back benefits and arrears furthermore the displacement order of the appellant, while giving the charge to the junior most fixed pay employee is also be declared illegal based on the ulterior motive and malafide intention with necessary direction to place the appellant in on his due place of posting.

Appellant

Through

ZARTAJ ANWAR

Advocate Supreme Court
of Pakistan

&
IMRAN KHAN

Advocate Peshawar

AFFIDAVIT

I, Mr Ayub Khan, Superintendent cum P.S. (BPS-17) PGMI Peshawar, do hereby solemnly affirm and declare on oath that the contents of the above noted appeal are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.

Deponent

8

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Appeal No. _____/2024

Mr Ayub Khan, Superintendent cum P.S. (BPS-17) PGMI
Peshawar.

(Appellant)

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Health
Department Khyber Pakhtunkhwa Civil Secretariat Peshawar and
others.

(Respondents)

**APPLICATION FOR RELEASING THE CURRENT
SALARY OF THE APPELLANT.**

Respectfully Sheweth:

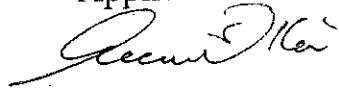
1. That the appellant is serving the respondent department for long period on various positions.
2. That the applicant has never been proceeded against, nor any charge sheet or show cause notice has ever been served upon his, moreover the services of the appellant has not been terminated thus he is entitled for the release of his salary and also entitled for back benefits.
3. That withholding of salary amounts to punishment albeit without any Charge Sheet or Show Cause Notice, salary of the applicant has been stopped without any reason and justification.
4. That the applicant belongs to a poor family and has a large family dependent upon his, moreover the applicant have no other source of income, due to the withholding of his salary his whole family is thus suffering.

It is therefore most humbly prayed that on acceptance of this application the respondents may kindly be directed to release the current salary of the applicant.



Applicant

Through



ZARTAJ ANWAR
Advocate, Peshawar

AFFIDAVIT

I Mr Ayub Khan, Superintendent cum P.S. (BPS-17) PGMI Peshawar. . , do hiseby solemnly affirm and declare on oath that the contents of the above noted application are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.

Deponent





KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, MONDAY, 17TH APRIL, 2017

GOVERNMENT OF KHYBER PAKHTUNKHWA HEALTH DEPARTMENT

NOTIFICATION

Peshawar, dated the 17th April, 2017

No. E&A/Health/PGMI Rules/2017.— In exercise of the powers conferred by sub-section (8) of section 9 of the Khyber Pakhtunkhwa Medical Teaching Institutions Reforms Act, 2015 (Khyber Pakhtunkhwa Act No. IV of 2015) read with section 23 thereof, the Government of the Khyber Pakhtunkhwa is pleased to make the following rules, namely:

THE KHYBER PAKHTUNKHWA POST GRADUATE MEDICAL INSTITUTE (FUNCTION) RULES, 2017

1. **Short title and commencement.**—(1) These rules may be called the Khyber Pakhtunkhwa Post Graduate Medical Institute (Function) Rules, 2017.

(2) They shall come into force at once.
2. **Definitions.**—(1) In these rules, unless the text or context otherwise requires,—
 - (a) "Act" means the Khyber Pakhtunkhwa Medical Teaching Institutions Reforms Act, 2015 (Khyber Pakhtunkhwa Act No. IV of 2015);
 - (b) "Associate Dean" means the Associate Dean who is,—
 - (i) in-charge of post graduate medical education in a Medical Teaching Institution; or
 - (ii) designated by the Government for teaching hospitals under its control;
 - (c) "Chief Executive Officer" means the Head of the Post Graduate Medical Institute appointed by Government;
 - (d) "Executive Council" means the Executive Council of the Post Graduate Medical Institute;
 - (e) "Post Graduate Medical Institute" means the Post Graduate Medical Institute at Hayatabad, Peshawar; and
 - (f) "post graduate medical education" means the post graduate medical education recognized by the Pakistan Medical and Dental Council and College of Physicians and Surgeons.

(2) All other words and expressions used but not defined in these rules shall have the same meanings as assigned to them under the Act.

3. Functions of the Post Graduate Medical Institute.—(1) The Post Graduate Medical Institute established by the Government vide Notification No. SOV(H)3-PI/80-81, dated: 27.08.1984, shall be the governing body of all the doctors in the Khyber Pakhtunkhwa to-

- (a) provide post graduate medical education and post graduate level courses, and
- (b) coordinate with Pakistan Medical and Dental Council and College of Physicians and Surgeons for post graduate medical education;

(2) The Post Graduate Medical Institute shall be under the supervision and control of Government and in performance of its functions, shall act in accordance with the directions of the Executive Council.

4. Chief Executive Officer of the Post Graduate Medical Institute.—(1) The Post Graduate Medical Institute shall be headed by the Chief Executive Officer to be posted by the Government for a period of two (02) years and may be transferred earlier before the completion of his tenure:

Provided that this appointment shall be in addition to the responsibilities towards the Clinical Unit that Professor heads in students' and patients' benefit.

(2) Appointment as Chief Executive Officer of the Post Graduate Medical Institute shall be a single-term appointment and the incumbent shall not be eligible for extension for another term.

5. Executive Council.—(1) For the smooth and efficient functioning of the Post Graduate Medical Institute, there shall be constituted an Executive Council to be headed by the Chief Executive Officer and comprising Associate Deans.

(2) The Executive Council shall-

- (a) be the decision making body with regard to post graduate education and shall also act as the Central Induction Committee for the purposes of Induction of Trainee Medical Officers;
- (b) Induct FCPS Trainees for different specialties against slots indicated by Associate Deans based on guiding principles of the College of Physicians and Surgeons Pakistan and Pakistan Medical and Dental Council Rules and any other procedure approved and laid down by the Executive Council; and
- (c) facilitate and coordinate Medical Teaching Institutions for the use of skills Lab of the Post Graduate Medical Institute and to provide hands on experience to trainees in diverse disciplines of medicine.

6. Responsibility in relation to trainees.—(1) The administrative, financial and academic activities of all trainees, who are inducted in the Post Graduate Medical Institute, shall be the responsibility of the Associate Dean.

(2) Stipend and other financial benefits of trainees shall be released to the Associate Deans of the individual trainees. Such Associate Deans shall be the Drawing and Disbursing officers for such moneys.

7. Meetings of the Executive Council.—(1) The Executive Council shall meet as frequently as required:

Provided that even if there is no pressing business or agenda, the Executive Council shall meet atleast once every three (03) months.

(2) Ordinarily the Chief Executive Officer shall call the meetings on his own and ensure that the agenda for such meetings is delivered with a gap of atleast seven (07) clear days to all members. However, the Chief Executive Officer shall call a meeting within seven (07) days of written request of atleast two Associate Deans and in extra ordinary circumstances within twenty four (24) hours:

Provided that in such an eventuality the condition of agenda delivery time shall stand relaxed.

(3) Decisions of the Executive Council shall be on majority vote of the members present at the time of the meeting:

Provided that for the purposes of such decisions the Chief Executive Officer shall also be considered a Member for purposes of voting:

Provided further that in case of difference of opinion, the matter shall be referred to Government for decision which shall be considered as final.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT



13

GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 31-08-2021

NOTIFICATION

No.SOHIV/4-13/PGMI/2021/. In exercise of powers conferred by rule 5 sub-rule (2) after clause (c) in the Postgraduate Medical Institute (Function) Rules, 2017, the Provincial Government of Khyber Pakhtunkhwa has been pleased to approve the following amendments in rules 5 sub rule (2) with the directions to draft separate long term Act for PGMI:

- (d) Collaborate with other institutions, universities, both public and private sectors hospitals within and outside the province and if need be, outsource functions of clinical skills labs, to achieve excellence in medical education and to promote and sustained the valued synergy between research, teaching and training.
- (e) Create, re-designate or abolish posts, provided that while creating posts the financial implications do not exceed the approved annual budget.
- (f) Appoint such persons, experts or consultants in the service of the Postgraduate Medical Institute, as deemed necessary and on such terms and conditions as may be prescribed by the regulations.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT.

End of even number & date

Copy forwarded to :

1. The Principal Secretary to Governor Khyber Pakhtunkhwa, Peshawar.
2. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
3. The Chief Executive Officer, Postgraduate Medical Institute HMC, Peshawar.
4. The Section Officer (Cabinet) Administration Department, Peshawar w/r to his letter No.SOC(E&AD)9-58/2021. dated 17-08-2021.
5. The Director General Health Services, Khyber Pakhtunkhwa, Peshawar
6. The Manager Printing Press, Peshawar for publication in the official Gazette.
7. PS to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
8. PS to Minister for Health Khyber Pakhtunkhwa, Peshawar.
9. PS to Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department, Peshawar.
10. PS to Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department, Peshawar.
11. PS to Secretary to Govt. of Khyber Pakhtunkhwa, Law, Parliamentary Affairs & Human Rights, Department, Peshawar.
12. PS to Secretary to Govt. of Khyber Pakhtunkhwa, Health Department, Peshawar.
13. PS to Special Secretary Health Department (Estt) (B&D).
14. PA to Additional Secretary (MTI) Health Deptt.
15. P.A. to Deputy Secretary (Admin) Health Dept.

Graduate Medical

THE PGMI EMPLOYEES (SERVICE)
REGULATIONS, 2022.

WHEREAS, the KP MTI Act, 2015 was promulgated through an Act of the Provincial Assembly, The KP Medical Institutions Reforms Act, 2015, to provide autonomy to the Govt. owned Medical Teaching Institutions and their affiliated Teaching Hospitals in the KP Province and to regulate the services being rendered by these Institutions and to improve the performance, enhance effectiveness, efficiency and responsiveness for the provision of quality health care services to the people of KP.

WHEREAS, under Section-9(8) of the above referred Act, with the concurrence of the government and as per rule 5 of the KP PGMI Functions Rules 2017, The Executive Council is pleased to make the following regulations namely PGMI Employees (Service) Regulations, 2022.

CHAPTER- I

1. Short Title, Commencement & Application:

These Regulations may be called PGMI Employees (Service) Regulations, 2022.

1(a)- These Regulations shall come into force at once.

1(b)- These Regulations shall be applicable to all cadres/ categories/ Class/discipline of employees of PGMI Peshawar.

2. Definitions: In these Regulations, unless the context otherwise requires:-

i- *Act* means the KP MTI Reforms Act, 2015.

ii- *Appointing Authority* means the EXECUTIVE COUNCIL or Officers empowered by the EXECUTIVE COUNCIL under these Regulations.

- iv- *Authority* means the EXECUTIVE COUNCIL or Officer empowered by the EXECUTIVE COUNCIL under these Regulations to take action against an employee of the PGMI.
- v- *Appellate/ Review Committee* means the Appellate/ Review Committee constituted under these regulations in cases of disciplinary matters.
- vi- *Executive Council* means Council notified by the government for PGMI.
- vii- *Chief Executive Officer* means Chairman/ Chairperson of the PGMI.
- viii- *Committee* means any committee constituted under these Regulations by the EXECUTIVE COUNCIL for any purpose.
- ix- *Cadres/ Categories/ Class* means the classification or group of employees of the PGMI categorized by the EXECUTIVE COUNCIL under these Regulations for the purpose of administration, pay and conduct.
- x- *Contract* means an agreement duly signed and agreed upon by the employee and employer (institution).
- xi- *Contributory Fund* means the contribution made @ 5% of monthly pay/salary by both employee and employer.
- xii- *Conduct* means conduct of an employee not prejudicial to good conduct, performance or behavior of an employee.
- xiii- *Department/ wing* means the administrative divisions of offices created by the EXECUTIVE COUNCIL within the Institution under these Regulations for effective administration of the PGMI.

the EXECUTIVE COUNCIL or by a person/ officer, authorized by the EXECUTIVE COUNCIL under these Regulations.

xv- *Deputation* means borrowing officials from other Govt: departments and other Autonomous Bodies on request of EXECUTIVE COUNCIL.

xvi- *Deputationist* means any official who is borrowed from other Govt: Deptts or Autonomous Bodies on the request of the EXECUTIVE COUNCIL.

xvii- *Employee* means any employee working in the PGMI except deputationist or Civil Servant who shall be on deputation to this Institution, and also does not include a person appointed on work charge basis or paid out of contingencies.

xviii- *Fund* means fund as described in Section -19 of the KP MTI Reforms Act, 2015.

xix- *Family* means wife or wives, as the case may be, or husband of an employee, parents, children or step children dependent upon an employee.

xx- *Government* means the Govt: of KP

xxi- *Gratuity* means the amount to be paid to an employee at the time of retirement @ one month's pay per year.

xxii- *Institution* means PGMI.

xxiii- *Job Description* means assignments/ duties/ responsibilities assigned to employees including deputationists by the EXECUTIVE COUNCIL or their respective Directors, as the case may be.

xxiv- *Leave* means kind of leave as specified by the EXECUTIVE COUNCIL or specified by Govt: of KP for Civil Servants and duly adopted by the EXECUTIVE COUNCIL of PGMI.

- xxv- *Leave Salary* means Pay for the period granted as leave by competent authority.
- xxvi- *Pay* means the monthly pay after deduction of due tax and 5% contribution, as specified by the EXECUTIVE COUNCIL for each cadre/ category or class of employees of the PGMI
- xxvii- *Other Pay* means pay in shape of special pay, qualification pay, technical pay, or personal pay to be paid to persons to be specified by the EXECUTIVE COUNCIL.
- xxviii- *Performance Assessment* means performance report of an employee to be assessed by the officer authorized/ empowered by the EXECUTIVE COUNCIL quarterly (QAR) and further yearly (AAR) to be based on QAR, to be submitted to the competent authorities i.e EXECUTIVE COUNCIL or Officer empowered by EXECUTIVE COUNCIL as competent authority.
- xxix- *Post* means post on the strength of PGMI or any other post created by the EXECUTIVE COUNCIL for achievement of the purposes of KP MTI Reforms Act, 2015 and PGMI Functions or necessary for the PGMI and also include those posts fall into the pool of PGMI after the death/ retirement/ repatriation of Civil Servants..
- xxx- *Regulations* mean PGMI Employees (Service) Regulations, 2022, applicable to the employees of the PGMI.
- xxxi- *Retirement* means attaining age of superannuation (60 years) by an employee of the Institution..
- xxxii- *Reward* means cash award to be given to an employee by the EXECUTIVE COUNCIL based on his outstanding performance for encouragement.
- xxxiii- *Schedule* means the schedules appended to these Regulations.
- xxxiv- *The word and expression* used but not defined in these Regulations shall have the same meaning as interpreted by the EXECUTIVE COUNCIL.

CHAPTER - 23. APPOINTMENTS

- a. All appointments against the vacant posts shall be made by the competent Authority/Executive Council, as specified herein after, and after publication in at least two leading newspapers. The requisite criteria and method of appointment, and, award of different marks for qualifications, experience & interview etc. for determining merit thereto, shall be determined and approved by the EXECUTIVE COUNCIL prior to publication in newspapers and also shall be provided in the advertisements for that purpose to ensure transparency.
- b. All the initial appointments shall be on contract basis with 6 months of period of probation, further extendable to 6 months. The contract of service shall be extendable on yearly basis, based on performance of an employee.
- c. The EXECUTIVE COUNCIL or Authority empowered by EXECUTIVE COUNCIL can appoint person or persons on fixed pay or to be paid out of contingency fund, who shall not be termed as employees of the PGMI who shall not claim rights that available to the PGMI employees.
- d. Appointment to the posts can also be made by transfer or by deputation from other Govt: Deptt: by the EXECUTIVE COUNCIL or Officer so authorized by the EXECUTIVE COUNCIL and those officers posted by transfer or deputation shall not be termed as employees of the PGMI and can be repatriated or transferred back to parent Deptt: without any notice or assigning any reasons.

7. If the deputation shall be an appointment for whole

- f. The authorities and committees for desired appointment shall be as specified and mentioned in the Schedule – I of these Regulations.
- g. The EXECUTIVE COUNCIL shall determine the strength required for the Institution and shall have the powers to create, abolish, re-designate any post. The EXECUTIVE COUNCIL shall give an option to the employee, whose post is going to be abolished, either to work on another post specified with low grade/pay or to avail retrenchment benefits @ 5% contribution fund, contributed by both parties & Gratuity.
- h. The EXECUTIVE COUNCIL shall have the powers to appoint a person on work charge basis or person to be paid out of contingency fund to meet the urgent requirements of the Institution. The person or persons so appointed shall not be the employees of the Institution and shall not claim any right of being employees of the Institution.
- i. The requisite qualifications and their method of appointment (Initial or Promotion) shall be such as approved and specified in the Schedules attached to these Regulations and approved by the EXECUTIVE COUNCIL.
- j. The job descriptions for the employees shall be described/prescribed by the EXECUTIVE COUNCIL.
- k. All the appointments shall be made on contract basis and shall be governed by the principle of *Master & Servant* relationship. The contract of service can be terminated on fifteen days prior notice by either side or forfeiture of pay of such period in lieu thereof.
- l. The Authorities for the appointment of various posts shall be as under:
- 1) EXECUTIVE COUNCIL for the all appointments of PGM employees and any other employee necessary for the Institution for whom the creation of post with specific qualifications shall be approved by the EXECUTIVE COUNCIL.

CHAPTER - 34. PAY/ SALARY/ ALLOWANCES/PROMOTION.

- 4(1)- The employees of the Institution shall be entitled to such pay as specified and fixed by the EXECUTIVE COUNCIL for the cadre/ category/ class of employees.
- 4(2)- The EXECUTIVE COUNCIL shall as may deem necessary, grant Special Pay, Technical Pay, Personal Pay, Qualification Pay, to any cadre/ category/ class of employees.
- 4(3)- The EXECUTIVE COUNCIL shall be competent to approve any kind of allowance or allowances to the cadre/ category/ class of employees of the Institution.
- 4(5)- The EXECUTIVE COUNCIL may also grant cash award to any employee, on his outstanding performance for his future encouragement.
- 4(6)- The EXECUTIVE COUNCIL may grant any special allowance to the employees of a cadre/category/ class of employees as deems necessary.
- 4(7)- All promotions/extensions shall be made in accordance with the Schedule of the employees having qualifications and service length as specified in the Schedule with having outstanding/ very good service record, recorded in Quarterly Assessment Reports (QARs) and Yearly Assessment Reports (YARs).
- 4(8)- Seniority shall not be the sole criteria for promotion, and all promotions shall be made on merit basis, based on the quantifications/ marks of performance as fixed by the EXECUTIVE COUNCIL.
- 4(9)- All promotions shall be made on the recommendations of the concerned Institutional Promotion Committee, duly constituted by the EXECUTIVE COUNCIL and all the promotion orders shall be made effective after proper approval of the EXECUTIVE COUNCIL.

21

CHAPTER - 4.

5. LEAVE

- 5(1)- The EXECUTIVE COUNCIL shall be authority for determining and specifying any kind of leave or EXECUTIVE COUNCIL may adopt Govt of KP Employees Leave Rules or any kind of those Rules for the employees of the Institution.
- 5(2)- Leave shall not be claimed as of right by the employees of the Institution and the kind of leave shall be granted by the EXECUTIVE COUNCIL or any Director/ Officer of the PGMI duly authorized so by the EXECUTIVE COUNCIL.
- 5(3)- Every employee or person working in PGMI shall first obtained approval of leave prior to proceed on leave.

CHAPTER - 5.

6. TERMINATION & CONDUCT PROCEDURE.

- 6(1)- The Appointing Authority shall be the Competent Authority for terminating an employee of the Institution.
- 6(2)- An employee, whose performance is not satisfactory can be terminated during probation period or extended period of probation, without prior notice or without assigning any reason thereof.
- 6(3)- misconduct means commission or omission of an act of the employee prejudicial to the good service or conduct. The willful or unauthorized absence for 7 days without prior permission of the concerned authority shall also be termed as misconduct.
- 6(4)- An employee who has completed his probation period, his

from either side or forfeiture of pay in lieu thereof being have master & servants relationship inter-se.

- 6(5)- In case of misconduct or stigma, an employee can be terminated by serving upon him a show cause notice and affording prior chance of personal hearing to him by the Competent Authority.
- 6(7)- The Competent Authority/the Executive Council, as the case may be, can impose one or more minor or major penalties upon an employee of the Institution, keeping in view the gravity of misconduct. However, in case of awarding any penalty either minor or major or both along with recovery if loss sustained by the Institution due to his misconduct or negligence or embezzlement, shall be served with a show cause notice and providing him chance of personal hearing prior of passing such penalty/ punishment order.
- 6(8)- The minor punishment shall include warning/ Censure, forfeiture of pay, stoppage of promotion for specified period and the major punishments shall include termination of contract of service, reduction/ demotion for specific period and recovery of such amount as of loss sustained by the Institution.
- 6(9)- The employee against whom an adverse order is made which may affect his terms and conditions of service shall have a right of Appeal or Review to the EXECUTIVE COUNCIL as the case may be and such Appeal or Review, as the case may be, shall be filed within 15 days of the communication of the adverse order. The EXECUTIVE COUNCIL shall decide Appeal or Review against the adverse order within 15 working days.

CHAPTER - 6

7. TERMINAL BENEFITS.

- 7(1)- The employees of the Institution shall be entitled to Contributory Fund @ 5% of the monthly pay to be contributed by employee and employer each month upon the completion of service till age of attaining superannuation.
- 7(2)- Those employees who have been terminated due to misconduct shall not be entitled to any benefits of Contributory Fund.
- 7(3)- An employee of the Institution shall be entitled to Gratuity @ one month's pay per year for the service he rendered.

CHAPTER - 7.

8. MISCELLANEOUS PROVISIONS.

- 8(1)- Each head of the respective wing shall be the custodian of the record and shall present before the EXECUTIVE COUNCIL on demand. The record shall not be damaged or destroyed without prior approval of the EXECUTIVE COUNCIL.
- 8(2)- The EXECUTIVE COUNCIL shall be competent to add, change or delete any regulation or part of regulation as and when needed.
- 8(3)- The EXECUTIVE COUNCIL may establish a Legal Cell or Wing with such necessary staff as deems appropriate to deal with the legal cases of the Institution, tender legal opinion if so asked relating to any legal issue and to have liaison with the legal advisors of the Institution.
- 8(4)- The Legal Cell/ Wing shall be responsible for all legal and court matters and will be the custodian of the Record.

CHAPTER - 8

SCHEDULES.

SCHEDULE - I

APPOINTING AUTHORITIES.

<u>S.NO</u>	<u>NAMES OF THE POSTS</u>	<u>AUTHORITY</u>
1	All the vacancies of various cadre/grades.	EXECUTIVE COUNCIL on recommendations of respective selection Committee constituted by EXECUTIVE COUNCIL.

SCHEDULE - II.

CADRE/ CATEGORY/ CLASS OF EMPLOYEES.

SCHEDULE - III.

REVIEW/ APPELLATE AUTHORITIES.

<u>SNO</u>	<u>COMPETENT AUTHORITY</u>	<u>REVIEW/</u>	<u>APPELLATE</u>
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SCHEDULE - IV.*APPOINTING/ TERMINATING AUTHORITIES OF FACULTY MEMBERS.*

- a)- EXECUTIVE COUNCIL shall be the appointing authority of all member of Service of the PGMI to be made on recommendations of the selection committee with such terms & conditions as specified and approved by the EXECUTIVE COUNCIL.
- b)- EXECUTIVE COUNCIL shall be the competent Authority for taking any action against any employee of the PGMI for the misconduct/ negligence of the employee.
- c)-
- d)- The EXECUTIVE COUNCIL shall be the Review Authority for the members of the service of the PGMI against whom any adverse order is passed by the Executive Council.
- f)- The Review/Appeal shall be submitted within 15 days of the communication of adverse order and the EXECUTIVE COUNCIL being the Review Authority shall decide the Review/ within 15 working days.

Re: CONSERVATION OF SERVICE RULES FOR INSTITUTIONAL EMPLOYEES

Respected Sir,

Reference your letter No. HHS12/53 SO/1-SRC/AD Admn/PGMI dated 14/12/2021 and our PGMI staff joint meeting with you in presence of Deputy CEO Vide Letter No. 6057/PGMI dated 15/10/2021.

The following few lines are submitted for your kind consideration:-

INSTITUTIONAL SERVICE RULES

1. PGMI as institute is still under the Government according to PGMI functional rules 2017, Para 3(2) and 2021 PGMI modified rules and the Budget is still Head-wise ^{being} a Government Institute (Copy attached).
2. As per notification No. SOH-IV/4-13/PGMI/2021 dated 31/3/2021 are related to Skill Labs (One time) and the process of fix pay employees has been completed and it is not for Institutional employees working under repealed Ordinance 2002.
3. The Service Rules for Deputy Director Finance, Superintendent, Account Assistant & Senior Clerk is the jurisdiction of the Government and not of PGMI & where the Health rules are silent the approval of Health Department SSRC will be essential otherwise such promotions will be illegal and against the law.
4. PGMI functions under the government and EC has not been delegated powers to make service rules, regulations & up-gradation for 2002 ordinance employees.
5. The incumbent due for Deputy Director Finance (EPS-13) is member of Service Rules Committee is again unethical.
6. The Superintendent, Account Assistant and Senior Clerk rules frame 1982 (Establishment) adopted by Service Rules Committee is obsolete & in the presence of latest Health Department rules as per policy the Health Department rules is needed to be adapted rather than Establishment Department 1982 rules.
7. It will be over stepping if the institutional junior in a government institute if promoted over the Civil Servants working in a government institution as per PGMI function 2017 rules and preference to a cadre lacking jurisdiction in a Government institution.
8. It is further brought to your knowledge that appointment, abolishment, re-designation power was given to EC vide No. No. SOH-IV/4-13/PGMI/2021 dated 31/3/2021 but up-gradation and Service Rules & Regulations is still the jurisdiction of the Government.

[Handwritten signature]
14/12/2021

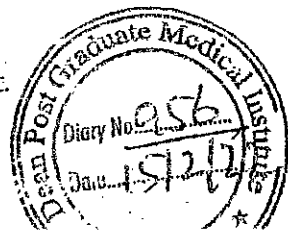
Representative of Institutional Servants
PGMI Peshawar

[Handwritten signature]
14/12/2021
Representative of Civil Servants
PGMI Peshawar.

Copy to:-

1. Secretary to Govt. of Khyber Pakhtunkhwa Health Department.
2. Chairman Service Rules Committee - PGMI.
3. Members Executive PGMI for information.

[Handwritten initials]
HR Man...
[Handwritten signature]



To,

The CEO / Chairman
Executive Council
PGMI Peshawar

Re:- OBSERVATION ON SERVICE RULES FOR INSTITUTIONAL EMPLOYEES

Respected Sir,

Reference your letter No 11812/53-CC/1-SRC/AD Admin/PGMI dated 14.12.2021 and our PGMI staff joint meeting with you in presence of Deputy CEO vide Letter No. 6057/PGMI dated 15.10.2021.

The Following few lines are submitted for your kind consideration:-
Institutional Service Rules

1. PGMI as institute is still under the Government according to PGMI Functional rules 2017 P 3(21 and 2021 PGMI modified rules and the Budget is still Head-wise budget being a Government Institute. (Copy attached)
2. As per notification NO. SOH-IV/4-12/PGMI/2021 dated 31/8/2021 are related to Skill Lab (One time) and the process of fix pay employees has been completed and It is not for Institutions employees working under repealed Ordinance 2002.
3. The Service Rules for Deputy Director Finance, Superintendent, Account Assistant & Senior Clerk is the jurisdiction of the Government and not of PGMI & where the Health rules are silent the approve of Health Department SSRC will be essential otherwise such promotions will be illegal and against the law.
4. PGMI functions under the Government and EC has not been delegated powers to make Service rules, regulation & Upgradation for 2002 ordinance employees.
5. The incumbent due to Deputy Director Finance (BPS-18) is member of Service Rules Committee is again on-ethical.
6. The Superintendent, Account Assistant and Senior Clerk rules frame 1982 (Establishment) adopted by Service Rules Committee is obsolete & in the presence of latest health Department Rules as per policy the Health Department rules is needed to be adapted rather than establishment department 1982 rules.
7. It will be over stepping if the institutional juniors in a government institute if promoted over the Civil Servants working in government institution as per PGMI function 2017 rules and preference to a cadre lacking jurisdiction in a Government institution.
8. It is further brought to your knowledge that appointment, abolishment, re-designation power was given to EC vide No SOH-IV/4-13/PGMI/2021 dated 31/8/2021 but up-gradation and Service Rules & Regulations is still the jurisdiction of the Government.

Representative of Institutional Servants
PGMI Peshawar

Representative of Civil Servant
PGMI Peshawar

Amir: SD
27

OFFICE ORDER

The following internal postings / transfers are hereby ordered with immediate effect in the best interest of public and institute.

S#	NAME & DESIGNATION	FROM	TO
01.	Mr. Ayub Khan, Superintendent	PS to CEO	Director Medical Education, Research & Publication Office
02.	Mr. Masal Khan, Computer Operator	JPMI	Additional responsibilities of Manager HR Office

Arrival / departure report be submitted accordingly.

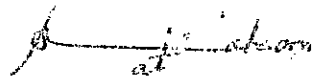
Deputy Chief Executive Officer
Postgraduate Medical Institute
Hayatabad Peshawar.

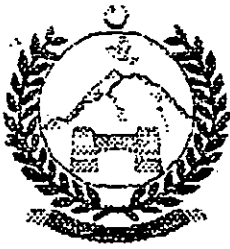
No. 4184-89 /Essit/PGMI.

Dated: - 25/3 /2022

Copy forwarded for information and n/c to the:-

1. Director, Department of Medical Education PGMI, Hayatabad, Peshawar.
2. Assistant Professor Department of Medical Education PGMI, Hayatabad, Peshawar.
3. Mr. Ayub Khan, Superintendent PGMI, Hayatabad, Peshawar.
4. HR Manager PGMI, Hayatabad, Peshawar.
5. PS to CEO, PGMI Hayatabad Peshawar.
6. Mr. Masal Khan, Computer Operator JPMI Office PGMI, Hayatabad, Peshawar.


Deputy Chief Executive Officer
Postgraduate Medical Institute
Hayatabad Peshawar.



Amdy. E 28

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

OFFICE ORDER

Mr. Ayub Khan newly promoted office Superintendent under transfer to BMC Bannu is hereby adjusted against the vacant post of Private Secretary (BPS-16) in PGMI/HMC Peshawar in the interest of public service with immediate effect:

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

SD/XXXXXX
DIRECTOR GENERAL HEALTH
SERVICES, K.P.K PESHAWAR.

No. 718-20 /Personnel

Dated 7 /01/2011

Copy forwarded to the:-

1. Dean PGMI/HMC Peshawar w/r to his letter No. 63/PGMI dated 04.01.2011.
2. Principal BMC Bannu.
3. Officer concerned.

For information and necessary action.


Assistant Director (P-II)
DGHS, Khyber Pakhtunkhwa Peshawar

Hafiz S.M Ali Shah



Annex. F

29

No. 11153 /Esstt:/PGMI,

Dated: - 19-08 /2022

OFFICE ORDER

The following internal postings / transfers are hereby ordered with immediate effect in the best interest of public and institute.

S#.	NAME & DESIGNATION	FROM	TO
01.	Mr. Ayub Khan PS to DME	DME Office	PS to Chief Executive Office in addition to his own duty
02.	Muhammad Hussain Office Superintendent	PS to Chief Executive Office	Establishment Section

Arrival / departure report be submitted accordingly.

[Signature]

Assistant Director Admin
Postgraduate Medical Institute
Peshawar

No. _____ /Esstt:/PGMI,

Dated: - _____ /2022

Copy forwarded for information and n/a to:-

1. Director Medical Education PGMI, Hayatabad Peshawar.
2. PS to Chief Executive Officer PGMI, Hayatabad Peshawar.
3. Official Concerned.

Assistant Director Admin
Postgraduate Medical Institute
Peshawar

30 *Anwar G*

Dated: - / / 2022
Ref. No. /Esst/PGMI

OFFICE ORDER

An un-authorized transfer order issued vide office order No 11154-56 Dated 12-08-2022 is hereby withdrawn in the best interest of the institution/ Public

A. J. Wilson

Manager Human Resource
Postgraduate Medical Institute
Peshawar

No. 11154-60 /Esst/PGMI

Dated: - 15/08 /2022

Copy forwarded for information and n/a to:

1. Director Medical Education PGMI, Hayatabad Peshawar.
2. PS to Chief Executive Officer PGMI, Hayatabad Peshawar.
- ✓ 3. Officer concerned.

A. J. Wilson

Manager Human Resource
Postgraduate Medical Institute
Peshawar

*Respected Thana
Director R.M.E.P*

GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 29th August 2022

NOTIFICATION

No. SOH(E-V)/2-2/2022. Dr. Hamid Ahmad, Chief Medical Officer (BS-20) attached to DHQ Hospital Charsadda is hereby authorized to hold additional charge of the post of Deputy Chief Officer BPS-19 Postgraduate Medical Institute Peshawar in addition to his own duties till further orders.

SECRETARY HEALTH

GOVERNMENT OF KHYBER PAKHTUNKHWA

No. 3471-81/Endst of even No & Date.

Copy to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
3. Medical Superintendents, DHQ Hospital Charsadda.
4. District Account Officer, Charsadda.
5. Chief Executive Officer, PGMI Peshawar.



PGMI

POST GRADUATE MEDICAL INSTITUTE
PESHAWAR, KPK PAKISTAN

Amsted. I

32

Chief Executive Officer (PGMI)
Phase-4 Hayatabad
Peshawar

Tel. No. 0092-91-9217190
0092-91-9217192
Fax No. 0092-91-9217191

No.16838 /PS/CEO

Dated 28-10-2022

1. Professor Shahid Ayub, Associate Dean, MTI/HMC, Peshawar.
2. Professor Yasir Gillani, Associate Dean, MTI/ATH, Abbottabad.
3. Professor Mahid Iqbal, Saidu Group of Hospital Swat.
4. Prof. Muslim Khan, Associate Dean KCD Peshawar
5. Prof. Lal Mohammad, Associate Dean KIMS Kohat
6. Dr. Mohammad Hamayun Khan, Associate Dean
Mufti Mehmood Teaching Hospital/MTI, DI Khan
7. Dr. Shehzadi Neelam, Associate Dean,
MTI/Qazi Hussain Ahmad Memorial Hospital Nowshera
8. Dr. Mohammad Shoaib Khan, Associate Dean, KTH/MTI, Peshawar
9. Dr. Raza Mohammad, Associate Dean, MTI/Gajju Khan Medical College Swabi.
10. Dr. Mohammad Tariq, Associate Dean, PIC Peshawar
11. Dr. Muhammad Nadeem, Associate Dean, MTI/Group of Teaching Hospital, Bannu.
12. Dr. Erum Behroz Khan, Associate Dean, Saidu College of Dentistry, Swat.
13. Dr. Naccemul Haq, Associate Dean Mardan Medical Complex/MTI Mardan.
14. Dr. Riaz, Associate Dean Lady Reading Hospital/MTI, Peshawar

Subject:- 39TH EXECUTIVE COUNCIL MEETING OF PGMI ON FRIDAY DATED 04/11/2022 AT 09:30 AM.

The 39th Executive Council meeting of PGMI is hereby rescheduled and the said meeting will be held on Friday dated 04-11-2022 at 09:30 am in the Committee Room of PGMI Hayatabad Phase-IV, Peshawar.

You are requested to attend the meeting on the above mentioned date and time.

Tentative agenda;

1. Induction 2023.
2. Report of enquiry committee.
3. Job description of PGMI staff amendments/correction.
4. Reconstitution of service rules committee.
5. Any other point.
6. Change of supervisor in case of retirement/transfer of supervisor

Hamid
Chief Executive Officer
Postgraduate Medical Institute
Hayatabad, Peshawar.

Dated 28-10-2022

No.16839-46 PS/CEO/PGMI

Copy for information & necessary action to the:-

1. I/C PGR Section PGMI, Hayatabad, Peshawar
2. HR Manager PGMI, Hayatabad, Peshawar.
3. Accounts Section PGMI, Hayatabad, Peshawar.
4. PS to Director Medical Education, PGMI Hayatabad, Peshawar.
5. Incharge IT for information to ensure availability of internet service.
6. Mr. Junaid Taswar, for information to ensure availability of Multimedia facility.
7. PA to Deputy CEO PGMI, Hayatabad, Peshawar.
8. Mr. Nasir Khan, Photographer.

Hamid
Chief Executive Officer
Postgraduate Medical Institute
Hayatabad, Peshawar

✓ All section incharge are

requested to submit-

any file / issue / case needs

EC discussion / decisions. It must reach to this office
on or before 2/11/2022. *Hamid*
2/11/22

11/ DME

Amir J

33

No. 17253 /Esstt:/PGMI,

Dated: 2 / 12 /2022.

OFFICE ORDER

Consequent upon the retirement of Dr Hamid Ahmad Deputy CEO (Additional charge), ^(8PS-17) Dr. Farah ^(8PS-19) Sagheer Incharge/PGR is hereby assigned the additional charge of Deputy CEO/PGMI with immediate effect till the appointment of regular incumbent.

Chief Executive Officer
Postgraduate Medical Institute
Hayatabad, Peshawar

No. 17254-62 /Esstt:/PGMI,

Dated: - 2 / 12 /2022

Copy forwarded for information and n/action to:-

1. Director DMERP PGMI, Peshawar.
2. Assistant Professor Medical Education PGMI Peshawar.
3. Manager Human Resource PGMI Peshawar.
4. Deputy Director Finance PGMI Peshawar.
5. Audit Officer PGMI Peshawar.
6. Asst Editor JPGMI PGMI Peshawar.
7. Chief Librarian PGMI Peshawar.
8. PS to Deputy CEO PGMI, Peshawar
9. Officer concern.

Chief Executive Officer
Postgraduate Medical Institute
Hayatabad, Peshawar



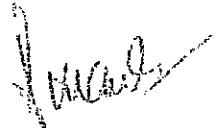
Approved: K
34

OFFICE ORDER

The following internal postings / transfers are hereby ordered with immediate effect in the best interest of public and institute.

S. NO.	NAME & DESIGNATION	FROM	TO
01.	Zubair Khan, Junior Clerk	HR Section	PS to CEO
02.	Muhammad Hussain, Office Superintendent	PS to CEO	HR Section

Arrival / departure report be submitted accordingly.



Chief Executive Officer
Postgraduate Medical Institute
Peshawar.

No. 121-24 /Essit/PGMI.

Date: 25/01 2023

Copy forwarded for information and n/a to the:-

1. Director MER&P PGMI, Hayatabad, Peshawar.
2. Manager Human Resource, PGMI Hayatabad Peshawar.
3. PA to Dy. CEO PGMI, Hayatabad, Peshawar.
4. Officials concerned.


Chief Executive Officer
Postgraduate Medical Institute
Hayatabad, Peshawar



Amir L

35

To

Mr. Zubair Khan,
Junior Clerk, Establishment Section
PGMI, Peshawar

Subject: **POOR PERFORMANCE.**

It is to inform you that you were given the following assignment by Administrative Officer PGMI, Hayatabad, Peshawar but you failed to do so.

1. Receipt and timely processing of Dak
2. Record Keeping in neat & tidy form.
3. Safety & security of record.
4. Casual leave, short leave and biometric attendance.

Further to say that you were already given task of personal files photocopies of teaching staff working in MTI/LRH, Peshawar on emergency basis for onward submission to Dean MTI/LRH, Peshawar properly but you did not complete the same till now.

However, today on 13-11-2019 again Dean MTI/LRH, Peshawar pressing hard for the same after lapse of time (07 months), which is a gross negligence and creates problems for Administration.

Therefore, you are fined Rs. 2000/- and directed to complete all remain photocopies of the personal files (teaching staff) within two days otherwise strict disciplinary action will be initiated against you which may include charge sheet.

Deputy Chief Executive Officer
Postgraduate Medical Institute
Hayatabad, Peshawar
Dated: 13-11-2019

No. 10057-58 /Esstt:/PGMI,

Copy forwarded for information and n/a to: -

1. The Administrative Officer PGMI, Hayatabad, Peshawar.
2. PS to CEO PGMI, Peshawar.

Deputy Chief Executive Officer
Postgraduate Medical Institute
Hayatabad, Peshawar



Amended M
36

Dean

Prof. Dr. Riaz Anwar Khan

M.B.B.S, M.Sc (Glasgow), F.R.C.S (Glasgow),
F.R.C.S (Dublin), FCPS (Cardiac Surgery)

Tel. No. 0092-91-9217190
0092-91-9217192
Fax No. 0092-91-9217191

Ref. No. 5045

Dated: 22-2-2016

To

The Administrative Officer
Post Graduate Medical Institute
Hayatabad, Peshawar

Subject: **FRAUDULENT ACTIVITY CHARGES AGAINST MR. ZUBAIR KHAN, JUNIOR CLERK, PGMI**

Reference may be made to the following:

1. Inquiry Report regarding Dr. Najma Nawaz, Ex-TMO, Gynae B, Hayatabad Medical Complex Peshawar
2. Letter regarding fraudulent activity reported to Dean Office by Accounts Officer dated 25-01-2016.
3. Letter regarding suspension of Mr. Zubair Khan vide Ref. No. 3397/PGMI Dated 08-02-2016
4. Show-cause notice issued to Mr. Zubair Khan vide Ref. No. 3401/PGMI Dated 08-02-2016
5. Reply of show-cause submitted by Mr. Zubair Khan vide Ref. No. 931 Dated 16-02-2016

Reference to reply of Mr. Zubair Khan which has not been found satisfactory and other documents pertaining to previous and current charges against him, you are directed to pursue the matter as per rules and instructions of the Dean.

The matter is urgent and important so kindly keep the authorities informed regarding the progress. Please also ensure that the full amount is recovered and deposited in the PGMI official account.

(Signature)
22/2/16

Deputy Dean
Post Graduate Medical Institute
Hayatabad, Peshawar

CC to:

- PS to Dean, PGMI
- Audit Officer, PGMI
- Accounts Officer, PGMI
- All the previous inquiry committee members with the directions to cooperate and assist.

-- Page 1 of 1 --



MCB
Bank Limited

Adm Ref. 0
37

To:- DEAN POSTGRADUATE MEDICAL INSTITUTE
HAYATABAD PESHAWAR

From:- B/O MCB TRUCK STAND PESHAWAR 1686

Ref:- MCB/

Dated:- 26-APR-2016

Subject: CREDIT TO PGMI ACCOUNT Rs.1722883.00

Sir,

It is intimated to you that as per your letter # 931 Dated 19/01/2016 we have credited Rs.1, 722,883.00 to PGMI account # 0650559521004135 maintained with Hayatabad branch Peshawar 1448.


Regards,
MCB truck Stand Peshawar
1686



Amir P
38

Ref. No. _____/Esstt:/PGMI,

Dated: - _____/2022

To

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

Through: Proper Channel

Subject: **PROMOTION/ADJUSTMENT ON THE POST OF ASSISTANT DIRECTOR
(ADMIN).**

Enclosed please find herewith a self-explanatory application in respect of Mr. Ayub Khan Superintendent (BPS-17), PGMI Hayatabad, Peshawar for promotion/Adjustment on the post of Assistant Director (Admin).

He shall stand relieved from this institution after his promotion/adjustment to the post of Assistant Director Admin.

His application is forwarded for further necessary action.

Chief Executive Officer
Postgraduate Medical Institute
Peshawar

No. 6373 /Esstt:/PGMI,

Dated: - 31-03 /2022

Copy forwarded for information and n/a to: -

1. Mr. Ayub Khan Superintendent (BPS-17), PGMI Hayatabad, Peshawar.

Chief Executive Officer
Postgraduate Medical Institute
Peshawar

13th February, 2023

To,

Admitted. Q
39

The Secretary Health
Govt. Khyber Pakhtunkhwa
Peshawar

Through : PROPER CHANNEL

Subject:- APPEAL IN THE CASE OF REPATRIATION OF 4 CIVIL SERVANTS EMPLOYEES

Sir,

Reference your letter No.SOH-VI/HD/1-1/Misc/Repatriation/PGMIStaff 2022 dated 31/1/2023 in response to PGMI letter No.17424/Estt/PGMI dated 24/11/2022.

1. I would like to bring the following facts to the knowledge of Health Department being a Civil Servant under the Health Department:-
2. I was not officially called but was told by the Chairman that it is an internal facts finding committee. I would like to inform that I have just implemented the orders always obeyed the orders of my superiors but would like to say with respect that the inquiry is based on malafide intentions against me by Ex-CEO Prof.Mohammad Arif, Ex-Deputy CEO Dr.Hamid Ahmad and HR Manager.
3. I made a suggestion vide No.956/PGMI dated 15/2/2022 during recruitment process for Skill Labs PGMI to Ex-CEO and ex-Deputy CEO that **PGMI IS A GOVERNMENT INSTITUTE according to 3(2) of PGMI function rules 2017** rules are attached as ready reference, which aggrieved all the above who were adamant to divert the functioning of PGMI like MTI though it is not run by any Board of MTI. **Annexure-1 (Ref 956 letter attached).**
4. In the 34th EC meeting they done appointments, promotions & upgradations on **Draft Regulations 2022 and draft service rules without approval of the government.** The Service Rules approval is the domain of Secretary Establishment through SSRC without involvement of government its approval & appointments is a gross irregularity in a government department. **(Annexure-2, 3, 4).**

Continued P.....2

Signature
Date

5. In 35th Executive Council held on 8/3/2022 wherein I was present 2 posts of superintendents were sanctioned and 3rd was done without any sanctioned seat was brought in the notice of EC and Prof. Lal Mohammad & others endorsed my point of view and the case was differed due to non existence of 3rd seat & later on how the HR Manager managed in 35th EC promotion of 3rd superintendent without sanctioned seat. The incumbent order attached as evidence (Annexure-5)
6. Due to the above facts and suggestions to ex-CEO as punishment I was internally transferred vide No.6184-89/Estt/PGMI date 25/3/2022 to DMERP PGMI which lobeye the and still work in that Department signed by HR Manager on the designation of ex-deputy ceo who was not the competent authority for BPS-17 transfer/posting (Annexure-6).
7. In July 2022 both the ex-CEO left charge of office without leaving charge to anybody and ex-deputy ceo joined (DHQ Charsadda) as BPS-20 CMO in this interim period Dr. Siddique AD (Admin) came discuss the matter with Director DMERP that an Addl Charge will be given to me. I told in front of the Director DMERP that I am subordinate to Director if she has no objection I will accept to which she agreed. The AD (Admin) told he is legally allowed to issue order as per certificate issued to him by Chief Executive signed by ex-deputy ceo (11061/Estt/PGMI dated 10/8/2022). (Annexure-7)
8. After that an order No.11153/Estt/PGMI dated 12/8/2022 as Addl Charge of PS to CEO while working office as Addl Charge which I implemented. (Annexure-8).
9. The HR Manager was basically recruited on fix pay for skill lab with job description of skill lab in 32nd Executive Council meeting and without any placement order he was sitting in establishment. (Annexure-9)
10. The Ex-Deputy CEO Dr. Hamid Ahmad got his addl. Charge order through health department being as CMO (BPS-20) DHQ Charsadda as given Addl. charge of deputy CEO (BPS-19) in lower scale against the Addl charge rules to be in the same scale to fulfil his malafide intentions during addl. Charge time the validity & actions taken by him need attention of the government particularly sending this inquiry before actual CEO arrival to Health Deptt. (Annexure-10).

Continued P.....3

41

11. In 39th EC being chaired by ex-Deputy CEO Dr.Hamid Ahmad to fulfil his malafide intentions to approve inquiry report, abolish PS to CEO post and oust me from the institute shows his malafide intentions.

It is pertinent to mention that Deputy CEO according to PGMI function rules 2017 is not even member of executive council and for chairing executive council by Deputy CEO there is a need of modification for deputy ceo in PGMI functions rules 2017.

12. It is further added that the Executive Council PGMI is itself Government regulations implementing body then how can approve service rules & regulations which is the authority of Secretary Establishment through SSRC.

There are other internal inquiries pending but involve high ups or involve people of Ex-Deputy CEO lobby and he wants to protect them have been kept pending intentionally which are mentioned for attention of government as under:-

a) The above inquiry committee No.11731-34/Estt/PGMI dated 1/9/2022 was called for interview of remaining TMOs by PGR section during the interim period when Ex-CEO and Deputy CEO left charge and the matter was reported by Dr.Mumtaz Mohammad to Secretary Health at that time that junior clerk has called interviews for TMOs remaining slots from July 2022 induction.(Annexure-11)

Later on Dr.Hamid Ahmad ex-deputy ceo diverted to an internal order Addl charge by AD (Admin) as the PGR relevant personnel refused to appear & to exonerate from inquiry his own favourites.

- b) That Dr.Ghaffar Shah TMO Fellowship in Urology IKD was taken on a scanned signature order which is not being owned by any body need the attention of authorities.(Annexure-12).
- c) Dr.Aijan DGO TMO HMC was taken local fee basis which is against the displayed 2000 USD per annum rules in PGMI Prospectus on website as foreign policy and any change in the policy is again the jurisdiction of government not EC for foreign students.(Annexure-13).
- d) That missing files of staff after arrival of HR Manager on 1/2/2022 still pending.

Continued P.....4

e) The House subsidy case for PGMI institutional employees was sent to Health Department on direction of EC and the Finance Department declared it as an illegal payments by internal committee of PGMI but ex-deputy ceo always a hurdle to implement the Finance department clear order.

It is requested that an impartial departmental inquiry is held in the light of the above facts with a representative of Health and Establishment to look into all the irregularities and then targeting me on malafide intentions by ex-administration of PGMI mentioned above Ex-CEO, ex-Deputy CEO Dr. Hamid Ahmad who recently proceeded on premature retirement along with the HR Manager both have malafide intentions to repatriate me from PGMI to run PGMI on the pattern of MTIs without any written clarification from the Government that PGMI is MTI or government institute.

Yours sincerely,

over
Mr. Ayub Khan
Ex-PS to CEO &
PS to DMERP
PGMI Peshawar

13/2/2023

Copy to:

1. Secretary Establishment Government Khyberpakhtunkwa.
2. Director General Health Services Khyber Pakhtukhwa Peshawar.
3. Accountant General, Khyber Pakhtunkhwa Peshawar.
- ✓ 4. SO6 Health for information with ref to letter above.

CIRCULAR

In light of the Inquiry committee constituted vide letter No. 11692-94/PS/PGMI, Dated: 01/09/2022 regarding unlawful/unauthorized orders/notifications/actions by PGMI during the last 03 weeks. Therefore, all the staff of PGMI is hereby directed to be present on their duty paces by tomorrow and onwards till the completion of inquiry and no leave shall be entertained.

The first meeting of the inquiry committee is going to be held on Friday dated 02-09-2022 at 10:00 am in the committee room of PGMI.

Copy forwarded for information and file to:-

1. All Incharge Sections PGMI, Peshawar to ensure the compliance of the above mentioned order on their respective staff.
2. PS to Chief Executive Office PGMI, Peshawar.
3. Dy: Chief Executive Officer PGMI, Peshawar.
4. Notice Board.

[Signature]
Dy. Chief Executive Officer
Postgraduate Medical Institute
Peshawar

Dy. Chief Executive Officer
Postgraduate Medical Institute
Peshawar
Date: 1/9/2022

No. 11751-34/ESSII/PGMI

No. _____/ESSII/PGMI
Date: _____/2022

Amir QI

1/3

Amir QI-11



Amir Q2
2/4

Ref No. I7424/Esstt: /PGMI

Dated: 24/11/2022

The Secretary Health,
Govt. of Khyber Pakhtunkhwa
Peshawar

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

Subject: **REPATRIATION OF 04 CIVIL SERVANT EMPLOYEES.**

In light of Inquiry committee recommendations and subsequent approval by the Executive Council awarded in its 39th meeting held on 04th Nov 2022 vide agenda item No. 16, it is requested to repatriate following 04 Civil Servant attached with PGMI to their parent department as their services are no more required at this institution. They were found guilty of misconduct by involving themselves in preparing and issuing of an illegal notification. The EC minutes of 39th meeting & Inquiry committee report is attached with remarks that the competent authority may further proceed on this matter as per rules if deems necessary.

S#	Name	Designation	Scale
1	Dr. Muhammad Saddique	Medical Officer	BPS-17
2	Mr. Ayuob Khan	Office Superintendent	BPS-17
3	Mr. Asif Jan	Office Assistant	BPS-16
4	Mr. Masal Khan	Computer Operator	BPS-16

It is further stated that officer on serial no 1, Dr Saddique is absent from PGMI since 30th August 2022.

Hamid
DY. CHIEF EXECUTIVE OFFICER
Postgraduate Medical Institute
Hayatabad, Peshawar.

Enclosed: Min of 39th meeting of the Executive council PGMI Peshawar including the Report of Inquiry Committee

No. 9788 /HR Deptt/PGMI,

Dated: - 12/9 /2023

415 *Aravind R*

To

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

Subject: APPEAL IN THE CASE OF REPATRIATION OF 04 CIVIL SERVANTS.

Kindly refer to your office letter No. SOH-VI/HD/Secret/1-1/2021-22(Ayub Khan/Supdt/PGMI) dated 16-03-2023 on the subject cited above.

In this connection it is stated that the appeal of Mr. Ayub Khan (Office Superintendent) regarding the enquiry conducted on his unlawful/ unauthorized notification issued in the absence of CEO-PGMI was placed before the Executive Council in 43rd Meeting dated 01-09-2023 vide agenda item No.11 for decision. After detailed deliberation of the Executive Council it was decided that the grounds/ plea taken in his appeal did not satisfy the Executive Council and the findings of the enquiry committee is correct hence, his appeal was regretted by the EC.

Consequent upon the decision of the Executive Council, the services of Mr. Ayub Khan (Office Superintendent) civil servant is no more required at this institution and is repatriated to Health department with immediate effect on administrative grounds.

Chief Executive Officer
Postgraduate Medical Institute
Peshawar.

Dated: - 12/9 /2023

No. 9789-93 /HR Deptt//PGMI,
Copy forwarded for information and n/a to:-

1. Director General Health Services, Govt of Khyber Pakhtunkhwa, Peshawar.
2. Director MER&P, PGMI, Hayatabad, Peshawar.
3. Deputy Director Finance, PGMI, Hayatabad Peshawar to stop his salary.
4. PS to CEO PGMI, Hayatabad, Peshawar.
5. Mr. Ayub Khan (Office Superintendent) with the direction to report to DGHS with immediate effect.

Chief Executive Officer
Postgraduate Medical Institute
Peshawar.

19th September, 2023

To,

The CEO/Chairman EC
PGMI Peshawar

46

Approved 3

Subject:- Repatriation of 4 Civil Servants

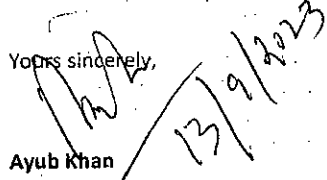
Sir,

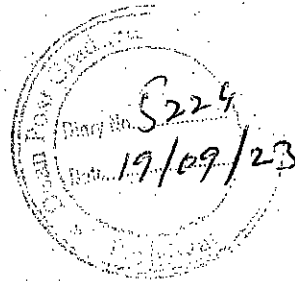
Reference your letter No.9788-93/HR/PGMI dated 12/9/2023 in response to Health Deptt letter No.SOH-VI/HD/Secret/1-1/2021-22 dated 16/3/2023 with the direction to report to Health Department/stoppage of my salary since 13/9/2023.

- That the appeal PGMI Diary No.776 dated 13th Feb 2023 was deliberately delayed upto 12th September, 2023. It was addressed to the appellate authority of Civil Servant i.e. Secretary Health and regretting it in PGMI 43rd Executive Council held on 1st September 2023 to which it was party is against the basic principles of appeal to whom it was addressed.
- That PGMI has not been declared/ notified autonomous body by government of Khyber Pakhtunkhwa Peshawar therefore, government business rules 1989 to be implemented rather running the institute on the pattern of autonomous MTIs.
- That in the 34th Executive Council meeting PGMI regulations 2022 wherein it was described that Civil Servants are not employees of the institute which aggrieved me & other Civil servants working since long in the institute. Under these draft regulations fix pay appointments & 2002 repealed ordinance in 2015 act institutional employee's promotions & upgradations were done by executive council.
- That PGMI itself a government regulations implementing body have no jurisdiction to approve or make service rules and regulations 2022 for appointments.
- That Civil Servants BPS-17 working in PGMI & their repatriation/transfer is the jurisdiction of the government and not of CEO or Executive Council PGMI to issue direction for repatriation.
- That an inquiry on the above cited subject is also in process & in mid of inquiry stoppage of my salary is against the justice & no communication regarding administrative grounds.

It is requested to kindly withdraw your direction regarding my repatriation during mid of the inquiry on the above cited subject till the finalization report of inquiry report and release my pay which has been stopped since 13/9/2023.

Yours sincerely,


Ayub Khan
Superintendent
PGMI Peshawar.



Copy:-

1. The Secretary Health Govt. Khyber Pakhtunkhwa with ref to above.
2. The Director General Health Services, Khyber Pakhtunkhwa with ref to above
3. Director DMERP PGMI for information.

47

1st January, 2024

To,

The Chief Executive
Postgraduate Medical Institute
Hayatabad Phase-4 Peshawar

Subject:- FATE OF APPEAL PGMI DIARY NO.5224/PGMI DATED 19/9/2023


Sir,

I would like to bring to your kind notice that an Appeal was submitted by the undersigned to your office vide Diary No.5224/PGMI dated 19/9/2023 against your letter vide No.9788-93/HR/PGMI dated 12/9/2023 regarding unjustified stoppage of salary and displacement from the place of duty at PGMI without any transfer by the competent authority for BPS-17 Civil Servant.

Subsequently the Health Deptt. letters vide SOH-VI/4-4/Ministerial dated 23/11/2023 and DGHS letter No.6888/Personnel Dated 29/11/2023 & meeting with you in this regard.

I would like to know about that what is the fate of my appeal addressed to you in the light of Health Department responses may kindly be communicated to the undersigned.

Yours sincerely,


Mr. Ayub Khan
Superintendent cum
PS to CEO PGMI
Peshawar

01/01/2024

PGMI Diary No.7034
Dated 01/01/2024

48

23/08/2014

The Chief Executive/Diwan Public
Hayatabad, Peshawar

SUBJECT

APPEAL

I am directed to inform the subject noted above and to state that a copy submitted by Mr. Ayub Khan Superintendent (BS 171) stationed at the PCMC, Peshawar, requesting for re-employment at FGHM at his original pay post and the decision which is under process.

I am further directed to state that furnish yours view of comments if any, in order to proceed further in the matter please.

(MUHAMMAD IBRAHIM)
SECTION OFFICER (ESTAE)

Ends: of even no & date.

Copy forwarded to -

1. PS to Secretary Health, Feroze - Peshawar
2. PS to Special Secretary Health (Genl) Peshawar
3. PA to Deputy Secretary Health (Admin) Hayatabad Peshawar

Section Officer (ESTAE)

To,

The Chief Executive / Dean PGMI
Hayatabad Peshawar.

Subject: **APPEAL**

I am directed to refer to the subject noted above and to state that an appeal submitted by Mr. Ayub Khan Superintendent (BS-17) attached to Dean/CEO, PGMI, Hayatabad Peshawar, requesting for retention at PGMI at his original pay post until the decision of inquiry which is under process.

I am further directed to state that furnish yours views/comments in the instant appeal to proceed further in the matter please.

(MUHAMMAD IBRAHIM)

SECTION OFFICER (ESTAB-VII)

Endst; of even no & date.

Copy forwarded to:-

- 1- PS to Secretary Health, Khyber Pakhtunkhwa
- 2- PS to Special Secretary Health (B&D) Khyber Pakhtunkhwa.
- 3- PA to Deputy Secretary Health (Admn) Khyber Pakhtunkhwa.

SECTION OFFICER (ESTAB-VII)

DIRECTORATE GENERAL HEALTH SERVICES

KHYBER PAKHTUN KHWA PESHAWAR

E-Mail Address: gwfpkhs@yahoo.com office Ph# 091-9210259 Exchange# 091-9210187, 9210196 Fax # 091-9210230
No. 6888 /Personnel Dated: 27/11/2023

To,

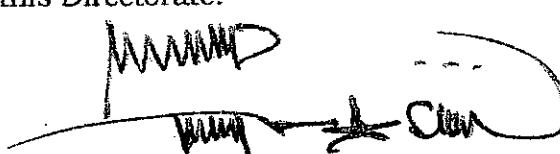
The Dean
PGMI Hayatabad Peshawar.

Subject:
Memo

APPEAL IN THE CASE OF REPATRIATION OF 04 CIVIL SERVANTS

Reference to your Endst No. 9789-93/HR Deptt://PGMI dated 12.09.2023 on the subject noted above.

Please withdraw the relieving order in respect of Mr. Ayub Khan Superintendent till the finalization of enquiry report as well as there is no vacant post of Superintendent under the control of this Directorate.

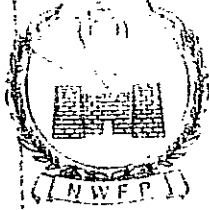

DY: DIRECTOR (ADMN)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P.K PESHAWAR.

29/11/2023

Drang
6526/pam
30/11/23

EXTRAORDINARY

GOVERNMENT



REGISTERED NO. P. 111

GAZETTE

50

North-West Frontier Province

Published by Authority

PESHAWAR, FRIDAY, 20TH SEPTEMBER, 2002.

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

NOTIFICATION

20th March, 2001.

No. SOH-III/8-91/99— In pursuance of the provisions contained in Article 5 of the Provisional Constitution Order No. 1 of 1999 and in exercise of all other powers enabling him in that behalf, the Chief Executive of the Islamic Republic of Pakistan is pleased to direct that in the Health Department Notification No. SOH/IV-4-13/75 P-I-I dated Peshawar the 29th March, 1982, the following further amendments shall be made namely:

AMENDMENT

In the appendix:-

(a) The existing serial number "IA" shall be renumbered as "IB" and before serial number "IB", as so renumbered the following new entries shall be inserted in the respective columns, namely:-

1	2	3	4	5	6
IA	Assistant Registrar (Academic)	Second Class II B Degree and five years experience in academic students affairs in a Medical Institution.	30-40 years		By promotion from amongst Administrative Officer/Private Secretaries/Superintendents; or i Assistants, or ii by initial recruitment, in the order of preference as aforesaid, in case of non-availability of a qualified candidate, and

(b) After serial number "IB", as so renumbered, the following new entries shall be inserted in the respective columns, namely:-

1	2	3	4	5	6
IB	Private Secretary.				By transfer from amongst the Superintendents having been promoted from Stenographer.

Sd/-s/-s
Ali Muhammad
Section Officer (II-III)

North West Frontier Province

Published by Authority

Peshawar. Friday, 20th September 2002GOVERNMENT OF NWFP
HEALTH DEPARTMENTNOTIFICATION
20th March 2001.

No. SOH-III/8-91/99-- In pursuance of the provisions contained in Article 5 of the Provisional Constitution Order No 1 of 1999 and in exercise of all other powers enabling him in that behalf, the Chief Executive of the Islamic Republic of Pakistan is pleased to direct that in the Health Department Notification No SOH/V-4-13/75 PI-II dated Peshawar the 29th March 1982, the following further amendments shall be made namely:-

AMENDMENT

In the appendix:-

The existing serial number 1A shall be renumbered as 1B and before serial No 1B as so renumbered the following new entries shall be inserted in the respective columns namely:-

1	2	3	4	5	6
1A	Assistant Registrar (Academic)		Second Class B degree and live years experience in academic students affairs in a Medical institution		i. By promotion from amongst Administrative Officer / Private / Secretaries / Superintendents or ii. Assistants, or iii. by initial recruitment, in the order of preference as aforesaid, in case of non availability of a qualified candidate, and
		Second B Degree and live year experience in academic students affairs in a Medical Institution		30-40 years	

After serial number 1B as so renumbered, the following new entries shall be inserted in the respective columns, namely:-

1	2	3	4	5	6
1B	Private Secretary				By transfer from amongst the Superintendents having been promoted from Stenographer.

POWER OF ATTORNEY

In the Court of Khyber Pakhtun Khwa Sardar Tribunal
Ayub Khan } For
 } Plaintiff
 } Appellant
 } Petitioner
 } Complainant

VERSUS

Govt of KPIC and others } Defendant
 } Respondent
 } Accused

Appeal/Revision/Suit/Application/Petition/Case No. _____ of _____
Fixed for _____

I/W, the undersigned, do hereby nominate and appoint


ZARAJ ANWAR & IMRAN KHAN ADVOCATES, my true and lawful attorney, for me in my same and on my behalf to appear at Peshawar to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions, An appeal, statements, accounts, exhibits. Compromises or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or subpoena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

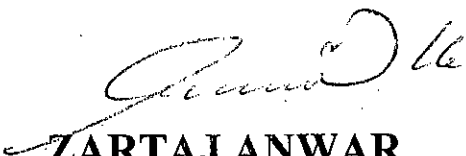
AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

IN WITNESS whereof I/we have hereto signed at Peshawar
the _____ day to _____ the year _____
Executant/Executants _____
Accepted subject to the terms regarding fee _____


IMRAN KHAN
Advocate High Court
Mob: 0345-9090648


ZARAJ ANWAR
Advocate High Courts
ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT
FR-3, Fourth Floor, Bilour Plaza, Saddar Road, Peshawar Cantt
Mobile-0331-9399185
BC-10-9851
CNIC: 17301-1610454-5