_received in Service Appeal No.__2445. Cost of Rs. VS r Titled Vide Order ______ /___0 Registrar, Assistant office in the of submitted on / / 2/2024. A1 14 Kh Botter City Servise Thibunalunal Peshawar

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 2445/2023

Rashida Begum......Appellant

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Versus

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09. 2. 24 Peshawar

BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL, PESHAWAR. Khyber Pakhtukhwa Service Tribunal

Service Appeal.No.2445-P/2023.

Miss Rashida Begum, Nurse (BPS-16)

DHQ Teaching Hospital KDA Kohat.....Appellant

VERSUS

- 1. Government of Khyber Pakhtunkhwa through Secretary Health Department, Khyber Pakhtunkhwa, Peshawar.
- 2. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
- 3. Medical Superintendent, DHQ Teaching Hospital, Kohat.
- 4. Miss Najma Firdous, Charge Nurse, Shaheed Farid Khan DHQ Hospital Hangu.....
 - Respondents.

Comments on behalf of Respondents No.1to3.

Preliminary Objections.

- 1. That the appellant has neither cause of action nor locus standi.
- 2. That the appellant is not maintainable in the present form.
- 3. That the appellant has not come to the Court with Clean hands.
- 4. That the appellant is bad due to mis joinder and non- joinder of necessary party.

RESPECTFULLY SUBMITTED.

 Correct to the extent that the Appellant was appointed by respondent No.2 as Charge Nurse BPS-16 vide office order No:11727-883/E.II,Dated Pesh.The 04-05-2007 at Serial No:47. Ever since appointment she is posted at DHQ Kohat.(Annex-A) Regarding of Appellant efficiency and complaint; she has been remained

unsatisfactory and multiple times absenteeism from duties in her entire service. (Annex-B) 2. Incorrect. The final warning was issued to respondent No.4 on 15.02.2023 by respondent

- No.3 who was staff nurse at that time in DHQ Hospital Kohat for misbehaving, bullying and allowing male persons to visit her in the Nursing Hostel.
- 3. Correct upto the extent that respondent No.3 constitute an inquiry committee vide office order No.1207/k-18 Dated.28/03/2023 in response of complaint launched by appellant against respondent No.4 Mst. Najma Firdous Charge Nurse for their conflict on entertaining the outsiders/ relatives in the Nursing hostel violating the hostel rules.
- 4. Correct. The inquiry committee submitted report to respondent No.3on 03/04/2023 by mentioning last warning and cancellation of hostel allotment to appellant for keeping illegal residents her hostel room.(Para 8 Inquiry Report Anexx-C)
- 5. Correct. Respondent No.4 had launched appeal for re-inquiry to Respondent No.2 who had constituted inquiry against Appellant and Respondent No.4.
- 6. Incorrect. The appellant and Respondent No.4 had exercising quarrels and abusive languages on many occasions. During inquiry proceedings on 16th September 2023, Deputy Medical Superintendent on duty at Night Shift submitted an incident report of quarrel between nurses of the hostel especially appellant and Respondent No.4 and in continuation of the incident report Deputy Medical Superintendent on duty at Evening shift on 17/09/2023 write letter to SHO Police station KDA for Police contingents especially Ladies Police for evacuation of outsider and illegal occupants from hostel.

<u>Page 1 of 2</u>

Diary No. 10976

Dated 02-02-2024

On recommendation of inquiry report Respondent No.2 who is the competent authority issued transfer order of Appellant and Respondent No.4 on administrative ground.(Copies attached as Anexx-D)

- 7. Correct.
- 8. Incorrect. The appellanthad not resumed duty in joining time and reports for non compliance has been submitted to Respondent No.2. by Medical Superintendent DHQ Hospital Karak vide Letter No.2237/Admn/DHQH/KK Dated 14/11/2023. (Copy attached as Anexx-E)

GROUNDS:

- **A.** Incorrect. The appellant and Respondent No.4 transferred on administrative ground by the competent authority after fulfilling all codal formalities/Inquiry.
- B. Incorrect as mentioned above in Para-A.
- C. Incorrect. The appellant has attached old notifications of Election Commission ban on posting and transfer; the latest notification on posting and transfer has been issued on 15th December 2023 vide No.F.2(1)2023-Cord-Vol-IX. (Copy attached as Anexx-F)
- **D.** As replied above.
- **E.** Incorrect. The transfer order is not violation of Appointment, Promotion and Transfer Rules, 1989 Rule 12.
- F. Incorrect. Educational facilities are provided by Government in each and every district. It is therefore most humbly prayed that the appeal may very kindly be dismissed with cost.
- G. The respondents seek permission to raise additional grounds at the time of arguments.

Mehmood Aslam

Secretary Health Department,

Government of Khyber Pakhtunkhwa. .

Respondent No-1.

Dr. Mushtaq Ahmad, MEDICAL SUPERINTENDENT, DHQ TEACHING HOSPITAL KDA KOHAT. Respondent No-3

Dr. Shouka

Director General Health Khyber Pakhtunkhwa, Peshawar. Respondent No-2.

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DIRECTORATE GENERAL HEALTH <u>Services, NWPP, Peshawar</u>,

OFFICE ORDER,

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Consequent upon the approval accorded by Department Selection Committee the following qualified Nurses are hereby appointed as Charge Nurse in BPS-16 i.e. Rs.4375-340-14575, plus usual allowances as admissible under the Rules, and posted against the vacant post in the Hospitals mentioned against their names :-

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	S.No.	Name	From	1	
ſ	1.	Bibi Ajmeena D/O Abbas		То	Remarks
-	2.	Khan Rehm-un-Nisn D/O Ajab Khan	Ist. Appointment	DHQ Hospital, Kohal	Against the vacant Post.
-			Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
-	3.	Ferhat Bibi D/O Abdul Wahid Ancela Gul D/O Ghulam	Ist. Appointment	DHQ Teaching Hospital DIKhan	Against the vacant Post.
-	4.	Muhammad	Ist, Appointment	DHQ Teaching Hospital, DIKhan	Against the vacant Post.
	5.	Janet Rose D/O Pervaz Akhtar	ist. Appointment	DHQ Hospital, Kohat	Against the
	6.	Shazia Aslam D/O Muhammad Aslam Khan	Ist. Appointment	Mufil Mehmood Teaching Hospital DIKhan	vacant Post. Against the
	7.	Shazia Bibl D/O Ghulam Asghar	Ist. Appointment	DHQ Teaching Hospital,	vacant Post. Against the
	8.	Jane Rose D/O Pervaz Akhter	Ist. Appointment	DIKhan DHQ Hospital, Kohat	vacant Post. Against the
	9.	Uzma Atta D/O Atta Muhammad	Ist. Appointment	City Hospital, Lakki Marwat	vacant Post. Against the
	10.	Saima Gul D/O Misal Khan	Ist. Appointment	Multi Mehmood Teaching	vacant Post. Against the
Γ	11.	Ncelam D/O Aseem Khan	Ist Appointment	Hospital, DIKhan Multi Mehmood Teaching	vacant Post. Against the
IL	12.	Farzana D/O Khurshid Alam		Hospital, DIKban	vacant Post.
Į⊢			Ist. Appointment	City Hospital, Lakki Marwat	Against the vacant Post.
		Samia Begum D/O Raza Khan Rozina Begum D/O Taj.	Ist. Appointment	Mufti Mehmood Teaching Hospital, DIKhan	Against the vacant Post.
Ť	14.	Mulianimad	Ist. Appointment	City Hospital, Lakki Marwat	Against the vacant Post
-	15.	Rifat Jehan D/D Amcerullah	1st. Appointment	City Hospital, Lakki Marwat	Against the vacant Post.
	16.	Seema Akhtar D/O Nazir	Ist. Appointment	City Hospital, Lakki Marwat	Against the vacant Post.
	17.	Asia Begum D/O Sardar Gul	Ist. Appointment	City Hospital, Lakki Marwat	Against the
	18.	Naheed Begum D/O Fazii Raziq	lst. Appointment	City Hospital, Lakki Marwat	Against the
	19.	Reshma Nowshad D/O Nowshad Khan	Ist. Appointment	DHQ Hospital, Bannu	vacant Post. Against the
	20.	Nuzrat Parveen D/O Zahbor Khan	Ist. Appointment	DHQ Hospital, Kohat	vacant Post. Against the
	21.	Kalsoom Bibi D/O Zahir Shah	lst. Appointment	DHQ Hospital, DIKhan	vacant Post. Against the
	22.	Azeb Nisa D/O Zard Ali Khan	Ist. Appointment	DHQ Hospital, Karak	vacant Post. Against the
	23.	, Romana Shamsher D/O	ist. Appointment	DHQ Hospital, Kohat	vacant Post. Against the
\vdash	24.	Shamsher Hussain Parveen Akhter D/O Nazir Bal	Ist. Appointment	DHQ Hospital, Kohat	vacant Post. Against the
┝		Kousar Shaheen D/O Gul	·····	THQ Hospital Banda Daud	vacant Post. Against the
	25.	Nawaz Khan Shazia Akhter D/O Ghulam	Ist. Appointment	Shah (Karak)	vacant Post.
	26.	Shabir	Ist. Appointment	DHQ Hospital, DIKhan	Against the vacant Post.
	27.	Dali Rashid D/O Rashid	Ist. Appointment	Mufti Mehmood Teaching Hospital, DIKhan	Against the vacant Post.
	28.	Salam Tabassum D/O Muhammad Nasir	Ist. Appointment	DHQ Hospital, Karak	Against the vacant Post.
	29.	Zahida Khatoon D/O Noor Sakhi Jan	Ist. Appointment	THQ Hospital, Banda Daud Shah (Karak)	Against the vacant Post.
	30.	Samrcen Ali D/O Khurshid Ali Khan	Ist, Appointment	DHQ Hospital, Bannu	Against the vacant Post.
	31.	Samreen Maqsood D/O Maqsood Ahmad	Ist. Appointment	DIIQ Hospital, Kohat	Against the vacant Post.

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They will be on probation initially for a period of two years extendable for a further period not exceeding one year.

Their Services can be dispensed with during the probation period, if their work and conduct found unsatisfactory.

Their appointment will be subject to medical fitness and verification of character and antecedents/Educational qualification etc.

They will not be entitled to any TA/DA for medical examination and joining the first appointment.

They will be governed by such Rules and orders as may be issued by the Government for the category of Government Servant to which they belong.

They shall for all intents and purposes be Civil Servant, except for the purpose of Pension and Gratuity. In lieu of the same they will be entitled to receive Contributory provided Fund. For the said fund 10% contribution will be made by the provincial Govt, and 10% by the Civil Servant concerned in the prescribed manner. Provided further that in the event of death of the Civil Servant whether before or after retirement, their family shall be entitled to receive the said amount if it has already not been received by concerned decensed Civil Servant.

They are liable to serve any where in the NWFP/FATA.

They will serve the Government of NWFP Health Department for a period of 05 years being under bond failing which they will deposit a sum of Rs.50,000/- as bond money into Government treasury.

They will submit an under taking on judicial stamp paper to the Director General Health Services, NWFP Peshawar that the documents submitted are genuine and not fake. Moreover they have not been dismissed from service by any Govt. or semi Govt. organization

If they wish to resign from Service after completion of bond period they shall resign in writing by giving prior notice of one month OR deposit one month pay in lieu of one month advance notice, in the Government treasury. However they will continue to serve the Govt. till their resignation is accepted by the competent authority.

If the above terms and conditions are acceptable to them they should report in the institutions mentioned against their names for duty within (14) days of receipt of this order.

Note :- Arrival reports should be submitted on proper charge report forms.

Sd/-DIRECTOR GENERAL HEALTH SERVICES, NWFP, PESHAWAR.

No. 11727-883 /E.II, Dated Pesh. The copy forwarded to the:-

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04-05-12007.

- Secretary to Govt. of NWFP Health Department Peshawar, for information
- Executive District Officers (Health), DIKhan, Kohat, Bannu, Hungu, Karak and Lakki Marwat Medical Supdi. DHQ Hospitals, DIKhan, Kohat, Bannu, Hanga Karak and Lakki Marwat.
- Medical Supdt. City Hospital, Lakki Marwat
- Medical Supdt. Mufti Mehmood Teaching Hospital, DIKhan. 6.

District Accounts Officers, DIKhan, Kohat, Bannu, Hangu, Karak and Lakki Marwat. Bibi Ajmeena D/O Abbas Khan, Village Faqir Abad, P.O. Shakardara, Tehsil & District Kohat. 7. Rehm-un-Nisa D/O Ajab Khan, P.O. Sabir Abad, Village Deli Mela, Mohla Zakola, Tehsil & 8.

- District Karak. Farhat Bibi D/O Abdul Wahid, Basti Tarcen Abad near Degree College House No.701-B DiKhan.
- 10. Aneela Gul D/O Ghulam Muhammad, Mohallah Toyan Wala, District DIKhan,

11. Janet Rose D/O Pervaz Akhter, C/O Dr. Musarrat Jabeen, Liagat Memorial Hospital, Kohat. 12. Shazla Aslam D/O Muhammad Aslam, Assit, Professor Depti. of Soil Science Faculty of Agriculture Gomal University DIKhan,

- 13. Shazia Bibi D/O Ghulam Asghar, Kot Jai, Tehsli Paharpur, District DIKhan. 14. Jane Rose D/O Pervaz Akistar, U.P. Church, Shimala Pahari, Kohat,
- 15.
- Nuzrat Parveen D/O Zahoor Khan, Village Mir Ahmad Khail, Near Ayaz General Store, Tehsil & District Kohat,
- 16. Uzma Atta D/O Atta Muhammad, Mohallah Ibrahim Khel, Tangi Nusral Zai,

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Dated:03/04/2008

To,

Medical Superintendent DHQ Hospital KDA Kohat.

Subject:

Complaint / Enquiry

Sir,

After thorough investigation it is clear that C/N Rasheeda refused the order of Supervisor Safia. C/N Rasheeda had performed duty in Casualty upto 12°Clock (Mid night). When Supervisor Safia told her that due to non availability of staff, you are directed to perform duty in Orthopaedic Ward. She plainly refused to go to orthopaedic ward. C/N Rasheeda is of the opinion that her duty is finished at 12 Mid Night and she is going to hostel to sleep. C/N Rasheeda not only refused the order, but misbehaved with Night Supervisor Safia, which is negligence from her duty. It is recommended that disciplinary action should be taken against C/N Rasheeda according to rules and regulations.

Dr.Mohammad Karim Afridi Deputy Medical Superintendent DHQ Hospital KDA Kohat

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Mrs.Musarrat Jabeen Nursing Superintendent DHQ Hospital KDA Kohat

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OFFICE OF THE MEDICAL SUE RINTENDENT DHQ HOSPITAL KDA KOHAT.

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MEDICAL SUPERINTENDENT DHQ HOSPITAL KDA KUHAT.

NO..4.5.6.3.....(PF) D ted, Kohat theo7.10.08.

TO:

Mst.Rasheeda, Charge Nurse,DHQ Hospital,KDA Kohat.

SUBJ-CT: FINAL NOTICE.

^Memo:

You are absent from duty w.e.f.4.10.08, till date without any information and prior sanction of leave.

You are hereby finally warned through this letter to immediately resume your duty within 02 days of the reciept of this Notice/letter, otherwise you services will be not more required in this hospital and will be relieved to Director General, Haalth Services, NWFP Peshawar, for further orders.

No. 4522 1PF Dated: 0/0 / 10 / 2008

Τo,

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The Executive District Officer (Health) Kohat.

Subject:- ABSENT REPORT

Sir,

The following Charge Nurses working in DHQ Hospital KDA Kohat were found absent from their place of duty during Eid ul Fitar Holidays without any information.

S/No	Name of Staff	Date of Absent from duty	
1	C/N Saima	03/10/08 & 05/10/08	
2	C/N Ajmeena	04/10/08	
3	C/N Rasheeda	04/10/08	
4	C/N Mina Kumari	04/10/08	

Report is submitted for disciplinary action under the rules.

the fur

A Medical Superintendent DHQ Hospital KDA Kohat

No. 36-10-13 /E-16, From:

9 Dated Kohat the

The Executive Distt Officer, (Health) Kohat.

Ίο,

1.Miss. Saima Charge Nurse DHQ Hospital, KDA, Kohat. 2. Miss. Ajmeena Charge Nurse DHQ Hospital, KDA, Kohat. A. Miss, Rasheeda Charge Nurse DHQ Hospital, KDA, Kohat 4. Miss Mina Kumari Charge Nurse DHQ Hospital KDA, Kohat.

Subject:

Memo;

As intimated by the Medical Superintendent DHQ Hospital KDA Kehat that you were found absent from your duties on dates mentioned against so meames during Eid Holidays without obtaining prior approval /permission from the company authority.

1. Miss. Saima

ABSENT REPORT

- 2. Miss. Ajmeena
- 3. Miss. Rasheeda
- 4. Miss. Mina Kumari

03/10/2008 to 5/10/2008. 04/10/2008. 04/10/2008. 04/10/2008.

You are therefore, directed to explain your position regarding willing absence within 03 days from the receipt of this letter failing which action it be recommended against you to the higher authorities.

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Executive Distt Officer. (Health) Kohat.

NU. 3614 /E-16,

reference to his letter referred to

Dated Kohat the copy forwarded to the Medical Superintendent DHQ Hospital KDA, Kohat with

Executive Distt Officer. (Health) Kohat.

No: <u>5536 (PF)</u> Dated, Kohat the 03/12/2008

To:

Mst. Rashida Charge, Nurse HQ Hospital, KDA, Kohat

Subject: <u>ABSENT FROM DUTY</u>

Memo:

As reported by CMO, Dr. Farid Afridi, that you were absent from duty on 02/12/2008, without any information / proper permission from competent authority.

You are therefore, directed to explain the reason of absence within 03 days of the receipt of this letter, otherwise strict action will be initiated against you, under the rules.

Sd/--MEDICAL SUPERINTENDENT DHQ HOSPITAL KDA, KOHAT

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No: 5537 / (PF)

Copy for read to Nursing Superintendent, DHQ KDA, Kohat for information.

> Sd/--MEDICAL SUPERINTENDENT DHQ HOSPITAL KDA, KOHAT

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Charge Murst.

A rep ried by CMQ, Dr. 7 rid fridi, trat is were absent from duty on, 2.12.2005, without only interaction/ propr permission from competent authority.

You are thereafore, dir stol of any blanch responsed than 03 days of the rocci to thes lette. oth ratics strict which will be initiated o what

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ED. 5537 ... /PT.

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DHUE AD NOT ", for information.

OFTICK OF THE MEDICAL SUPARIAT, NUMERT ING: HOSPITAL, KDA, KOHAT

NO.5698-5703 /PF, "ated "onat_16/12/2008.

Α,

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Mss: Romana Gilarni, C/Nurse.
 Mss: Asia Sultana. C/Nurse.
 Mss: Rashida. C/Nurse.
 Mr: Abdul Wahid. W/Orderly.
 Mr: Sabir Rehman. W/Orderly.
 Mr: S.QasimAliShahW/Orderly.

Subject:= Memo; WARNING.

nef: your reply to explanation is not found satisfactory.

You are hereby warned to be more careful in future and take interest in Govt:duties.

THE K MEDICAL SUPERINTLN DEN T DHQ: HOSPITAL, K DA, KOHAT. Ð

NO. /PF,

for informaticn and n/action; //

MEDICAL SPELRINTENDENT DHQ:HOSPITAL,KDA,KOMAT.

Attan 1

To,

OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL.KDA.KOHAT.

159 NO. 7 PF.

Dated Kohat 3/ 01/2011.

To,

Mrs.Rasheeda, Charge Nurse, DHQ Hospital, Kohat.

Subject:-

LEAST IN GOVT DUTIES. INTEREST

Memo:

It is noted with great concern that you are irregular in performing your duty from the last two months. This has been checked time and again by the undersigned. You were also absent from the hospital when the hospital was dealing with the mass emergency of Bomb Blast at Kohat Tunnel.

You are directed to explain the reason in writing within three days failing which disciplinary action will be recommended against you.

MEDICAL SUPE MDENT QHQ HOSPITAL KDA KOHA L

I ven No.& date.

Copy forwarded to the.

- 1. The Nursing Superintendent DHQ Hospital,Kohat with the direction to assigned duty in Casualty Unit Morning from the 1st Feb.2011, so that comes under direct supervision and not to accept the mutual transfer of her with any one.
- 2. The Accountant.(Local office) with the direction to stop her salary till further order



MEDICAL SUPERINTENDENT DHQ HOSPITAL KDA, KOUA F.,

OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL, KDA, KOHAT

No.<u>9617</u>/PF

Dated Kohat <u>06</u> /06/2012

To,

C/N Rashida Begum

Subject:- EXPLANATION

Memo:

It has been reported that you are found absent from your duty w.e.f 01.06.2012 to 05.06.2012 without prior sanction of leave from the competent authority.

You are hereby called upon to explain the reason of your absence period within 03 days of the issue of this notice; otherwise strict disciplinary action will be initiated against you.

MEDICAL SUPERINTENDENT DHQ HOSPITAL, KDA, KOHAT

OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL, KDA, KOHAT

No. 9598 / PF

Dated Kohat 04 /06/2012

1. C/N Rashida Begum 2. C/N Sadia Faiz

3. Usman (Sweeper)

03/06/2012 03/06/2012 03/06/2012

Subject:- EXPLANATION

Memo:

To,

Ę

It has been reported that you are found absent from your duty on the mentioned date without prior sanction of leave from the competent authority.

You are hereby called upon to explain the reason of your absence period within 03 days of the issue of this notice; otherwise strict disciplinary action will be initiated against you.

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MEDICAL SUPERINTENDENT DHQ HOSPITAL, KDA, KOHAT

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OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL, KDA, KOHAT

No. 9595 /PF

Dated Kohat // ___/06/2012

To,

	Asma Dai	02/06/2012
2.	Nasir Ahmad	01-02/06/2012
3.	Younas (Sweeper)	02/06/2012
4.	Rashida Begum (N/Reliever)	02/06/2012
5.	Shashi Kapoor (Sweeper)	01/06/2012
6.	Imran (Sweeper)	01/06/2012

Subject:- EXPLANATION

Memo:

It has been reported that you are found absent from your duty on the mentioned date without prior sanction of leave from the competent authority.

You are hereby called upon to explain the reason of your absence period within 03 days of the issue of this notice; otherwise strict disciplinary action will be initiated against you.

(v[]

MEDICALSUPERINTENDENT DHQ HOSPITAL, KDA, KOHAT

. **.** . .

OFFICE OF THE MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL KOHAT 1248 No. /PF

Dated: (0/06/2016

To,

C/N Rashida Begam (ICU). 1.

M/N Imran Ali (CCU). 2.

W/O Amir Zeb (ICU). 3.

W/O Ilyas (Medical A Ward). 4

Subject: **EXPLANATION**

Memo:

During surprise round by the undersigned on 09/06/2016 at 08:00 PM, it was noted with great concern that all of you came late to your duty place, which is gross negligence on your part.

You are hereby directed to explain your position within 03 days positively, otherwise strict disciplinary action will be initiated against you under the rules.

Medical Superintendent DHQ Teaching Hospital Kohat

Even No & Date.

Copy forwarded for information to Nursing Superintendent, DHQ Hospital KDA Kohat.

Jain

Medical perintendent DHQ Teaching Hospital Kohat



1380 No. /PF

Dated Kohat the 16/06/2016

То

Ms. Rashida Begum (Charge Nurse) DHQ Teaching Hospital KDA Kohat.

Subject:- WARNING

Reference your reply to the explanation called vide this office letter No.1348/PF dated 10.06.2016.

You are hereby strictly warned to be careful in future.

Atony

MEDICAL SUPE NTENDENT DHQ TEACHING HOSPITAL KOHA

No. /PF

Dated Kohat the 20/06/2017

Ms. Rashida Begum (Charge Nurse) DHQ Teaching Hospital KDA Kohat.

Subject:-WARNING

It is noted with great concern that you are not obeying the orders of your shift supervisor, harass the Class - IV Staff and left your duty place uncovered at the time of Suboor (Sehri) which is a highly professional irresponsibility at your part.

You are hereby warned to be careful in in future, take interest in government duties and concentrate on your own duty as you do not have any concerns with the duties of other staff specially Ward Orderlies. You are further directed to obey the orders of your supervisors.

In case of any complaint and negligence strict disciplinary action will be initiated against you including recommendation of transfer from this hospital on administrative grounds.

> MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL KOHAT

Even No. & Dated:

Copy forwarded to the:

- Director General Health Services Khyber Pakhtunkhwa Peshawar for 1. information.
- Deputy Commissioner Kohat Division Kohat for information. 2.
- Chief Executive DHQ / W&C Teaching Hospitals Kohat for information. 3.
- 4. Divisional Monitoring Officer Independent Monitoring Unit (Health) Kohat Division for information. 5.
- Deputy Medical Superintendent DHQ Teaching Hospital KDA Kohat for information.
- 6. Chief Nursing Superintendent DHQ Teaching Hospital KDA Kohat for

MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL KOHAT 8

To

-Fi

4130 No. /PF

Dated Kohat the 16 /10/2017

То

Ms. Rasheeda (Charge Nurse) DHQ Teaching Hospital KDA Kohat.

Subject:- EXPLANATION

It has been reported by the Chief Nursing Superintendent that you were found absent from your place of duty on 12.10.2017 from 09:32PM to 09:50PM).

You are hereby called upon to explain your position within 03 days of the issuance of this notice, otherwise strict disciplinary action will be initiate against you.

MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL **()** KOHAT

Even No. & Dated:

- 1. Director General Health Services Khyber Pakhtunkhwa Peshawar for information.
- 2. Deputy Commissioner Kohat Division Kohat for information.
- Divisional Monitoring Officer Independent Monitoring Unit (Health) Kohat Division for information.
- 4. Deputy Medical Superintendent DHQ Teaching Hospital KDA Kohat for information.
- 5. Chief Nursing Superintendent DHQ Teaching Hospital KDA Kohat with the direction to serve this explanation on the concerned charge nurse and put up her reply or report after due date.

MEDICAL SUPERINTENDENT DHQ ŤĘACHING HOSŖITAI КОНАТ

nn 1 1

4166 /PF No.

Dated Kohat the 17/10/2017

То

Ms. Rashida Abbas (Charge Nurse) DHQ Teaching Hospital KDA Kohat.

Subject:-

<u>WARNING</u>

Reference your reply to the explanation called vide this office letter No.4066/PF dated 11.10.2017.

You are hereby warned to be careful in future and take interest in government duties.

MEDICAL SUPERINTENDENT CHING HOSPITAL DHQ TEA KOHAT

MEDICAL SUPERINTENDENT

DHQ TEACHING HOS

Even No. & Dated:

- 1. Director General Health Services Khyber Pakhtunkhwa Peshawar for information.
- 2. Deputy Commissioner Kohat Division Kohat for information.
- 3. Divisional Monitoring Officer Independent Monitoring Unit (Health) Kohat Division for information.
- 4. Deputy Medical Superintendent DHQ Teaching Hospital KDA Kohat for information.
- 5. Chief Nursing Superintendent DHQ Teaching Hospital KDA Kohat for information.
- 6. Accounts Section DHQ Teaching Hospital KDA Kohat with the direction to entry in her service book and deduct her 01 day salary on source.

OFFICE OF THE MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL KDA; KOHAT

4238 No. /PF

Dated Kohat the 19 /10/2017

То

Ms. Rasheeda (Charge Nurse) DHQ Teaching Hospital KDA Kohat.

Subject:- <u>EXPLANATION</u>

It has been reported that you were found absent from your place of duty on 17.10.2017 from 09:35PM to 10:30PM.

You are hereby called upon to explain your position within 03 days of the issuance of this notice, otherwise strict disciplinary action will be initiate against you.

MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL KOHAT

Even No. & Dated:

- 1. Director General Health Services Khyber Pakhtunkhwa Peshawar for information.
- 2. Deputy Commissioner Kohat Division Kohat for information.
- 3. Divisional Monitoring Officer Independent Monitoring Unit (Health) Kohat Division for information.
- 4. Deputy Medical Superintendent DHQ Teaching Hospital KDA Kohat for information.

MEDICAL S ERINTENDENT DHQ TEACHING HOSPITAL **KOHAT**



OFFICE OF THE	
MEDICAL SUPERINTENI	_
DHO TEACUDIC	DENT
DHQ TEACHING HOSPIT	AL
KDA; KOHAT	
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4849 No. /PF

Dated Kohat the 04/12/2017

Ms. Rasheeda Begum (Charge Nurse) DHQ Teaching Hospital KDA Kohat.

Subject:- <u>EXPLANATION (Last Warning)</u>

It has reported by the Chief Nursing Superintendent that you were found willfully absent from your place of duty on 30.11.2017 without any information.

You are hereby called upon to explain your position within 03 days of the issuance of this notice, otherwise strict disciplinary action will be initiate against you.

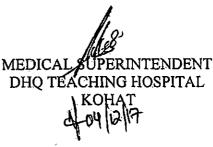
MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL KOHAT

Even No. & Dated:

То

- 1. Director General Health Services Khyber Pakhtunkhwa Peshawar for information.
- 2. Divisional Monitoring Officer Independent Monitoring Unit (Health) Kohat Division for information.
- 3. Deputy Medical Superintendent DHQ Teaching Hospital KDA Kohat for information.
- 4. Chief Nursing Superintendent DHQ Teaching Hospital KDA Kohat with the direction to serve this explanation on the concerned staff and put up their reply or report after due date.

C



No.

Dated Kohat the \sqrt{D} /05/2022

То

1. Ms. Naveeda (Charge Nurse)

2. Ms. Rashida Begum (Charge Nurse)

Subject:- EXPLANATION

Memo:

It has been reported by the Nursing Supervisor (Evening shift) on dated 05.05.2022; that you were late to join your duty without any information or prior permission.

You are hereby required to submit your written reply on this letter within 02-days from its receipt; failing which it will be presumed that you have no explanation to submit in your defense and ex-parte decision will be taken against you, under the rules.

MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL KOHAT

Even No. & Dated:

Copy forwarded for information to the:-

- 1. Deputy Medical Superintendent (Estab: / HR) DHQ Teaching Hospital KDA Kohat.
- 2. Nursing Superintendent DHQ Teaching Hospital KDA Kohat.
- 3. Accounts Section DHQ Teaching Hospital KDA Kohat with the direction to deduct 01-day salary of the above named charge nurses.

MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL KOHAT

KKW,

INQUIRY REPORT (HOSTEL's ISSUE DHOH, KDA, KOHAT)

BACKGROUND:

The inquiry was conducted in accordance with office order no. 4285/E.II, dated 4/8/2023, signed by the ADDL (Nursing) and ordered in response to Mst. Najma Firdous's complaint contains allegations about the entry of men into the bachelor hostel and her general unease with life (Page 5).

ALLEGATIONS (Pages 6):

- a) According to PC-I, the nursing hostel is a bachelor, not a residential one, and it is against the law for more than two people to occupy a room meant for two staff members.
- b) The administration is directly responsible for the irregularities, and when a complaint is filed, she is singled out for punishment rather than the alleged offender.
- c) She feels unsafe among the 3-4 rooms of married nurses, despite the fact that it is a bachelor hostel without rules and regulations and the hospital's MS has permitted married nurses to live with their husbands for a longer period of time.
- d) The Medical Superintendent's inquiry committee declared her as a psychiatric patient in the report using unethical language.

MODE OF INQUIRY:

The inquiry was started on August 24, 2023, and on August 22, 2023, letter No. 3984 was sent to Mst. Najma Firdous to record her statement. On August 24, 2023, letter Nos. 4135-37 were sent to the members of the inquiry committee to record their statements in writing, and on August 24, 2023, letter No. 4145 was sent to the Medical Superintendent to respond to the questions raised in the same letter. On September 4, 2023, letter No. 4311-17 requesting that six nursing staff members and an electrical technician appear before the inquiry officer was also sent to those individuals. Six female nursing staff members and two male nursing staff members received letters Nos. 4367-72 and 4405-6, respectively (Pages 7-12).

INSPECTION OF THE HOSTEL:

A joint visit was carried out to both hostels and the following information was noted:

- a) The New Hostel had 12 rooms, 12 nurses, six married couples, six people who were currently found to be outsiders, nine rooms with two tons of split air conditioning, eight TVs, eight washing machines, five ovens, eleven large refrigerators, eleven irons, and ten cooking heaters, and three rooms that were locked.
- b) There were 13 rooms in the old hotel, 10 nurses, 5 married, 9 people were currently discovered outsiders, 8 had two tons split air conditioning, 6 TVs, 6 washing machines, 5 ovens, 11 large-size refrigerators, 10 irons, 10 cooking heaters, and two were locked.
- c) Due to the filthy surroundings, hostels were typically highly contaminated and unfit for habitation. There were no indications of cleanliness.

According to the MS of the hospital, each nurse is charged Rs. 10,000 for the use of electricity; however, no documented proof was produced.

STATEMENTS:

i) Dr. Mushtag, Medical Superintendent, DHQH, KDA, Kohat responded that according to the PC-1, the nursing hostol is bachelor one and he does not know about the male persons, who visit the hostel; however, he clarified that only entitled persons have been allowed to reside (Page 13) The Inquiry Committee was given a questionnaire regarding its one-pager report and the committee responded. However, no attachment was found. The committee has further written that no warden or housekeeper is looking after the hostel, and the post is vacant. The inquiry committee report is entirely based on personal criticism and has attempted only to remove Mst. Najma Firdous from the hostel as well as the hospital because of her problematic nature (Pages 14-16).

Dr. Shamim Orakzai, DMS night shift mentioned that one night Mst. Najma Firdous asked to verify the presence of a male person in the room of Mst. Rashida. The room was checked by him along with 3-4 other nursing staff even Mst. Najma Firdous herself but no one was there and her act was merely to derange the smooth environment and blackmail Mst. Rashida Begum (Page 17).

The complainant Mst. Najma Firdous, Charge Nurse has mentioned that most (names have also been mentioned) of the married nursing staff live with their families in the bachelor hostel. All nurses have a single room except for three nurses who have two rooms. Her assertion that all nurses were not treated equally is true, but she failed to prove her allegation that the administration was involved in the hostel's conflict. She has shown her concerns about some words like a psychiatric patient, behaviour problem, and personality problem, written by the inquiry committee that if the said report is published or reaches social media then nobody will agree to marry her. No doubt, Mst. Najma Firdous had a personal relationship with Mr. Asif electrician. Later on, the friendship broke and he tried to harass her; however, they resolved the issue. Mst. Received negative remarks from the majority of staff and other employees. It is true that she cannot absorb rather quarrels with her colleagues for no reason and even beats them. Mst. Najma Firdous has written multiple applications/letters to the MS only for minor issues and should not have had to do so (Pages 18-29).

According to her verbal statement, MS has stopped outsiders by circulating rules but not by implementing them. The hostel lacks a visiting room or common kitchen. What was the reason for MS preventing my relatives while allowing other nurses? During the night a nurse stays outside and returns to the hostel in the daytime. An electrician Mr. Asif has a friendship with Mst. Rashida sends letters to my family. Several times, I have asked MS even in writing but he ignored me and said to leave while giving time to other staff.

At first, Mst. Rashida Begam, a charge nurse was a friend of Mst. Najma Firdous but after transfer to Kohat in 2012, they slowly became enemies of each other due to the above-said electrician who was visiting the hostel initially to Najma's room and then to Mst. Rashida Begum and both of them have degraded the conducive environment of the hospital. In detail, she has documented the friendship history between Mr. Asif, an electrician and Mst. Najma Firdous, who now, resides with her family members in the hostel and quarrels with others (Page 30).

According to Mst. Gulshan Hameeda, Mst. Najma Firdous is the main character in disputes. Rashida Begum and Ms. Najma Firdous fought in March 2023, most likely early in the day. When I arrived back at the hostel that night, they were still arguing. I made an effort to find a solution, but Ms. Najma Firdous along with her sister, Shazia, and two nieces abruptly began beating me, (Page 31).

i) Charge Nurse Mst. Shabnam Hakeem claimed that Mst. Najma Firdous has a habit of arguing with nursing staff. She also claimed to have personally observed Mst. Firdous' brother Waqas lives in the hostel permanently and has seen Mr. Asif, an electrician, frequently visiting her room in the late evening (8 p.m.), but their relationship has since deteriorated.

The sister of Mst. Najma Firdous has lived in the hostel for the past eight months. according to her verbul statement. Despite the fact that she gave birth in the same

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hospital and her child is now 18 months old, her husband lives abroad. Prior to her friendship with Mr. Asif, Ms. Najma had no issues with male outsiders, but after their breakup, she began griping that Mst. Jamsheda, the Nursing Superintendent, was given a questionnaire and she replied that the outsiders were visiting the hostel before the SOPs were circulated and now the relatives still come but in the evening (Page 32).

- viii) Mr. Zafar Iqbal, president of the nursing cadre added that the long conflict in the hostel still continues between the two fighters Mst. Najma Firdous and Mst. Rashida Begum (Page 33).
- ix) Mr. Asif, electrician stated that after his friendship ended, Mst. Najama Firdous was stopping him from electricity work in the rooms of other nurses and tried to blackmail him. According to his verbal statement, he has a friendship with Mst. Najma Firdous but could not continue because she made a male nurse Mr. Wajid as her friend. When she beat me with a stick I wrote a letter to her family and the situation became worse (Page 34)
- x) The fight between Ms. Najma Firdous and Ms. Rashida Begum was also seen in person by Mr. Said Nawab, the night shift supervisor (Page 35). According to Mr. Said Nawab's verbal statement, Ms. Najma and Ms. Sadaqat previously fought. He personally requested MS and DMS to find a long-term solution, but he was unable to produce proof of his verbal statement. The hostel should have a warden and a visiting room, but neither is present
- xi) The main players in the conflict, according to Mr. Muhammad Wajid Male Nurse, are Mst. Najma Firdous, Mst. Rashida Begum, and third Mr. Asif electrician, as well as a weak administration as a result of the failure to implement SOPs created by the Medical Superintendent. He added that Mr. Asif wrote letters to Mst. Najma Firdous's family for blackmailing her (Page 36). According to the verbal statement made by Mr. Muhammad Wajid, the previous MS had stopped all outsiders, including husbands, but things had picked up again under the current administration. The MS created the rules, but because he didn't follow them, he is powerless to do anything about it. Despite having two adult sisters in her room, Mst. Najma was against visitors whereas Mst. Shabnum, Rashida, and were more interested in it. Mst. Najma Firdous in particular has received offensive words from the investigation officers, which may ruin her future.

FACT FINDINGS:

It is true that the conflict has grown over the past few months and is getting worse every day, despite the MS of the hospital's best efforts to resolve it and the distribution of SOPs for both the hostel. Administration lapses were noted, particularly a failure to carry out various office orders and directives. The problem has gotten worse since Mst. Najma Firdous and Mr. Asif Electrician's friendship ended and the latter one became closer to Mst. Rashida Begum. The written agreement between Mst. Najma Firdous, Mst. Rashida Begum, and Mr. Asif Electrician in the police station, to which all three have confessed, cannot be ignored (Page 37). Drs. Naeem Shah, Syed Tahir Shah, and Musarrat Ali, PMO, patrolled a burning fire when they used unethical language in their inquiry report (Page 15). The statements and words of the aforementioned four tiers provide sufficient proof of their involvement in degrading the hostel environment and the hospital as a whole.

According to the official record, the MS has called for multiple explanations from both Mst. Najma Firdous and Mst. Rashida Begum even issued them final warnings before relieving them by the DGHS on administrative grounds in the past (Page 38).

Similar to this, the police department looked into Mst. Najma Firdous' complaint in 2014 and found that her claims were unfounded (Pages 39-40).

Page 3 of 4

x2jma Firdous beat up a nurse with a stick on Saturday, September 21, 2023, and pulled out Her sister, who resides in the hostel illegally, was with her. For future reference, pictures The nurse's attire and the wounds she received as a result of Mst. Najma Firdous' beating has a saved. The verbal statements of a number of nurses and doctors were recorded, and they metadly insisted that Mst. Najma Firdous is infamous for violence and regularly beats staff more with pipes, sticks, and whatever else she happens to have in her hands. The incident of Sectember 21, 20123 night is a live example of Ms. Najma Firdous plucked a nurse's hair, tore her . and left bruises on her. She also brings legal action against government employees without Insidential germission from the appropriate department (section 31, Govt. servant conduct rules 1471

RECOMMENDATIONS:

Eased on the aforementioned facts, it is imperative to give the following recommendations due minimized and the permanently resolve the problem:

- To achieve the desired results, an office or unit's head must be a responsible individual who 1 handles all problems promptly and fairly. The Medical Superintendent of the Hospital may be given instructions to correct the administrative flaws and take swift, severe action against anyone who disobeys instructions or causes problems.
- 2. The hostel's rooms are too small and aren't designed for more than two staff members. Both hostels are without a doubt bachelors, and each shall be assigned with defined SOPs two nurses after taking their affidavits on stamp papers they should follow the housekeeper's instructions and avoid causing any issues. No family member, not even an entitled one, shall be permitted to stay in the hostel without first meeting in the visitor's room.
- 3. A technical team of engineers should inspect the hostels to determine their deplorable condition, and sufficient funding should then be allocated or released in accordance with the team's recommendations for renovation. -
- 4. As mentioned, the aforementioned nurses cause a significant loss in power supply to the department, so no one is allowed to use the residential room as a kitchen or laundry facility. $\gamma \circ \delta \cdot \mathcal{C}$ Separate electric check meters must also be installed in each room after the creation of a common kitchen.
- 5. The investigation conducted by Drs. Nacem Shah, Syed Tahir Shah, and Musarrat Ali, PMO, are contrary to the procedures outlined in the E&D Rule 2011, have used unprofessional language, and focused on the personality of a female employee. As a result, the officers lack managerial experience, and they will not be given administrative responsibilities in the Hospital in the future.
- 6. It is strongly recommended that Mst. Rashida Begum, Mst. Najma Firdous and Mr. Asif Electrician be immediately relieved from the hospital and proved an example for others. The hospital was established for the treatment of the deserving population and not as a battleground.
- 7. The vacant position of housekeeper in the bachelor hostel must be filled right away after all statutory requirements have been met. Family members of the staff should be given access to a visitor's room only, and even a husband must pot enter his wife's room.

9/23 Inquiry Officer 25 Dr. Fazal Maula, DHO, Kohat.

D-C-



DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR

All communications Should be Addressed to The Director General Health Services Peshawal and not to any official by name <u>Office Ph (091 - 9210269Exchange - 091 - 9210187, 091 - 9210196Fax (091 - 92102.10</u>

/E.II,

Dated Pesh. The 3/00/2023

The Medical Superintendent DHQ Hospital Kohat.

Subject: -Memo:-

11

То

INEQUIRY REPORT.

Enclose please find herewith a photo copy of inquiry report conducted by Dr. Fazal Maula District Health Officer Kohat into the complaint lodged by Mst: Najma Firdous D/O Muhammad Suleman Registered Nurse Officer BPS-16 DHQ Hospital Kohat regarding irregularities in Nursing Hostel of DHQ Hospital Kohat.

The recommendation No.1 to 5 and 7 are related to your office which may be implement in letter and spirit, under intimation to this Directorate

ADDI: DIRECTOR (NURSING) DIRECTORATE GENERAL HEALTH SERVICES, KP PESHAWAR





DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR All communications Should be Addressed to The Director General Health Services Peshawar and not to any official by name Office Ph (091 – 9210269Exchange 2001 – 9210187, 091 – 9210196Fax (* 091 – 9210230

OFFICE ORDER

As approved by the competent authority the following posting/transfer of Registered Nurse Officer (RNO) / Charge Nurses (BPS-16) are hereby ordered on administrative ground in the interest of public Service with immediate effect:-

S.#	Name of Charge Nurse	From	То	Remarks
.01	Mst: Najma Firdous D/O Muhammad Suleman RNO BS-16		Shaheed Farid Khan DHQ Hospital, Hangu	Against the vacant post
02	Mst: Rashida Begum RNO BS-16	DHQ Hospital, Kohat	DHQ Hospital, Karak	Against the vacant post

NB: - Arrival/Departure reports should please be submitted to this Directorate for record.

Sd/-DIRECTOR GENERAL HEALTH SERVICES, K.P. PESHAWAR

No. 5717-25

Dated Pesh. The

0 /2023.

Copy forwarded to the:-

/E.II.

- 01. Medical Supdt: DHQ Hospital Kohat for information w/r to his letter No.654/PF dated 15.02.2023.
- 02. Medical Supdt: DHQ Hospital Karak.
- 03. District Health Officer Kohat for information w/r to his letter No.3606/DHO/Kohat dated 25.09.2023.
- 04. Medical Superintendent Shaheed Farid Khan DHQ Hospital, Hangu.
- 05. District Account Officer, Kohat.
- 06. District Account Officer, Hangu.
- 07. District Account Officer, Karak.
- .08. Registered Nurse Officer concerned.
- 09. DA-concerned, DGHS KP Peshawar.

For information and necessary action.

ADDI: DIRECTOR (NURSING) DIRECTORATE GENERAL HEALTH SERVICES, KP PESHAWAR

10/2023



DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR

All communications Should be Addressed to The Director General Health Services Peshawar and not to any official by name Office Ph 1 091 - 9210269Exchange 94 091 - 9210187, 091 - 9210196Fax t 091 - 9210230

NO.6251-53 /E-II DATED PESH: THE 08 / // /2023.

То

7

1. The Medical Superintendent DHQ Hospital Kohat.

2. Medical Superintendent Women and Children/LMH Kohat.

Subject: Memo:- OFFICE ORDER.

In continuation of this Directorate office orders bearing endst: No. 5717-25/E-II dated 03.10.2023 and No.2672-77/E-II dated 28.04.2022 on the subject noted above wherein Mix/Najma Firdous D/O Muhammad Suleman Registered Charge Nurse BS-16 DHQ Hospital Kohat and Miss: Rahat UI Ain Registered Nurse Officer BS-16 Women & Children /LMH Kohat were transferred to Shaheed Farid Khan DHQ Hospital Hangu but still they did not reported for duty, at their new assignment uptill now.

You are requested to relieve the above mentioned Registered Nurse Officers immediately and direct them to report to Shaheed Farid Khan DHQ Hospital Hangu on urgent basis.

ADDI: DIRECTOR (NURSING)

DIRECTORATE GENERAL HEALTH T

Medical Superintendent Shaheed Farid Khan DHQ Hospital Hangu w/r to his reference referred above.

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OFFICE ORDER

With reference to the Additional Director (Nursing) Directorate General Health Service Khyber Pakhtunkhwa Peshawar office order No.5717-25/E.II DATED 03.10.2023; the following Registered Nurse Officer (RNO) / Charge Nurses (BS – 16) are hereby relieved from their duties at this hospital and directed to report to their new place of posting, with immediate effect, on administrative ground, in the best interest of public service (copy attached).

	Sr.	Name of Charge Nurse	From	То
	x.	Ms. Najma Firdous	DHQ Teaching Hospital KDA Kohat	Shaheed Farid Khan DHQ Hospital Hangu
	2.	Ms. Rashida Begum	DHQ Teaching Hospital KDA Kohat	DHQ Hospital Karak

SD/-MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL KOHAT

NO. 4115-23 /PF

Dated Kohat the 63/10/2023

Copy forwarded to the:-

- 1. Director General Health Services Khyber Pakhtunkhwa for information w/r to his office No. quoted above.
- 2. Regional Director Health Services (South) Khyber Pakhtunkhwa.
- 3. Medical Superintendent, DHQ Hospital Karak.
- 4. Medical Superintendent, Shaheed Farid Khan DHQ Hospital Hangu.
- 5. District Comptroller of Accounts, Kohat.
- 6. Deputy Medical Superintendent (Admin) DHQ Teaching Hospital KDA Kohat.
- 7. Nursing Superintendent DHQ Teaching Hospital KDA Kohat.
- 8. Accounts / Establishment Sections DHQ Teaching Hospital KDA Kohat.
- 9. Charge Nurses concerned.

For information and further necessary action.

MEDICAL DHQ TE NG HOSPITAL





OFFICE OF THE MEDICAL SUPERINTENDENT DISTRICT HEADQUARTER HOSPITAL KARAK No._____/ Admn /DHQH/KK Dated.____/ 11 / 2023

То

The Director General Health Services, Khyber Pakhtunkhwa Peshawar

Subject: - OFFICE ORDER Respected Sir:

Kindly refer your office order No: 5717-25/E.II dated: 03-10-2023.

I have the honour to state that Mst: Rashida Begum RNO BS-16 transferred from DHQ Hospital Kohat to DHQ Hospital Karak has not submitted arrival report till

date 14-11-2023 for duty.

Report is submitted for your kind information and further necessary action please.

al/Superintendent Hospital Karak

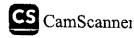
Even No & date:

Copy forwarded to:

- Regional Director Health (South) Khyber Pakhtunkhwa Peshawar for information please.
- 2. Deputy Chief Nursing Superintendent DHQ Hospital Karak for information.

Medical Superintendent DHQ Hospital Karak

Attaul





ELECTION COMMISSION OF PAKISTAN

NOTIFICATION

Islamabad lhe 15th December, 2023

No.F.2(1)/2023-Cord-Vol-IX.- In pursuance of Articles 218(3) & 220 of the Constitution of Islamic Republic of Pakistan, Section 5 and Section 230 (2) (f) of the Elections Act, 2017, the Election Commission of Pakistan hereby directs that:

- I. No Government, autonomous / semi-autonomous organization or any authority in the Federation and the Provinces shall post or transfer any officer / official, till the publication of the names of the Returned candidates in the official Gazette. In case of any exigency proposals of postings / transfers with cogent reasons, if in public interest, shall be sent to this Election Commission for consideration.
- ii. No Government Officer / Official shall be granted leaves till culmination of Election process, except maternity leaves or medical leave with the authentication of medical officer. During upcoming winter vacations, the Officers / Officials of Education department shall not leave their stations of posting and shall remain available at their respective work place to attend the training planned for polling personnel.

By Order of the Election Commission of Pakistan.

(Muhammad Nasir Khan) Deputy Director (Coord.)

The Manager, Printing Corporation of Pakistan Press, Islamabad.

[For publication in the Gazette of Pakistan, Extraordinary (Part-III) of today's date.]

Attact

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 2445/2023

Rashida Begum.....Appellant

Versus

Government of Khyber Pakhtunkhwa & othersRespondents.

<u>Affidavit</u>

I, Dr. Shaukat Ali, Director General Health Services, Khyber Pakhtunkhwa, Peshawar, under the directions of the Competent Authority, do hereby solemnly affirm that the contents of the parawise Comments on behalf of Respondents are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'able Court. It is further stated on oath that in this appeal, the answering respondents have neither been placed Ex-parte nor their defense has been struck off. Furthermore, cost of Rs. 5,000/- imposed are deposited on 01/02/2024 (copy attached).



Deponent

Atutal



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DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR

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

AUTHORITY LETTER

Muhammad Yousaf Jamal Focal Person Litigation Section Directorate General Health Services Khyber Pakhtunkhwa is hereby authorized to file / submit parawise comments in Service Appeal No. 2445/2023 titled Rashida Begum versus Govt. of Khyber Pakhtunkhwa & others on behalf of the undersigned before the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar.

Director General Health Services Khyber Pakhtunkhwa, Peshawar