

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

**SERVICE APPEAL NO. 89/2024**

Najma Firdous.....Appellant

**Versus**

Government of Khyber Pakhtunkhwa & others .....Respondents

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2-2-24

Pesh

**BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,**  
**PESHAWAR.**

**Service Appeal.No. 89/2024.**

Miss Najma Firdous D/O Muhammad Sulaiman (RNO) (BS-16), District Headquarter Hospital,  
KDA Kohat..... **Appellant**

**VERSUS**

1. Secretary Health Services, Government of Khyber Pakhtunkhwa, Khyber Road, Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa, Warsak Road, Peshawar.
3. Medical Superintendent, District Headquarter Hospital, KDA, Kohat..... **Respondents.**

**Comments on behalf of Respondents No.1 to3.**

**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.

**Khyber Pakhtunkhwa  
Service Tribunal**

Dia: No. 10977

D: 02-02-2024

**RESPECTFULLY SUBMITTED.**

1. Correct to the extent that the Appellant had been transferred from District Karak to DHQ Hospital KDA Kohat vide Officer Order No:3086-7/E-II, Dated Pesh. The 26/12/2011. Since which the appellant was posted at DHQ Hospital KDA Kohat.(Annex-A)  
Regarding of Appellant efficiency and complaints; she has been remained unsatisfactory and multiple times complaints in duty and in hostel in her entire service. (Annex-B)
2. 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's colleague nurse for residing outsiders/ relatives in the Nursing hostel violating the hostel rules. The inquiry committee issue recommendation for relieving appellant from Hospital and cancellation of allotment. However Respondent No.3 issued cancellation of their hostel allotment of both nurses but the appellant did not comply the order ( Copy attached as Annex-C )
3. Correct. The appellant submitted a complaint in the office of respondent No.2 and an inquiry committee was constituted to inquire the matter and submit the report to respondent No.2. (Copy attached).  
On recommendation of inquiry officer respondent No.2 issued transfer order dated 3/10/2023 of appellant on administrative grounds where appellant was transferred from DHQ Hospital Kohat to Farid Khan Shaheed DHQ Hospital Hangu and consequently respondent No.3 relieved the appellant from DHQ Teaching Hospital KDA Kohat.( Copies of the inquiry committee, inquiry report, transfer order and relieving order are attached as Annex-D)
4. Correct. Appellant had submitted departmental representation to Respondent No.1

on 5/10/2023 which was dispatched to Respondent No.2; but the decision is still awaited.

5. Incorrect. The appellant and other resident nurses had exercising quarrels and abusive languages on many occasions. During inquiry proceedings on 16<sup>th</sup> September 2023, Deputy Medical Superintendent on duty at Night Shift submitted an incident report of quarrel between nurses of the hostel especially appellant and Mst. Rasheeda Begum Charge Nurse 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.

The appellant had launched FIR in Police Station KDA Kohat for steeling of gold, cash and other belongings and harassment against respondent No.3.

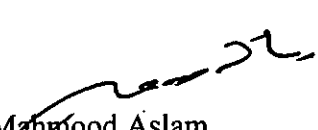
The trial in honorable Additional Session Judge -/EX officio justice of peace Kohat was preceded and judgment was issued on 12/12/2023. (Copies attached as Annex-E)


**GROUND:**


- A. Incorrect. The appellant and Mst. Rasheeda Begum transferred on administrative ground by the competent authority after fulfilling all codal formalities/Inquiry.  
B. Citation and References not attached.  
C. The appellant was treated according to constitution.  
D. Incorrect. The transfer order is not violation of Appointment, Promotion and Transfer Rules, 1989 Rule 12. Zone distribution and quota are not attached.  
E. Incorrect. As mentioned in Para D.  
F. Incorrect the treatment of the respondents are not on malafied, malicious and discriminatory intention.

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.

  
Mahmood Aslam  
Secretary Health Services,  
Government of Khyber Pakhtunkhwa,  
Khyber Road, Peshawar  
Respondent No-1.

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

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



**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 - 9210269 Exchange #: 091 - 9210187, 091 - 9210196 Fax : 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                   | To  | Remarks                    |
|-----|---|------------------------|---|----------------------------|
| 01  | Mst: Najma Firdous D/O<br>Muhammad Suleman<br>RNO BS-16 | DHQ Hospital,<br>Kohat | Shaheed Farid Khan<br>DHQ Hospital, Hangu | Against the<br>vacant post |
| 02  | Mst: Rashida Begum<br>RNO BS-16                         | DHQ Hospital,<br>Kohat | DHQ Hospital, Karak                       | Against the<br>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 /E.II, Dated Pesh. The 03/10/2023.

Copy forwarded to the:-

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.

Office order

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

2/10/2023

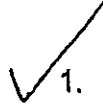


DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR

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

NO. 6251-53 /E-II DATED PESH: THE 08/11/2023.

To



1. The Medical Superintendent  
DHQ Hospital Kohat.
2. Medical Superintendent  
Women and Children/LMH Kohat.

Subject: OFFICE ORDER.  
Memo:-

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 Miss Najma Firdous D/O Muhammad  
Suleman Registered Charge Nurse BS-16 DHQ Hospital Kohat and Miss:  
Rahat Ul 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.

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

7/11/23

25  
5/11/2023

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

Accountal

PS

est. Selia

Im n/a please.

M. Juttary  
5/11/2023.

OFFICE OF THE  
MEDICAL SUPERINTENDENT  
DHQ TEACHING HOSPITAL  
KDA; KOHAT

**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                            | To                                    |
|-----|----------------------|---------------------------------|---------------------------------------|
| 1.  | 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

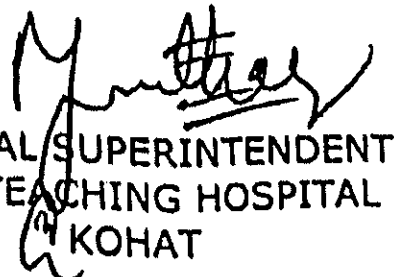
No. 4115-23 /PF

Dated Kohat the 03 /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 SUPERINTENDENT  
DHQ TEACHING HOSPITAL  
KOHAT

  
Attendant

B

(46)

OFFICE OF THE  
MEDICAL SUPERINTENDENT  
DHQ TEACHING HOSPITAL  
KDA, KOHAT

No. 4685 /PF

Dated Kohat the 27 /12/2013

To,

Ms. Najma Firdous (Charge Nurse)  
DHQ Teaching Hospital;  
KDA; Kohat.

Subject:- NOTICE

Memo:

It has been observed that an outsider is residing with you in your room in the Nursing Hostel. You are hereby directed to stop this practice and vacate the room from her within 24 hours on the receipt of this letter. Otherwise, your room allotment will be cancelled.



MEDICAL SUPERINTENDENT  
DHQ TEACHING HOSPITAL  
KOHAT



Even No. & Dated:-

Copy forwarded to the House Keeper Nursing Hostel DHQ Teaching Hospital  
KDA Kohat for information and further necessary action.



MEDICAL SUPERINTENDENT  
DHQ TEACHING HOSPITAL  
KOHAT

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OFFICE OF THE  
MEDICAL SUPERINTENDENT  
DHQ TEACHING HOSPITAL  
KDA; KOHAT

**OFFICE ORDER**

As recommended by the Enquiry Officer and approved by the Chief Executive DHQ Teaching Hospital KDA Kohat, Ms. Najma Firdous (Charge Nurse) under the control of this office is hereby relieved of her duty from this Hospital with immediate effect and directed to report to the Directorate General Health Services Khyber Pakhtunkhwa Peshawar for further posting on account of not allowing Sadaqat Saba (Charge Nurse) in the room in the Nursing Hostel with her allotted vide this office No.5156/K-37 dated 30/09/2013; living her sister with her in the room in the Nursing Hostel and bringing unauthorized male visitor to her room in the Nursing hostel for night stay.

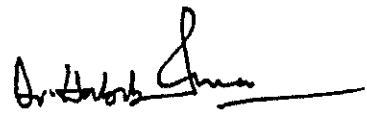
SD/-  
MEDICAL SUPERINTENDENT  
DHQ TEACHING HOSPITAL  
KOHAT

No. 4379 /PF

dated Kohat the 28 /10/2013

Copy forwarded to the:-

1. Director General Health Services Khyber Pakhtunkhwa Peshawar for information and with the request to transfer her out of this Hospital on administrative ground.
2. Chief Executive DHQ Teaching Hospital KDA Kohat.
3. Ms. Najma Firdous (Charge Nurse) to immediately vacate the room in the Nursing Hostel and report to the Directorate General Health Services Khyber Pakhtunkhwa Peshawar for further posting.
4. Ms. Sadaqat Saba (Charge Nurse) DHQ Teaching Hospital KDA Kohat with the direction not to bring those friends to room in the Nursing Hostel who are not acceptable to her roommate.
5. Accountant DHQ Teaching Hospital KDA Kohat to inactivate her salary and freeze her salary account till she vacates the room in the Nursing Hostel.

  
MEDICAL SUPERINTENDENT  
DHQ TEACHING HOSPITAL  
KOHAT





(44)

OFFICE OF THE  
MEDICAL SUPERINTENDENT  
DHQ TEACHING HOSPITAL  
KDA; KOHAT

OFFICE ORDER

As recommended by the Enquiry Officer and approved by the Chief Executive DHQ Teaching Hospital KDA Kohat, Ms. Najma Firdous (Charge Nurse) under the control of this office is hereby relieved of her duty from this Hospital with immediate effect and directed to report to the Directorate General Health Services Khyber Pakhtunkhwa Peshawar for further posting on account of not allowing Sadaqat Saba (Charge Nurse) in the room in the Nursing Hostel with her allotted vide this office No.5156/K-37 dated 30/09/2013; living her sister with her in the room in the Nursing Hostel and bringing unauthorized male visitor to her room in the Nursing hostel for night stay.

SD/-  
MEDICAL SUPERINTENDENT  
DHQ TEACHING HOSPITAL  
KOHAT

No. 4379 /PF

dated Kohat the 28 /10/2013

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4. Ms. Sadaqat Saba (Charge Nurse) DHQ Teaching Hospital KDA Kohat with the direction not to bring those friends to room in the Nursing Hostel who are not acceptable to her roommate.
5. Accountant DHQ Teaching Hospital KDA Kohat to inactivate her salary and freeze her salary account till she vacates the room in the Nursing Hostel.

*Admitted*  
*[Signature]*

*[Signature]*  
MEDICAL SUPERINTENDENT  
DHQ TEACHING HOSPITAL  
KOHAT

102  
OFFICE OF THE  
MEDICAL SUPERINTENDENT  
DHQ TEACHING HOSPITAL  
KDA, KOHAT

No. 561 /B-07

Dated Kohat the 05 /04/2017

To

The Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar.

Subject:-

**DISCIPLINARY ACTION AGAINST CHARGE NURSES ON ACCOUNT OF MISCONDUCT**

It is stated that Ms. Jamila Begum has resumed the charge as Chief Nursing Superintendent (BPS - 18) at this hospital on 24.03.2017 vide Government of Khyber Pakhtunkhwa Health Department Notification No.SOH-III/10-4/2016 dated 03.03.2017 and have applied for residential room in the Nursing Hostel (copy attached).

It is further stated that the Charge Nurses of this hospital have occupied all the rooms in the Nursing Hostel being a single in each room. They were directed to become in pairs in each room through this office order No.546/K-37 dated 01.04.2017 (copy attached) but the instructions were not obeyed. Moreover the hospital Accommodation Regulatory Committee constituted vide this office No.550/K-37 dated 03.04.2017 (Copy attached) have approached the concerned Charge Nurses and tried to resolve the issue but all of them proved to be non-cooperative and straight away refused to become in pair to occupy the rooms.

It is requested that strict disciplinary action may please be initiated against the following Charge Nurses including Ms. Shagufta Naz (House Keeper) on account of disobedience and for creating administrative problems.

1. Ms. Najma Firdous d/o Muhammad Suleman
2. Ms. Rashida Begum d/o Ghulam Saddique
3. Ms. Yasmeen Akhtar d/o Abdul Munaf
4. Ms. Shakila Naz d/o Gul Ahmad
5. Ms. Shama Naz d/o Gul Daraz
6. Ms. Saira Aftab d/o Aftab Bahadar

Encl: As Above.

*Attended*  
*[Signature]*

*[Signature]*  
MEDICAL SUPERINTENDENT  
DHQ TEACHING HOSPITAL  
KOHAT

C  
M


Dated Kohat the: 03/04/2023

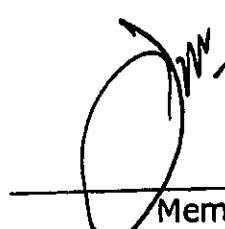
## INQUIRY REPORT

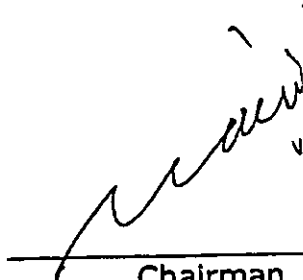
With reference to the Medical Superintendent DHQ Teaching Hospital KDA Kohat Office No.1207/K-18 dated 28/03/2023.

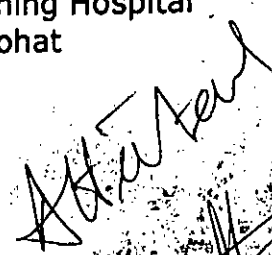

After assessing Mst. Najma Firdous (Charge Nurse) personal file, Mst. Jamsheeda Ghafoor (Nursing Superintendent), Mr. Syed Nawaz (Nursing Supervisor - Morning) and complainant Mst. Rasheeda Begum (Charge Nurse), the following was concluded:-

1. She has some behavior issues or personality problem for being unmarried? Psychiatrist help can be taken in her case.
2. She did not take proper route to handle the issue and instead tried to handle the case ill handedly.
3. Warden of hostels should be appointed.
4. Defined SOPs for hostel affairs for residents may be followed in future.
5. All illegal residents from the hostel rooms should be directed to leave with immediate order.
6. Moreover she kept illegal residents in her hostel room without permission from the competent authority
7. She has no respect for hospital management or seniors. Her bad behaviour, arrogance and ready to flare fight are sufficient grounds so that she may be relieved from this institution, with immediate effect.
8. Mst. Rasheeda charge nurse shall be served with last warning for being involved in fight with Charge Nurse Najma and keeping illegal residents in her hostel room without permission from the competent authority.
9. Medical Superintendent, if directs committee can provide defined set of SOPs for hostel residents.

  
Member  
Dr. Musarat Ali  
MLO / PMO  
DHQ Teaching Hospital  
Kohat

  
Member  
Dr. Syed Tahir Shah  
DMS (Coord:)  
DHQ Teaching Hospital  
Kohat

  
Chairman  
Dr. Naeem Shah  
DMS (Estab: / HR)  
DHQ Teaching Hospital  
Kohat

OFFICE OF THE  
MEDICAL SUPERINTENDENT  
DHQ TEACHING HOSPITAL  
KDA; KOHAT

**OFFICE ORDER**

An enquiry committee comprising of the following members is hereby constituted and directed to conduct the fact finding enquiry in to the complaint of Ms Rashida Begum (C/N) against Ms. Najma firdous (C/N) and submit the report along with recommendations within three days positively (copy of complaint attached).

- |   |          |
|---|----------|
| 1. Dr. Naeem Shah (DMS Estb/HR)               | Chairman |
| 2. Dr. Mussarat Ali (PMO/MLO)                 | Member   |
| 3. Dr. Syed Tahir Ali Shah (DMS Coordination) | Member   |

SD/-  
MEDICAL SUPERINTENDENT  
DHQ TEACHING HOSPITAL  
KOHAT

No. 1207 /K-18

Dated Kohat the 28 /03/2023

Copy forwarded to the:-

1. Regional Director Health services (south) Khyber pakhtoon Khuwa.
2. Enquiry Committee for further necessary action.
3. All concerned for information.

*[Handwritten signature]*

*[Handwritten signature]*  
MEDICAL SUPERINTENDENT  
DHQ TEACHING HOSPITAL  
KOHAT

To

The Medical Superintendent  
DHQ Teaching Hospital KDA Kohat.

Subject: **COMPLAINT AGAINST BELLIGERENT BEHAVIOR OF C/N NAJMA FIRDOS**

Respected Sir,

I would like to bring into your kind consideration the hostile behavior of one of our colleague staff Miss Najma. Yesterday she alongwith her sisters entered my room without knocking, she was furious and combative and used very rough tone. Her behavior was very rude and violent and she alongwith her sister and niece beat me up. This is not the first instance this has happened. Her violent behavior is habitual. She and her sisters sneak into rooms without seeking any prior permission and threaten fellow staff members, sometimes beating them up. I would like to mention that her married sisters are living in the hostel illegally. At first we bore with her rude behavior thinking she will change but now we've had enough of her and cannot put up with her belligerent behavior anymore. She was also warned to behave herself few days back but in vain.

Your kind honour is therefore requested to kindly take strict actions against her before something unfortunate happens.

I shall be thankful,

Yours truly,

Ms. Rashida Begum  
Charge Nurse

DHQ Teaching Hospital KDA Kohat

*Dr. Naeem Shah Chairman  
Dr. Musarat member  
Dr. Talib member*

*re nominated to conduct Case both  
Fact finding inquiry and Miss Najma  
Ms. Rashida*

Dated: 27/03/2023

*Perumun  
27/3/23*

*Attendant*

To

The medical superintendent

Dhq hospital kda kohat

Subject: Reporting against aggressive and assailing behavior of R/N najma firdos

Respected sir,

I would like to bring into your kind consideration of hostile behavior of one of our colleague najma firdos. she has violent and rude behavior, she always misbehaves using very rough tone and abusive language with derogatory remarks at hostel with each and everyone. one of her married sister and niece are residing in hostel with her (has no concern with hospital or health department) have violent behavior with staff, they sneak into rooms without permission and threatened the fellow staff and sometimes beat them up, recently she and her sister sneak into our colleague room abused her and beat her.

Respected sir, this is not the first instance that has happened she has also received a warning letter from administration because of her belligerent behavior but nothing has changed. because of this situation we are very disturbed as she is constantly conspiring against all and we all female staff are threatened by it.

Therefore it is requested that kindly take strict disciplinary action against her and halt her from using abusive slang language, threatening and physical assault.

We thanking you to look into this matter as early as possible and looking forward to your positive response.

Truely and regards

All RNO s of nursing hostel

① e / N Qashida Beesum = *[Signature]*

② c / N Sarra *[Signature]*

③ c / N. Gulshan *[Signature]*

④ R / N RASHIDA ABBAS. *[Signature]*

⑤ SHABNAM HAKIM — *[Signature]*

⑥ Yasmeen ACHTAR *[Signature]*

⑦ Shazia. Sadiq *[Signature]*

⑧ BIBI. HAJRA — *[Signature]*

*[Signature]*  
*[Signature]*

To,  
The medical Superintendent,  
DHO Teaching hospital,  
KDA Kohat.

Subject: Application regarding  
Information about threat  
from RNO Najma.

Respected Sir,

With due respect it  
is stated that I am Jamsheed  
Ghaffar working as Nursing Superintendent.  
I want to inform you that on date  
30-03-2023 at 03:57 pm I received a  
phone call from RNO Najma Firdus  
and she misbehaved with me and  
threatened me. So, I am in danger  
Please take prompt action on it to  
protect me from any mishap.

I shall be very thankful. ~~Mark~~ <sup>the</sup> ~~will~~ <sup>statements</sup>  
your sincerely  
N/s Jamsheed Ghaffar  
31/3/23

~~U~~  
Dated: 31-03-2023

آپ لوگوں نے ساتھ میری یہ بات conditional ہوگی یہ لیٹرز اور Evidence

آپ لوگوں دیکھ لیں۔ اور پھر دیکھیں کہ میں اگر آپ لوگوں اس پر کوئی

Investigation کرنا چاہتے ہیں تو میں نے Through یا کسی اور کے Through

یہ اس پر مجھے خوش ہوگی۔ اس میں پھر آپ لوگوں کو بہت سے Evidence

مل جائیگا

اور آخر میں پھر میں آپ لوگوں کو بتانا چاہتی ہوں کہ مجھے کئی Sources

میں بہت چلا ہے کہ دستاویز اور انٹرویو کے کسی طریقے پر مجھے بالمشکل

میں نکال لیں۔ کہ مجھ پر پھر کسی برائے کی جگہ رہا نہیں پڑے ہو گا اور پھر

ٹارگٹ Killers کے ذریعے مجھے مارنے کا Planing کر سکتا۔ اس انٹرویو میں میں

آپ لوگوں کو بتانا چاہتی اور Inform کرنا چاہتی ہوں اور Request کرنا

چاہتی ہوں کہ آپ لوگوں کو کسی بتا دیں کہ میں نے اس کے ساتھ

ایسا کیا ہوا تو اس کے ذریعہ دستاویز اور انٹرویو کے۔ چونکہ دستاویز

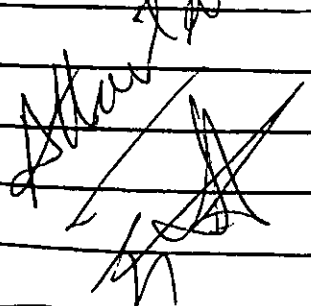
اور دستاویز صاحب الی کے ملنے کے لیے میں تو یہ دونوں اس میں لیا ہے

ذریعہ دار ہونے اس مسئلہ میں تین چار اور سٹاف لٹرز اس میں شامل ہیں۔

جہنوں نے عالم دینی کا جواب دے کر مجھے مارنے کا کہا۔

اور میں اس بار میں اپنا Affidavit لکھتی ہوں اور عند دلین

میں پولیس تھانے میں بھیج کر دوں گی



سٹاف مجید فرید سے

Date



والٹن سینٹر میں انٹو ایئرین کمیٹی ڈی ایچ کیو Hospital کے ڈی ایے کو پاٹ

Letter No 1207/K18

Date:

لے سب Asif الیکٹریشن کی organized plan میں اس نے رشیدہ

سٹاف کو کہہ Hostal میں اپنے شو پر اور 13 سال بلڈ کے سواہ illegal

طریقے سے ریالٹیشن بنانے کے لیے اس کو اپنے سواہ متاثر کیا گیا اس سے پہلے

آف آف کے چھ ایک سال سے مسلسل بلڈ میں کرنے کو سٹیشن ہی سے جیسے توت میرے

باس موجود ہیں جب میں اس کی باتوں میں نہ آئی تو اس نے میرے کھانچوں

کو لپیٹرز اور WhatsApp کے ذریعے بلڈ میں لے کر نام شروع کیا۔ وہ لپیٹرز اور message

اور WhatsApp میرے پاس موجود ہے اور دیکھا بھی سکتی ہوں اس کے بعد میرا کھانا

کو پاٹ آیا آف کے سواہ والا اور آف نے accept بھی کیا۔ کہ لپیٹرز اور WhatsApp

میں نے لپے میں اور کچھ کھانی نے آف الیکٹریشن کو سٹیشن سے منع کیا۔ اور سواہ میں نے

بھی لپا۔ کہ میری بہن سے دور رہو ورنہ نتائج اچھے نہیں ہونگے تو کچھ اس کے بعد

آف الیکٹریشن نے سابق ایم ایس ناہرا فریڈ کو اپنے گھر سے نہیں لے کر دوسرے گھر

سے فنڈل شروع لپے چھ بلڈ میں لپے لپے۔ اس کے بعد message

اور میں نے سارے صورت حال سے آگاہ کیا۔ اور written بھی دیا کہ آف الیکٹریشن

الیکٹریشن نے کسی مار میری روم کی بجلی خراب کرنے کی کوشش کی اور چھ بلڈ میں

کرتی تھی۔ تو سابق ایم ایس نے؟ میں ہاسٹل آنے سے منع کیا اور ہاسٹل کے لیے

ایک روم بھی بنا یا کہ جب بھی جس روم کو جو بھی مسئلہ ہو جائے وہ الیکٹریشن

کا ہو یا کسی اور کا تو وہ Proper طریقے سے Complant کو درج کروائیں گے cell

COMPTON

اس پر نوٹ کیا گیا ہے

اس کے ساتھ ساتھ

Monitors Evidance

GPU کے ساتھ ساتھ

اور پھر complaint cell کے آواز کو ماسٹل سمجھوانے کا ٹوٹا

صیاب 2013/3/26 کو آفس الیکٹرانکس میں organized پلان ہی تحت آیا۔

رشتیدہ سٹاف کے ساتھ مل کر اپنی Duty hours کے بغیر complaint cell

کو درخواست اور 2013/3/26 کے بغیر صرف اس وقت تک کہ وہ تھے نکل

کر سکیں رات کو 8 بجے تک صیری بجلی بند کی۔ سٹاف رشتیدہ پتہ نہیں کہ وہ

اسیابیوں کر رہی ہے اور آفس الیکٹرانکس سے اسے لیا فائدہ ہے۔ حالانکہ قس رشتیدہ کے

ساتھ کچھ لبر نہیں لیا اٹا صیرے اس پر اپنی سے افسانہ میں میں نے اس کے

سے کو پالا ہے لبر لیا کا سال تک میں خود صیراں میں اس بات پر کہ صیرے اتر

افسانہ ہونے کے بعد خود وہ الیکٹرانکس کا ساتھ دے رہی ہے۔ لبر سبب

حالت ہونے بھی کہ وہ صیرے خود میں ایک ایئر اسٹیشن میں ہے صرف اس وقت

کے لئے کہ وہ فہمیل کا فائدہ اٹھا رہا ہے۔ صیرہ وہ خود بتا رہے تھے اور چار

بلیٹوں کو باپ بھی ہے۔

سٹاف رشتیدہ نے اٹھ کر لبر آفس میں صیرے خلعہ درخواست دی ہے

کہ میں نے اسے مارا ہے حالانکہ اس کا کچھ نہیں ہے میں نے اس کے روم کئی ہوا

جہاں رشتیدہ سٹاف کا شوپرز کے ساتھ اس کے خلعہ جو اس کے ساتھ رہائش

پذیر ہے اس کو بتانے کہ اپنی بیوی کو منع کر میں کہ اس ادوی کا ساتھ نہ دیں

کل کو کچھ بھی ہو سکتا ہے۔ پھر یہ نہ کہنا کہ کچھ پتہ نہیں تھا۔ تو اس بات

لبر سٹاف رشتیدہ نے صیرے اور لبر یا کہ اٹھایا کھپڑ مارے میں uniform میں

*[Handwritten signature]*

سابقہ سبب لیا اور ساتھ میں جوان بلٹا بھی تھا۔ یہ سبب اس نے اس لیے لیا۔

کہ میں نے اس کے سٹوری کو سارے صورت حال کے بارے میں کیوں بتایا۔

تھپڑ کا Respond شاید دے بھی دیتی لیکن اس کا سٹوری اس کے ساتھ

کھڑا تھا۔ اس سے پریشر ہو کر میں نے Respond نہیں کیا۔ باقی سبب

خود دیکھیں میری اور سٹاف رشتہ کی فزیکل باڈی ٹیپ کی۔ کہ لیا دقتی میں

میں اسے مار سکتی ہوں یہ صرف جھوٹ پر صحتی ایک ڈراؤں رچا ہوا ہے جو اٹھ

اسے کہتا ہے کہ لڑتی رہتی ہے۔

میں نے پولیس مقامے میں اٹھ کے خلاف FIR درج کی ہے لیکن سٹاف

رشتہ پر نہیں۔ صرف ایڈوکیٹ کے ذریعے شاید اسے احساس ہو جائے

اور ایسی غلطی پر معافی بھی مانگے۔ لیکن مجھ پتہ نہیں تھا کہ وہ اس حد تک جا سکتی ہے

پتہ نہیں انگریزی کہی تو میں جتنے بھی Letters اور Evidence دے رہی ہوں

یہ اپنے پاس confidential رکھیں۔ اگر مجھ یہاں سے انصاف نہیں ملا

میرے Application پر ایکشن نہیں ہوا۔ تو پھر میں مجبوراً پولیس کا دفتر میں

گزرتی اور یہ FIA Evidence میں دونگی اور Complant کرونگی کہ بات

Find out کریں کہ یہ لیڈرز کس نے send کر کے اس سے کسی

پولیس ولسی طور سے نہیں کینیٹا CPO سے Send کر کے اس کی عمل

انگوار کی کی جائے FIA دے کرے یا پولیس دے پولیس میں زبردستی

FIR درج کیا ہے جس میں اس کی جو بھی کڑیاں ہیں چاہے وہ

رشتہ یا فزیکل رشتہ ہو یا سبب سے سبب اس میں آجائے

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**INQUIRY REPORT**  
**(HOSTEL'S ISSUE DHQH, 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-1, 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. Mushtaq, Medical Superintendent, DHQH, KDA, Kohat responded that according to the PC-1, the nursing hostel 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).

iii) 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).

iv) 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.

v) At first, Mst. Rashida Begum, 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).

vi) 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).

vii) 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 verbal statement. Despite the fact that she gave birth in the same

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).

Najma 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 of the nurse's attire and the wounds she received as a result of Mst. Najma Firdous' beating has been saved. The verbal statements of a number of nurses and doctors were recorded, and they all insist that Mst. Najma Firdous is infamous for violence and regularly beats staff members with pipes, sticks, and whatever else she happens to have in her hands. The incident of September 21, 2023 night is a live example of Ms. Najma Firdous plucked a nurse's hair, tore her clothes, and left bruises on her. She also brings legal action against government employees without getting permission from the appropriate department (section 31, Govt. servant conduct rules 1973).

### RECOMMENDATIONS:

Based on the aforementioned facts, it is imperative to give the following recommendations due consideration in order to permanently resolve the problem:

1. To achieve the desired results, an office or unit's head must be a responsible individual who 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. ✓ CNU
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. Separate electric check meters must also be installed in each room after the creation of a common kitchen. ✓ D.C.
5. The investigation conducted by Drs. Naeem 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 not enter his wife's room. D.C.

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



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 - 9210269) Exchange (091 - 9210187, 091 - 9210196) Fax (091 - 9210230)

No. 5735 /E.II,

Dated Pesh. The 03/10 2023

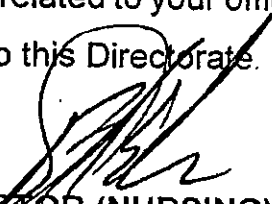
To

The Medical Superintendent  
DHQ Hospital Kohat.

Subject: - INEQUIRY REPORT.  
Memo:-

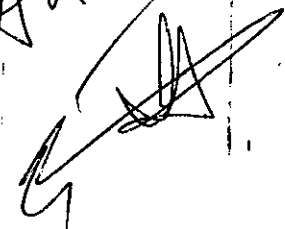
Enclose please find herewith a photo copy of inquiry report conducted by Dr. Fazal Maula District Health Officer Kohat into the complaint lodged by Mst: Najma Firdous D/O Muhammad Suleman Registered Nurse Officer BPS-16 DHQ Hospital Kohat regarding irregularities in Nursing Hostel of DHQ Hospital Kohat.

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

73  
3/10/2023

K-18

Attent  


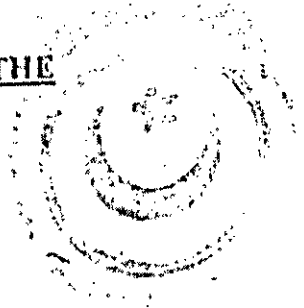
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**BEFORE THE COURT OF: KHALID HUSSAIN**  
**ADDL. SESSIONS JUDGE- I/EX-OFFICIO JUSTICE OF THE**  
**PEACE, KOHAT**



**PETITION U/s 22-A No. 71/2023**

**MST. NAJMA PARVEEN VS MS KDA HOSPITAL KOHAT**

Order---04  
12.12.2023

Petitioner through brother, while respondent No.01 through representative present. Arguments have already been heard.

The petitioner namely Mst Najma Firdos daughter of Muhammad Sulaiman r/o Karak presently at DHQ Hospital KDA Kohat has filed instant application U/s 22-A(6) Cr.PC, soliciting direction of this Court to respondent a SHO Police Station KDA Kohat for registration of FIR against Mushtaq Ahmad Medical Superintendent DHQ/KDA hospital Kohat.

As per contents of instant petition, petitioner alleged that she is serving as a nurse in Health Department and has been transferred from DHQ/KDA hospital Kohat to (Shaheed Farid Khan) hospital Hangu. That she has submitted an application to Secretary Health against her transfer order which is still pending. That respondent No.01 by taking undue advantage of her post started harassing the petitioner. That respondent No.01 issued her a seven-day notice to vacate the room of hostel and letter issued a 24 hours' notice. That challenging the said notice, petitioner filed a Civil Suit in the court of Senior Civil Judge, Kohat and interim injunction was granted in her favour. That despite the injunctive order, respondent No.01 on 14.10.2023 at 02.00pm, illegally broke the lock of her residential room, in her absence, and stole 09 Tolas gold and cash amount of Rs.3,55,000/-. That respondent No.01 has also extended threats of dire consequences to the petitioner. That petitioner approached the concerned SHO for registration of FIR, but of no avail. Therefore, the petitioner prayed that directions may be

**KHALID HUSSAIN**  
Addl. District & Sessions Judge-I,  
Kohat

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**BEFORE THE COURT OF KHALID HUSSAIN**  
**ADDL. SESSIONS JUDGE-EX-OFFICIO JUSTICE OF THE**  
**PEACE, KOHAT**

PETITION U/S 22-A NO. 73/2023

MST. NAIMA PARVEEN VS MS KDA HOSPITAL KOHAT

issued to respondent SHO/DPO for registration of FIR against respondent No.01.

In view of the contents of the petition, comments of SHO concerned were called, who accordingly submitted his comments.

I have already heard arguments of learned counsel for the parties and perused the record.

Perusal of the contents of instant petition, comments of SHO concerned and other material produced and placed on file reveals that in order to vacate the official accommodation room of the hostel, the petitioner was issued and served with a seven-day notice bearing No.4165/ACCTS dated 05.10.2023. On expiry and non-compliance of the above-mentioned notice, a second notice, from the office of respondent No.01 was issued to the petitioner requiring her to vacate the hostel room within 24 hours. Thereafter, the matter was brought into the notice of District Administration with the request to depute a representative of their office alongwith the District Police, so that the room may be vacated by the hospital administration. On face of the record, malafide, ill-will, personal vendetta on part of respondent No.01 is lacking in the case, rather prima facie the respondent No.01 has performed his official obligations, therefore, to my mind, it would be unwise to proceed the respondent No.01 u/s 22-A Cr.PC for the registration of criminal case against him. If any injunction was violated, as alleged, the petitioner has efficacious remedy in the form of an application under Order-39 Rule-2 (3) CPC. No proof, whatsoever, in shape of receipt etc of the 09 Tolas gold is appended with the instant

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18 DEC 2023

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BEFORE THE COURT OF KHALID HUSSAIN  
ADDL. SESSIONS JUDGE-1/EX-OFFICIO JUSTICE OF THE  
PEACE, KOHAT

PETITION U/S 22-A NO. 73/2023


MST. NAJMA FARVEEN VS MSR KDA HOSPITAL KOHAT

application. Similarly, no proof of the existence of the cash amount, alleged to have been stolen, is annexed with the petition. It appears that an attempt was made on the part of petitioner to resolve a civil dispute/service matter, through criminal proceedings.

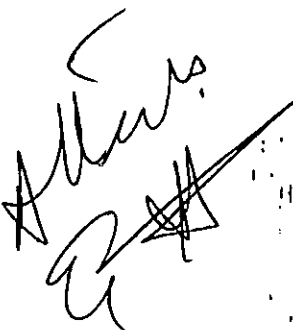
In the circumstances, the issuance of direction for registration of FIR does not seem of propriate, hence, petition in hand is hereby dismissed. This file be consigned to record room after its completion and compilation.

ANNOUNCED

12.12.2023

  
KHALID HUSSAIN,  
Addl. Sessions Judge-1  
Ex-Officio Justice of the Peace

Kohat  
(KHALID HUSSAIN)  
Addl. District Sessions Judge  
Kohat

②  


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بعدالت جناب ڈسٹرکٹ اینڈ سیشن جج باختیارات جیشن آف پیس کوہاٹ



سماۃ بچہ فردوس دختر محمد سلیمان سکڑ کرک حال DHQ ہسپتال KDA کوہاٹ

بنام

۱۔ مشتاق احمد میڈیکل پرنٹنڈنٹ ڈوڑل ہیز گوارڈ ہسپتال KDA کوہاٹ

۲۔ DPO کوہاٹ

۳۔ SHO تھانہ KDA کوہاٹ

درخواست بمطابق 22-A CrPC بابت اندراج کرنے FIR بزخلاف مسؤل الیہ نمبر 1 بوجوہات ذیل

8

جناب عالی اسانکے حسب ذیل عرض کرتی ہے۔

۱۔ یہ کہ ساکے حکم صحت میں بطور نرس 16-BPS ڈی ایچ کیو ہسپتال کوہاٹ میں ڈیوٹی سرانجام دے رہی ہے۔

۲۔ یہ کہ ساکے کانٹارل DG ایٹھ نے کوہاٹ سے ہنگو کرایا گیا۔

۳۔ یہ کہ ساکے نے اس ٹرانسفر کے خلاف باقاعدہ انٹرو پٹیشن اپیل دائر کیا۔ جو کہ زیر التواء ہے۔

۴۔ یہ کہ ساکے نے مسؤل الیہ کے خلاف مورخہ 16-10-2023 جناب DIG صاحب کوہاٹ کو درخواست دی گئی۔ جس کا ڈاڑری

نمبر 1830 مورخہ 16-10-2023 ہے۔ جو کہ DIG صاحب نے DPO کوہاٹ کو ناک کیا۔ مذکورہ درخواست کا تسن ذیل

ہے۔

درخواست بمطابق 22-A CrPC بابت اندراج کرنے FIR بزخلاف مسؤل الیہ

جناب عالی

۱۔ یہ کہ ساکے حکم صحت میں بطور نرس ملازمت کرتی ہے۔ اور ساکے کانٹارل KDA ہسپتال سے ہنگو کیا گیا ہے۔ تدارک حکم کے خلاف ساکے

نے بیکر ٹری ایٹھ پٹا درگور کو درخواست گزار دی ہے۔ جو کہ زیر غور ہے۔ بدیں جو ساکے نے ہنگو ہسپتال میں رپورٹ نہیں کی ہے۔

۲۔ یہ کہ مسؤل الیہ نے اپنی پوسٹ کا ناجائز فائدہ اٹھانا کہ ساکے کو بے جا تک کرنا شروع کیا ہے۔ اور ساکے کو مختلف طریقوں سے اذیت دی جا

رہی ہے۔

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EXAMINED COFING BRANCH KOHAT

۳۔ یہ کہ مسؤل الیہ نے سالانہ کوہائل کرہ خالی کرانے کے لیے 07 یوم اور بعد ازاں 24 گھنٹے کا نوٹس جاری کیا۔

۴۔ یہ کہ سالانہ نے نوٹس کے خلاف سینئر نوٹس جج صاحب کو حاکمیت میں دعوئی دائر کیا۔ اور عارضی حکم اتنا ہی جاری کیا گیا۔

۵۔ یہ کہ عارضی حکم اتنا ہی جاری ہونے کے باوجود نوٹس یہ صادر ہونے سے قبل مسؤل الیہ نے سالانہ کی عدم موجودگی میں غیر قانونی، غیر اخلاقی طور پر کرے کا تالہ توڑ کر جملہ سونا 9 تونے، سامان و رقم مبلغ 33 لاکھ 55 ہزار روپے، دستاویزات وغیرہ غائب کر دیا ہے۔ اور دھمکیوں پر اتر آیا ہے۔

۶۔ یہ کہ سالانہ نے تھانہ KDA میں رپورٹ کرنے کے لیے کئی چکر لگائے۔ لیکن محرر تھا: اور SHO نے FIR اور رپورٹ درج کرنے سے انکار کر دیا اور سالانہ کی دادوری نہیں کی۔ حالانکہ محرر SHO رپورٹ درج کرنے کے پابند ہیں۔

استدعا ہے کہ مسؤل الیہ کے خلاف حسب مضمون FIF درج کی جائے۔

۵۔ یہ کہ مورخہ 2023-10-14 بوقت 2 بجے۔ سپر مسؤل الیہ نمبر 1 نے سالانہ کی عدم موجودگی میں سالانہ کے رہائشی گھر سے 9 تونے سونا اور مبلغ 3,55,000 روپے بمعداہم دستاویزات غائب کر کے چوری کی گئی ہے۔ اور ساتھ ہی مسؤل الیہ نمبر 1 نے گھریلو کو سالانہ کو سنگین قسم کی دھمکیاں بھی دے رہا ہے۔ نیز مسؤل الیہ نمبر 1 اپنے عہدے کا ناجائز فائدہ اٹھا رہا ہے۔

۶۔ یہ کہ مسؤل الیہ نمبر 1 نے اس کے علاوہ سالانہ کی دیگر تمام تر زیر استعمال اشیاء جس میں فرنیچر، واشنگ مشین، اسٹری، ونی، الٹاریاں، صندوقیں، بمعداہم کچن گھریلو سامان، راہم دستاویزات بھی اپنے قبضہ میں لے گیا ہے۔ جس کی بابت مسؤل الیہ نمبر 1 نے سالانہ کو مورخہ 2023-10-21 بذریعہ سیریل نمبر 4360 نوٹس بھی دیا گیا ہے۔ کہ اندر 2 یوم میں مذکورہ سامان لے جائیں۔ بصورت دیگر یہ سامان بھی ضبط کیا جائے گا۔ (نقل نوٹس لف ہے)

۷۔ یہ کہ مسؤل الیہ 2 کو ہدایت کی جائے کہ وہ مسؤل الیہ نمبر 3 کو حکم دے کہ وہ مسؤل الیہ نمبر 1 کے خلاف قانونی کارروائی کر کے FIR درج کرے۔ جرائم بوجہ قابل دست اندازی پولیس ہونے کے مسؤل الیہ 1 کے خلاف مقدمہ درج کرے۔

۵۔ یہ کہ عدالت حضور کے پاس زیر دفعہ 22-AI سہل اختیارات ہیں۔ کہ وہ مسؤل الیہ 2 کو ہدایت کرے۔ کہ مسؤل الیہ نمبر 1 کے خلاف مقدمہ درج کر کے کارروائی کرے۔

لہذا استدعا ہے کہ درخواست ہذا منظور فرمائی جا کر سالانہ کی دادوری فرمائی جاوے۔ اور مسؤل نمبر 1 کے خلاف کارروائی میں لائی جائے۔

مورخہ 2023-10-26

نجر فردوس (سالانہ)

بذریعہ ڈاکٹر امیر محمد الیہ کو حاکمیت

بیان علی

حلفا بیان ہے کہ جملہ مراتب درخواست بالا تاحد میرے علم و یقین کے درست و صحیح ہیں۔ حلفا بیان ہے کہ کوئی دادرغ کوئی سے کام نہیں لیا گیا ہے۔

العبد

نجر فردوس (سالانہ)

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DIRECTORATE GENERAL HEALTH SERVICES (5)  
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 - 9210269) Exchange (091 - 9210187, 091 - 9210196) Fax. (091 - 9210230)

No. 4285 /E.II.

Dated Pesh. The 04/10/2023

To:-

The District Health Officer,  
Kohat

Subject: - INQUIRY REPORT

Memo:-

Enclosed please find herewith a copy of a complaint submitted by Mst Najma Firdous D/O Muhammad Suleman RNO (BS-16) DHQ Hospital Kohat against the irregularities in Nursing hostel DHQ Hospital Kohat.

You are requested to inquire the matter and submit detail report to this Directorate within 15 days positively for further necessary action.

Enclosures attached

*[Handwritten signature]*

*[Handwritten signature]*  
ADD: DIRECTOR (NURSING)  
DIRECTORATE GENERAL HEALTH  
SERVICES, KP PESHAWAR

*[Handwritten date]*  
31/7/2023

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

**SERVICE APPEAL NO. 89/2024**

Najma Firdous.....Appellant

**Versus**

Government of Khyber Pakhtunkhwa & others .....Respondents.

**Affidavit**

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.



*[Signature]*  
Deponent

02 FEB 2024



**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*

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**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. 89/2024 titled Najma Firdous 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**