

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
CAMP COURT ABBOTTABAD

Service Appeal No. 118/2016

Date of Institution... 02.02.2016

Date of decision... 22.02.2018

Qadeer Nawaz son of Ghareeb Nawaz, Junior Clinical Technician/District
Headquarter Banazir Shaheed Hospital, Abbottabad. (Appellant)

Versus

1. The Secretary, Health Department, Government of Khyber Pakhtunkhwa
Peshawar and 4 others. (Respondents)

Mr. Muhammad Waqas,
Advocate ... For appellant.

Mr. Ziaullah,
Deputy District Attorney ... For respondents.

MR. NIAZ MUHAMMAD KHAN, ... CHAIRMAN
MR. MUHAMMAD HAMID MUGHAL, ... MEMBER

JUDGMENT

NIAZ MUHAMMAD KHAN, CHAIRMAN: Arguments of the learned
counsel for the parties heard and record perused.

FACTS

2. The appellant was appointed as Radiographer on temporary basis on
25.08.1993 in BPS-06. He continued his service as such till 2006 when he was upgraded
to BPS-09 in 2006. The appellant filed departmental appeal on 18.3.2015 by challenging
the seniority list dated 10.10.2009 on the ground that the appellant's name did not figure
in the said seniority list. His departmental appeal was rejected on 14.01.2016.

ARGUMENTS

3. Learned counsel for the appellant argued that on 24.08.1983 some upgradation
of the 11 cadres were notified. That this notification did not include Radiographer and X-

Ray Technicians. That in order to remove this anomaly the President of Pakistan issued a notification on 01.03.1988 by upgrading both the posts of X-Ray Technician and Radiographer to BPS-9. That the appellant was appointed on 25.08.1993 in BPS-6. That the appellant should have been appointed in BPS- 9 instead of BPS-6. He further argued that the appellant was qualified also for X-Ray Technician and he also applied for the post of X-Ray Technician but he was appointed as Radiographer and not X-Ray Technician. He further argued that there was no difference between the qualification of X-Ray Technician and Radiographer at the time of appointment. That he came to know about the seniority list in the year 2015 when he filed the departmental appeal.

4. On the other hand learned AAG argued that the present appeal is time barred. That the appellant challenged his appointment letter which was issued in the year, 1993 and he filed departmental appeal in the year, 2015 after 22 years. That merits could not be discussed if the appeal is time barred.

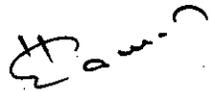
CONCLUSION.

5. The appointment letter of the appellant dated 25.08.1993 clearly states that the appellant was appointed as Radiographer in BPS-6 and not Senior Radiographer. In the method of recruitment issued on 07.11.1988 the post of Radiographer and Senior Radiographer are different. Senior Radiographer is appointed by promotion with 5 years service as Radiographer. The Radiographer is appointed by initial recruitment. It means that Senior Radiographer and Radiographer were different posts and were in different scales. The appellant was not appointed as Senior Radiographer but as Radiographer which means that the appellant was in the knowledge that post of Senior Radiographer is different from Radiographer. The method of recruitment clearly shows that the qualification for X-Ray Technician is qualified Radiographer from NWFP Medical Faculty while qualification for Radiographer was possessing certificate of Radiographer from NWFP Medical Faculty. It means that both the qualifications were different. The appellant was appointed as Radiographer and not as Senior Radiographer or X-Ray Technician. He cannot claim that his appointment should not have been made in BPS-6

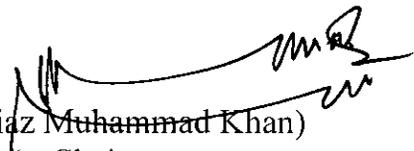
but in BPS-09. At the bar, the appellant admitted that at that time, the Senior Radiographer was in BPS-07 and X-Ray Technician was in BPS-09. Then how a Radiographer could be given BPS-09 when his post was junior to X-Ray Technician and Senior Radiographer. Above all, the appointment letter of the appellant shows that he was appointed temporarily with an undertaking that his services shall be terminated if a Senior Radiographer is posted. It means that there was clear difference between the Radiographer and Senior Radiographer at the time of his appointment.

6. The other aspect of the present appeal is that the appellant had never challenged his appointment order and he has come forward after so many years on the grounds that some 16 persons were appointed in BPS-09 and that he came to know about their appointments and now he is also entitled for BPS-9. This is no ground for accepting the appeal of the appellant because, the appellant is to show his appeal in accordance with the rules and law and if some other persons have been treated favorably (not proved) no relief can be granted to the appellant on those basis. Mere qualification for a higher post never means that a person cannot be appointed for lower post. For example if a Naib Qasid at the time of appointment passed Master's degree he can never claim that he should have posted against post of Clerk/Superintendent etc.

7. As a sequel to the above discussion, the present appeal is dismissed. Parties are left to bear their own costs. File be consigned to the record room.



(Muhammad Hamid Mughal)
Member



(Niaz Muhammad Khan)
Chairman
Camp Court, A/Abad

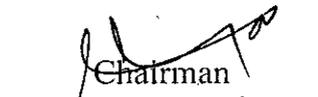
ANNOUNCED

22.02.2018

20.02.2018

Appellant alongwith counsel and Mr. Ziaullah, DDA alongwith Qazi Muhammad Naeem, AD for the official respondents present. After hearing the arguments at some length this Tribunal reaches the conclusion that notification of 2012 whereby the appellant was upgraded to BPS-09 is required for the decision of the present appeal. The department is directed to produce the said notification. To come up for further arguments/order on 22.02.2018 before this D.B.


Member


Chairman
Camp court, A/Abad.

22.02.2018

Appellant alongwith counsel and Mr. Ziaullah, Deputy District Attorney alongwith Qazi Muhammad Naeem, AD for the official respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, this appeal is dismissed. Parties are left to bear their own costs. File be consigned to the record room.


MEMBER


CHAIRMAN
Camp Court, A/Abad

ANNOUNCED
22.02.2018

33

For Compliance
Ade (PK-I)
M. Salim
Disc. 2/11/06
7/16/06

GOVERNMENT OF NWFP
HEALTH DEPARTMENT

Dated Peshawar the 25th August, 2006

NOTIFICATION

NO SOH-III /8-60/05 (Paramedics). In supersession of this Department's Notification of even number dated 10th May 2006 and in pursuance of the decision taken by the Provincial Cabinet in its meeting held on 27th December 2005, the Competent Authority is pleased to approve eight stage Paramedics Services Structure of NWFP as follows:-

- (1) The exiting 57 different categories of Paramedics at annex A are restructured into 14 cadres as annexure B.
- (2) In all the aforesaid cadres/specialties, the posts in various pay scales shall be integrated/categorized and re-designated as under:-

S.No	Existing Posts	Re-designation
i)	Posts in BPS-5 to BPS-9 in all specialties	Junior Technicians (BPS-9)
ii)	Posts in BPS-10 to BPS-12 in all specialties	Technicians (BPS-12)
iii)	Posts in BPS-13 to BPS-14 in all specialties	Senior Technicians (BPS-14)
iv)	Posts in BPS-15 to BPS-16 in all specialties	Chief Technicians (BPS-16)
v)	Posts in BPS-17 in all specialties	Technologist (BPS-17)
vi)	Posts in BPS-18 in all specialties	Senior Technologist (BPS-18)
vii)	Posts in BPS-19 in all specialties	Chief Technologist (BPS-19)
viii)	Posts in BPS-20 in all specialties	Principal Technologists (BPS-20)

The words "clinical" shall be mentioned with the categories of posts meant for Paramedics working in the hospitals and "Primary Health Care" with the paramedics working in the field along with mention of specific specialty (e.g. Junior Clinical Technician (Radiology) and Junior Primary Health Care Technician (Multi purpose)).

- (3) The number of Posts in BPS-9, BPS-12, BPS-14, BPS-16, BPS-17, BPS-18, BPS-19 and BPS-20, in the service shall be worked out according to the following proportionate ratio:-

S.No.	BPS	Percentage
a)	Post in BPS-9	80%
b)	Post in BPS-12	12%
c)	Post in BPS-14	3.5%
d)	Post in BPS-16	2.5%
e)	Post in BPS-17	1.86%
f)	Post in BPS-18	0.09%
g)	Post in BPS-19	0.04%
h)	Post in BPS-20	0.01%

- (4) Seniority of the incumbents of the posts in the 14 cadres so merged shall be caused on the basis of scale wise seniority as well as date of regular appointment in the pay scale. (e.g. in joint seniority list of BPS-12, the officials already in BPS-12 will be senior and the officials in the lower pay scales shall be accordingly placed step by step in the list, invariably keeping intact the inter-se-seniority of the incumbents in the same pay scales).
- (5) Promotions to the posts in BPS-18, 19 and BPS 20 shall be made on the basis of joint seniority list. The joint seniority list of all the 14 cadres shall be caused at BPS-17 level, keeping in view, the principles laid down in section 8 of the NWFP Civil Servants Act, 1973 and Rule-17 of the NWFP Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.
- (6) This eight stage Paramedics Service Structure will replace all existing categories, cadres, structures and nomenclatures and will cancel all such cadres/categories rules and regulations etc, which are in contravention to the approved Paramedics Service Structure.
- (7) The following four Cadres declared as dying cadre by the Provincial Cabinet vide its decision dated 22.06.2000 will be replaced with the following new cadres:-

Existing Nomenclature	New Nomenclature
Dispenser/Compounders/Dressors	Pharmacy Technician
Malaria Technician	Primary Health Care(Multipurpose)
EPI Technician	-do-
Sanitation Technician	-do-

- a) The Health Department should devise job description and distribution plan of the above four cadres.
- b) The post so vacated by the incumbent of the above four cadres will be filled in after its fresh approval from Finance Department.

Sd/xxx
(ABDUS SAMAD KHAN)
SECRETARY HEALTH

Dated Peshawar, 25.08.2006

ENDST: NO.KC/TD/SO(FR)/7-3/2001

Copy forwarded for information and necessary action to:-

- 1) The Accountant General, NWFP, Peshawar.
- 2) All District/Agency Accounts Officer in NWFP.

Ref:xxx
(B/4) IQ AKBAR
SECTION OFFICER(FR)
FINANCE DEPARTMENT



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)

Dated Peshawar, the 11-08-2015

NOTIFICATION

NO. SO(FR)FD/7-3/2015/Paramedics. The competent authority has been pleased to upgrade all the Paramedics Staff appointed under Khyber Pakhtunkhwa Civil Servants Act 1973, with immediate effect:

- I. All the incumbents Paramedics in BS-09 are upgraded to BS-12. In future the initial recruitment will be made in BS-12 instead of BS-09 and the Administrative Department shall immediately amend the service rules through SSRC accordingly.
- II. The incumbents presently serving in BS-12 & BS-14 are allowed 02 steps upgradation respectively with relaxation of condition of 10 years service in the same grade stipulated in the existing upgradation policy.
- III. The Paramedics presently serving in BS-16 and BS-17, having 05 years service in the respective pay scales, are allowed an allowance at the rate of fixation of pay in next grade.
- IV. The Administrative Department shall further streamline the service structure of BPS-16 and above through the mechanism of SSRC.
- V. Pay of existing incumbents of the posts shall be fixed in higher pay scales at a stage next above the pay in the lower pay scale.
- VI. This department notification bearing No. SO(FR)/FD/10-22/2015 dated 30-06-2015 will have no affection to the above employees.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

Endst No. & Date even.

Copy of the above is forwarded for information and necessary action to the:-

1. PS to Additional Chief Secretary, FATA.
2. All Administrative Secretaries Government of Khyber Pakhtunkhwa.
3. Senior Member, Board of Revenue, Khyber Pakhtunkhwa Peshawar.
4. Accountant General, Khyber Pakhtunkhwa, Peshawar.
5. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
6. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
7. Secretary Provincial Assembly, Khyber Pakhtunkhwa.
8. All Heads of Attached Departments in Khyber Pakhtunkhwa.
9. Registrar, Peshawar High Court, Peshawar.
10. All Deputy Commissioners, Political Agents, District & Sessions Judges / Executive District Officers in Khyber Pakhtunkhwa.

19.07.2017

Appellant in person and Mr. Muhammad Bilal, DDA alongwith Muhammad Irshad, SO (Litigation) and Abdul Karim, Technologist for the respondents present. Due to general strike of the Bar, counsel for the appellant is not in attendance. Adjourned. To come up for final hearing on 20.09.2017 before the D.B.


Member


Chairman
Camp court, A/Abad

20.09.2017

Counsel for the appellant, Mr. Muhammad Bilal, Deputy District Attorney alongwith Muhammad Javed, Office Superintendent and Abdul Karim, Technologist for the respondents present. Learned Deputy District Attorney seeks adjournment. Adjourned. To come up for final hearing on 15.01.2018 before D.B at Camp Court Abbottabad.

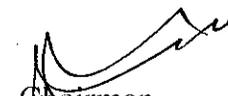

Member


Chairman
Camp court, A/Abad.

15.1.2018

Appellant in person and Mr. Muhammad Bilal, Deputy District Attorney alongwith Muhammad Arshad, SO, Qazi Muhammad Naeem, AD, Tahir Junior Clerk and Dr. Mujeebur Rahman, for the respondents present. Due to general strike of the bar, counsel for the appellant is not in attendance. To come up for arguments on 20.02.2018 before the D.B at camp court, Abbottabad.


Member


Chairman
Camp court, A/Abad.

18.08.2016

Counsel for the appellant, M/S. Muhamad Irshad, SO, Tahir Ali, Junior Clerk and Abdul Karim Technologist alongwith Mr. Muhammad Bilal, GP for the respondents present. Seeks adjournment. To come up for written reply/comments on 24.11.2016 before S.B at camp court, Abbottabad.


Chairman
Camp court, A/Abad.

24.11.2016

Counsel for the appellant and M/S Tahir Ali, Junior Clerk Muhammad Javed Assistant and Munir Hussain, Senior Clerk alongwith Mst. Bushra Bibi, Government Pleader for respondents present. Requested for adjournment. To come up for written reply/comments on 19.01.2017 at camp court, Abbottabad.


Chairman
Camp Court, A/Abad

19.1.2017

Appellant in person M/S Muhammad Irshad, SO, Amjad Ali, Asstt. Munir Hussain, Senior Clerk alongwith Mr. Muhammad Siddique, Sr.GP for respondents present. Written reply by respondents No. 1 to 4 submitted. Learned SrGP relies on the same on behalf of respondent No. 5 The appeal is assigned to DB for rejoinder and final hearing for 19.07.2017 at camp court, Abbottabad.


Chairman
Camp court, A/Abad

17.02.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was initially appointed as Radiographer (BPS-6) vide order dated 25.8.1993 and now serving as Junior Clinical Technician (BPS-9). That the appellant was to be given BPS-9 with effect from the date of his initial appointment which was not granted to him though similarly placed employees were granted the same by the respondents constraining the appellant to prefer departmental appeal on 27.3.2015 which was declined on 14.1.2016 and hence the instant service appeal on 2.2.2016.

That the appellant is entitled to BPS-9 with effect from the date of his initial appointment i.e 25.8.1993 as the same was given to similarly placed employees by the respondents.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 18.5.2016 before S.B at Camp Court A/Abad.


Chairman
Camp Court A/Abad

18.5.2016

Counsel for the appellant, M/S Muhammad Irshad, SO, Muhammad Arshad, SO, Munir Hussain, Senior Clerk and Tahir Ali, Junior Clerk alongwith Mr. Muhammad Siddique, Sr.GP for respondents present. Requested for adjournment. To come up for written reply/comments of respondents on 18.08.2016 at camp court, Abbottabad.


Chairman
Camp court, A/Abad

Appellant Deposited
Security & Process Fee

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 118 /2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	02.02.2016	<p>The appeal of Mr. Qadeer Nawaz presented today by Mr. Muhammad Waqas Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2	8-2-16	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>17-2-2016</u></p> <p> CHAIRMAN</p>

BEFORE HONORABLE THE SERVICES TRIBUNAL OF
KHYBER PAKHTUNKHWA, PESHAWAR CAMP AT
ABBOTTABAD

Appeal no-118/2016

Qadeer Nawaz Son of Ghareeb Nawaz,
Junior Clinical Technician/ District Headquarter-Benazir Shaheed Hospital,
Abbottabad.

.....APPELLANT

VERSUS

1. The Secretary, Health Department, Government of Khyber Pakhtunkhwa, Peshawar.
2. The Director General of Khyber Pakhtunkhwa, Health Department, Peshawar.
3. Medical Superintendent, DHQ/ Benazir Shaheed Hospital, Abbottabad.
4. District Health Officer, Abbottabad.
5. Secretary, Finance Department, Government of Khyber Pakhtunkhwa, Peshawar.

.....RESPONDENTS

INDEX

S. No.	Description	Page No.	Annexure
1.	Appeal	01-08	
2.	Affidavit	09	
3.	Copy of Notification of Ministry of Health dated 01.03.1988	10	"A"
4.	Copy of Appointment Order	11-12	"B"
5.	Copy of Seniority List	13-19	"C"
6.	Copy of Departmental Appeal	20-26	"D"
7.	Copy of Reply of Departmental Appeal by Respondent No.3	27-31	"E"
8.	Copy of Order	32	"F"
9.	Wakalatnama	33	

..... APPELLANT

Dated 26-01 /2016

Through



(Muhammad Waqas)
Advocate High Court Abbottabad

Muhammad Waqas
Advocate
Abbottabad. 0313-5871510

BEFORE HONOURABLE THE SERVICES TRIBUNAL OF
KHYBER PAKHTUNKHWA, PESHAWAR CAMP AT
ABBOTTABAD.

Appeal no. 118/2016

**K.W.P. Province
Service Tribunal
Diary No. 78
dated 02-2-2016**

Qadeer Nawaz son of Ghareeb Nawaz,
Junior Clinical Technician / District Headquarter-Benazir Shaheed
Hospital,
Abbottabad,

APPELLANT.

VERSUS

- 1- The Secretary, Health Department, Government of Khyber Pakhtunkhwa, Peshawar,
- 2- The Director General of Khyber Pakhtunkhwa, Health Department, Peshawar,
- 3- Medical Superintendent, DHQ / Benazir Shaheed Hospital, Abbottabad,
- 4- District Health Officer, Abbottabad,
- 5- Secretary, Finance Department, Government of Khyber Pakhtunkhwa, Peshawar,

RESNDENTS

APPEAL under Section 4 of the Khyber Pakhtunkhwa Services Tribunal Act, 1974, for grant of BPS-09 instead of BPS-06 to the appellant w.e.f. his date of appointment i.e. 25.08.1993 and treating at par with those employees, who have been either appointed or granted BPS-9, as per seniority list and in the light of Notification No.F-4-98/85-MF-II, dated 1st March, 1988, with all back benefits or any other relief to which the Honourable competent Authority deemed it just and proper.

Filed to-day

Registered

Respectfully Sheweth:-

- 1- That the Government of Pakistan, Ministry of Health, Islamabad vide Notification No.F-4-98/85-MF-II dated 1st March, 1988, in the matter of removal of anomaly, through which the President of Pakistan was pleased to place the posts of X-Ray Technicians and Radiographers in BPS-9 with 1/3rd post in selection grade (BPS-11) w.e.f. 26th January, 1988, meaning thereby that all subsequent appointments were required to be made in BPS-09 instead of BPS-06. Copy of Notification is placed as Annexure-A.
- 2- That the appellant being qualified applied for appointment against the post of X-Ray Technician (BPS-9) but in spite of availability of post of X-ray Technician BPS-9 and contrary to the contents of above notification, the appellant was recruited as Radiographer BPS-06 vide office order of respondent No.3 dated 25.08.1993. Copy of appointment order is attached as Annexure-B.
- 3- That prior to appointment of the petitioner, the Authorities of Health Department in the Province, time and again, made initial appointments of so many persons in the light of ibid notification dated 01.03.1988 as X-Ray Technicians in BPS-9 whereas the act of respondents in not making initial appointment of the appellant in BPS-9 was illegal, wrong and against the contents of ibid notification.

That the appellant on circulation of seniority list came to know about discrimination meted out to him at the time of initial appointment and thereafter time and again approached the respondents for the redressal of his genuine grievances. Copy of seniority list is attached as Annexure-C.

4- That lastly, the appellant preferred departmental appeal and respondent No.3 in his reply admitted availability of the post of BPS-09 of X-ray technician at the time of appointment of appellant but in spite of that the appellant was appointed in BPS-6. Copy of departmental appeal is attached as Annexure-D while reply of respondent No.3 is annexed as Annexure-E.

5- That appeal of the appellant has been turned down by respondent on 14.01.2016, hence, the instant appeal, inter-alia on the following, copy of order is attached as Annexure-F:--

G R O U N D S:

(A). that the very appointment of the appellant made in BPS-06 instead of BPS-09 is apparently found to have been made in violation and utter disregard of contents / sanction of Honourable the then President of Islamic Republic of Pakistan, as it has been enshrined in Notification dated 1st March, 1988, as such he has been meted out discriminately.

(B) That respondent No.3 in his reply to Secretary Health admitted availability of X-ray Technician post BPS-9 at the time of appointment of the appellant but in spite of that the appellant had been appointed as Radiographer BPS-6.

(C) That the settled principle of law in the shape of maxim "*A Communi observantia non est recedendum*" means that where a thing was provided to be done in a particular manner, it had to be done in that manner, and if not so done, it would not be lawful. When a power was given to do a certain thing in a certain way, that thing must be done in that way and adoption of any other method of performance has strictly been forbidden.

In the case of Raja Hamayun Sarfaraz Khan Vs. Noor Mohammad reported as 2007 SCMR 307(b), it is held that:-

"Administration of Justice – When a thing is to be done in a particular manner, it must be done in that way and not otherwise".

(D) So far as limitation, if any, is concerned, the appellant relies on (1) *Rao Solat Yasin Khan Vs. Director General, Federal Directorate of Education* (1995 PLC (C.S) 1026.,

"S.4(b) – Appeal – Limitation – Civil Servant who was initially appointed as Library Assistant in BPS-5, having been transferred against a vacant post of Librarian (BPS-15), claimed pay of that higher post, but his claim was rejected by Authority whereupon civil servant challenged the same Authority in appeal before Tribunal – Appeal was resisted on ground of bar of limitation – Held, in matter of pay and pension bar of limitation not being applicable plea of limitation raised by Authority had no substance".

- 2- Muhammad Hanif Shah Vs. Divisional Commercial Officer, Pak Railways Multan and another (1996 PLC (C.S) 832.

“S. 2(a) – Service Tribunals Act (LXX of 1973), S.4 – Appeal, competency of – Station Masters, by virtue of Notification No.P.1/90-LP/9 dated 9.6.1992 issued by Ministry of Railways, having been declared as “Supervisors” and “civil servants” employee who was a Station Master, was a civil servant and as such his appeal filed by Service Tribunal was competent – Matter relating to pay and pension being a continuing grievance, limitation was not applicable to appeal filed by civil servant”.

- 2- United Bank Ltd Vs. Muhammad Rattas (1998 PLC 466)

“ Cause of action accrued to employee being continuous, mere passage of time would not disentitle employee to claim arrears – Stand-point of employer that employee wits debarred by limitation for claiming his back benefits, was repelled to circumstances”.

- 4- Asad Ali Shah Vs. Secretary, Finance Division and others (2005 PLC (CS) 1497

“Period specified for preference of appeal would not be applicable in case of appellants as financial benefit was involved in his case – Delay, if any in preference of appeal, was condoned – Service Tribunal accepting appeal set-aside impugned order and directed Authorities to allow Orderly Allowance / Special Additional Pension w.e.f. 19.02.1991”.

- 5- Pakistan Railways Vs. Ajmal Khan (2003 PLC (C.S) 1027, the Apex Court strongly observed:-

“ Supreme Court observed that the Authorities, instead of causing hardship and inconvenience to an employee with long service spreading over 25 years, should have

adopted just, fair and reasonable attitude in dealing with its employees rather than to adopt attitude of rigidity having harsh bureaucratic tendency – Supreme Court declined to interfere with the judgment passed by Service Tribunal – Leave to appeal was refused”.

6- Managing Director, Sui Southern Gas Company Ltd, Karachi Vs. Ghulam Abbas and others (PLD 2003 Supreme Court 724).

“(k) Limitation – Administration of Justice – Decision of the cases on merits always to be encouraged instead of non-suiting the litigants for technical reasons including on limitation (p.769)”.

- (E) That the appellant is performing his duties honestly, punctually and satisfactorily in the Health Department since the date of his appointment.
- (F) That in the light of ibid notification, service rules and requisite educational criteria for recruitment, the nature of duties of X-ray Technicians and Radiographers have been treated at par and placed in BPS-9. Even the requisite qualification was same for rest of all paramedics cadres.
- (G) That in the light of ibid notification appointment of other candidates in BPS-9, the appointment order of appellant was required to have been passed in BPS-9 instead of BPS-6.
- (H) That in the Government of KPK numbers persons have been either appointed or granted BPS-9

whereas in case of appellant it had been over sighted and not made applicable.

- (I) That no other adequate and efficacious remedy is available, as apparently terms and conditions as well as grant of BPS-9 instead of BPS-6 is involved in the appeal.
- (J) That the appeal is within time and this Honourable Tribunal has the jurisdiction to entertain and decide the appeal.
- (K) That the appellant seeks permission of Honourable Tribunal to agitate additional grounds at the time of final arguments.

It is, therefore, very humbly and respectfully prayed that on acceptance of this appeal, the appellant be held entitled to the grant of BPS-9 instead of BPS-06 w.e.f. 25.08.1993 in the light of Notification No.F-4-98/85-MF-II, dated 1st March, 1988 and treating at par with those employees, who have been either appointed or granted BPS-9, with all back benefits, or to any other relief to which the Honourable competent Authority deemed it proper and just and oblige.

Dated : 26-01-16

Qadeer Nawaz

(Qadeer Nawaz)
Junior Clinical Technician /
District Headquarter-Benazir Shaheed Hospital,
Abbottabad.

Through:

Muhammad Waqas
(MUHAMMAD WAQAS)
ADVOCATE HIGH COURT,
ABBOTTABAD.

Muhammad Waqas
Advocate
Abbottabad. 0313-5871510

BEFORE HONORABLE THE SERVICES TRIBUNAL OF
KHYBER PAKHTUNKHWA, PESHAWAR CAMP AT
ABBOTTABAD

Qadeer Nawaz Son of Ghareeb Nawaz,
Junior Clinical Technician/ District Headquarter-Benazir Shaheed Hospital,
Abbottabad.

.....APPELLANT

VERSUS

1. The Secretary, Health Department, Government of Khyber Pakhtunkhwa, Peshawar.
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4. District Health Officer, Abbottabad.
5. Secretary, Finance Department, Government of Khyber Pakhtunkhwa, Peshawar.

.....RESPONDENTS

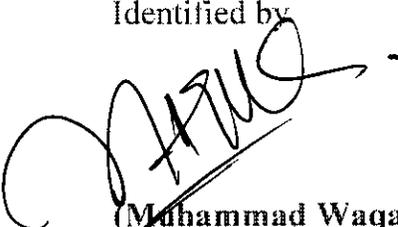
AFFIDAVIT

I, Qadeer Nawaz, JCT, Radiology, District Headquarter Benizir Shaheed Hospital, Abbottabad, do hereby affirm and declare on oath that the contents of foregoing Appeal are true and correct to the best of my knowledge and belief and nothing has been suppressed from this Honourable Court.

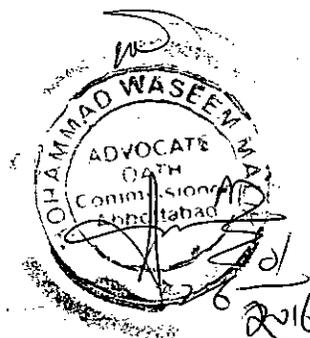
Dated : 26-01 /2016


DEPONENT

Identified by


(Muhammad Waqas)
Advocate High Court Abbottabad

Muhammad Waqas
Advocate
Abbottabad. 0313-5871510



To

①

(Handwritten mark)

(A 722/82) A

D/98/1-10
11/98/2-10

No.F.4-73/85-MF-II
Government of Pakistan
Ministry of Health, Special Education
and Social Welfare,
(HEALTH DIVISION)

ANNEXURE

(A)

Islamabad, the 1st March, 1988

1. The Director,
Jinnah Postgraduate
Medical Centre,
KARACHI.
2. The Medical Superintendent,
Federal Government Services
Hospital,
ISLAMABAD.
3. The Executive Director,
Pakistan Institute of
Medical Sciences,
ISLAMABAD.
4. The Director,
Central Health Establishment,
Block-47, Pak. Secretariat,
KARACHI.
5. The Executive Director,
National Institute of Cardiovascular
Diseases, Rafique (I.I.J.) Shaheed Road,
KARACHI.

Subject: - X-RAY TECHNICIAN/RADIOGRAPHER'S SCALE OF
PAY - REMOVAL OF ANOMALY.

Sir,

I am directed to convey the sanction of the
President to the placement of the post of X-Ray Technicians
and Radiographers in BPS-9 with 1/3rd posts in selection
grade (BPS-11) with effect from the 26th January, 1988.

2. This issues with the approval of The Finance
Division (Regulations Wing) obtained vide their U.O. No.
D.63-R1/88, dated 25-1-1988.

Your obedient servant,

CH. MUHAMMAD SIDDIQUE
SECTION OFFICER (MF-II)
GOVERNMENT OF PAKISTAN.

Handwritten initials

13/5

Handwritten notes: B. Khan, my collection, T.A.S., C.A.D., S.P.

(PTO)

FROM DIRECTOR

Copy with spare copies forwarded to the
Ministry of Finance for Counter Signature and
communication to Accountant General Pakistan Revenues,
Islamabad, Lahore, Karachi, Islamabad, Quetta and
Peshawar.

SECTION OFFICER (MF-II)
GOVERNMENT OF PAKISTAN

No. F. 1(1)-RI/88-D272/83
Government of Pakistan
Ministry of Finance
(REGULATION WING)

Islamabad, the 6th March, 1988

Forwarded to the Accountant General Pakistan
Revenues, Islamabad, Karachi, Lahore, Quetta, Peshawar
and Hyderabad.

163 H
R. S. O. Peshawar
Received from
R. S. O. Peshawar

MUHAMMAD ISHAQUE
SECTION OFFICER 6/3/88

Handwritten notes:
No. 198
M. F. 1(1)-RI/88-D272/83

Handwritten notes:
T.M.F.
M.F.

No. 4540
1/11 Dated Abotabad the 25/18/1993.

From:

The Medical Superintendent,
DHO Hospital, Abotabad.

To:

Mr. Gader Nawaz S/O Ghazi Nawaz
Vill: P.O. Sheikhanabad, Abotabad.

Subject:-

OFFER OF APPOINTMENT.

Name:

Reference your application and interview
dated 24.8.1993.

You are hereby appointed as a temporary
Radiographer in BPS-6 against the vacant post of Senior Radiografer
on temporary basis subject to the written order telling that his
services shall be terminated if a senior radiographer is posted.

Your services are liable to be terminated any
time without notice and any cause of assigned, and then your
services are terminated you shall not be paid any compensation
what sever for the unexpired period, as mentioned above.

The appointment is subject to physical fitness
You shall not be entitled for any TA/DA for
presenting yourself for medical examination nor for holding your
first appointment.

If you accept the offer on above noted
conditions please report to the Deputy Medical Superintendent
DHO Hospital, Abotabad, within three days from the receipt of
this offer.

Medical Superintendent,
DHO Hospital, Abotabad.

No. /RE

Copy forwarded to the:-

- 1. Deputy Medical Superintendent DHO Hospital, Abotabad.
- 2. Accountant DHO Hospital, Abotabad.

For information and action.

Medical Superintendent,
DHO Hospital, Abotabad.

ANNEXURE (B)
B
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12

DIRECTORATE GENERAL HEALTH SERVICES, N.W.F.P., PESHAWAR.

OFFICE ORDER.

Mr. Qadir Nawaz, Radiographer being surplus at DHQ: Hosp: Abbottabad is hereby transferred and placed at the disposal of DHQ, Mansehra for further posting under his control in the interest of public service.

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

SD/XXXXXXXXXXXXX
DIRECTOR GENERAL HEALTH SERVICES, NWFP, PESHAWAR.

No. 36281-82 /E.IV DATED PESHAWAR THE 01/11/1999.

Copy forwarded to the:-

- 01. Medical Supdt: DHQ: Hospital, Abbottabad.
- 02. Distt: Health Officer, Mansehra.

For Information and n/action.

[Handwritten signature]
02/11/99

FOR DIRECTOR GENERAL HEALTH SERVICES, NWFP, PESHAWAR.
[Handwritten signature]
11.11.99

AA/11199.

No _____ dated _____ 199

No 1057.591 PF. Dated Abbottabad the, 2-11-1999.

Copy to the:-

1. Dy; Medical Superintendent (Admn)
2. I/C Account Branch.
3. Official Concerned for information & compliance.

2/11/99

Office Superintendent (Admn)
for Medical Superintendent
DHQ Hospital Abbottabad

No. _____ / Dated _____ / 19__

Copy forwarded to the _____

//

DIRECTORATE GENERAL HEALTH SERVICES, NWFP, PESHAWAR.

NO. 42373-482 IAE-VII

Date: 10/20/09

ANNEXURE

13

ANNEXURE (C)

1. All Medical Superintendents, LRH, KTH, HMC, Peshawar and Ayub Teaching Hospital, Abbottabad

2. All Sub-offices, Health Department, NWFP.

3. Principal KMC, KCD, Peshawar.

4. All Agency Surgeons in NWFP.

5. Director Health Services (PATA), NWFP, Peshawar.

Subject: FINAL SENIORITY LIST OF JUNIOR CLINICAL TECHNICIAN (RADIOLOGY) BPS-9 IN HEALTH DEPARTMENT, NWFP.

Memo:

In pursuance of the Govt of NWFP Health Deptt Notification No. SOH-III/8/60/2009 (Paramedics) dated 17.1.2009, the final seniority list of Junior (Clinical Technician(Radiology)) in Health Department, NWFP prepared by this Directorate amongst Junior Health Services, NWFP, is sent with the request that this list may please be circulated amongst Junior Clinical Technicians (Radiology) BPS-9 working under your control for their information and record.

The final Seniority List shall be deemed to have effect from the date prior to 15.01.2002 in light of the Government Notification mentioned above.

No. 42483-84 IAE-VII

Copy forwarded to the:

Secretary to Govt of NWFP, Health Department, Peshawar.
President Provincial Para-medical Association, NWFP (LRH), Peshawar.

For information.

DIRECTOR GENERAL HEALTH SERVICES, NWFP, PESHAWAR.

2/10/09

DIRECTOR GENERAL HEALTH SERVICES, NWFP, PESHAWAR.

2/10/09

7/10/

Final Seniority List of Junior Clinical Te

S.No	Name/Father's Name	Old Nomenclature With BPS	Date of Joining Govt. Service
✓ 1.	Afzalur Rehman	X-Ray Tech: BPS 09	12/12/1989
✓ 2.	Gul-Sher Khalil	X-Ray Tech: BPS 09	03.03.1991
✓ 3.	Razeem Khan	X-Ray Tech: BPS 09	04.03.1991
✓ 4.	Islamuddin	X-Ray Tech: BPS 09	13.04.1991
✓ 5.	Jamil Khan S/O Muhammad Amir Khan	X-Ray Tech: BPS-09	18/03/1993
6.	Rehmatullah S/O Shaista Khan	X-Ray Tech: BPS 09	13/09/1995
✓ 7.	Muhammad Alam S/O Habibur Rehman	X-Ray Tech: BPS 09	12/03/1999
8.	S.Hasnain S/O S.M Sbtain	1.Radiographer BPS 06 2.X-Ray Tech: BPS 09	27-12-1994 21-08-2003
✓ 9.	Hamid Noor S/O-Syed Manoor	X-Ray Tech: BPS-09	25/10/2003
10.	Faheem Ullah S/O Muratullah Khan	X-Ray Tech: BPS-09	08/12/2005
11.	Rizwan Ullah Khan	1.Radiographer BPS 06 2.X-Ray Tech: BPS 09	16.04.1995 03.03.2006
12.	Muhammad Hussain	Dietician BPS 06 X-Ray Tech: BPS 09	09.04.2004 01.04.2006

Circulate to all
 JCT (Radiology) BPS - SNO: 14917
 Tiff hospital W & C - Hospital
 Abbottabad for information
 4/7/9
 18/5/2011
 19-7-2011

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7/10/2009

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Final Seniority List of Junior Clinical Technician (Radiology) BPS 09 in the Health Department N.W.F.P

S.No	Name/Father's Name	Old Nomenclature With BPS	Date of Joining Govt. Service	New Nomenclature With BPS	Date of Upgradation / New Nomenclature	Place of Present Posting	Date of Birth Domicile	Date of Retirement	Remarks
✓ 1.	Afzalur Rehman	X-Ray Tech: BPS 09	12/12/1989	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	09/05/1966 Swabi	08/05/2026	
✓ 2.	Gul-Sher Khalil	X-Ray Tech: BPS 09	03.03.1991	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	01.10.1971 Peshawar	30.09.2031	
✓ 3.	Razeem Khan	X-Ray Tech: BPS 09	04.03.1991	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	04.12.1967 Mardan	03.12.2027	
✓ 4.	Islamuddin	X-Ray Tech: BPS 09	13.04.1991	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	20.03.1971 Malakand	19.03.2031	
✓ 5.	Jamil Khan S/O Muhammad Amir Khan	X-Ray Tech: BPS 09	18/03/1993	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KTH Peshawar	01/01/1969 NW Agency	31/12/2029	
6.	Rehmatullah S/O Shaista Khan	X-Ray Tech: BPS 09	13/09/1995	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDOH Lakki	02/01/1970	01/01/2030	
✓ 7.	Muhammad Alam S/O Habibur Rehman	X-Ray Tech: BPS 09	12/03/1999	J. Clinical Technician (Radiology) BPS-09	25-08-2006	PIMT Swat	28/04/1971	27/04/2031	
8.	S.Hasnain S/O S.M Sbtain	1. Radiographer BPS 06 2. X-Ray Tech: BPS 09	27-12-1994 21-08-2003	J. Clinical Technician (Radiology) BPS-09	25-08-2006	THQ Sadda	01-04-1973	31-03-2033	
✓ 9.	Hamid Noor S/O Syed Manoor	X-Ray Tech: BPS 09	25/10/2003	J. Clinical Technician (Radiology) BPS-09	25-08-2006	ASNW MiranShah	10/03/1984 NW Agency	09/03/2044	
10.	Faheem Ullah S/O Mumtullah Khan	X-Ray Tech: BPS 09	08/12/2005	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQH Bannu	05/06/1978 Bannu	04/06/2038	
11.	Rizwan Ullah Khan	1. Radiographer BPS 06 2. X-Ray Tech: BPS 09	16.04.1995 03.03.2006	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KGNTB Bannu	04/03/1971 Bannu	03/03/2031	
12.	Muhammad Hussain	Dietician BPS 06 X-Ray Tech: BPS 09	09.04.2004 01.04.2006	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQT Hospital DI Khan	01.04.1983 DI Khan	31.03.2043	

13.	Ghulam Akhtar	1. Radiographer BPS 06 2. X-Ray Tech: BPS-09	31-08-1989 22-05-2006	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDOH Abbottabad	30-01-1963 Haripure	29-01-2023	
14.	Saifur Rehman (1)	Radiographer BPS-06	14-09-1976	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Mansehra	19-01-1957 Mansehra	18-01-2017	
15.	M. Riaz Akhtar S/O Muhammad Rafiq	Radiographer BPS-06	11/04/1977	J. Clinical Technician (Radiology) BPS-09	25-08-2006	BBSH Abbottabad	03/08/1958 Abbottabad	02/08/2018	
16.	MOHD Arshad (2)	Radiographer BPS-06	19-01-1978	J. Clinical Technician (Radiology)	25-08-2006	LRH Peshawar	15-09-1958 Peshawar	14-09-2018	
17.	Ijaz Muhammad S/O Ghulam Miskeen (3)	Radiographer BPS-06	28-02-1978	J. Clinical Technician (Radiology) BPS-09	25-08-2006	ATH A. Abad	17-09-1958 Abbottabad	16-09-2018	
18.	Waliullah	Radiographer BPS-06	07-03-1978	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Charsadda	07-01-1952 Charsadda	06-01-2012	Retire
19.	Riaz Akhtar (4)	Radiographer BPS-06	18-04-1978	J. Clinical Technician (Radiology) BPS-09	25-08-2006	BBSH A. Abad	03-08-1958 Abbottabad	02-08-2018	
20.	Mutahir Shah S/O (5) Syed Muhammad Karim Shah	Radiographer BPS-06	20-05-1978	J. Clinical Technician (Radiology) BPS-09	02.12.2006	DHQH Mardan	24-11-1955 Mardan	23-11-2015	
21.	Mushtaq Ahmed S/O (6) Abdul Ghani	Radiographer BPS-06	01-01-1979	J. Clinical Technician (Radiology) BPS-09	02.12.2006	DHQH Mardan	01-05-1953 Mardan	01-05-2013	
22.	Sair Gul (7)	Radiographer BPS-06	06-02-1979	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Bajour	01-09-1960 Bajour	01-09-2020	
23.	Ghulam Hazrat (8)	Radiographer BPS-06	14-04-1979	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Bajour	21-03-1959 Bajour	21-03-2019	
24.	Abdul Aziz S/O Hajj Fazal Ahmad (9)	Radiographer BPS-06	13-06-1979	J. Clinical Technician (Radiology) BPS-09	25-08-2006	BBSH Abbottabad	21-03-1959 Abbottabad	20-03-2019	
25. 10	Zard Ali Khan	Radiographer BPS-06	26-07-1979	J. Clinical Technician (Radiology) BPS-09	25-08-2006	LRH Peshawar	20-04-1957 Peshawar	20-04-2017	
26. 11	Mubasherin	Radiographer BPS-06	09-03-1980	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Charsada	07-04-1959 Charsadda	07-04-2019	
27. 12	Asfar Khan	Radiographer BPS-06	18-03-1980	J. Clinical Technician (Radiology) BPS-09	25-08-2006	HMC Peshawar	07-05-1955 Peshawar	07-05-2015	
28. 13	Zaitullah	Radiographer BPS-06	01-08-1981	J. Clinical Technician (Radiology) BPS-09	25-08-2006	Buner	30-12-1962 Charsadda	29-12-2022	
29. 14	Zaitullah	Radiographer BPS-06	05-04-1982	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQ Kohat	20-03-1962 Kohat	20-03-2022	

Agree

30.	Haroon Rashid (15)	Radiographer BPS-06	01-06-1982	J. Clinical Technician (Radiology) BPS-09	25-08-2006	STH Swat	07-08-1954 Swat	07-08-2014	
31.	Akhtar Ali Khan S/O Misal Dad Khan (16)	Radiographer BPS-06	29/01/1983	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQH Bannu	01/07/1962	30/06/2022	
32.	Jamil Ahmed (17)	Radiographer BPS-06	22-03-1983	J. Clinical Technician (Radiology) BPS-09	25-08-2006	LRH Peshawar	15-02-1961 Peshawar	15-02-2021	
33.	M. Akram Khan (18)	Radiographer BPS-06	22-01-1984	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Mansehra	22-05-1965 Mansehra	22-05-2025	
34.	Hamdullah (19)	Radiographer BPS-06	10-02-1984	J. Clinical Technician (Radiology) BPS-09	25-08-2006	LRH Peshawar	01-09-1959 Nowshera	01-09-2019	
35.	Muhammad Shafi (20)	Radiographer BPS-06	15-03-1984	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Charsadda	01-04-1963 Charsadda	01-04-2023	
36.	Muhammad Ishaq (21)	Radiographer BPS-06	01-12-1984	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KTH Peshawar	22-09-1964 Charsadda	21-09-2024	
37.	Fazli Elahi (22)	Radiographer BPS-06	14-10-1985	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Chatral	04-04-1964 Chitral	04-04-2024	
38.	Sultanullah (23)	Radiographer BPS-06	27-01-1986	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KTH Peshawar	21-03-1964 Bannu	20-03-2024	
39.	Javed Sultan S/O Muhammad Din (24)	Radiographer BPS-06	27-09-1986	J. Clinical Technician (Radiology) BPS-09	25-08-2006	BBSH Abbottabad	13-03-1966 Abbottabad	13-03-2026	
40.	Ghulam Sarwar (25)	Radiographer BPS-06	11-04-1987	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQ Chitral	16-03-1966 Chitral	15-03-2026	
41.	Zakir Ali S/O Ghulam Rehmani (26)	Radiographer BPS-06	12-04-1987	J. Clinical Technician (Radiology) BPS-09	25-08-2006	HMC Peshawar	01-01-1968 Peshawar	31-12-2028	
42.	Muhammad Wisal (27)	Radiographer BPS-06	13-04-1987	J. Clinical Technician (Radiology) BPS-09	25-08-2006	MMC Mardan	28-04-1968 Mardan	27-04-2028	
43.	Behramand (28)	Radiographer BPS-06	27-04-1987	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQ Charsada	02-10-1969 Charsadda	01-10-2029	
44.	Qazi Mohd Tariq (29)	Radiographer BPS-06	04-05-1987	J. Clinical Technician (Radiology) BPS-09	25-08-2006	PH Peshawar	12-02-1964 Peshawar	11-02-2024	
45.	Abdul Hameed (30)	Radiographer BPS-06	05-05-1987 Class IV	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQ Haripur	10-03-1965 Haripur	09-03-2025	
46.	Noor ul Wahab S/O Noor ul Wahab (31)	Radiographer BPS-06	24-05-1987	J. Clinical Technician (Radiology) BPS-09	25-08-2006	LRH Peshawar	03-03-1959 Charsadda	02-03-2029	
47.	Hidayat Shah S/O S. Mehboob Shah (32)	1. DRABPS-05 2. Radiographer BPS-06	28-02-1984 24-05-1987	J. Clinical Technician (Radiology) BPS-09	25-08-2006	LRH Peshawar	15-04-1963 Charsadda	14-04-2023	

18

Provisional Seniority List of Clinical Technician (Radiology) BPS 12 in the Health Department KPK as stood on 01.02.2011

S.No.	Name/Father's Name	Old Nomenclature With BPS	Date of Joining Govt. Service	New Nomenclature With BPS	Date of Upgradation / New Nomenclature	Place of Present Posting	Date of Birth Domicile	Date of Retirement
1.	Afzalur Rehman	X-Ray Tech B 09 Clinic: Tech B 12	12/12/1989 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	09/05/1966 Swabi	08/05/2026
2.	Gul Sher Khalil	X-Ray Tech B 09 Clinic: Tech B 12	03.03.1991 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	01.10.1971 Peshawar	30.09.2031
3.	Razeem Khan	X-Ray Tech B 09 Clinic: Tech B 12	04.03.1991 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	04.12.1967 Mardan	03.12.2027
4.	Islamuddin	X-Ray Tech B 09 Clinic: Tech B 12	13.04.1991 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	20.03.1971 Malakand	19.03.2031
5.	Jamil Khan S/O Muhammad Amir Khan	X-Ray Tech B 09 Clinic: Tech B 12	18/03/1993 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KTH Peshawar	01/01/1969 NW Agency	31/12/2029
6.	Muhammad Alam S/O Habibur Rehman	X-Ray Tech B 09 Clinic: Tech B 12	12/03/1999 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	PIMT Swat	28/04/1971	27/04/2031
7.	Abdur Rahman S/O Gul Hassan Badshah	R.Grapher BS 06 X-Ray Tech B 09 Clinic: Tech B 12	27.12.1994 31.08.2000 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQH KDA Kohat	25.09.1973 Kohat	24.09.2033
8.	Syed Hamid Noor S/O Syed Manoor	X-Ray Tech B 09 Clinic: Tech B 12	25/10/2003 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	ASNW Miranshah	10/03/1984 NW Agency	09/03/2044
9.	Mohiuddin	R.Grapher BS 06 X-Ray Tech B 09 Clinic: Tech B 12	10.10.1988 27.12.2003 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQH D.I.Khan	16.03.1968 Karak	15.03.2028
10.	Khurshid	X-Ray Tech: B 9 Clinic: Tech B 12	22.09.2004 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KAT Hospital Mansehra	07.05.1963 Mansehra	06.05.2023
11.	Saifur Rehman	R.Grapher BS 06 Clinic: Tech B 12	14-09-1976 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Mansehra	19-01-1957 Mansehra	18-01-2017
12.	Muhammad Arshad	R.Grapher BS 06 Clinic: Tech B 12	19-01-1978 20.04.2010	J. Clinical Technician (Radiology)	25-08-2006	LRH Peshawar	15-09-1958 Peshawar	14-09-2018

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1. PS to Secretary
2. President, PMA, KPK Peshawar. For information.

Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

13.	Ijaz Muhammad S/O Ghulam Miskeen	R.Grapher BS 06 Clinic: Tech B 12	28-02-1978 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	ATH A.Abad	17-09-1958 Abbottabad	16-09-2018
14.	M. Riaz Akhtar S/O Muhammad Rafiq	R.Grapher BS 06 Clinic: Tech B 12	18/04/1978 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	BBSH Abbottabad ✓	03/08/1958 Abbottabad	02/08/2018
15.	Mutahir Shah S/O Syed Muhammad Karim Shah	R.Grapher BS 06 Clinic: Tech B 12	20-05-1978 20.04.2010	J. Clinical Technician (Radiology) BPS-09	02.12.2006	DHQH Mardan	24-11-1955 Mardan	23-11-2015
16.	Mushtaq Ahmed S/O Abdul Ghani	R.Grapher BS 06 Clinic: Tech B 12	01-01-1979 20.04.2010	J. Clinical Technician (Radiology) BPS-09	02.12.2006	DHQH Mardan	01-05-1953 Mardan	01-05-2013
17.	Abdul Aziz S/O Haij Fazal Ahmad	R.Grapher BS 06 Clinic: Tech B 12	13-06-1979 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	BBSH Abbottabad ✓	21-03-1959 Abbottabad	20-03-2019
18.	Zard Ali Khan	R.Grapher BS 06 Clinic: Tech B 12	26-07-1979 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	LRH Peshawar	20-04-1957 Peshawar	20-04-2017
19.	Mubasherin	R.Grapher BS 06 Clinic: Tech B 12	09-03-1980 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Charsada	07-04-1959 Charsadda	07-04-2019
20.	Asfar Khan	R.Grapher BS 06 Clinic: Tech B 12	18-03-1980 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	HMC Peshawar	07-05-1955 Peshawar	07-05-2015

Director General Health Services,
Khyber Pakhtunkhwa, Peshawar

108
18/11/2011

No.

- Copy forwarded to inc: -
1. PS to Secretary to Govt. of KPK, Health Department Peshawar.
 2. President, PMA, KPK Peshawar.
- For information.



L.No. 3227
Date 7-5-15
Secretary Health

OFFICE OF THE DISTRICT HEALTH OFFICER ABBOTTABAD.

No. 3135 /Estab/D/DGHS.
Dated Abbottabad the 27/03/2015.

D ANNEXURE ①

20

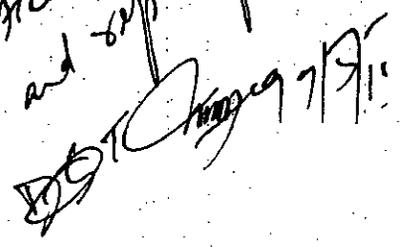
To,
The Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

Subject: Departmental Appeal.
Memo:

Enclosed please find herewith an application (in original) alongwith its enclosures in respect of Mr. Qadcer Nawaz, JCT Radiology BBS Teaching Hospital Abbottabad received through the Medical Superintendent, BBS Teaching Hospital Abbottabad vide his letter No.1203 dated 21.03.2015 with the remarks that the request of official concerned is genuine. The Government of Khyber Pakhtunkhwa Finance Department has sanctioned the same qualification posts in two different nomenclature i.e X-Ray Technician BPS-09 & Radiographer BPS-06 due to which such confusion occurred. There is same qualification for both the posts in the Health Department.

Case is submitted for further necessary action as per rules please.

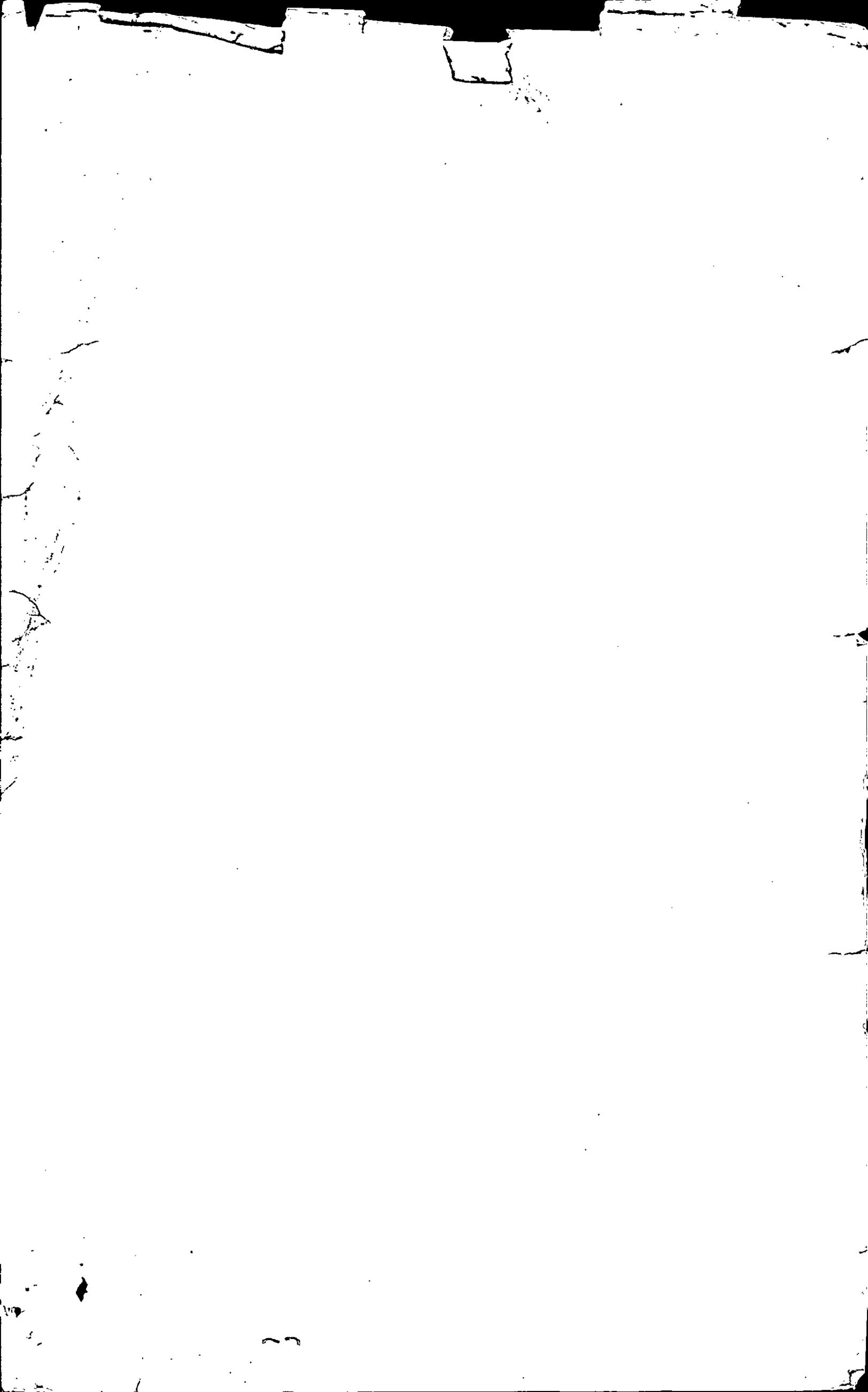

District Health Officer,
Abbottabad

DGHS/DS II
Pl ensure that no
injustice is done
and report progress
 7/7/15

9873/END
30-3-15

District Health Officer, Link Road, Abbottabad.
Phone # 0992-9310192
Fax # 0992-9310196
edonab@syalim.com

clear violation to the said notification. However, subsequent



2

21

OFFICE OF THE MEDICAL SUPERINTENDENT
BBS TEACHING HOSPITAL ABBOTABAD.
No. 1203 /Estab: dated 21 / 3 /2015.

To

District Health officer
Abbottabad.

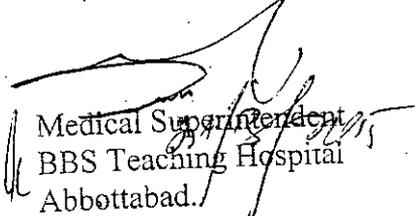
Subject

DEPARTMENTAL APPEAL

Sir,

Please find enclosed here with appeal in respect of Mr. Qadeer Nawaz JCT radiology BBS Teaching Hospital Abbottabad for the grant of BS-09 instead of BS-06 form the dated recruitment.

Submitted for your information and further necessary action please.


Medical Superintendent
BBS Teaching Hospital
Abbottabad.

30-3-15
9873 / ZTC

3



**OFFICE OF THE DISTRICT HEALTH
OFFICER ABBOTTABAD.**

No. 3135
Dated Abbottabad the

/Estab/D/DGHS.
27/03/2015.

22

To,

The Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

Subject: **Departmental Appeal.**
Memo:

Enclosed please find herewith an application (in original) alongwith its enclosures in respect of Mr. Qadeer Nawaz, JCT Radiology BBS Teaching Hospital Abbottabad received through the Medical Superintendent, BBS Teaching Hospital Abbottabad vide his letter No.1203 dated 21.03.2015 with the remarks that the request of official concerned is genuine. The Government of Khyber Pakhtunkhwa Finance Department has sanctioned the same qualification posts in two different nomenclature i.e X-Ray Technician BPS-09 & Radiographer BPS-06 due to which such confusion occurred. There is same qualification for both the posts in the Health Department.

Case is submitted for further necessary action as per rules please.

District Health Officer,
Abbottabad

(4)

23

In respect of

Secretary to government of Khyber Pukhtoonkhwa
Health department, Peshawar.

Director general of Khyber Pukhtoonkhwa
Health department, Peshawar.

Through: Proper Channel

DEPARTMENTAL APPEAL FOR GRANT OF BPS-09 INSTEAD OF BPS-06 TO THE APPELLANT FROM 25.8.1993 IN VIEW OF NOTIFICATION NO. F-4-78/85-MF-II, GOVERNMENT OF PAKISTAN, MINISTRY OF HEALTH; DATED 1ST MARCH, 1988 WITH ALL BACK BENEFITS TO THE APPELLANT.

Respectfully sheweth;

1. That vide notification no. F-4-78/85-MF-II, government of Pakistan, ministry of health, Islamabad; dated 1 march, 1988 in the matter removal of anomaly, the President of Islamic Republic of Pakistan was pleased to place the posts of X-Ray Technicians and Radiographers in BPS-09 with 1/3rd post in selection grade (BPS-11) w.e.f. 26th January, 1988; meaning thereby all subsequent appointments of candidates were required to be made in BPS-09 instead of BPS-06. The ibid notification issued to with the prior approval of finance department (regulation wing) obtained vide their notification No.D-63-R1/88 dated 26th January 1988.

Copy of notification No.F-4-78/85-MF-II is attached as Annexure A.

2. That, however, the appellant was recruited as radiographer in BPS-06 vide office order with all requisite qualification found clear violation to the said notification. However, subsequent

appointment of Appellant was also made in BPS-06 is Radical Departure from the letter and spirit of notification of 1988 (ibid), which was wrong to the effect of pay scale and liable to be rectified with all retrospective effects.

Copy of appointment order is attached as annexure B.

- 3. That the then high-ups of Health Department of NWFP in violation and disregarded the sanction of the President, Islamic Republic of Pakistan, enshrined in notification dated 1st March 1988 made appointments/placements to the extent of X-Ray Technician in BPS-09 after its promulgation while appointment of the appellant as Radiographer in BPS-06 with same qualification and eligibility criteria, according to their whims and wishes. Which created harmony of discrimination in employees. The ibid notification never sought choices to the selection authorizes and law disregards such likenesses.

Copy of seniority list is attached as Annexure "C".

- 4. That the requisite educational criteria/qualification for the recruitment of radiographer and X-Ray Technician was/is the same and similarly their training tenure and job description are the same.
- 5. That the settle principle of law, "**A communi observantia est non recedendum**" (There should be no departure from law/common observance or usage) is applicable in the case of appellant and disallowed any other interpretation/ deviation, placed to the contrary to ibid notification of 1988, would cause patent injustice to the aggrieved one (appellant). Law must be followed as whole, not any part of it.

④

25

The appellant has right to appeal inter-alia on the following grounds.

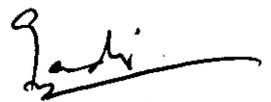
1. That with same basic requisite education criteria and qualification, it would be injustice on the part one person was serving in BPS-09 while other in BPS-06 in performing/discharging same duties, inspite they have already been placed to the same status by law.
2. That the legitimate rights of the appellant have been infringed by appointment made in BPS-06 instead of BPS-09 in sheer discrimination with others (X-Ray Technicians), which is clear violation of Article-03, 04, 25 and 38-(E) of the constitution of Islamic Republic of Pakistan, 1973. Which disregards work exploitation, ensures right of individuals to be dealt within accordance with law, ensures equality of citizens and reduces disparity in the income and earning of individuals including persons in various classes of the service of Pakistan.
3. That the anomaly in pay scale was removed by notification of 1988 (ibid) and from then the post of X-Ray Technicians and Radiographers have to be treated at par in pay and other prospects of services.
4. That the appointments of X-Ray Technicians were made in the light of said notification in BPS-09, later on after its promulgation. The seniority list is already attached in this support.

7

P-26

5. That the appointment of Radiographer in BPS-06 also lead to the discrimination in seniority list which is already annexed, shows apparent discrimination irrelevant to the length of service, the X-Ray Technicians have been placed at top irrespective of their length of service.
6. That in essence, the very appointment of appellant in the light of notification ibid was required to have been made the appointment of appellant in BPS-09 instead of BPS-06. The appointment of appellant in BPS-06 which was wrong and illegal to the effect of the basic pay scale.
7. That the appellant is satisfactorily serving in Health Department since the date of their appointment and upto the mark.

It is therefore very humbly and respectfully prayed that the appellant may kindly be granted and treated as appointed in BPS-09 instead of BPS-06 from the date 26th January, 1988 with all back benefits.


Qadeer Nawaz Awan
JCT(Radiology),
BBSTH, Abbottabad

Dated: 18.03.2015

15 JUNIOR RADIOGRAPHERS PROMOTED HIGH SCALE BPS-16-17 SAME QUALIFICATION

26 SENIOR RADIOGRAPHERS WANTS JUSTICE AND SAME QUALIFICATION

S No	Name/FN	Old Nomenclature	Date of Joining	Date of Birth	Place of present posting	Same Qualif; NWFP M/ Faculty	S No	Name/FN	Old Nomenclature	Date of Joining	Date of Birth	Place of present posting	Same Qualif; NWFP M/ Faculty
1	Afzal-ur-Rehman	X-Ray Tech BPS-9	12-12-1989	9-05-1966	KMC Pesh;	?	1						
2	Gul Sher Khalil	X-Ray Tech BPS-9	03-03-1991	1-10-1971	KMC Pesh;	?	2						
3	Razeem Khan	X-Ray Tech BPS-9	4-3-1991	4-12-1967	KMC Pesh;	?	3						
4	Islamuddin	X-Ray Tech BPS-9	13-04-1991	20-3-1971	KMC Pesh;	?	4						
5	Jameel Khan	X-Ray Tech BPS-9	18-03-1993	1-1-1969	KTH Pesh;	?	5						
6	Rehmatullah	X-Ray Tech BPS-9	13-09-1995	2-1-1970	EDOH Lakki	?	6	Qadeer Nawaz	R/G BPS-6	25-8-1993	30-5-1972	BBSTH ATD	NWFP M/F Pesh 1992
7	Muhammad Alam	X-Ray Tech BPS-9	12-03-1999	28-4-1971	PIMT Swat	?	7						
8	S Hussnain	R/G BPS-6 X- Tech BPS-9	27-12-1994 21-8-2003	1-4-1973	THQ Sadde	?	8						
9	Hamid Noor	X-Ray Tech BPS-9	25-10-2003	10-3-1984	ASNW Miran Shah	?	9						
10	Faheem Ullaha	X-Ray Tech BPS-9	8-12-2005	5-6-1978	DHQH Bannu	?	10						
11	Rizwanullaha	R/G BPS-6 X- Tech BPS-9	16-04-1995 3-3-2006	4-3-1971	KGNTN Bannu	?	11						
12	Muhammad Hussain	Dietician BPS-6 X- Tech BPS-9	9-4-2004 1-4-2006	1-4-1983	DHQTH D I Khan	?	12						
13	Abdul Rehman	R/G BPS-6 X- Tech BPS-9	27-12-1994 31-8-2000	25-9-1973	DHQH KDA Kohat	?	13						
14	Ghulam Akthar	R/G BPS-6 X- Tech BPS-9	31-8-1989 22-5-2006	30-1-1963	EDOH ATD	?	14						
15	Mohiuddin	R/G BPS-6 X- Tech BPS-9	10-10-1988 27-12-2003	16-3-1968	DHQ DI Khan	?	15						
16	Khursheed	X-Ray Tech BPS-9	22-9-2004	7-5-1963	KATH Manshara	?	16						

E

0001

ANNEXURE

E

27



GOVT. OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

No. SOH-III/8-89/2015(Qadeer Nawaz/JCT Radiology)
Dated the Peshawar 17th June, 2015

District Health Officer,
Diary No. 2438
* Dated 19-6-15 *
Abbottabad

To

The District Health Officer,
Abbottabad.

SUBJECT: DEPARTMENTAL APPEAL.

I am directed to refer to the subject noted above and to state that the following information/documents may be furnished to this department at the earliest to proceed further in the matter.

- i) The post of X-Ray Technician (BS-09) was available or not when Mr. Qadeer Nawaz, JCT (Radiology) (BS-09) BBS Teaching Hospital, Abbottabad applied.
- ii) Attested copy of Advertisement.
- iii) Attested copy of Budget Book (1993-94).
- iv) Attested copy of Minutes of the DSC meeting.
- v) Attested copy of under taking mentioned in his 1st appointment order.
- vi) Attested copy of application Mr. Qadeer Nawaz applied for at that time.
- vii) Why the official concerned was appointed on the post of Radiographer (BS-06) instead of X-Ray Technician (BS-09).

[Signature]
(Muhammad Tariq)
Section Officer-III

Endst: of even no & date.

Copy forwarded to:-

- 1. PS to Secretary Health, Khyber Pakhtunkhwa.
- 2. PS to Special Secretary Health, Khyber Pakhtunkhwa.

Section Officer-III

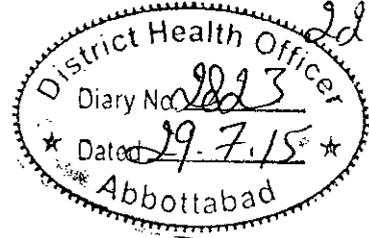
[Handwritten signature]
[Handwritten signature]
19/6/15

OFFICE OF THE MEDICAL SUPERINTENDENT
BBS TEACHING HOSPITAL ABBOTABAD.
No. 2527 /Estab: dated 27/07 /2015.

To:

District Health officer
Abbottabad.

Subject: DEPARTMENTAL APPEAL



Sir,

Reference your office letter No. 6171/Estab/D/MS dated 22-06-2015; with reference letter No. SOH-III/8-89/2015 (Qadeer Nawaz JCT Radiology) dated 17-06-2015 on the subject noted case the requisite information / documents are submitted for your perusal and proceeding further in the matter.

1. The post of X-Ray Technician BPS-09 was lying vacant at that time of ^{recruitment} ~~appointment~~ of official concerned.
2. At present no advertisement is traceable probably it might have been misplaced at the time of shifting / re-shifting.
3. Attested copy of pay and allowances proposed is attached.
4. At the time of recruitment of the applicant there was no need of constitution of any selection committee of DSC meeting.
5. The record not traceable and might have been misplaced during shifting / re-shifting process.
6. Same reply as above.
7. As the Personal File of the appellant is not traceable so the question cannot be replied; however appointment letter shows that the official was appointed against the post of Sr. Radiographer temporary with the condition that his services will be terminated as and when senior radiographer is posted.

Forwarded to SO III JCT Radiology

[Signature]
28/7/15

[Signature]
27/7/2015
Medical Superintendent
BBS Teaching Hospital
Abbottabad.

DETAIL OF PAY AND ALLOWANCE PROPOSED UNDER HEAD "6-40000-SOCIAL SERVICES, A OFFICE OF THE MEDICAL SUPERINTENDENT DISTRICT HEADQUARTERS

00000-TOTAL ESTABLISHMENT CHARGES:

01100-PAY OF OFFICERS:

	1-Medical Superintendent	DPS-20
	1-Dental Surgeon	BPS-18
	2-Medical Officers (DMS & WHO)	BPS-18
	1-Dispensary Superintendent	BPS-18
	1-Blood Bank Officer	BPS-18
2-2-H	6-Senior Registrar	BPS-18
	1-Chief Nursing Superintendent	BPS-18
3-2-H	7-10-Junior Registrar	BPS-18
3-2-H	13-15-Medical Officers	BPS-17
	1-Nursing Superintendent	BPS-17
	1-Medical Officer (Anesthesia)	BPS-17
	1-Security Officer	BPS-17
	1-Assistant Account Officer	BPS-17
2-2-H	13-2-15-Medical Nurses	BPS-17
	1-Chief Radiographer	BPS-16
	1-Public Health Supervisor	BPS-16
	1-Office Superintendent	BPS-16
	1-Chief O.T.A.	BPS-16
	1-Chief Dispenser	BPS-16

01105-INDEX PAY:

01200-PAY OF ESTABLISHMENT:

13-2-H	52-2-65-Charge Nurses	DPS-15
	1-Artist Carpenter	BPS-14
	1-Steno Typist	BPS-11
	1-Electro Medical Technicians	BPS-12
	1-Dental Techni	BPS-11
	2-Blood Bank Technicians	BPS-11
	1-Senior Blood Bank Technician	BPS-9
	1-Senior Laboratory Technician	BPS-9
	2-House Keeper	BPS-9
	2-B.O.C. Technicians	BPS-9
	1-Lady Health Visitor	BPS-9
	1-Anesthesia Technician	BPS-9
	1-Almoner	BPS-9
	1-X-Ray Technician	BPS-9
	2-Laboratory Technician	BPS-9
	2-Head & Dispenser	BPS-9
	1-Photographer	BPS-8
	1-O.T.A.	BPS-8
	1-Anesthesia Assistant	BPS-8
	2-Senior Clerk	BPS-8
	1-Senior Store Keeper	BPS-70548
	2-Junior Clerk	BPS-7
	1-Store Keeper	BPS-7
	1-Driver	BPS-7
	1-Sanitary Inspector	BPS-7
	1-O.T.A.	BPS-6
	3-Radiographer	BPS-6
	1-Laboratory Assistant	BPS-6
	2-Compounders	BPS-6
	1-Driver	BPS-6
	1-Anesthesia Assistant	BPS-6
	1-Generator Driver	BPS-6
	1-Junior Clerk	BPS-6
	1-B.O.C. Keeper	BPS-6
	1-Sterilization Assistant	BPS-5
	1-Dark Room Assistant	BPS-5
	1-Tailor	BPS-5
	1-Masura	BPS-5
	2-Drivers	BPS-5

Handwritten signature
ACCOUNT OFFICER
 B.S. Teaching Hospital
 Abbottabad
 25/07/2015

DETAIL OF PAY AND ALLOWANCES PROPOSED UNDER HEAD 'G-40000 SOCIAL SERVICES', 42000 HEALTH, 42200 GENERAL HOSPITAL & CLINICS IN RESPECT OF OFFICE OF THE MEDICAL SUPERINTENDENT, DISTRICT HEADQUARTERS HOSPITAL, ABOTTABAD FOR THE YEAR 1992-93.

00000-TOTAL ESTABLISHMENT CHARGES:

146,29,550/-

01101-TOTAL PAY OF OFFICERS:

38,11,360/-

1-Medical Superintendent	BS-20	103170/-
1-Dental Surgeon	BS-18	72820/-
2-Medical Officers (MS & MO)	BS-18	90860/-
1-Deputy Medical Superintendent	BS-19	101370/-
1-Dispensary Superintendent	BS-18	63070/-
1-Blood Bank Officer	BS-18	65320/-
8-Senior Registrars	BS-18	490630/-
1-Chief Nursing Superintendent	BS-18	46810/-
10-Junior Registrars	BS-17	512100/-
16-Medical Officers	BS-17	775500/-
1-Nursing Superintendent	BS-17	65400/-
1-Medical Officer (Anesthetist)	BS-17	46050/-
1-Security Officer	BS-17	38310/-
1-Assistant Accounts Officer	BS-17	58950/-
2-Sister Tutor	BS-17	119190/-
15-Head Nurses	BS-16	477660/-
1-Chief Radiographer	BS-16	35640/-
1-Public Health Supervisor	BS-15	22500/-
1-Office Superintendent	BS-15	37390/-
1-Chief Operation Theater Asst.	BS-16	22500/-
1-Chief Dispenser	BS-16	25128/-

01201-TOTAL PAY OF ESTABLISHMENT CHARGES:

69,16,964/-

65-Charge Nurses	BS-14	1693910/-
1-Stenotypist	BS-12	25510/-
2-Assistant	BS-11	61520/-
1-Artist/Comperter	BS-11	24070/-
1-Electro Medical Technician	BS-11	24070/-
1-Dental Technician	BS-9	26140/-
2-Blood Bank Technicians	BS-9	58380/-
1-Senior Blood Bank Technician	BS-9	14220/-
1-Senior Laboratory Technician	BS-9	14220/-
2-House Keepers	BS-9	47450/-
2-E.C.G. Technicians	BS-9	44630/-
2-Lady Health Visitor	BS-9	30600/-
1-Anesthesia Technician	BS-9	21560/-
1-Almocer	BS-9	25020/-
1-X-Ray Technician	BS-9	15300/-
2-Laboratory Technicians	BS-9	40540/-
2-Head Dispensers	BS-9	30600/-
1-Photographer	BS-9	19530/-

Handwritten signature
 ACCOUNT OFFICER
 B.S. Teaching Hospital
 Abbottabad

Accounts Officer
 Abbottabad

11/11/92
 11/11/92

31

22

Annexure

F

32



GOVT. OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

No. SOH-III/8-89/2015(Qadeer Nawaz/JCT Radiology)
Dated the Peshawar 14th January, 2016

To

The Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

F

SUBJECT: DEPARTMENTAL APPEAL.

I am directed to refer to your letter No. 8097/AE.VII, dated: 11-06-2015 on the subject noted above and to state that the appeal of Mr. Qadeer Nawaz, JCT Radiology, BBS Teaching Hospital, Abbottabad is hereby regretted on the following grounds:-

Mr. Qadeer Nawaz was appointed in 1993 and was upgraded in 2012 to BS-09. He preferred an appeal in 18-03-2015 which is time barred.

(Muhammad Tariq)
Section Officer-III

Endst: of even no & date.

Copy forwarded to:-

1. The Section Officer-IV, Governor's Secretariat, Khyber Pakhtunkhwa, Peshawar w/r to his letter quoted above.
2. PS to Secretary Health, Khyber Pakhtunkhwa.

Section Officer-III

13.	Ijaz Muhammad S/O Ghulam Miskeen	R.Grapher BS 06 Clinic: Tech B 12	28-02-1978 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	ATHA.Abad	17-09-1958	16-09-2010
14.	M. Riaz Akhtar S/O Muhammad Rafiq	R.Grapher BS 06 Clinic: Tech B 12	18/04/1978 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	BBSH Abbottabad	03/08/1958	02/08/2010
15.	Mutahir Shah S/O Syed Muhammad Karim Shah	R.Grapher BS 06 Clinic: Tech B 12	20-05-1978 20.04.2010	J. Clinical Technician (Radiology) BPS-09	02.12.2006	DHQH Mardan	24-11-1955	23-11-2010
16.	Mushtaq Ahmed S/O Abdul Ghani	R.Grapher BS 06 Clinic: Tech B 12	01-01-1979 20.04.2010	J. Clinical Technician (Radiology) BPS-09	02.12.2006	DHQH Mardan	01-05-1953	01-05-2010
17.	Abdul Aziz S/O Haij Fazal Ahmad	R.Grapher BS 06 Clinic: Tech B 12	13-06-1979 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	BBSH Abbottabad	21-03-1959	20-03-2010
18.	Zard Ali Khan	R.Grapher BS 06 Clinic: Tech B 12	26-07-1979 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	LRH Peshawar	20-04-1957	20-04-2010
19.	Mubasherin	R.Grapher BS 06 Clinic: Tech B 12	09-03-1980 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Charsada	07-04-1959	07-04-2010
20.	Asfar Khan.	R.Grapher BS 06 Clinic: Tech B 12	18-03-1980 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	HMC Peshawar	07-05-1955	07-05-2010

Director General Health Services,
Khyber Pakhtunkhwa, Peshawar

108
18/10/2011

No.

- Copy forwarded to:-
1. PS to Secretary to Govt. of KPK, Health Department Peshawar.
 2. President, PMA, KPK Peshawar.
- For information
- 10/10/2011

18

Provisional Seniority List of Clinical Technician (Radiology) BPS 12 in the Health Department KPK, as stood on 01.02.2011

S.No.	Name/Father's Name	Old Nomenclature With BPS	Date of Joining Govt Service	New Nomenclature With BPS	Date of Upgradation / New Nomenclature	Place of Present Posting	Date of Birth Domicile	Date of Retirement
1.	Afzalur Rehman	X-Ray Tech B 09 Clinic: Tech B 12	12/12/1989 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	09/05/1966 Swabi	08/05/20
2.	Gul Sher Khalil	X-Ray Tech B 09 Clinic: Tech B 12	03.03.1991 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	01.10.1971 Peshawar	30.09.20
3.	Razeem Khan	X-Ray Tech B 09 Clinic: Tech B 12	04.03.1991 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	04.12.1967 Mardan	03.12.20
4.	Islamuddin	X-Ray Tech B 09 Clinic: Tech B 12	13.04.1991 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	20.03.1971 Malakand	19.03.20
5.	Jamil Khan S/O Muhammad Amir Khan	X-Ray Tech B 09 Clinic: Tech B 12	13/03/1993 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KTH Peshawar	01/01/1969 NW Agency	31/12/20
6.	Muhammad Alam S/O Habibur Rehman	X-Ray Tech B 09 Clinic: Tech B 12	12/03/1999 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	PIMT Swat	28/04/1971	27/04/20
7.	Abdur Rahman S/O Gul Hassan Badshah	R.Graher BS 06 X-Ray Tech B 09 Clinic: Tech B 12	27.12.1994 31.08.2000 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQH KDA Kohat	25.09.1973 Kohat	24.09.20
8.	Syed Hamid Noor S/O Syed Manoor	X-Ray Tech B 09 Clinic: Tech B 12	25/10/2003 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	ASNW Miranshah	10/03/1984 NW Agency	09/03/20
9.	Mohiuddin	R.Graher BS 06 X-Ray Tech B 09 Clinic: Tech B 12	10.10.1988 27.12.2003 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQH D.I.Khan	16.03.1968 Karak	15.03.20
10.	Khurshid	X-Ray Tech: B 9 Clinic: Tech B 12	22.09.2004 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KAT Hospital Mansehra	07.05.1963 Mansehra	06.05.20
11.	Saifur Rehman	R.Graher BS 06 Clinic: Tech B 12	14-09-1976 20.04.2010	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Mansehra	19-01-1957 Mansehra	18-01-20
12.	Muhammad Arshad	R.Graher BS 06 Clinic: Tech B 12	19-01-1978 20.04.2010	J. Clinical Technician (Radiology)	25-08-2006	LRH Peshawar	15-09-1958 Peshawar	14-09-20

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1. PS to Secretary
2. President, PMA, KPK Peshawar. For information.

Director General Health Services,

24

30.	Haroon Rashid (15)	Radiographer BPS-06	01-06-1982	J. Clinical Technician (Radiology) BPS-09	25-08-2006	STH Swat	07-08-1954 Swat	07-08-2014	
31.	Akhtar Ali Khan S/O Misal Dad Khan (16)	Radiographer BPS-06	29/01/1983	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQH Bannu	01/07/1962	30/06/2022	
32.	Jamil Ahmed (17)	Radiographer BPS-06	22-03-1983	J. Clinical Technician (Radiology) BPS-09	25-08-2006	LRH Peshawar	15-02-1961 Peshawar	15-02-2021	
33.	M. Akram Khan (18)	Radiographer BPS-06	22-01-1984	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Mansehra	22-05-1965 Mansehra	22-05-2025	
34.	Hamdullah (19)	Radiographer BPS-06	10-02-1984	J. Clinical Technician (Radiology) BPS-09	25-08-2006	LRH Peshawar	01-09-1959 Nowshetra	01-09-2019	
35.	Muhammad Shafi (20)	Radiographer BPS-06	15-03-1984	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Charsadda	01-04-1963 Charsadda	01-04-2023	
36.	Muhammad Ishaq (21)	Radiographer BPS-06	01-12-1984	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KTH Peshawar	22-09-1964 Charsadda	21-09-2024	
37.	Fazli Elahi (22)	Radiographer BPS-06	14-10-1985	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Chatral	04-04-1964 Chitral	04-04-2024	
38.	Sultanullah (23)	Radiographer BPS-06	27-01-1986	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KTH Peshawar	21-03-1964 Bannu	20-03-2024	
39.	Javed Sultan S/O Muhammad Din (24)	Radiographer BPS-06	27-09-1986	J. Clinical Technician (Radiology) BPS-09	25-08-2006	BBSH Abbottabad	13-03-1966 Abbottabad	13-03-2026	
40.	Ghulam Sarwar (25)	Radiographer BPS-06	11-04-1987	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQ Chitral	16-03-1966 Chitral	15-03-2026	
41.	Zakir Ali S/O Ghulam Rehmani (26)	Radiographer BPS-06	12-04-1987	J. Clinical Technician (Radiology) BPS-09	25-08-2006	HMC Peshawar	01-01-1968 Peshawar	31-12-2028	
42.	Muhammad Wisal (27)	Radiographer BPS-06	13-04-1987	J. Clinical Technician (Radiology) BPS-09	25-08-2006	MMC Mardan	28-04-1968 Mardan	27-04-2028	
43.	Behramand (28)	Radiographer BPS-06	27-04-1987	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQ Charsada	02-10-1969 Charsadda	01-10-2029	
44.	Qazi Mohd Tariq (29)	Radiographer BPS-06	04-05-1987	J. Clinical Technician (Radiology) BPS-09	25-08-2006	PH Peshawar	12-02-1964 Peshawar	11-02-2024	
45.	Abdul Hameed (30)	Radiographer BPS-06	05-05-1987 Class IV	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQ Haripur	10-03-1965 Haripur	09-03-2025	
46.	Noor ul Wahab S/O Noor ul Wahab (31)	Radiographer BPS-06	24-05-1987	J. Clinical Technician (Radiology) BPS-09	25-08-2006	LRH Peshawar	03-03-1959 Charsadda	02-03-2029	
47.	Hidayat Shah S/O Mehboob Shah (32)	1. DRABPS-05 2. Radiographer BPS-06	28-02-1984 24-05-1987	J. Clinical Technician (Radiology) BPS-09	25-08-2006	LRH Peshawar	15-04-1963 Charsadda	14-04-2023	

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13.	Ghulam Akhtar	1. Radiographer BPS-06 2. X-Ray Tech: BPS-09	31-08-1989 22-05-2006	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDOH Abbottabad	30-01-1963 Haripure	29-01-2023	
14.	Saifur Rehman (1)	Radiographer BPS-06	14-09-1976	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Mansehra	19-01-1957 Mansehra	18-01-2017	
15.	M. Riaz Akhtar S/O Muhammad Rafiq	Radiographer BPS-06	11/04/1977	J. Clinical Technician (Radiology) BPS-09	25-08-2006	BBSH Abbottabad	03/08/1958 Abbottabad	02/08/2018	
16.	MOHD Arshad (2)	Radiographer BPS-06	19-01-1978	J. Clinical Technician (Radiology)	25-08-2006	LRH Peshawar	15-09-1958 Peshawar	14-09-2018	
17.	Ijaz Muhammad S/O Ghulam Miskeen (3)	Radiographer BPS-06	28-02-1978	J. Clinical Technician (Radiology) BPS-09	25-08-2006	ATH A. Abad	17-09-1958 Abbottabad	16-09-2018	
18.	Waliullah	Radiographer BPS-06	07-03-1978	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Charsadda	07-01-1952 Charsadda	06-01-2012	Retire
19.	Riaz Akhtar (4)	Radiographer BPS-06	18-04-1978	J. Clinical Technician (Radiology) BPS-09	25-08-2006	BBSH A. Abad	03-08-1958 Abbottabad	02-08-2018	
20.	Mutahir Shah S/O Syed Muhammad Karim Shah (5)	Radiographer BPS-06	20-05-1978	J. Clinical Technician (Radiology) BPS-09	02.12.2006	DHQH Mardan	24-11-1955 Mardan	23-11-2015	
21.	Mushtaq Ahmed S/O Abdul Ghani (6)	Radiographer BPS-06	01-01-1979	J. Clinical Technician (Radiology) BPS-09	02.12.2006	DHQH Mardan	01-05-1953 Mardan	01-05-2013	
22.	Sair Gul (7)	Radiographer BPS-06	06-02-1979	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Bajour	01-09-1960 Bajour	01-09-2020	
23.	Ghulam Hazrat (8)	Radiographer BPS-06	14-04-1979	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Bajour	21-03-1959 Bajour	21-03-2019	
24.	Abdul Aziz S/O Hajj Fazal Ahmad (9)	Radiographer BPS-06	13-06-1979	J. Clinical Technician (Radiology) BPS-09	25-08-2006	BBSH Abbottabad	21-03-1959 Abbottabad	20-03-2019	
25.	Zard Ali Khan (10)	Radiographer BPS-06	26-07-1979	J. Clinical Technician (Radiology) BPS-09	25-08-2006	LRH Peshawar	20-04-1957 Peshawar	20-04-2017	
26.	Mubasherin (11)	Radiographer BPS-06	09-03-1980	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDO Charsada	07-04-1959 Charsadda	07-04-2019	
27.	Asfar Khan (12)	Radiographer BPS-06	18-03-1980	J. Clinical Technician (Radiology) BPS-09	25-08-2006	HMC Peshawar	07-05-1955 Peshawar	07-05-2015	
28.	Zaitullah (13)	Radiographer BPS-06	01-08-1981	J. Clinical Technician (Radiology) BPS-09	25-08-2006	Buner	30-12-1962 Charsadda	29-12-2022	
29.	Zaitullah (14)	Radiographer BPS-06	05-04-1982	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQ Kohat	20-03-1962 Kohat	20-03-2022	

Agree

THE HONOURABLE KPK SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 118/2016

**MR. QADEER NAWAZ SON OF GHAREEB NAWAZ, JUNIOR CLINICAL TECH: /
DISTRICT HEADQUATER- BENAZIR SHAHEED HOSPITAL, ABBOTTABAD.**

.....Appellant.

VERSUS

SECRETARY TO GOVT OF KPK HEALTH DEPARTMENT PESHAWAR & OTHER ETC

.....Respondents.

COUNTER AFFIDAVIT

I, Dr. Aqeel Jan Bangish MS BBS Teaching Hospital Abbottabad, do hereby solemnly affirm and declare on oath that the contents of parawise comments are true and correct to the best of my knowledge and belief & nothing has been concealed from this Hon'able Tribunal.


AFFANT



**BEFORE THE HONORABLE SERVICE TRIBUNAL PESHAWAR
CAMP COURT ABBOTTABAD**

**MR. QADEER NAWAZ V/S SECRETARY TO GOVT OF KPK HEALTH
DEPARTMENT PESHAWAR & OTHERS ETC**

Para wise comments on behalf of respondents.

Honourable Sir,

Preliminary Objection:

1. That the applicant has got no cause of action.
2. That the present appeal is not maintainable in its present form, hence liable to be dismissed.
3. That the instant appeal is time barred.
4. That the appellant has not come to this tribunal with clear hands.
5. That the appellant has treated under the law and prevailing rules hence the present appeal is liable to be dismissed.
6. That the appellant has cancelled material facts from this Honorable service tribunal hence the present appeal is liable to be dismissed as this single score.
7. That any others ground & case of law will be submitted at the time of humble submission at the bar.

Para Wise Reply:

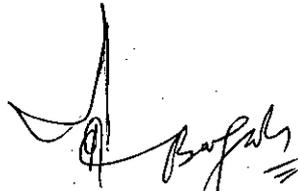
1. Is correct to the extent of Govt; of Pakistan, ministry of Health, Islamabad Notification No.F-4-98/85-MF-II dated 01st March, 1988. Whereas appointments were made in BPS-06; that of Radiographers. Seniority list attached here as Annex. "A" page 1 to 15, showing appointments were made in BPS-06 and were upgraded to BPS-09 in 2006 (after approval of service structure); the post of Radiographer existed in both grade i.e BPS-06 & BPS-09. (appellant being at serial no.113)
This office has learnt explicitly that notification of GOP, mentioned above was for the institutions who were offering 02 years diploma; hence the initial recruitment in BPS-09. The appellant qualification at the time of appointment was matriculate and with basic radiographer diploma.
2. Para no 2 is incorrect as stated. In fact the appellant was appointed as a temporary Radiographer in BPS-06 against the vacant post of Senior Radiographer on temporary basis (Copy of appointment order attached as Annex. "B").
3. Para No.3 is incorrect as stated, already reply given in Para No.1. Moreover, seniority list was communicated in 2009 vide notification No.40373-482/AE-VII dated 10/10/2009, while departmental appeal was subjected on 18/3/2015; after lapse of 05 years and 05 months, questioning the intent of appellant, since the right to appeal under KP civil servant act 1973 CHAPTER-II TERMS AND CONDITIONS OF SERVICE OF CIVIL SERVANTS Para 22, is 30 days.
4. Same as Para 2. However, it was clearly depicted in his appointment order that the appellant was being appointed against the post of Senior Radiographer and on temporary basis till the availability of eligible. Para as stated is incorrect.
5. This office up holds the decision by Director General Health Services, Khyber Pakhtunkhwa decision vide letter No. SOH-III/8-89/2015 (Qadeer Nawaz/JCT Radiology) dated 14th January, 2016. (Copy

attached as Annex "C"). The appeal of appellant was rightly dismissed being time barred.

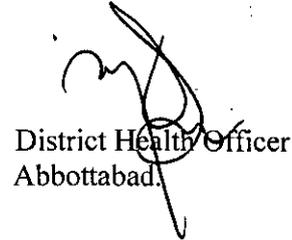
Reply to Grounds:

- A. Incorrect and denied. The appointment of appellant was as per prescribed rules, as evident from the attached list of Junior Clinical Technicians (Radiology) BS-09. Annex "A"
- B. Correct to the extent of availability of Senior X-ray Technician post BPS-09. Not in concurrence to the qualification/ experience of the appellant.
- C. The appellant has been treated under the law and law favours the vigilant and not the indolent. The appeal of appellant was time barred.
- D. No comments'.
- E. No comments, being not relevant.
- F. Para "F" is incorrect and denied.
- G. As per Annex "A" appointment was in accordance to other officials. Ground "G" is incorrect, hence denied.
- H. Further stated the appellant was promoted to BPS-09 at par with other officials
- I. The appellant was granted 04 advance increments after qualifying B.A (in Parts) after judgment of Hon'able Supreme Court of Pakistan (CPLA 590 of 2007, on basis of Para No.5(I)(b) notification of FD (PRC)1-1/89 dated 11-08-1991 as well as by the order of Hon'able Services Tribunal of NWFP order No. vide appeal N0.1276/2007 passed on 12/3/2009.
- J. Incorrect and denied. The appeal of appellant is time barred.
- K. The respondents will advance further against/ grounds if needed.

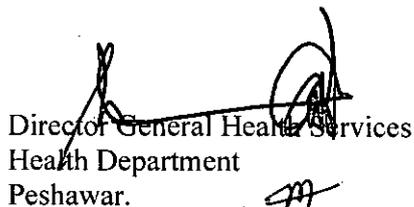
It is therefore humbly prayed that in the above mentioned circumstances the appeal of appellant may kindly be dismissed with cost.



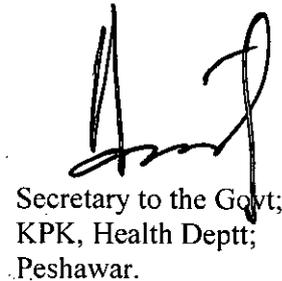
Medical Superintendent
BBS Teaching Hospital
Abbottabad



District Health Officer
Abbottabad.



Director General Health Services
Health Department
Peshawar.



Secretary to the Govt;
KPK, Health Deptt;
Peshawar.

From pre-page

Copy with care forwarded to the
Ministry of Finance for Counter Signature and
communication to Accountant General Pakistan Revenues,
Islamabad, Lahore, Karachi, Hyderabad, Quetta and
Peshawar.

SECTION OFFICER (MF-II)
GOVERNMENT OF PAKISTAN

Original No. 142

No. P.1(1)-RI/88-D272/89
Government of Pakistan
Ministry of Finance
(REGULATION WING)

Islamabad, the 6th March, 1988

Forwarded to the Accountant General Pakistan
Revenues, Islamabad, Karachi, Lahore, Quetta, Peshawar
and Hyderabad.

Stamp: P. R. (S.O.) Islamabad
163/88
Received

Humaid Ishaque
HUMAIAD ISHAQUE
SECTION OFFICER 6/3/88

Amrune

P-11

B

No.

4540

From:

The Medical Superintendent,
DHQ Hospital, Abbottabad.

To:

Mr. Guseer Nawaz S/O Ghazi Nawaz
Vill: & P.O. Sheikhuibandi, Abbottabad.

Subject:-

OFFER OF APPOINTMENT.

Name:

Reference your application and interview
dated 24.8.1993.

You are hereby appointed as a temporary
Radiographer in BPS-6 against the vacant post of Senior Radiographer
on temporary basis subject to the written order to be issued that his
services shall be terminated at a senior radiographer is posted.
Your services are liable to be terminated any
time without notice and any cause of assigned, and then your
services are to be terminated you shall not be paid any compensation
whatsoever for the unexpired period, as mentioned above.

The appointment is subject to physical fitness
You shall not be entitled for any TA/DA for
presenting yourself for medical examination nor for joining your
first appointment.

If you accept the offer on above noted
conditions please report to the Deputy Medical Superintendent
DHQ Hospital, Abbottabad, within three days from the receipt of
this offer.

No.

1/11

Deputy Medical Superintendent,
DHQ Hospital, Abbottabad.

Copy forwarded to the:-

- 1. Deputy Medical Superintendent DHQ Hospital, Abbottabad.
- 2. Accountant DHQ Hospital, Abbottabad.

For information and action.

Medical Superintendent,
DHQ Hospital, Abbottabad.

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DIRECTORATE GENERAL HEALTH SERVICES, NWFP, PESHAWAR.

NO. 42373-482 /AE-VII

Date: 10/11/2009

17

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ANABXURG C

To:

1. All Medical Superintendents, LRH, KTH, HMC, Peshawar and Ayub Teaching Hospital, Abbottabad.
2. All Sub-Offices, Health Department, NWFP.
3. Principal KMC, KCD, Peshawar.
4. All Agency Surgeons in NWFP.
5. Director Health Services (FATA), NWFP, Peshawar.

Subject: FINAL SENIORITY LIST OF JUNIOR CLINICAL TECHNICIAN (RADIOLOGY) BPS-9 IN HEALTH DEPARTMENT, NWFP.

Memo:

In pursuance of the Govt of NWFP Health Deptt Notification No. SOH-III/8/60/2009 (Para-medics) dated 17.1.2009, the final seniority list of Junior Clinical Technician (Radiology) in Health Department, NWFP prepared by this Directorate General Health Services, NWFP, is sent with the request that this list may please be circulated amongst Junior Clinical Technicians (Radiology) BPS-9 working under your control for their information and record.

The Final Seniority List shall be deemed to have effect from the date prior to 15.01.2002 in light of the Government Notification mentioned above.

JL
DIRECTOR GENERAL HEALTH SERVICES, NWFP, PESHAWAR
9/11/09
7/10/09

No. 42483-84 /AE-VII

Copy forwarded to the :-

1. Secretary to Govt of NWFP, Health Department, Peshawar.
2. President Provincial Para-medical Association, NWFP (LRH), Peshawar.

For information.

JL
DIRECTOR GENERAL HEALTH SERVICES, NWFP, PESHAWAR.
9/11/09
7/10/09

19

7/10/2009

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Final Seniority List of Junior Clinical Technician (Radiology) BPS 09 in the Health Department N.W.F.P

S.No	Name/Father's Name	Old Nomenclature With BPS	Date of Joining Govt. Service	New Nomenclature With BPS	Date of Upgradation / New Nomenclature	Place of Present Posting	Date of Birth Domicile	Date of Retirement	Remarks
✓ 1.	Afzalur Rehman	X-Ray Tech: BPS 09	12/12/1989	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	09/05/1966 Swabi	08/05/2026	
✓ 2.	Gul Sher Khalil	X-Ray Tech: BPS 09	03.03.1991	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	01.10.1971 Peshawar	30.09.2031	
✓ 3.	Razeem Khan	X-Ray Tech: BPS 09	04.03.1991	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	04.12.1967 Mardan	03.12.2027	
✓ 4.	Islamuddin	X-Ray Tech: BPS 09	13.04.1991	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KMC Peshawar	20.03.1971 Malakand	19.03.2031	
✓ 5.	Jamil Khan S/O Muhammad Amir Khan	X-Ray Tech: BPS-09	18/03/1993	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KTH Peshawar	01/01/1969 NW Agency	31/12/2029	
✓ 6.	Rehmatullah S/O Shaista Khan	X-Ray Tech: BPS 09	13/09/1995	J. Clinical Technician (Radiology) BPS-09	25-08-2006	EDOH Lakki	02/01/1970	01/01/2030	
✓ 7.	Muhammad Alam S/O Habibur Rehman	X-Ray Tech: BPS 09	12/03/1999	J. Clinical Technician (Radiology) BPS-09	25-08-2006	PIMT Swat	28/04/1971	27/04/2031	
✓ 8.	S.Hasnain S/O S.M Sbtain	1. Radiographer BPS 06 2. X-Ray Tech: BPS 09	27-12-1994 21-08-2003	J. Clinical Technician (Radiology) BPS-09	25-08-2006	THQ Sadda	01-04-1973	31-03-2033	
✓ 9.	Hamid Noor S/O Syed Manoor	X-Ray Tech: BPS-09	25/10/2003	J. Clinical Technician (Radiology) BPS-09	25-08-2006	ASNW MiranShah	10/03/1984 NW Agency	09/03/2044	
10.	Faheem Ullah S/O Mumtullah Khan	X-Ray Tech: BPS-09	08/12/2005	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQH Bannu	05/06/1978 Bannu	04/06/2038	
11.	Rizwan Ullah Khan	1. Radiographer BPS 06 2. X-Ray Tech: BPS 09	16.04.1995 03.03.2006	J. Clinical Technician (Radiology) BPS-09	25-08-2006	KGNTB Bannu	04/03/1971 Bannu	03/03/2031	
12.	Muhammad Hussain	Dietician BPS 06 X-Ray Tech: BPS 09	09.04.2004 01.04.2006	J. Clinical Technician (Radiology) BPS-09	25-08-2006	DHQT Hospital DI Khan	01.04.1983 DI Khan	31.03.2043	

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197/17

**BEFORE HONOURABLE THE SERVICES TRIBUNAL OF KHYBER PAKHTUNKHWA,
PESHAWAR, CAMP AT ABBOTTABAD.**

Qadeer Nawaz son of Ghareeb Nawaz, Junior Clinical Technician,
District Headquarter / Benazir Shaheed Hospital, Abbottabad

APPELLANT

Versus

The Secretary, Health Department, Government of KPK Peshawar and
others

RESPONDENTS

SERVICE APPEAL

REJOINDER

INDEX

S.#	Description	Annexure	Pages
	Rejoinder along with affidavit		1-11
1.	Copy of service rules	"A"	12-14
2.	Copy of application dated 12-06-2012	"B"	15
3.	Copy of seniority list 2006	"C"	16-25
4.	Copy of 24-08-1983	"D"	26-37
5.	Copy of letter dated 15-11-1994	"E"	38-39

Dated 17-07-2017


Qadeer Nawaz

(Appellant)

Through:


(Muhammad Waqas)
Advocate High Court,
Abbottabad.

**BEFORE HONOURABLE THE SERVICES TRIBUNAL OF KHYBER PAKHTUNKHWA,
PESHAWAR, CAMP AT ABBOTTABAD.**

Qadeer Nawaz son of Ghareeb Nawaz, Junior Clinical Technician,
District Headquarter / Benazir Shaheed Hospital, Abbottabad

APPELLANT

Versus

The Secretary, Health Department, Government of KPK Peshawar and
others

RESPONDENTS

SERVICE APPEAL

**REJOINDER ON BEHALF OF APPELLANT TO
COMMENTS FURNISHED BY RESPONDENTS.**

Respectfully Sheweth:-

Rejoinder to preliminary objections:

1. That the petitioner is agitating / pressing hard from the date of his appointment till today to the respondents / high-up's of the department and ultimately approaching the Honourable Tribunal regarding implementation of

Notification No.F-4-78/85-MF-II dated 1st March, 1988 issued in the matter of removal of anomaly in its letter and spirit, as in some of the cases initial appointments of various X-ray Technicians have been made in BPS-9 whereas due to either misfortune of the petitioner or due to willful negligence or omission of the respondents it has not been acted upon / followed in case of the petitioner and, as such, the appellant has been meted out discriminately from the very beginning till today by appointing him in BPS-6 whereas his colleagues throughout the Province are enjoying the benefit of BPS-9 from their appointments and onward promotions on its basis till today. Further, the matter apparently involved pay and allowances, therefore, it has a recurring cause of action being involved pay and allowances and appellant can agitate or press the same into service at any stage, as it has been laid down by the superior courts of the country from time to time till today and in such an eventuality no limitation can run against him. Furthermore, nothing has been suppressed from this Honourable Tribunal.

2. Incorrect, hence vehemently denied. Service Appeal u/Sec 4 of KPK Service Tribunal Act, 1974 is well maintainable and the hon'ble court has the powers to adjudicate upon the matter.

Furthermore the petitioner has no other adequate and efficacious remedy except the instant appeal.

3. Incorrect and denied, as it has already been meted out in Para 1 of the Rejoinder to preliminary objections. Further the administration of justice required the case shall be decided on its matter rather than technicalities including limitation.
4. Incorrect rather the respondents have no right to contest due to their conduct and behavior, which is against the law and administration of justice.
5. Incorrect and vehemently denied, rather the respondents acted against the Arts. 3, 25 and 27 of the constitution of Pakistan, 1973 rendered exploitation, negates equality among service employees and discrimination in services.
6. Incorrect, rather the respondents has concealed the materials facts to hide their malafide, malice and mal-fisanance.
7. That the respondents cannot go beyond their pleadings/comments.

Rejoinder to Parawise reply:

1. In substance, the respondents at the very beginning of parawise reply frankly **admitted correct the issuance of notification by Govt of Pakistan, Ministry of Health,**

Islamabad Notification No.F-4-78/85-MF-II dated 01st

March, 1988 and, as such, the stance of appellant needs no proof and liable to be accepted and relief prayed for may kindly be granted. Whereas, as per chart appended herewith, it is clear that all the candidates having similar qualification like appellants were inducted into services in PBS-9 and subsequently were first promoted to BPS-12 and further promoted to BPS-16 and 17 but unfortunately in case of appellant it has intentionally been not done so. Moreover, the petitioner name was not mentioned in the alleged seniority list by the Respondents. The appellant moved an application to incorporate his name in said seniority list on 12-06-2012. (Copies of Service Rules and Application are attached as annexure "A" & "B").

2. Like para-1, the respondents categorically stated that appellant was appointed as a temporary Radiographer in BPS-6 against the vacant the then available post of X-Ray Technician BPS-9, which, prima facie, presumed that there existed post of BPS-9 and intentionally appellant was appointed in BPS-6 instead of BPS-9 either with malafide intention or against the law / ibid notification. Further, Section Officer-III, Office of Secretary Health, Peshawar, made query from District Health Officer, Abbottabad and

later in response thereto categorically admitted the stance of appellant by stating that "the post of X-ray Technician BPS-9 was lying vacant at the time of recruitment of official (appellant) concerned".

3. It is pertinent to mention here that the appellant came to know about the seniority list which superseded the seniority list of 2006 and the factual position at the time when other similarly placed persons, who were inducted into service in BPS-9 were promoted to BPS-16 & 17 in the year 2012 and appellant is agitating for his seniority position since then. (Copy of 2006 seniority list is attached as a Annexure "C").
4. In reply to para-4 it is stated that it is too strange and does not appeal to a prudent mind that how and why the appellant was appointed against vacant post temporarily till availability of eligible one and appellant is performing his duties to the best of his abilities since then till today on regular basis.
5. In reply to para-5 it is stated that respondents wrongly and illegally turned down the appeal of the appellant, as matter involves pay and allowances of appellant since his appointed, which are liable to be corrected and rectified in according with the prevailing rules on the subject.

Rejoinder to Grounds:

1- That every Government Department and Government official(s) of the State is/are legally and morally bound to honour the directions / orders of the President of Islamic Republic of Pakistan, and no departure in any case is either allowed or permissible in any manner whatsoever, as such, the appellant was required to be appointed against the then existed post of BPS-9 instead of BPS-6 in compliance with the directions / orders of the then President of Pakistan, which has been shown to have been followed / acted upon in case of several other employees of the same nature, as such, petitioner has been meted out discriminately from the very beginning till now, which action, under the law, is required to be corrected or rectified in the best interest of justice. ***“Further, for the same nature of job with similar qualification but different sets of BPS renders anomaly, exploitation, inequality among employees and discrimination in service as per Arts. 3, 25 & 27 of the constitution of the Pakistan, 1973. So, the appointments made after the promulgation of the constitution i.e 14th August,1973 as radiographer in BPS-6 is illegal, void-ab-initio and those appointments shall***

be considered in BPS-9 as per Constitution and and ibid notification."

2- The respondents once again frankly admitted availability of vacant post of Senior X-ray Technician BPS-9 but it is too strange that the appellant having similar qualification according to service rules, as in case of recruited candidates of BPS-9 has been appointed against BPS-6, which amounts to sheer discrimination.

3- In reply to ground-3 it is stated that prominent maxim quoted by the appellant in his appeal has not been shattered / rebutted by the answering respondents in any manner whatsoever whereas here the matter involves pay and allowances of appellant, which according to settled law can be urged or agitated at any stage of service for resolution of the same, as injustice is being done with the appellant from the date of his inception till today, which under the law is required to be corrected or rectified in the best interest of justice and administration apart.

4- In reply to Ground-D regarding citation of dictums of superior courts in the shape of settled law, the answering

respondents could not dare to quote any authority in rebuttal or contrary to the proposition involved herein, as such, the appeal of appellant merits acceptance retrospectively with all back benefits.

5- Similarly, in reply to Ground-E it is stated that respondents furnished no comments being conceded and admitted the stance of the appellant as a whole.

6- In reply to ground-F it is stated that the respondents could not furnish any justification whereas Secretary Health in his letter bearing No.2274-5/HSTH/E dated 15.11.1994 categorically stated that "**The Radiographers working in this Institution are drawing pay in BPS-6 while the X-ray Technicians are drawing pay in BPS-9 but the recruitment rules for both the categories are equal i.e. Matric with Science subject and qualified Radiographer from NWFP, Medical Faculty.**" The petitioner at the time of recruitment had such a qualification.

7- In reply to Ground-G it is stated that respondents have not denied the existence of law on the subject for initial appointment of appellant against BPS-9, as the same has

been found acted upon in case of various other employees in the Province, who have been initially inducted into service in BPS-9.

8- In reply to Ground-H, the stance of appellant has not been denied, as, in essence, the appellant is seeking his initial appointment in BPS-9 according to the law / notification issued on the subject and not on the basis of promotion thereafter. Further the petitioner may be promoted like his colleagues after declaring his initial appointment in BPS-9.

9- Reply furnished to Ground-I is evasive in nature and does not apply to the case in hand.

10- In reply to ground-J it is stated that the appellant on rejection of departmental appeal has rightly approached the Honourable Tribunal, highly constituted forum for redressal of genuine grievances of the poor employees of the Province, and apparently matter relates to pay and allowances, which can be rectified at any stage of service, hence, appeal is well within time and under the law no limitation can run against him.

11- Needs no reply.

It is, therefore, very humbly and respectfully prayed that on acceptance of appeal of appellant, he may kindly be declared appointed initially in BPS-9, according to law / ibid notification, and thereafter to promotion(s), as have been accorded to similarly placed his colleagues thereafter, who have been inducted initially into service in BPS-9, on or after 1993, retrospectively, with all back benefits and oblige.

Dated 17-07-2017



Qadeer Nawaz

(Appellant)

Through:



(Muhammad Waqas)

Advocate High Court,
Abbottabad.

**BEFORE HONOURABLE THE SERVICES TRIBUNAL OF KHYBER PAKHTUNKHWA,
PESHAWAR, CAMP AT ABBOTTABAD.**

Qadeer Nawaz son of Ghareeb Nawaz, Junior Clinical Technician,
District Headquarter / Benazir Shaheed Hospital, Abbottabad

APPELLANT

Versus

The Secretary, Health Department, Government of KPK Peshawar and
others

RESPONDENTS

REJOINDER

Affidavit.

I , Qadeer Nawaz son of Ghareeb Nawaz, Junior Clinical
Technician, District Headquarter / Benazir Shaheed Hospital, Abbottabad, the
appellant do hereby solemnly affirm and declare on Oath that the contents of
enclosed / above rejoinder on behalf of mine is true and correct and nothing has
been suppressed from this Honourable Tribunal.


Qadeer Nawaz

APPELLANT

Identified by



Muhammad Waqas,

Advocate High Court, Abbottabad.

**GOVERNMENT OF N.W.F.P. PROVINCE,
HEALTH & S. WELFARE DEPARTMENT.**

Annexure

(A)

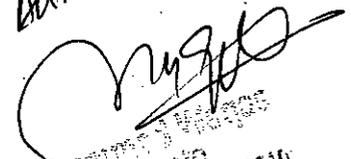
(12)

NOTIFICATION.

Dated Peshawar the 7-11-1988.

No. SOI(H)/4-41/83. — In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1975, and in supersession of all previous rules made in this behalf, the Health and Social Welfare Department, in consultation with the Services and General Administration Department and the Finance Department, hereby lays down the method of recruitment, qualifications and other conditions specified in columns 3 to 5 of the Appendix to this Notification which shall be applicable to the posts Microbiologist in column 2 of the said Appendix.

Allesed



Muhammad J. Ali
Attorney
Abbottabad. 0313-5071519

Minimum qualification for initial

APPENDIX

(13)

Muhammad Waqar
Abbottabad, 0315-5971515

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1	2	3	4	5
1.	*Chief Radiographer	By promotion on the basis of seniority-cum-fitness from amongst the holders of the posts of Senior Radiographer with at least 7 years service as such.
2.	Senior Radiographer	By promotion on the basis of seniority-cum-fitness from amongst Radiographers with at least five years service as such.
3.	Radiographer	i) Secondary School Certificate from a recognized Board, and ii) Possessing Certificate of Radiographer from NWFP Medical Faculty.	18-25 years	By initial recruitment.
4.	Dark Room Assistant.	Secondary School Certificate from a recognized Board.	18-25 years	By initial recruitment.
5.	Senior Dietician	B.Sc. Home Economic from a recognized University.	18-25 years	a) Thirty per cent by initial recruitment & b) 70% by promotion from amongst Dieticians with at least five years service.
6.	Dietician	F.Sc. Home Economics from a recognized Board.	18-25 years	By initial recruitment.
1.	Analytical Assistant.	B.Sc with Chemistry as one of the subjects or an equivalent qualification from a recognized University.	20-25 years	By initial recruitment.

* Amendment made vide Health Department Notification No. SOI(H)/6-22/83-III, dated 1.10.1987.

2. Sanitary Inspector.

i) Secondary School Certificate from a recognized Board;

18-25 years

By initial recruitment.

2.

Entomological Assistant.

B.Sc with Zology or Entomology as one of the subjects or an equivalent qualification from a recognized University.

20-25 years

By initial recruitment.

3.

House Keeper.

F.Ss. Home Economics from a recognized Board.

18-25 years

a) 30% by initial recruitment; and
b) 70% by promotion, on the basis of seniority-cum-fitness from amongst Assistant House Keepers with at least five years service as such.

4.

Assistant House Keeper.

Secondary School Certificate from a recognized Board.

18-25 years

By initial recruitment.

5.

Dental Technician.

i) Secondary School Certificate from a recognized Board; and
ii) Certificate of Dental Training Course of one year's from the recognized Government Institute/NWFP Medical Faculty.

18-25 years

By initial recruitment.

6.

Midwife

i) Secondary School Certificate from a recognized Board; and
ii) Qualified Midwife from NWFP Nursing Council.

18-25 years

By initial recruitment.

7.

Radio Therapy Technician.

i) Secondary School Certificate from a recognized Board; and
ii) Qualified Radiographer from NWFP Medical Faculty.

18-25 years

By initial recruitment.

8.

X-Ray Technician/X-Ray Operator.

i) Secondary School Certificate from a recognized Board; and
ii) Qualified Radiographer from NWFP Medical Faculty.

18-25 years

By initial recruitment.

Amended

C. Singh

Mr.

Abbottabad. U.S. 13-5811510

To
The Director General Health Services
Khyber Pakhtunkhwa, Peshawar

Thorough: Proper Channel

Subject: MISSING / CORRECTION OF NAME IN THE FINAL SENIORITY LIST

Sir,

I have honor to state that I have checked the provincial seniority list of Category of RADIOLOGY, issued vide letter No. 15472-500/AE-VII dated 30.5.2012 wherein my name is not mentioned in the seniority list or need correction as under:-

My bio data is as under:

1. Name: QADEER NAWAZ AWAN
2. Father's Name: GHARIB NAWAZ AWAN
3. Old Nomenclature: RADIOGRAPHER
4. New Nomenclature: JCT RADIOLOGY TECH.
5. Date of Joining Govt. Service as present post: 25.08.1993
 - a. 1st Appointment (date): 29.08.1993
 - i. Position / Post (at the time of 1st Appointment): RADIOGRAPHER
 - b. 2nd Adjustment / Appointment (date): NIL
 - i. Position / Post (at the time of adjustment): NIL
6. Place of present posting: B.B.S.H. (DHQ) ABBOTTABAD
7. Date of Birth: 30.05.1972
8. Date of Retirement: 30.05.2032
9. Domicile: ABBOTTABAD
10. NIC Number (Attached Photocopy): ATTACHED 13101-085845-5

Note: Photo copy of Appointment order & Service Book should be provided with this application.

It is therefore requested that my name may kindly be entered in Final Seniority List accordingly.

Thanking you sir.

Your Obediently

Name: QADEER NAWAZ AWAN
Designation: JCT RADIOLOGY TECH

No. 1529 / 12/12

dated Abbottabad the 12/06/2012

Forwarded to the DGHS for necessary action please.

Medical Superintendent
BBS (DHQ) Hospital
Abbottabad

Muhammad
Abbottabad. 0313-5971510



MOST IMMEDIATE.

DIRECTORATE GENERAL HEALTH SERVICES NWFP, PESHAWAR.

No. 633-57 /L-V

Dated 09/01/2006.

Annex
C
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To

01. Medical Supdt: LKH, Peshawar.
02. Medical Supdt: K.T.H. Peshawar.
03. Medical Supdt: FMC, Peshawar.
04. Medical Supdt: Medical Complex Mardan.
05. Medical Supdt: DHQ Hospital, Swabi, Abbottabad, Dasser Bunir, Kohat, Dikhan, SGHS, Swat, E.S.H.C. Fata (Nowshera), Chitral, Agency Headquarter Hospital, Batakhele.
06. Executive District Officers (Health) Swat, Charsadda, Karak, Dikhan, Mardan, Nowshera, Chitral, Mansehra.
07. Agency Surgeons, Bajor at Khar, Parachinar
08. Dean P.G.M.I Peshawar, D.H.S. NWFP (FATA).

SUBJECT: PROMOTION TO THE POST OF SENIOR RADIOGRAPHER (BPS-07)

Memo: Please furnish full service/ biodata, No Departmental Enquiry certificates in respect of the following radiographers within one week positively so as to process their promotion cases to be put up before departmental promotion committee for consideration:-

ACRs.

- | | |
|-------------------------------------|---|
| 01. Mabd Arshad, LKH, Peshawar. | 24. Ezzi Elahi RHC Naghri Chitral. |
| 02. Zard Ali. -do- | 25. Amir Siyab AHQ.H. Batakhele. |
| 03. Jamil Ahmed. -do- | 26. Muhammad Pervez EDO(H) Swat. |
| 04. Hamidullah. -do- | 27. Bakht Rehman. -do- |
| 05. Muhammad Ishaq K.T.H. Peshawar. | 28. Waliullah, RHC, Sherpaw Charsadda. |
| 06. Sultanullah. -do- | 29. M. Ibrahim THQ.H. Tangi. Charsadda. |
| 07. Niazbad Shah -do- | 30. Muhammad Shefi -do- |
| 08. Ijaz Ahmed. -do- | 31. Inayatullah C.H.T. Masrati, Karak. |
| 09. Afser Khan. H.M.C. Peshawar. | 32. Riaz Pussain Shah; THQ.H. Kulabi Dik. |
| 10. Zakir Ali -do- | 33. Mushtaq Ahmed, RHC, Katlon, Mardan. |
| 11. Mutahir Shah. M.M.C. Mardan. | 34. Mir Askar, TBO, Mardan. |
| 12. Muhammad Wisal -do- | 35. Ghulam Serwar, DHQ.H. Chitral. |
| 13. Shah Muhammad, DHQ.H. Swabi. | 36. Saifur Rahman, Mental Hospital, Dodial, Mansehra. |
| 14. Ijaz Muhammad DHQ.H. A. Abad. | 37. M. Akram Khan, EDO(F) Mansehra. |
| 15. Riaz Akhter. -do- | 38. Raziq Dad, A/Surgeon, Parachinar. |
| 16. Abdul Aziz. -do- | 39. Saif Gul CH Nawagai, Bajor. |
| 17. Javid Sultan. -do- | 40. Ghulam Hazrat CH Khar Bajor. |
| 18. Zarin Gul. DHQ.H. Dasser Bunir. | 41. Mubasherin, CH: Shabguder. |
| 19. Zaitullah. -do- | 42. Wajid Ali. PGMI, Peshawar. |
| 20. Zaitullah DHQ.H. Kohat. | 43. Chohan. DHQ.H. Charsadda. |
| 21. Khurshid Iqbal DHQ.H. Dikhan. | |
| 22. Haroon Rashid. SGHS, Swat. | |
| 23. Saadullah -do- | |
| 24. Anwar Aziz. -do- | |
| 25. Bakhtiar Shah. E.S.H.C. Fata. | |

Wajid
H

Muhammad
Advocate
Abbottabad. 0313-5071510

For Director General Health Services NWFP, Peshawar.

Copy forwarded to all concerned radiographers of this hospital for info

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Do the needful
May 26/06

NON DIRECTOR GENERAL HEALTH SERVICES NWFF

(P.V.V) for information and necessary action. Copy forwarded to the Director Health Services NWFF /E.V

No. 1678

NON DIRECTOR GENERAL HEALTH SERVICES NWFF

12/10/06

In case any one has objection with regard to the Seniority the same may please be communicated to this Director's General for re-consideration and rectification within one month positively after the receipt of this letter, otherwise no objection will be considered after the due date.

All the Registrars working under your control for their information General is sent herewith. This list may please be circulated amongst (P.S-6) in the Health Department NWFF, prepared by this Director's A copy of the Provisional Seniority List of Registrar and confirmation about the correctness of the entries made therein.

Memo:

Muharrir Waqas
Awaraz
Addoosad 013-5871510

Musad

SUBJECT: PROVISIONAL SENIORITY LIST OF REGISTRARS (P.S-6) IN THE HEALTH DEPARTMENT, NWFF.

01. All Medical Superintendents in NWFF.
02. All Executive District Officers (Health) in NWFF.
03. All Agency Surgeons in NWFF.
04. Medical Superintendent, Govt. L.M.I. Teshwar.
05. Medical Superintendent, K.L.H. Teshwar.
06. Medical Superintendent, H.M.O. Teshwar.
07. Principal K.C.D. Teshwar.
08. Principal, K.M.C. Teshwar.
09. Principal Saidu Medical College, Swat.
10. Principal Tara Medical Institute, Swat.
11. Gynecologist, Govt. Maternity Hospital Teshwar.

Dated: 21/01/2006.

No. 1612-77/E.V

DIRECTOR GENERAL HEALTH SERVICES NWFF

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21-01-2006

PROVISIONAL SENIORITY LIST OF REDIGRAPHERS (EPS-06) IN THE HEALTH DEPTT: NWFP.

S.NO.	NAME.	DATE OF JOINING SERVICE.	PRESENT PLACE OF POSTING.	DATE OF BIRTH/ HOME DISTRICT.	DATE OF RETIREMENT.
1	2	3	4	5	6
01.	Mubammad Pervaz.	07-11-1967	EDC(H) Swat.	10-10-1946	10-10-2008
02.	Bekht Rahmani.	01-09-1968	EDC(H) Swat.	06-04-1946	06-04-2009
03.	Amir Siyab.	06-09-1976	EDC(H) Malakand.	20-05-1958	Malakand. 20-05-2012
04.	Seifur Rehman.	14-09-1976	EDC(H) Mansehra.	19-01-1957	Mansehra 19-01-2017
05.	Shed Muhammed.	18-03-1977.	DCQ.H. Swebi.	01-01-1952	Swebi 01-01-2012
06.	Muhammed Arshad.	19-01-1978	Govt. LRH, Peshawar.	09-1958	Pesh. 15-09-2018
07.	Muhammed Arshad.	28-02-1978	DCQ.H. Malakand.	17-09-1958	Malakand. 17-09-2018
08.	Maliullah.	07-03-1978	EDC(H) Charsadda.	07-01-1952	Charsadda 07-01-2012
09.	Riaz Akhter.	18-04-1978	DCQ.H. Malakand.	03-08-1958	Haripur. 03-08-2018
10.	Mutahir Shah?	20-05-1978	(M.N.O.) Mardan.	24-11-1953	Mardan. 24-11-2015
11.	Inayatullah.	13-07-1978	EDC(H) Karak.	08-05-1953	Karak. 08-05-2015
12.	M. Ibrahim.	07-08-1978	EDC(H) Charsadda.	07-08-1958	Charsadda 07-08-2018
13.	Riaz Hussain Shah	17-09-1978	EDC(H) Dikhan.	20-10-1950	LIKhan. 20-10-2010
14.	Mushtaq Ahmed.	01-01-1979	EDC(H) Mardan.	01-05-1953	Mardan. 01-05-2013
15.	Sair Gul	06-02-1979	EDC(H) Bejour.	01-07-1960	Bejour. 01-09-2020
16.	Chuliam Hazrat.	14-04-1979	EDC(H) Bejour.	21-03-1959	Bejour. 21-03-2019
17.	Abdul Aziz.	13-06-1979	DCQ.H. Abbottabad.	21-03-1957	Abbottabad. 21-03-2019
18.	Zaid Ali Khan.	28-07-1979	Govt. LRH Peshawar	20-04-1957	Kohat. 20-04-2017
19.	Mubasherin.	09-03-1980	EDC(H) Charsadda.	07-04-1959	Pesh. 07-04-2019
20.	(Afsar Khan)	18-03-1980	(M.O. Peshawar)	07-05-1955	Pesh. 07-05-2015
21.	Zarin Gul	20-12-1980	EDC(H) District Swat	10-10-1962	Swat. 10-10-2022
22.	Zaitullah.	04-08-1981	EDC(H) District Swat	30-12-1962	Charsadda. 30-12-2022
23.	Khurshid Iqbal.	25-08-1981	DCQ. H. Dikhan.	07-03-1960	LIKhan. 07-03-2020
24.	Zaitullah.	05-04-1982	DCQ. H. Kohat.	20-03-1962	Bannu. 20-03-2022
25.	Farcon Rashid.	01-06-1982	SGHS, Swat.	07-08-1954	Swat. 07-08-2014
26.	Jamil Ahmed.	22-03-1983	Govt. LRH, Peshawar	15-02-1961	Pesh. 15-02-2021
27.	Wajid Ali.	26-04-1983	PGMI, Peshawar.	25-08-1961	Pesh. 25-08-2021
28.	Saeedullah.	04-10-1983	SGHS, Swat.	07-03-1965	Swat. 06-03-2025
29.	Mir Asker.	01-11-1983	EDC(H) Mardan.	15-06-1947	Kurram. 14-06-2007
30.	M. Akbar Khan.	22-01-1984	EDC(H) Mansehra.	22-05-1965	Mansehra. 22-20-2025
31.	Hamidulish.	10-02-1984	Govt. LRH, Peshawar	01-09-1959	Nowshera 31-08-2019
32.	Muhammed Shafi.	15-03-1984	EDC(H) Charsadda.	01-04-1963	Charsadda 31-03-2023
33.	Muhammed Ishaq.	01-12-1984	Govt. Peshawar.	22-09-1964	Charsadda 21-09-2024
34.	Bekhtiar Shah.	01-04-1985	EDC(H) Nowshera.	03-01-1966	Nowshera 02-01-2026
35.	Fazli Elahi.	14-10-1985	EDC(H) Chitral.	04-04-1964	Chitral. 03-04-2024
36.	Sultenullah.	27-01-1986	Govt. Peshawar.	21-03-1964	Bannu. 20-03-2024

Muhammad
 Approved
 03-13-5871510

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106. Zarnosh Khan. 10-11-1986
 107. Wajid Ali Shah. 10-11-1986
 108. Waliur Rehman. 13-11-1986
 109. Muztazzullah. 16-11-1986
 110. Syed Mehfooz. 16-11-1986
 111. Saadud Din. 20-11-1986
 112. M. Arshad. 30-11-1986

KTH, Peshwar. 01-02-1977/Charsada
 AHC, E. Landi-Kotal. 05-04-1966/Bannu
 Mental (H) Peshwar. 06-02-1966/Charsada
 DHC, E. Swabi. 30-07-1966/Swabi
 Govt. ID Children Hospital, Pesh. 10-03-1966/Peshwar
 EDC(F) Manshara. 11-04-1965/Manshara
 Mental Hosp. Pesh. 14-05-1963/Manshara

1	2	3	4	5	6
37. Reziq Dard	01-03-1986	Agency Surgeon Parachinar.	01-01-1985/		13-06-2025
38. Anwar Aziz.	01-07-1986	SGHS, Swat.	14-08-1947/Swat		13-08-2007
39. Javed Sultan.	27-09-1986	DHC, H. Abbottabad.	13-03-1968/A. Abad.		12-03-2025
40. Niazbad Shah.	12-10-1986	K.T.H. Peshwar.	13-11-1966/Charsada		12-11-2020
41. Ijaz Ahmed.	12-10-1986	K.T.H. Peshwar.	22-08-1960/Charsada		21-08-2020
42. Ghulam Sarwar.	11-04-1987	DHC, H. Chitral.	16-03-1966/Chitral.		15-03-2020
43. Zekir Ali.	12-04-1987	HMC, Peshwar.	01-01-1968/Pesh.		31-12-2020
44. Muhammad Wissel.	13-04-1987	M.H.C. Mardan.	28-04-1968/Mardan.		27-04-2020
45. Fehrasmond.	27-04-1987	L.H. F. Charsada.	02-10-1960/Charsada.		1-10-2020
46. Qazi Mohd Tariq.	04-05-1987	Jalibi Hosp: Pesh.	12-02-1964/		11-02-2024
47. Abdul Fatah.	05-05-1987	Govt. Hosp: Pesh.	10-03-1965/Peshwar		09-03-2025
48. Noorul Wahab.	24-05-1987	Govt. L.H., Pesh.	05-05-1955/Charsada		02-05-2020
49. Fidayat Shah.	24-05-1987	Govt. L.H., Pesh.	24-03-1960/Charsada		14-04-2020
50. Zahreen Khan.	24-05-1987	Govt. L.H., Pesh.	24-03-1960/Charsada		23-03-2020
51. Fezli Hakeem.	25-05-1987	Govt. L.H., Pesh.	16-04-1958/Charsada.		15-04-2020
52. Noor Khalig.	25-05-1987	R.F.C. Battagram.	01-09-1967/Charsada.		31-08-2020
53. Jamilur Rahman.	01-09-1987	D.H. F. Charsada.	13-04-1964/Charsada.		12-04-2024
54. Muhammad Asif.	01-10-1987	Govt. L.H., Pesh.	12-01-1970/Mardan.		11-08-2030
55. Moqin Khan.	19-10-1987	REC Doari Julagru.	10-03-1964/Malakand		09-03-2024
56. Shekeel Akhter.	14-01-1988	EDC(F) Manshara.	01-01-1957/Manshara.		31-12-2017
57. Zulfigar.	04-04-1988	ATH, Abbottabad.	11-10-1968/Manshara.		10-10-2020
58. Saadullah.	18-04-1988	SGHS, Swat.	07-03-1965/Swat		06-03-2025
59. Javed Iqbal.	20-04-1988	SGHS, Swat	01-05-1965/Swat		30-04-2025
60. Abidullah.	21-04-1988	HTM, Peshwar.	01-01-1958/Bannu.		07-01-2018
61. Taj Muhammad.	21-04-1988	DHC, H. Mardan.	12-07-1970/Mardan.		11-07-2030
62. Shamraz Gul.	28-04-1988	TBC, Abbottabad.	04-03-1965/A. Abad.		03-03-2025
63. Sajad Ahmed.	03-05-1988	KTH, Peshwar.	01-12-1966/Charsada.		30-11-2026
64. Ibrahim.	04-05-1988	EDC(H) Buner.	01-03-1960/Buner.		28-02-2020
65. Hesan Sher.	26-05-1988	Govt. L.H., Peshwar	15-10-1967/Charsada.		14-10-2027
66. Irfanullah.	28-05-1988	EDC(F) Nowshera.	02-10-1968/Charsada.		01-10-2020
67. Iftikhar Ahmed.	28-05-1988	Govt. L.H., Peshwar	13-02-1960/Pesh.		18-02-2020
68. Saneur Rehman.	30-05-1988	Govt. L.H., Peshwar.	09-01-1966/Pesh.		07-01-2026
69. Afser Ali.	31-05-1988	Govt. L.H., Peshwar	31-03-1967/Charsada		30-03-2027
70. Jehangir Khan.	31-05-1988	Govt. L.H., Peshwar	13-04-1960/Charsada.		12-04-2020
71. Azmat Khan.	11-06-1988	KTH, Peshwar.	06-01-1954/Peshwar.		05-01-2014
72. Zehoor Mohd Khan	16-06-1988	SGHS, Swat.	05-05-1965/Swat.		04-05-2025
73. M. Zafrullah.	19-06-1988	Govt. L.H., Peshwar	17-06-1957/Pesh.		16-06-2017
74. Hamayun	03-07-1988	DHC, L. Tidergare	10-07-1960/Dir.		05-07-2020
75. Obaidul Haq.	09-07-1988	REC Dir Khan.	02-02-1968/Dir.		02-02-2028

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Alshad
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 Manshara

(2:65-3)

1	2	3	4	5
76. Mujeebur Rehman.	30-06-1988	F.M.O Feshwar.	04-05-1964/Reswar.	26-04-2021
77. Moin Khan.	31-06-1988	Govt. IRP, Pesh.	45-02-1966/Reswar.	14-06-2022
77. Abid Kamel.	31-06-1988	Govt. IRP, Pesh.	42-06-1966/Reswar.	12-04-2022
78. Muhammad Miskeen.	31-06-1988	V/Service (P) Pesh.	11-04-1967/Reswar.	14-05-2025
79. Azizullah.	01-07-1988	Govt. LR, Pesh.	15-05-1965/Reswar.	14-05-2025
80. Saleem Khan.	03-06-1988	EDO(H) Marzen.	07-01-1966/Reswar.	21-05-2025
81. Jehar Ali.	04-06-1988	Govt. LRH, Pesh.	01-06-1965/Reswar.	15-02-2026
82. Mehry-ud-Din.	10-10-1988	DHC. F. Bihan.	16-03-1963/Reswar.	14-04-2025
83. Sher Muhammad.	14-10-1988	KTH, Peshwar.	15-04-1965/Reswar.	14-04-2025
84. Iftikhar.	16-10-1988	KTH, Peshwar.	15-04-1965/Reswar.	14-04-2025
85. Sher Alam.	29-10-1988	KTP, Peshwar.	05-01-1966/Reswar.	04-04-2026
86. Asifullah.	26-10-1988	Govt. LRH, Peshwar.	06-02-1966/Reswar.	05-01-2026
87. Akbar Zetti.	26-10-1988	KTI, Peshwar.	06-02-1966/Reswar.	12-04-2026
88. Farwar Khan.	31-10-1988	KTH, Peshwar.	20-05-1966/Reswar.	12-04-2026
89. Faridullah.	01-11-1988	IMC, Peshwar.	13-06-1966/Reswar.	16-04-2026
90. Eshat Ali.	02-11-1988	KTH, Peshwar.	17-06-1966/Reswar.	31-03-2026
91. Muhammad Garig.	22-11-1988	SGHC, Pesh.	01-04-1966/Reswar.	13-07-2026
92. Syed Mir Azam Shah.	26-11-1988	Govt. LRH, Peshwar.	14-07-1966/Reswar.	01-05-2026
93. Dac Khan.	05-12-1988	RIC, Spinwar.	02-05-1966/Reswar.	12-06-2026
94. Abdul Khaliq.	06-12-1988	DNO, Peshwar.	13-06-1966/Reswar.	12-12-2026
95. Farhad Chahzad.	08-12-1988	DDO(H) Swabi.	11-12-1966/Reswar.	15-11-2030
96. Muhammad Ayaz.	11-12-1988	KTH, Peshwar.	14-01-1967/Reswar.	31-12-2027
97. Faridullah.	12-07-1988	DHC(H) Swat.	02-05-1966/Reswar.	29-12-2027
98. Akbar Khan.	06-01-1989	DHC. F. Abbottabad.	23-03-1965/Reswar.	14-11-2027
99. Akbar Kac Mastari.	31-06-1989	DHC. F. Abbottabad.	15-11-1970/Reswar.	29-11-2027
100. Khalidur Rehman.	31-06-1989	DHC. F. Abbottabad.	20-01-1967/Reswar.	02-11-2027
101. Ghulam Akhter.	22-09-1989	DHC. F. Abbottabad.	02-11-1967/Reswar.	03-06-2028
102. Muhammad Sheraz.	30-09-1989	HMC, Peshwar.	04-06-1967/Reswar.	01-04-2028
103. Iftikhar Ahmed.	03-10-1989	IMC, Peshwar.	02-06-1967/Reswar.	07-02-2028
104. Rehmatullah.	06-10-1989	EDO(H) Charsadda.	07-02-1967/Reswar.	04-04-2028
105. Zarnosh Khan.	10-11-1989	KTH, Peshwar.	01-02-1971/Reswar.	04-04-2028
106. Waqif Ali Shah.	12-11-1989	MHC. H. Landi Kotel.	05-04-1966/Reswar.	05-02-2028
107. Waliur Rehman.	16-11-1989	Mental (H) Peshwar.	06-02-1967/Reswar.	28-07-2028
108. Maszullah.	16-11-1989	DHC. F. Swabi.	20-07-1966/Reswar.	14-03-2029
109. Syed Mehfuz.	26-11-1989	Govt. ID Children.	12-03-1967/Reswar.	14-03-2029
110. M. Arshad.	30-11-1989	Hospital Pesh.	15-04-1965/Reswar.	18-04-2029
111. M. Arshad.	30-11-1989	ZPO(H) Muzaffere.	14-05-1967/Reswar.	13-05-2029
112. M. Arshad.	30-11-1989	Mental Hosp. Pesh.	24-07-2027	30-06-2029

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 Muhammad Waqas
 Sub-Divisional Officer

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115	Zabeen A.	25-01-1999	DO(E) Abbottabad.	24-02-1966/A. Abad.	23-02-2025
116	Muhammad Asif.	01-06-1999	DO(E) Bannu.	04-04-1971/Bannu.	03-01-2031
117	Muhammad Munir.	13-06-1999	DHC(E) A. Abad.	01-04-1969/Abbottabad	07-01-2025
118	Wahidullah.	13-06-1999	EDO(E) Bannu.	10-04-1972/Bannu.	09-04-2032
119	Jam Bahader Khan	17-06-1999	EDO(E) Bannu.	07-02-1963/Bannu.	06-02-2023
120	Wajid Ali.	01-07-1999	LPH, Peshwar.	12-05-1960/Charsadda	11-05-2025
121	Falek Naz.	22-07-1999	DHC(E) Mardan.	02-04-1970/Mardan.	01-01-2030
122	Noor Jehan Shah	25-07-1999	DHC(E) Laki Marwat	25-06-1969/Bannu.	24-08-2020
123	Mukhtiar Hussain	26-07-1999	-do-	15-06-1969/Bannu.	14-08-2020
124	Noor Sadat.	30-07-1999	EDO(E) Fangu.	01-07-1967/Karak.	30-06-2027
125	Zainullah.	31-07-1999	EDO(E) Malakand.	01-04-1965/Malakand.	31-03-2025
126	Mudasar Shah.	01-08-1999	DHC(E) Swabi	02-02-1965/Swat.	01-02-2025
127	Rashid Muhammad	01-08-1999	EDO(E) Muzaffargarh.	03-04-1970/	02-04-2030
128	Nehar Ali.	11-08-1999	DHC(E) Swabi.	15-04-1971/Swabi.	14-04-2031
129	Heleem Shah.	12-08-1999	DHC(E) Mardan.	-	-
130	Siraj Hussain.	12-08-1999	DHC(E) Mardan.	11-02-1972/Mardan.	10-02-2032
131	M. Irbad.	15-08-1999	EDO(E) Manshera	01-04-1970/Manshera.	31-03-2030
132	Tariq Shah.	15-08-1999	DHC(E) Kohat.	13-02-1969/Kohat.	12-02-2029
133	Munser Hussain.	16-08-1999	AHC(E) Peshawar.	20-04-1970/Kurrum.	19-04-2030
134	Abdul Haq.	16-08-1999	DHC(E) Karak.	02-10-1972/Karak.	01-10-2032
135	Abdul Ghafoor.	22-08-1999	KTH, Peshawar.	30-12-1970/Peshawar.	29-12-2030
136	Rehimullah.	22-08-1999	EDO(E) DIKhan.	16-03-1971/DIKhan.	15-03-2031
137	Inayatullah.	04-09-1999	SGHS, Swat.	15-04-1969/Swat.	14-04-2029
138	Sarder Ali.	04-09-1999	CH, Barikot.	01-05-1972/Swat	30-04-2032
139	Muhammad Habib.	02-09-1999	EDO(E) Swat.	01-02-1964/Swat	31-01-2024
140	Rahim Zeb.	10-09-1999	-	01-06-1979/Dir	31-05-2030
141	Shah Wazir Khan.	13-09-1999	EDO(E) Buner.	08-01-1969/Buner.	08-01-2029
142	Muhammad Saeed	07-10-1999	EDO(E) Haripur.	06-04-1969/Haripur.	05-04-2029
143	Fazal Rahim.	11-10-1999	DHC(E) Abbottabad.	15-08-1967/Abbottabad	14-08-2027
144	Musculleh.	23-10-1999	HMC, Peshawar.	04-04-1969/Peshawar.	03-04-2029
145	Muhammad Asif.	27-11-1999	L.A.H. Peshawar	12-08-1970/Swabi	11-08-2030
146	Muhammad Safir	25-01-1999	DHC(E) Abbottabad.	01-01-1954/Abbottabad	31-12-2014
147	Shakil Akhter.	30-03-1999	-do-	20-03-1968/Abbottabad	19-03-2028
148	Rab Nawaz/	30-03-1999	-do-	22-03-1973/Abbottabad	19-03-2033
149	Afad-ud-Din.	20-06-1999	TBC Chitral.	20-01-1970/Chitral.	19-01-2030
150	Fazal Haider.	27-10-1999	SGHS, Swat.	01-06-1970/Swat.	31-05-2030
151	Hanifullah.	10-11-1999	DHC(E) Laki Marwat.	20-04-1971/Bannu.	10-04-2031
152	Abdul Faid.	02-12-1999	DHC(E) Haripur.	10-03-1965/	09-03-2025
153	Abdul Satter.	05-01-1999	AHC(E) Wana	06-02-1949/Bannu	05-02-2025
154	Gulzar Hussain	16-01-1999	-do-	-do-	-do-

Added

Muhammad Waqas
 Advocate
 Abbottabad. 0313-5871510

155	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
156	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
157	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
158	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
159	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
160	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
161	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
162	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
163	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
164	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
165	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
166	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
167	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
168	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
169	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
170	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
171	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
172	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
173	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
174	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
175	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
176	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
177	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
178	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
179	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
180	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
181	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
182	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
183	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
184	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
185	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
186	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
187	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
188	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
189	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
190	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
191	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
192	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
193	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
194	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
195	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
196	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
197	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
198	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
199	Muhammad Waqas	16-01-1999	-do-	-do-	-do-
200	Muhammad Waqas	16-01-1999	-do-	-do-	-do-

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1	2	3	4	5
1555	M. Shabid.	22-11-1972	T. B. C. Abbottabad.	02-06-1972/Abbottabad.
1556	Mubarak-e Saleem	03-02-1972	TDO (I) Kohat.	02-06-1972/Abbottabad.
1557	Irshad Akbar.	22-02-1972	EDO (F) Kerak.	05-10-1972/TR Kohat.
1558	Azmat Ali.	23-02-1972	W/S Peshawar.	05-03-1972/Kerak.
1559	Zarin Gul.	01-03-1972	DFO (I) Deeg.	05-03-1972/Kurpur.
1560	Shah Hussain.	01-03-1972	TDO (I) Kerak.	04-04-1972/Kerak.
1561	S. Zia Hussain.	04-03-1972	DFO (I) Peshawar.	07-05-1972/Kurpur.
1562	Niaz Mubarak.	11-03-1972	DFO (I) Peshawar.	15-02-1972/
1563	Mudesar Khan	12-03-1972	TDO (F) Abbottabad.	15-12-1971/Swt.
1564	Ijaz Hussain	14-03-1972	S.G.S Swat.	04-01-1972/Abbottabad.
1565	Erakat Ali.	15-03-1972	I.F.O Dir Khas	04-06-1972/Swt.
1566	Azat Shah.	15-03-1972	O.F. Saeed Begh.	04-04-1972/Malakand.
1567	Ghulam Hussain.	15-03-1972	TDO (F) Chitral.	21-05-1972/
1568	Rehmat Khan.	17-03-1972	A.F.C.H. Peshawar.	15-05-1972/Malakand.
1569	Nader Khan.	17-03-1972	TDO (F) Chitral.	14-04-1974/Menager.
1570	Malik Ghani Akbar	13-04-1972	CP Menager.	02-04-1975/Bannu.
1571	Mubarak Iskan.	26-04-1972	TDO (F) Chitral.	12-02-1972/Chitral.
1572	Sher Faraz.	04-05-1972	TDO (F) Chitral.	21-04-1972/
1573	Noor Madat Khan.	05-05-1972	TDO (F) Chitral.	15-02-1972/
1574	Debir Afser.	28-05-1972	EDC (F) Abbottabad.	04-02-1977/
1575	Sarted Hussain.	04-07-1972	A.F.C.H. Chitral.	15-04-1977/Mohmand.
1576	Zahirud Din.	05-07-1972	DFO (F) Chitral.	14-04-1974/Chitral.
1577	Abdul Wahid.	05-07-1972	K.P.I. Peshawar.	04-01-1974/Peshawar.
1578	Jamil Khan.	07-07-1972	O.P. Peshawar.	03-01-1972/
1579	Fazli Woula.	17-07-1972	Govt. L.H. Peshawar	11-01-1972/
1580	Inayatullah.	07-07-1972	CP. Jinnah Picket.	11-01-1973/
1581	Atiqur Rehman.	30-07-1972	TDO, Peshawar.	15-04-1974/
1582	Imad Khan.	04-08-1972	TDO Nowshera.	04-01-1975/
1583	Attullah Khan.	06-08-1972	EDC (F) Margen.	12-01-1975/
1584	Zarin Zaid.	07-08-1972	EDC (F) Peshawar.	15-03-1977/Sunfer.
1585	Khalid Shah.	07-08-1972	A.F.C.H. Peshawar.	04-01-1977/
1586	Khalid Saad	15-08-1972	TDO (F) Swat.	04-04-1974/Swt.
1587	Farq Nawaz.	16-08-1972	A.F.C.H. Peshawar.	04-01-1974/Swt.
1588	Abdul Wahid	02-09-1972	EDC (H) Menager.	02-01-1974/
1589	Nasruddin Ali.	05-11-1972	DFO (F) Chitral.	14-01-1972/
1590	M. Tariq.	11-11-1972	Govt. L.H. Peshawar	15-01-1972/
1591	M. Tariq.	30-12-1972	A.F.C.H. Peshawar.	12-05-1971/
1592	Mir Zaman.	03-01-1973	CP. Jinnah	12-05-1971/
1593		07-01-1973		
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Mirza Advocate
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194	Muhammad Naeem	11-01-1982	SI (C) Dikhen	13-11-1981/Dikhen
195	W. Mushtaq Ahmad	17-01-1982	HTI, Feshawar	16-04-1975/Karak
196	Tazig Daf	23-01-1982	CH, Bokhe	14-04-1985/Furner
197	Fariq Nawaz	11-03-1982	LDO (H) Karak	15-03-1985/Karak
198	Wajid Khan	22-03-1982	THA, Kohat	16-04-1971/Kohat
199	M. Zeeshan Abbas	11-02-1982	HTI, Dikhen	03-04-1972/Dikhen
200	Ahmed Zillie	11-02-1982	LDO (H) Dikhen	31-01-1973/Dikhen
201	Amir Khalid	21-11-1982	LDO (H) Feshawar	21-02-1972/Munshirani
202	Abdul Raheem	21-03-1982	HTI, Feshawar	12-04-1972/Cheraga
203	Gibretullah	04-05-1982	HTI, Dikhen	11-04-1974/Dikhen
204	Aurang Zeb	02-11-1982	HTI, Feshawar	15-01-1974/Cheraga
205	Muhammad Guffail	01-10-1982	HTI, Feshawar	18-04-1975/Munshirani
206	Muhammad Asif	14-02-1982	HTI, Feshawar	21-04-1971/Munshirani
207	Allanuddin	16-02-1982	HTI, Feshawar	14-01-1983/Feshawar
208	Fahid Khan	16-02-1982	HTI, Feshawar	06-04-1972/Operaga
209	Enlighten Shah	16-02-1982	HTI, Feshawar	02-01-1975/Operaga

ASSISTANT

FOR DIRECTOR GENERAL SENIOR SERVICES UNIT, FESHAWAR.

Muhammad Waqas Advocate Abbottabad 0313-5871510

General is all the and conflict Seniority General for positively will be (BFS-C) Memo: SUBJECT:

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(PART) FOR

10



Attention S. Ajmal Shah
~~Mr. Zulfikar~~

DIRECTORATE GENERAL HEALTH SERVICES, KHYBER PAKHTUNKHWA, PESHAWAR

OFFICE ORDER

Consequent upon approval accorded by the competent authority in its meeting held on 01.07.2013, the following Clinical Tech: (Radiology) BS-12 and J- Clinical Tech: (Radiology) BS-09 have been upgraded to the post of Chief Clinical Tech: (Radiology) BS-16 in the light of Govt of Khyber Pakhtunkhwa, Health Department Notification No. SOH-III/8-50/2005 (Paramedics) dated 09.05.2012.

S. No	Name/Father's Name	Place of Present Posting
1.	Mohiuddin	DHQ Karak
2.	Khurshid	KAI Hospital Manshra
3.	Muhammad Arshad	LRH Peshawar
4.	Ijaz Mahmood Qureshi S/O Ghulam Miskeen	ATH Abbottabad
5.	M. Riaz Akhtar S/O Muhammad Rafiq	BBSH Abbottabad
6.	Mutahir Shah S/O Syed Muhammad Karim Shah	DHQ Mardan
7.	Abdul Aziz S/O Haji Fazal Ahmad	BBSH Abbottabad
8.	Zard Ali Khan	LRH Peshawar
9.	Mubasherin	EDO Charsadda
10.	Asfar Khan	HMC Peshawar
11.	Fahcem Ullah S/O Habibullah Khan	DHQ Bannu
12.	Rizwan Ullah s/o Mehr Gul Khan	KGNTM Bannu

On their up-gradation to the post of Chief Clinical Tech: (Radiology) BS-16, the following posting/transfer/adjustment are hereby ordered in the interest of public service with immediate effect:-

S. No	Name/Father's Name	From	To	Domicle	Remarks
1.	Mohiuddin	DHQ Karak	DHQ (H) Karak	Karak	Against the vacant post
2.	Khurshid	KAI Hospital Manshra	DHQ Kohat	Manshra	-do-
3.	Muhammad Arshad	LRH Peshawar	LRH Peshawar	Peshawar	-do-
4.	Ijaz Mahmood Qureshi S/O Ghulam Miskeen	ATH Abbottabad	ATH Abbottabad	Abbottabad	-do-
5.	M. Riaz Akhtar S/O Muhammad Rafiq	BBSH Abbottabad	ATH Abbottabad	Abbottabad	-do-
6.	Mutahir Shah S/O Syed Muhammad Karim Shah	DHQ Mardan	STH Swat	Mardan	-do-
7.	Abdul Aziz S/O Haji Fazal Ahmad	BBSH Abbottabad	DHQ H Dir Lower	Abbottabad	-do-
8.	Zard Ali Khan	LRH Peshawar	KTH Peshawar	Peshawar	-do-
9.	Mubasherin	EDO Charsadda	AHQ (H) Chahmani	Charsadda	-do-
10.	Asfar Khan	HMC Peshawar	NOM Hosp Peshawar	Peshawar	-do-
11.	Fahcem Ullah S/O Habibullah Khan	DHQ Bannu	DHQ Teaching Bannu	Bannu	-do-
12.	Rizwan Ullah s/o Mehr Gul Khan	KGNTM Bannu	KGNTM Hosp: Bannu	Bannu	-do-

Sd/xxxxxxx
 Director General Health Services,
 Khyber Pakhtunkhwa, Peshawar

No. 18104-204 /AE-VII

Dated Peshawar the 26/7/2013

Copy forwarded to the:-

- The Secretary to Govt of Khyber Pakhtunkhwa, Health Department Peshawar.
- The DHS PATA, Khyber Pakhtunkhwa, Peshawar.
- The Director Provincial Health Services Academy, Khyber Pakhtunkhwa, Peshawar.
- Medical Superintendents, KTH, LRH, HMC Peshawar.
- Director IKD, HMC Peshawar.
- The All Principals of Medical Colleges in Khyber Pakhtunkhwa.
- Medical Superintendent, Maulvi Anwar Shah Memorial Hospital Peshawar.
- All District Health Officer in Khyber Pakhtunkhwa, Province.
- Medical Superintendents, DHQ Hospitals in Khyber Pakhtunkhwa.
- Medical Superintendent, City Hospital Kohat Road, Peshawar.

Ajmal Shah
Muhammad Waqas
 Muhammad Waqas
 Abbottabad, 6313-5671510

Muhammad Waqas
 Advocate
 Abbottabad

Director General Health Services,
 Khyber Pakhtunkhwa, Peshawar



Attention: S. Ajmal Shah
 MR Zulfikar

DIRECTORATE GENERAL HEALTH SERVICES, KHYBER PAKHTUNKHWA, PESHAWAR

OFFICE ORDER:

Consequent upon approval accorded by the competent authority in its meeting held on 01.07.2013, the following Clinical Tech: (Radiology) BS-12 and J: Clinical Tech: (Radiology) BS-09, have been upgraded to the post of Chief Clinical Tech: (Radiology) BS-16 in the light of Govt. of Khyber Pakhtunkhwa, Health Department Notification No. SOH-III/8-60/2005 (Paramedics) dated 09.05.2012.

S. No	Name/Father's Name	Place of Present Posting
1.	Mohiuddin	DHQH Karak
2.	Khurshid	KAI Hospital Mansobra
3.	Muhammad Arshad	LRH Peshawar
4.	Ijaz Mahmood Qureshi S/O Ghulam Miskeen	ATH Abbottabad
5.	M. Riaz Akhtar S/O Muhammad Rafiq	BBSH Abbottabad
6.	Mutahir Shah S/O Syed Muhammad Karim Shah	DHQH Mardan
7.	Abdul Aziz S/O Haji Fazal Ahmad	BBSH Abbottabad
8.	Zard Ali Khan	LRH Peshawar
9.	Mubasherin	EDO Charsadda
10.	Asfar Khan	HMC Peshawar
11.	Fahcem Ullah S/O Habibullah Khan	DHQH Bannu
12.	Rizwan Ullah s/o Mehr Gul Khan	KGNTH Bannu

On their up-gradation to the post of Chief Clinical Tech: (Radiology) BS-16, the following posting/transfer/adjustment are hereby ordered in the interest of public service with immediate effect:-

S. No	Name/Father's Name	From	To	Domicile	Remarks
1.	Mohiuddin	DHQH Karak	DHQ (H) Karak	Karak	Against the vacant post
2.	Khurshid	KAI Hospital Mansobra	DHQ Kohat	Mansobra	-do-
3.	Muhammad Arshad	LRH Peshawar	LRH Peshawar	Peshawar	-do-
4.	Ijaz Mahmood Qureshi S/O Ghulam Miskeen	ATH Abbottabad	ATH Abbottabad	Abbottabad	-do-
5.	M. Riaz Akhtar S/O Muhammad Rafiq	BBSH Abbottabad	ATH Abbottabad	Abbottabad	-do-
6.	Mutahir Shah S/O Syed Muhammad Karim Shah	DHQ H Mardan	SH Swat	Mardan	-do-
7.	Abdul Aziz S/O Haji Fazal Ahmad	BBSH Abbottabad	DHQ H Dir Lower	Abbottabad	-do-
8.	Zard Ali Khan	LRH Peshawar	KTH Peshawar	Peshawar	-do-
9.	Mubasherin	EDO Charsadda	ATHQ (H) Ghallamat	Charsadda	-do-
10.	Asfar Khan	HMC Peshawar	NBM Hosp Peshawar	Peshawar	-do-
11.	Fahcem Ullah S/O Habibullah Khan	DHQH Bannu	DHQ Teaching Bannu	Bannu	-do-
12.	Rizwan Ullah s/o Mehr Gul Khan	KGNTH Bannu	KGN Teaching Hosp: Bannu	Bannu	-do-

Sd/xxxxxxxx
 Director General Health Services,
 Khyber Pakhtunkhwa, Peshawar

No. 18104-204 JAF-VII

Dated Peshawar the 26/7/2013

Copy forwarded to the:-

1. The Secretary to Govt of Khyber Pakhtunkhwa, Health Department, Peshawar.
2. The DHS/FATA, Khyber Pakhtunkhwa, Peshawar.
3. The Director Provincial Health Services Academy, Khyber Pakhtunkhwa, Peshawar.
4. Medical Superintendents, KTH, LRH, HMC Peshawar.
5. Director IKD, HMC Peshawar
6. The All Principals of Medical Colleges in Khyber Pakhtunkhwa
7. Medical Superintendent, Maulvi Arneer Shah Memorial Hospital Peshawar
8. All District Health Officer in Khyber Pakhtunkhwa, Province.
9. Medical Superintendents, DHQ Hospitals in Khyber Pakhtunkhwa.
10. Medical Superintendent, City Hospital Kohat Rural, Peshawar.

Ajmal Shah
 Muhammad Waqas
 Abbottabad. 0313-5671510

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Provisional Seniority List of Chief Clinical Technician (Radiology) BS-16 in the Health Department Khyber Pakhtunkhwa.

S.No	Name/ Father's Name	a/Old Nomenclature With BPS b New Nomenclature after restructuring	Date of Joining Govt. Service/ promotion/ up- gradation	Place of Present Posting	Date of Birth/ Domicile	Date of Retirement
1.	Wahidullah S/O Fazal Dad	a) X-Ray Tech: B-09/ b) Chief Clinical Tech Radiology B-16	22.09.2003 24.07.2013	DHQT Hosp: D.I.Khan	01.04.1962 D.I.Khan	31.03.2022
2.	Munir Hussain S/O Latif Hussain	a) Ultra/Sound/ Tech: BS-09/ b) Chief Clinical Tech Radiology B-16	15.09.2003 24.07.2013	AS Kurram at Sadda	01.01.1980 Kurram Agency	31.12.2039
3.	Iqbal Hussain S/O Hussain Arghar	a) X-Ray Tech: B-09/ b) Chief Clinical Tech Radiology B-16	22.10.2003 24.07.2013	AS Kurram at Sadda	26.02.1982 Kurram	29.02.2042
4.	Eyed Hamid Noor S/O Eyed Manoor	a) X-Ray Tech B 09/ b) Clinic: Tech B 12 c) Chief Clinical Tech Radiology B-16	25/10/2003 20.04.2010 24.07.2013	AHQ Hosp: Miranshah	10/03/1984 NW Agency	09.03.2044
5.	Mohiuddin S/O Saeed Ahmad	a) X-Ray Tech B 09 b) Clinic: Tech B-09 c) Chief Clinical Tech Radiology B-16	10.10.1983 27.12.2003 24.07.2013	DHQH Karak	16.03.1968 Karak	15.03.2028
6.	Khurshid S/O Rehmatullah	a) X-Ray Tech B 09 b) Clinic: Tech B 12 c) Chief Clinical Tech Radiology B-16	22.09.2004 20.04.2010 24.07.2013	DHQ Hosp: Kohat	07.05.1963 Mansehra	06.05.2023
7.	Muhammad Arshad	a) X-Ray Tech B 09 b) Clinic: Tech B 12 c) Chief Clinical Tech Radiology B-16	19-01-1978 20.04.2010 24.07.2013	LRH Peshawar	15-09-1958 Peshawar	14-09- 2019
8.	Ijaz Mahmood Qureshi S/O Ghulam Miskeen	a) X-Ray Tech B 09 b) Clinic: Tech B 12 c) Chief Clinical Tech Radiology B-16	28-02-1978 20.04.2010 24.07.2013	ATH A/Abad	17-09-1958 Abbottabad	16-09- 2013
9.	M. Riaz Akhtar S/O Muhammad Rafiq	a) X-Ray Tech B 09 b) Clinic: Tech B 12 c) Chief Clinical Tech Radiology B-16	18/04/1978 20.04.2010 24.07.2013	BBSH Abbottabad	03/05/1956 Abbottabad	02/05/201 3
10.	Abdul Aziz S/O Haji Fazal Ahmad	a) X-Ray Tech B 09 b) Clinic: Tech B 12 c) Chief Clinical Tech Radiology B-16	13-06-1979 20.04.2010 24.07.2013	BBSH Abbottabad	21-03-1959 Abbottabad	20-03- 2019
11.	Zard Ali Khan	a) X-Ray Tech B 09 b) Clinic: Tech B 12 c) Chief Clinical Tech Radiology B-16	26-07-1979 20.04.2010 24.07.2013	LRH Peshawar	20-04-1957 Peshawar	20-04- 2017
12.	Mubasheria	a) X-Ray Tech B 09 b) Clinic: Tech B 12 c) Chief Clinical Tech Radiology B-16	09-03-1990 20.04.2010 24.07.2013	DHO Charsadda	07-04-1959 Charsadda	07-04- 2019
13.	Faheem Ullah S/O Habibullah Khan	a) X-Ray Tech: BPS- 09 b) Chief Clinical Tech Radiology B-16	08/12/2005 24.07.2013	DHQH Bannu	03.04.1979 Bannu	02.04.2039
14.	Rizwan Ullah S/O Mehr Gul Khan	a) X-Ray Tech: BPS- 09 b) Chief Clinical Tech Radiology B-16	03.03.2006 24.07.2013	KGTH Bannu	04/03/1971 Bannu	03/03/203 1
15.	Rashid Muhammad S/O Gul Muhammad	a) X-Ray Tech: BPS- 09 b) Chief Clinical Tech Radiology B-16	04.03.2006 24.07.2013	DHO Laddi Marwat	15.09.1981 Laddi Marwat	14.09.2041

Muhammad Waqas
Muhammad Waqas
 Advocate
 Abbottabad

[Signature]
 Director General Health Services,
 Khyber Pakhtunkhwa, Peshawar
 24/11/11

(ii). Annual increment shall continue to be admissible subject to existing conditions on the 1st of December each year under this Scheme. However, the first annual increment of existing employees in the Basic Scales shall accrue on the 1st of December, 1983. (9)

4. Fixation of Pay on Promotion:- The existing provision regulating the fixation of pay in case of promotion of employees from a lower to a higher post shall continue to apply. (27)

5. Move-Over:- The existing provision regulating the concession of Move-Over without promotion to the next higher pay scale of employees in revised National Pay Scale-I(B-1) to revised National Pay Scale-16(B-16) shall continue to be applicable in this scheme.

6. The existing concession of "Move-Over" of employees from revised National Pay Scale-16 to revised National Pay Scale-17 (B-17) and RNPS-17(B-17) to RNPS-18(B-18) shall be extended upto B-20 and regulated as under:-

- (a) The existing condition of the period of stay of 3 years at the maximum of Pay Scale B-16 and B-17 in the case of Non-Technical and Non-Professional categories shall continue to be applicable.
- (b) No Move-over beyond B-18 in the case of categories of employees mentioned at (a) above shall be permissible.
- (c) The Move-Over in the case of Technical and Professional categories e.g. Doctors, Engineers, Educationists, Economists, Management Accountants, Scientists, Archaeologists, Geologists, Meteorologists, Expert of Agriculture, Animal Husbandry and Forestry shall be permissible upto B-20, without the condition of stay at the maximum for 3 years; provided that in cases where it is intended to allow move-over to the category of officers other than Doctors, Engineers, Educationists, Experts in Agriculture, Animal Husbandry and Forestry, prior concurrence of Finance Department shall be obtained.
- (d) Move-over shall be allowed in cases where an employee who is otherwise considered fit for promotion to higher post, cannot be promoted for want of a vacancy.
- (e) Normal promotion procedure as is observed in cases of promotion through the Competent Authority, e.g. S&GAD/Selection Board shall be followed in allowing Move-over to Basic Scales 19 and 20.

7. (A). Modification of Scales in case of certain Posts.
In the case of certain posts, the Basic Pay Scales indicated in Annexure-II to this circular letter will be allowed.

(B). Fixation of Pay in cases under (A) above. In cases where the Basic Scales under (A) above higher than the scale which correspond to the revised National Pay Scales have been allowed, initial fixation of pay of the employees concerned shall first be made in the Basic Scale corresponding to his existing revised National Pay Scale in the light of the initial fixation of pay formula mentioned in para 3 above, and

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Abbottabad. 0313-5871510

- 3 -

thereafter their pays in the higher Basic Scales shall be fixed at the next higher stage.

8. Special Pays:- (a) The existing special pays admissible to officials of various categories working as Private Secretaries and Personal Assistants shall be revised as under:-

<u>Name of Post.</u>	<u>Existing</u> Rs.	<u>Revised.</u> Rs.
P.S to Ministers/ Chief Secretary.	150/220	200
P.S to Addl:Chief Secretary.	150/220	150
P.S to Secretaries.	100	150
P.A to Minister.	60	100
P.A to Chief Secretary/ Additional Chief Secretary/ Secretary.	50	75

(b) The existing Private Secretaries who are in receipt of special pay exceeding Rs.150/- p.m shall continue to draw it at the existing rates as personal to them for so long as they hold these posts.

9. Advance increments to School Teachers on attaining higher qualifications.

Primary, Middle and High School teachers who possess or acquire while in service higher qualifications shall be allowed advance increments as under:-

I. Primary School.

- (i) A teacher who possesses or acquires F.A/F.Sc shall be allowed two advance increments.
- (ii) A teacher who (in addition to FA/F.Sc) also acquire C.T shall be allowed one additional advance increment.
- (iii) A teacher who acquires a Degree of B.A/B.Sc shall be allowed three additional advance increments.

II. Middle School.

A teacher who possesses or acquires a Degree of B.A/B.Sc shall be allowed three advance increments.

III. High School.

A teacher who possesses or acquires Master's Degree shall be allowed three advance increments. In case of a teacher who possesses or acquires Master's Degree in Education (M.Ed) and also a Master's Degree in any academic subject shall be allowed six advance increments.

Provided that a teacher who has already drawn increments for possessing higher educational qualification under the existing scales shall be allowed increments equal to shortfall in the number of increments, if any, between the increments obtained by him and the increments which have now been prescribed.

P.O.

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Muhammad Waqas
Advocate
Muhammad Waqas
Advocate
Abbottabad. 0313-5871519

Advance increments to Technical and Professional categories on possessing/acquiring higher qualifications.

Doctors, Engineers, Educationists, Economists, Management Accountants, Scientists, Geologists, Meteorologists, Archaeologists, Experts in Agriculture, Animal Husbandry and Forestry working in Universities, Colleges, Research Institutions or Technical Departments shall be allowed advance increments on possessing/acquiring higher qualifications as under:-

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- (i) In case a technical/professional employee of the above category possesses B.Sc., Ph.D degree from a foreign university, he shall be allowed six advance increments on entry into service in B-17.
- (ii) Those of the above categories of officers who possess M.A/M.Sc/M.S or equivalent from a foreign university or Ph.D or M.Phil from a university in Pakistan will receive four advance increments on induction in service in B-17.
- (iii) Those of the above categories of employees who while in service obtain a degree shall be allowed four advance increments in case of (i) above and two advance increments in case of (ii) above.
- (iv) In cases where it is intended to extend the concession of advance increments to the categories of Officers other than Doctors, Engineers, Educationists, Experts in Agriculture, Animal Husbandry and Forestry mentioned above, prior concurrence of Finance Department shall be obtained.

11. Advance increments to Stenographers:- The orders contained in the Government of NWFP, Finance Department circular letters No.FD(SRI)20-1/74 dated 13.5.1981 and No.FD(SRI)2-56/72 dated 13.9.1982 regarding grant of four advance increments to Steno-typists, Stenographers, Personal Assistants, Judgement Writers, Private Secretaries shall stand rescinded on the introduction of Basic Pay Scales with effect from 1-7-1983.

PART-II-ALLOWANCES.

12. Dearness Allowance, Local Compensatory Allowance and Rest and Recreation Allowance.

(i) As from the 1st of July, 1983, the existing Dearness Allowance, Local Compensatory Allowance wherever admissible, and Rest and Recreation Allowance shall cease to be admissible to a provincial civil servant who draws pay in the Basic Pay Scales.

(ii) The existing rules and orders regulating the grant of House Rent Allowance, Conveyance Allowance and Washing Allowance shall continue to be applicable.

Contd:- - -

Muhammad Waqas
Muhammad Waqas
Advocate
Abbottabad. 0313-5871510

3. Entertainment Allowance:- Entertainment Allowance shall be admissible at the following fixed rates to officers drawing pay in B-20 to B-22:-

(1) B-20	Rs.400/-p.m.
(2) B-21	Rs.450/-p.m.
(3) B-22	Rs.650/-p.m.

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14. Non-Practising Allowance:- The existing rates of Non-Practising Allowance shall be revised as under:-

Doctors drawing pay in B-17 and B-18.	Rs.500/-p.m.
Doctors drawing pay in B-19 and above.	Rs.700/-p.m.

The above Non-Practising Allowance shall be admissible in all cases where a doctor is not allowed private practice.

Doctors posted in rural areas below town committee level, and allowed private practice, shall be given a Practice Compensatory Allowance @ Rs.200/- p.m for male doctors and @ Rs.300/- p.m for female doctors.

15. Teaching Allowance:- Teaching Allowance @ Rs.100/- p.m shall be allowed to qualified High School Teachers who teach basic/natural sciences.

Junior Instructors in Polytechnics who possess Technical Teachers Diploma shall be allowed Teaching Allowance @ Rs.100/- p.m.

Doctors who teach basic sciences in Medical Colleges shall be allowed a Teaching Allowance @ Rs.500/- p.m in lieu of the existing teaching pay. The non-doctors who also teach basic sciences in Medical Colleges shall however continue to receive teaching pay at the existing rate.

16. Charge Allowance:- Charge Allowance to Principals of Colleges and Polytechnics shall be admissible at the following rates:-

a) Principals of Degree Colleges/Colleges of Technology.	Rs.200/-p.m.
b) Principals of Intermediate Colleges/Polytechnics.	Rs.100/-p.m.

17. Warden Allowance:- Teachers who are assigned the duty of Hostel Wardens in Colleges and Polytechnics shall be allowed a Warden Allowance of Rs.100/-p.m.

18. Design Allowance:- Engineers holding University degree in engineering and working full time in the Design Offices shall be allowed a Design Allowance at the following rates:-

Engineers drawing pay in B-17.	Rs.400/-p.m.
Engineers drawing pay in B-18.	Rs.500/-p.m.
Engineers drawing pay in B-19.	Rs.600/-p.m.
Engineers drawing pay in B-20.	Rs.700/-p.m.

P.T.C.

Handwritten Signature
Muhammad Waqas
Associate
Abbottabad. 0313-5871510

The existing incumbents of the aforesaid posts who are Design Allowance at the higher rates shall continue to draw the as personal to them for so long as they hold these posts.

Qualification Allowance:- S.A.S Accountants shall be allowed a Qualification Allowance of Rs.100/- p.m on qualifying the S.A.S or equivalent examination. This allowance shall continue to be admissible as a separate entity even after their promotion to higher posts.

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20. Special Research Allowance:- Field Officers on their appointment in research institutions for doing research work shall be allowed a Special Research Allowance @ 20% of their Basic Pay.

The field officers entitled to this allowance will be specified separately with the concurrence of the Finance Department on a case to case basis.

21. Deputation Allowance:- In lieu of the existing rates of Deputation Allowance, Civil servants while on deputation to foreign service in Pakistan, shall in consultation with Finance Department be allowed a Deputation Allowance @ 10% of the minimum of their Basic Pay Scale.

22. Ration Allowance:- Ration Allowance to the lower Police personnel shall be allowed at the rate of Rs.197.80 p.m as admissible to the equivalent categories in the Frontier Constabulary (Civil Armed Force).

23. Incentive Allowance to Female Nurses (Charge Nurses).

The orders contained in Finance Department's letter No. FD(SRE)1-3/79-III dated 21st March, 1982 regarding grant of Incentive Allowance to Female Nurses (Charge Nurses) shall stand rescinded with effect from 1-7-1983.

24. All existing rules and orders on the subject shall be deemed to have been modified to the extent indicated above. All existing rules and orders not so modified shall continue in force under this scheme.

25. In case of any doubt in the interpretation/implementation of the provisions contained in this circular letter, the matter may be referred to Finance Department for clarification/guidance.

Your obedient servant,

(Mohammad Amin)
Additional Finance Secretary-I,
Government of N.W.F.P.

24/8/83

Advised
Original
Abbottabad 0313-5871510

Contd:- - -

(32)

NO.FD(SR-I)1-67/82. Dated, Peshawar, the 24th August, 1983.

Copy forwarded for information to:-

1. All Autonomous and Semi-Autonomous Bodies in N.W.F.P.
2. The Secretary, Finance Department, Government of the Punjab, Sind and Baluchistan.


(Mohammad Siddique Khattak)
Deputy Secretary (Regulations),
Government of N.W.F.P.
Finance Department.

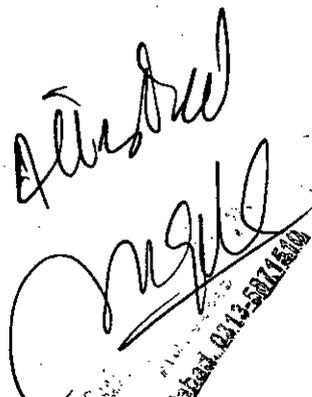
No.FD(SR-I)1-67/82. Dated, Peshawar, the 24th August, 1983.

Copy forwarded for information to:-

1. The Accountant General, N.W.F.P. Peshawar.
2. All District/Agency Accounts Officers in N.W.F.P.
3. The Treasury Officer, Peshawar.
4. The Private Secretary to Finance Minister, N.W.F.P.
5. P.S to Secretary, P.As to Additional Secretaries/
Deputy Secretaries in Finance Department.
6. All Section Officers/Budget Officers in Finance Department.
7. The Director, Local Fund Audit, N.W.F.P.


(Iftikhar Hussain)
Section Officer (SR-I),
Government of N.W.F.P.
Finance Department.

'S. Ali'


Peshawar 013-SR150

BASIC SCALES OF PAY

Annexure-I to Circular
letter
No. FD(SR-I)1-67/82
Dated 24th August, 1983

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No.	Existing Revised National Pay Scales	Basic Pay Scales
1.	250-5-280/6-340-7-375	B 1. 440-10-640
2.	260-6-302/7-365-8-405	B 2. 460-12-700
3.	270-7-326/8-390-9-435	B 3. 480-14-760
4.	280-8-352/9-415-12-475	B 4. 500-16-820
5.	290-10-350/12-470-14-540	B 5. 520-18-880
6.	315-12-399/14-525-16-605	B 6. 540-20-940
7.	335-14-447/16-575-18-665	B 7. 560-23-1020
8.	370-16-514/18-640-22-750	B 8. 590-26-1110
9.	390-20-590/22-700-24-820	B 9. 620-29-1200
10.	410-22-520/24-760-28-900	B 10. 660-32-1300
11.	430-24-550/28-830-30-980	B 11. 700-35-1400
12.	460-28-600/30-900-32-1060	B 12. 750-40-1550
13.	490-30-790/32-950-35-1125	B 13. 800-45-1700
14.	520-30-730/35-1010-40-1210	B 14. 850-50-1850
15.	550-35-900/40-1110-50-1350	B 15. 900-55-2000
16.	625-40-825/50-1325-60-1625	B 16. 1050-80-2250
17.	900-50-1150/60-1750-100-2250	B 17. 1600-120-3040
18.	1350-75-1650/100-2650	B 18. 2100-150-3600
19.	2250-100-3050	B 19. 3200-160-4480
20.	2600-125-3600	B 20. 3800-180-5240
21.	3000-150-4200	B 21. 4200-225-6000
22.	3250-200-4850	B 22. 4500-250-6500

Amended
Original
Muzaffar Ali
Abdullah 015-27721

36

NAME OF POST	EXISTING SCALE	BASIC SCALE
4. Draftsman	RNPS-8 Rs. 370-16-514/18-640-22-750	B-11 (Rs. 700-35-1400)
5. Inspector Cooperatives	RNPS-10 Rs. 410-22-520/24-760-28-900	-do-
6. Tilledar	-do-	B-14 (Rs. 850-50-1850)
POLICE DEPARTMENT:		
1. Foot Constable	RNPS-2 Rs. 260-6-302/7-365-8-405	*B-2 (Rs. 460-12-700)
2. Head Constable	RNPS-3 Rs. 270-7-326/8-390-9-435	*B-3 (Rs. 480-14-760) with 30% posts as selection grade in B-5 (Rs. 520-18-880). *Those Constables and Head Constables who are Matriculate at the time of recruitment or acquire Matriculation Certificate while in service may be allowed five advance increments.
3. Assistant Sub-Inspector	RNPS-5 Rs. 290-10-350/12-470-14-540	B-5 (Rs. 520-18-880) with 1/3rd posts as Selection Grade in B-7 (Rs. 560-23-1020)
4. Sub-Inspector	RNPS-7 Rs. 335-14-447/16-575-18-665	B-11 (Rs. 700-35-1400) with Graduation as minimum qualification.
5. Inspector	RNPS-11 Rs. 430-24-550/28-830-30-980	B-14 (Rs. 850-50-1850)
6. Prosecuting Sub-Inspector	RNPS-7 Rs. 335-14-447/16-575-18-665	B-11 (Rs. 700-35-1400). Those who possess Law Degree, five advance increments may be allowed, provided that a Prosecuting Sub-Inspector who has already drawn increments for possessing Law Degree under the existing scales shall be allowed increments equal to shortfall in the number of increments between the increments obtained by him and the increments which have now been prescribed.
7. Prosecuting Inspector	RNPS-11 Rs. 430-24-550/28-830-30-980	B-14 (Rs. 850-50-1850)

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Muhammad Waqas
 Addl. Magistrate
 Abbottabad. 0313-5871510

(37)

NAME OF POST	EXISTING SCALE	BASIC SCALE
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REVENUE DEPARTMENT.

- | | | |
|--|--|---------------------------|
| 1. Kanungo/Girdawar | RNPS-6
(Rs. 315-12-399/14-525-16-605) | B-9
(Rs. 620-29-1200) |
| 2. Naib Tehsildar/
District Kanungo/
Distt: Accountant | RNPS-8
(Rs. 370-16-514/18-640-22-750) | B-14
(Rs. 850-50-1850) |

TREASURY & ACCOUNTS.

- | | | |
|---|---|--|
| 1. Treasury Officer/
Distt: Accounts
Officer/Agency
Accounts Officer | RNPS-17
(Rs. 900-50-1150/60-1750-100-2250) | B-17
(Rs. 1600-120-3040) with 1/3rd of 50% of posts as selection grade in B-18 (Rs. 2100-150-3600). |
|---|---|--|

Government Departments & Organizations.

(Posts common to different Departments).

- | | | |
|--|--|---|
| 1. Junior Scale
Stenographer
Grade-II/ Steno-
Typist. | RNPS-8
(Rs. 370-16-514/18-640-22-750) | B-12
(Rs. 750-40-1550) |
| 2. Junior Scale
Stenographer
Grade-I | RNPS-10
(Rs. 410-22-520/24-760-28-900) | B-12
(Rs. 750-40-1550) |
| 3. Senior Scale
Stenographer | RNPS-12
(Rs. 460-28-600/30-900-32-1060) | B-15
(Rs. 900-55-2000) with 25% posts as selection grade in B-16 (Rs. 1050-80-2250). |

(Secretariat Departments).

- | | | |
|--|---|--|
| 1. Junior Scale
Stenographer
Grade-II | RNPS-8
(Rs. 370-16-514/18-640-22-750) | B-12
(Rs. 750-40-1550) |
| 2. Junior Scale
Stenographer
Grade-I | RNPS-10
(Rs. 410-22-520/24-760-28-900) | B-12
(Rs. 750-40-1550) |
| 3. Senior Scale
Stenographer | RNPS-12
(Rs. 460-28-600/30-900-32-1060) | B-15
(Rs. 900-55-2000) with 25% posts as selection grade in B-16 (Rs. 1050-80-2250) |
| 4. P.A. to Minister/
Chief Secretary/
Addl: Chief Secy/
Secretary/Addl: Secy: | RNPS-14
(Rs. 520-30-730/35-1010-40-1210) | B-15
(Rs. 900-55-2000) with 25% posts as selection grade in B-16 (Rs. 1050-80-2250) |
-) While working out the selection grade posts the number of existing posts of Private Secretaries in B-16 will also be accounted for.

Submitted
Original

Muhammad Waqas
Abdullah, 0313-5871510

(32)

Amendment

HAYAT SHAHEED TEACHING HOSPITAL, PESHAWAR.

No. 89745 /HSTH/E Dt: 15-11-1994

(38) (E)

Secretary Health,
Government of N.W.F.P.
Peshawar.

SUBJECT: AMALGAMATION OF X-RAY TECHNICIAN & RADIOGRAPHERS,
OF HAYAT SHAHEED TEACHING HOSPITAL, PESHAWAR.

Sir,

Reference your letter No. SO(H)III/7-317/94
Dated 15/11/1994.

An application of Radiographers of this Institution was sent to your office vide this Office No. 22306, dated 17/11/1994 which is self explanatory.

1. The Radiographers working in this Institution are drawing pay in BPS-6, while the X-ray Technicians are drawing pay in BPS-9, but the recruitment rules for both the categories are equal i.e. Matric with Science subject and qualified Radiographer from NWFP, Medical Faculty.

2. This anomaly has also been removed by the Ministry of Health Islamabad vide notification No. F.4-78/85 of II Health Division dated 1/3/1988 and Ministry of Finance Islamabad notification No. F.1(1) - RI/88-0272/88, Ministry Finance regulations wing and all the Radiographers and X-ray Technicians are placed in BPS-9 with 1/3rd in BPS-11 selection grade.

In view of the above facts it is requested that the posts of Radiographers and X-ray Technicians in Hayat Shaheed Teaching Hospital, Peshawar may please be amalgamated and the same may be read as X-ray Technicians/Radiographers BPS-9 with 1/3rd Selection grade in BPS-11.

15/11/94
ADMINISTRATOR
HAYAT SHAHEED TEACHING HOSPITAL
PESHAWAR. 1994.

NO _____ /HSTH(E)

Copy to:-

The Professor & Head Department of Radiology Department, HSTH, Peshawar.

ADMINISTRATOR
HAYAT SHAHEED TEACHING HOSPITAL
PESHAWAR.

Amended
Mujib
Abbas
15/11/94

0335045235

X / ~~XXXXXXXXXX~~

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Copy of letter No. PD(SR.IV)14/7/90, dated 10.1.95, from the
Section Officer(SR.IV), ~~xxxx~~ Finance Deptt., NWFP, to the
Section Officer.III, Health Deptt., NWFP.

Sub. AMALGAMATION OF X-RAY TECHNICIAN AND RADIOGRAPHER.

Will the Section Officer.III, Govt. of NWFP,
Health Deptt, please refer to his NO.SO(H)III/7-317/94,
dated 15.1.1995 on the subject.

The Finance Deptt observes as under:-

- a. When was the post of Radiographer (B-6)
and X-Ray Technician B-9 sanctioned?
Copies of their sanction orders may be
provided.
- b. Why were these sanctioned in different
pay scales? Was the Deptt not in knowledge
of their qualification and method of
recruitment?
- c. What is their job description and work load?
- d. What are the Admn. Deptt recommendations
about the Senior Radiographer (B-7)?
- e. What is the position in Sister Provinces.

GOVERNMENT OF NWFP
HEALTH DEPARTMENT

ENDST.NO.SO(H)III/7-317/94

Dated 15.2.1995

Copy forwarded to DG Health Services, NWFP
for information and necessary action w.r.t. his letter
No.33283/E.I, dated 14.12.1994.

Muhammad Waqas
Muhammad Waqas
Advocate
Abbottabad. 0313-5871510

M. J.

Sadik
SECTION OFFICER.III