

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 2245/2023

Rashida Begum V/S Government of KPK

INDEX

S.NO.	DOCUMENTS	PAGE NO.	
1.	Letter	01	
2.	Judgment	02-05	
3.	Order sheets	06-10	
4.	Check list & index of appeal	11-12	
5.	Memo of appeal and affidavit	13-17	
6.	Application for suspension	18	
7.	Copy of final warning	19-20	
8.	Copy of the Compliant	21-23	
8.	Copy of Inquiry and Final Report	24-25	
9.	Copy of Compliant	26-27	
10.	Copy of Both Impugned Order	28-29	
11.	Copy of Department Representation and order dated 20.11.2023	30-32	
12	Notification and transfer posting police	33-37	
13	Copy of Receipt	38	
14	Reply	39-75	
15	Wakalat Nama	76	
16	Notices	77-80	

Muharrar Compilation

Superintendent/Incharge Judicial Branch



①

**KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR**

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262

No. 1002/ST Dated 30/4/2024

To

The Director General Health,
Khyber Pakhtunkhwa Peshawar.

Subject

JUDGMENT IN SERVICE APPEAL NO. 2445/2023 TITLED MISS RASHIDA BEGUM - VERSUS- THE GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH SECRETARY HEALTH DEPARTMENT KHYBER PAKHTUNKHWA PESHAWAR AND OTHERS

Dear Sir,

I am directed to forward herewith a certified copy of order dated. 23.02.2024, passed by this Tribunal in the above mentioned service appeal for compliance.

Encl. As above.

(AAMIR FAROOQ KHATTAK)
ASSISTANT REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL,
PESHAWAR.

②

Service Appeals No.2445/2023, titled "Miss Rashida Begum-vs-The Government of Khyber Pakhtunkhwa through Secretary Health Services, Government of Khyber Pakhtunkhwa, Khyber Pakhtunkhwa, Peshawar and others" & 89/2024 titled "Mst. Najma Firdous-vs-Secretary Health Services, Government of Khyber Pakhtunkhwa, Khyber Road, Peshawar and others", decided on 23.02.2024 by Division Bench comprising Mr. Kalim Arshad Khan, Chairman, and Miss Fareeha Paul, Member, Executive, Khyber Pakhtunkhwa Service Tribunal Peshawar.

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR**

BEFORE: **KALIM ARSHAD KHAN ... CHAIRMAN**
FAREEHA PAUL ... MEMBER (Executive)

Service Appeal No.2445/2023

Date of presentation of appeal22.11.2023
Dates of Hearing.....23.02.2024
Date of Decision.....23.02.2024

Miss. Rashida Begum, Nurse (BPS-16) DHQ Teaching Hospital KDA, Kohat.....(*Appellant*)

Versus

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

Present:

Mr. Noor Muhammad Khattak, AdvocateFor appellant
Mr. Asif Masood Ali Shah, Deputy District Attorney.....For official respondents
Mr. Muhibullah Tarichvi, Advocate.....For private respondent

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974, AGAINST BOTH THE IMPUGNED ORDERS DATED 03.10.2023, WHEREBY THE APPELLANT HAS BEEN TRANSFERRED FROM DHQ HOSPITAL KOHAT TO DHQ HOSPITAL KARAK AND THROUGH SUBSEQUENT ORDER, THE APPELLANT HAS BEEN RELIEVED FROM HER POST AT DHQ HOSPITAL KOHAT AND AGAINST THE APPELLATE ORDER DATED 20.11.2023, WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED ON NO GOOD GROUNDS.

Service Appeal No.89/2024

Date of presentation of appeal05.01.2024
Dates of Hearing.....22.02.2024
Date of Decision.....22.02.2024

Mst. Najma Firdous, D/o Muhammad Suleman (RNO) (BPS-16), District Headquarter Hospital, KDA Kohat.....(*Appellant*)

Versus

1. **Secretary Health Services**, Government of Khyber Pakhtunkhwa, Khyber Road, Peshawar.
2. **Director General Health Services**, Khyber Pakhtunkhwa, Warsak Road, Peshawar.



CANNED
KPST
Peshawar

3. **Medical Superintendent,** District Headquarter Hospital, KDA, Kohat.....(**Respondents**)

Present:

Mr. Muhibullah Tarichvi, AdvocateFor appellant

Mr. Asif Masood Ali Shah, Deputy District Attorney.....For the respondents

.....
SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED ORDER DATED 03.10.2023 SERIAL NO.1 WHEREBY THE APPELLANT HAS BEEN TRANSFERRED FROM THE DHQ HOSPITAL KOHAT TO SHAHEED FARID KHAN DHQ HOSPITAL HANGU AGAINST THE VACANT POST.

.....
CONSOLIDATED JUDGMENT

KALIM ARSHAD KHAN CHAIRMAN: Through this single judgment this appeal and the connected service appeal No.89/2024 titled "Najma Firdous Vs. Secretary Health, Khyber Pakhtunkhwa, Peshawar & others" are decided as both the appeals have been filed by the appellants aggrieved from the same order and can, thus conveniently, be decided together.

2. According to the facts gathered from the record, the appellants were serving in the DHQ Teaching Hospital KDA Kohat. Appellant namely Rashida Begum was Charge Nurse (BPS-16) and appellant namely Najma Firdous (who is private respondent in service appeal No.1445/2023 filed by Rashida Begum) was Registered Nurse Officer (RNO) BPS-16. Both were serving in the same hospital. That due to misconceptions and some problems with each other, appellant Rashida Begum moved an application against Najma Firdous to respondent No.3, who directed a fact finding inquiry into the matter. That in the meanwhile the appellant (Rashida Begum) filed another complaint against Najma Firdous. Consequently, the competent authority, vide order dated 03.10.2023, transferred both the appellants from the said Hospital i.e. DHQ Hospital Kohat. Feeling aggrieved, the appellant of appeal No.2445/2023 (Rashida Begum) filed departmental appeal on 09.10.2023, which was rejected vide order dated 20.11.2023



and the appellant of appeal No.89/2024 (Najma Firdous) filed departmental appeal on 05.10.2023, which was not responded. Therefore, both filed the instant service appeals.

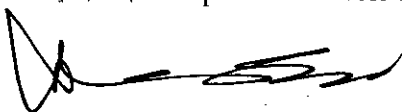
3. On receipt of the appeals and their admission to full hearing, the respondents were summoned. Respondents put appearance and contested the appeals by filing written replies raising therein numerous legal and factual objections. The defence setup was a total denial of the claim of the appellant.

4. We have heard learned counsel for the appellants and learned Deputy District Attorney for the respondents.

5. The learned counsel for the appellants reiterated the facts and grounds detailed in the memo and grounds of the appeal while the learned Deputy District Attorney controverted the same by supporting the impugned order(s).

6. From the record, it is evident that both the appellants were serving in the same hospital, wherein, due to their internal grudges, a complaint was made by one appellant against the other. In the matter, a fact finding inquiry was conducted, however, on the basis of complaint and their personal grudges, vide the impugned transfer order dated 03.10.2023, appellant Miss. Rashida Begum was transferred to DHQ Hospital Karak and the appellant Najma Firdous (who was also arrayed as private respondent in appeal No.2445/2023) was transferred to Shaheed Farid Khan DHQ Hospital, Hangu. Both filed departmental representations against the transfer order, however, appeal of Miss. Rashida Begum was rejected and the departmental appeal of Mst. Najma Firdous was not responded. The impugned transfer order was made on the basis of clashes/grudges between the appellants and seems to be a punishment because of the above.

7. This Tribunal in a case reported as 2012-PLC (CS) page-187 titled "Shamshad Begum Vs. The Chief Secretary Khyber Pakhtunkhwa" has already held that transfer of civil servant cannot be made on the basis of complaint which required a regular inquiry




in the matter because the transfer had not been mentioned as punishment in the penalty list in the rules & regulations regarding the conduct of civil servant. In the reply, the official respondents have contended that upon the complaint, inquiry was conducted and the appellants were transferred due to their grudges. The Department may proceed against the appellants under the relevant rules if it all they were found guilty of any misconduct which could not transfer the appellant solely as a punishment. Therefore, the impugned transfer order is not maintainable. In case the competent authority is of the view that the appellants had committed misconduct, which disturbed the discipline of service, the it may initiate disciplinary proceedings and transferring the appellant, was not a proper procedure covered under the Provincial Government, Posting/Transfer Policy.

8. As a resultant consequences, both the appeals are allowed and the impugned transfer order is set aside. The Competent Authority is, however, at liberty to initiate disciplinary proceedings against the appellants, if at all, it considers of any misconduct had been committed by the appellants. (Copy of this judgment be placed on file of Service Appeal No.89/2024 titled "Mst. Najma Firdous Vs. Government of Khyber Pakhtunkhwa"). Consign

8. *Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 23rd day of February, 2024.*


KALIM ARSHAD KHAN
Chairman


FAREEHA PAUL
Member (Executive)

Mutazem Shah

09.02.2024

Junior of learned counsel for the appellant present.
Dr. Khan Aksar, Principal Medical Officer alongwith Mr. Muhammad Jan, District Attorney for official respondents present.

Comments as well as receipt of payment of cost of Rs. 5000/- on behalf of respondents received through office. Copy of the comments handed over to junior of learned counsel for the appellant. To come up for arguments on 23.02.2024 before the D.B. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar

(Salah-ud-Din)
Member (J)

ORDER *Reem Amin**

23rd Feb. 2024

1. Learned counsel for the appellant and Mr. Asif Masood Ali Shah, Deputy District Attorney for official respondents present. Private respondent No.4 present through counsel.

2. Vide our consolidated judgment of today placed on file, the appeal is allowed and the impugned transfer order is set aside. The Competent Authority is, however, at liberty to initiate disciplinary proceedings against the appellant, if at all, it considers of any misconduct had been committed by the appellant. (Copy of the judgment be placed on file of Service Appeal No.89/2024 titled "Mst. Najma Firdous Vs. Government of Khyber Pakhtunkhwa"). Consign.

3. *Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 23rd day of February, 2024.*

(Farzeha Paul)
Member (E)

(Kalim Arshad Khan)
Chairman


26.01.2024

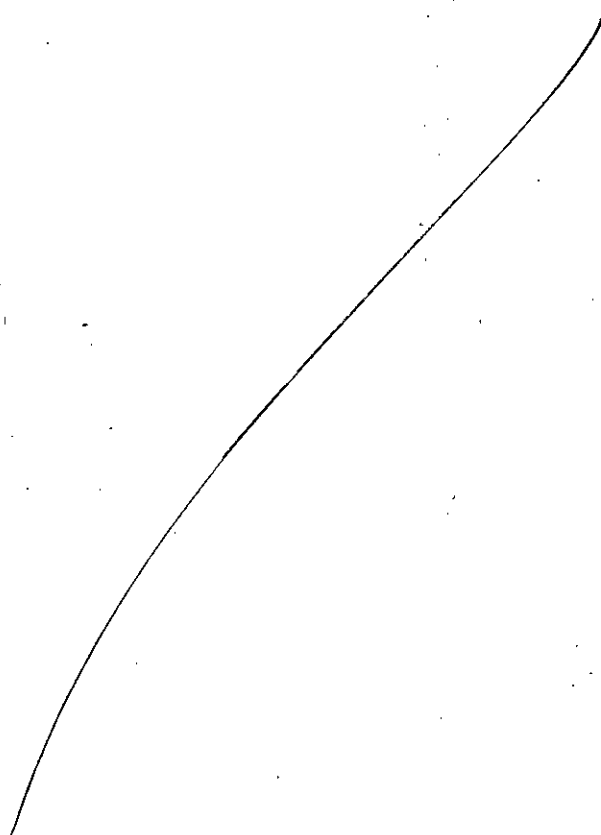
Junior of learned counsel for the appellant present. Mr. Khan Aksar, Principal Medical Officer alongwith Mr. Habib Anwar, Additional Advocate General for the respondents present.

Last opportunity was granted on the previous date for submission of reply/comments, however representative of the respondents is again seeking further time for submission of reply/comments. An opportunity is granted, however subject to payment of cost of Rs. 5000/-. Adjourned. To come up for submission of reply/comments as well as cost of Rs. 5000/- on 09.02.2024 before the S.B. Parcha Peshi given to the parties.

SCANNED
KOT
Peshawar

Naeem Amin


(Salan-ud-Din)
Member (J)



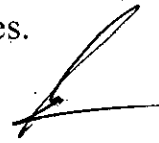
21st Dec, 2023

1. Clerk to counsel for the appellant present. Mr. Habib Anwar; Additional Advocate General alongwith Mr. Adil Shah, Junior Clerk for the respondent present.

2. Reply/comments on behalf of respondents not submitted. Representative of the respondents requested for time to submit reply/comments. Adjourned. To come up for reply/comments on

SCANNED
KPST
Peshawar

09.01.2024 before S.B. P.P given to the parties.




(Muhammad Akbar Khan)
Member (E)

kamrenullah

09.01.2024

Clerk of learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for official respondents present and sought further time for submission of reply/comments. Adjourned. Last opportunity given. To come up for reply/comments on 26.01.2024 before the S.B. Parcha Peshi given to the parties.

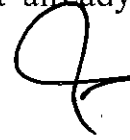
SCANNED
KPST
Peshawar


(Salah ud-Din)
Member (J)

Naeem Amin

come up for reply/comments on 13.12.2023 before S.B. P.P given to the learned counsel.

3. As to the application for suspension of the operation of the impugned order dated 03.10.2023, it is directed that the operation of the impugned order shall stand suspended to the extent of appellant if not already complied by the appellant.



(Kalim Arshad Khan)
Chairman

Mutazem Shah

13th Dec. 2023

1. Junior to counsel for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General alongwith Mr. Safiullah Focal Person for official respondents present. Nobody present on behalf of private respondent No.4, hence, placed ex-parte.

2. Request for adjournment was made by the learned AAG to submit reply on behalf of official respondents. Granted. To come up for reply/comments on 21.12.2023 before S.B. P.P given to the parties.



(Kalim Arshad Khan)
Chairman

Mutazem Shah

SCANNED
KUT
Peshawar

FORM OF ORDER SHEET

Court of _____

Appeal No. 2445 /2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	22/11/2023	

SCANNED
KPST
Peshawar

The appeal of Mst. Rashida Begum presented today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 04-12-2023 Parcha Peshai is given to the counsel for the appellant.

By the order of Chairman



REGISTRAR

4th Dec. 2023

1. Learned counsel for the appellant present and heard.
2. Against the impugned transfer order dated 03.10.2023, the appellant filed departmental appeal on 09.10.2023, which was rejected on 20.11.2023. The learned counsel submits that the appellant was transferred not only on administrative grounds but also on the basis of some complaint, whereas, posting/transfer could not be made as a punishment. The appeal is admitted to full hearing subject to all just and legal objections by the other side. Appellant is directed to deposit security fee within 10 days. The appellant shall also deposit the expenses of TCS for summoning the respondents, within seven days. To

11

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: Rashida Begum v/s Govt of KP

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: _____	✓	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	x	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	x	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	✓	
26	Whether copies of comments/reply/rejoinder submitted? On _____	✓	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____	✓	

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: 

Signature: _____

Dated: _____

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal NO. 2445 -P/2023

SCANNED
KPST
Peshawar

MISS RASHIDA BEGUM

VS

GOVT: OF KPK & OTHERS

INDEX

S. NO	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Service Appeal with affidavit	1-5
2.	Application for suspension	6
3.	Copy of the Final Warning	A	7
4.	Copies of the complaints	B	8-9
5.	Copies of inquiry and final report	C&D	10-11
6.	Copy of complaint	E	12-13
7.	Copies of the both the impugned orders	F&G	14-15
8.	Copy of the departmental representation and order dated 20/11/2023	H&I	16-17
9.	Notification & Transfer posting policy	J & K	18-22
10.	Copy of receipt	L	23
11.	Wakalat Nama	24

APPELLANT

THROUGH:

NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

13

1-

BEFORE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal NO. 2445 -P/2023

9346
22-11-2023

Miss Rashida Begum, Nurse (BPS-16)
DHQ Teaching Hospital KDA, Kohat.

..... **APPELLANT**

V E R S U S

1. The Government of Khyber Pakhtunkhwa through Secretary Health Department, Khyber Pakhtunkhwa, Peshawar.
2. Director General Health, Khyber Pakhtunkhwa, Peshawar. ✓
3. Medical Superintended DHQ Teaching Hospital KDA, Kohat.
4. Miss Najma Firdous, Charge Nurse, Shaheed Farid Khan DHQ Hospital Hangu.

..... **RESPONDENTS**

SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974 AGAINST BOTH THE IMPUGNED ORDERS DATED 03/10/2023, WHEREBY THE APPELLANT HAS BEEN TRANSFERRED FROM DHQ HOSPITAL KOHAT TO DHQ HOSPITAL KARAK AND THROUGH SUBSEQUENT ORDER, THE APPELLANT HAS BEEN RELIEVED FROM HER POST AT DHQ HOSPITAL KOHAT AND AGAINST THE APPELLATE ORDER DATED 20/11/2023, WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REGRETTEED ON NO GOOD GROUND.

PRAYER:-

That on acceptance of the instant service appeal, the impugned transfer order dated 03/10/2023 of respondent No 2 and impugned relieving order dated 03/10/2023 of respondent No 3 and appellate order dated 20/11/2023 may very kindly be set aside and the respondents may kindly be directed, not to transfer the appellant from DHQ Hospital Kohat. Any other remedy which this august Tribunal deems fit that may also be awarded in favour of the appellant.

23/11/23

R/SHEWETH:
ON FACTS:

Respectfully Sheweth:

Facts arising for the institution of instant service petition are as under:-

- 1- That the Appellant is the employee of the respondent department and performing her duties as Charge Nurse DHQ Teaching Hospital KDA, Kohat quite efficiently and to the entire satisfaction of her superiors and no complaint whatsoever made against the Appellant.
- 2- That the respondent No 3 vide letter dated 15/02/2023 issued a Final Warning to private respondent as the private respondent misbehaved with her colleagues and created problems in the Nursing Hostel. Copy of the Final Warning is attached as annexure.....**A**
- 3- That the Appellant alongwith her other colleagues moved a complaint to the respondent No 3 vide dated 03/04/2023 against the aggressive, assailing and misbehavior of the private respondent, further the Appellant moved another complaint against the same belligerent behavior of the private respondent. Copies of the complaints are attached as annexure.....**B**
- 4- That in response to the above complaints, the respondent No 3 through Office Order dated 28/03/2023 initiated a Departmental Inquiry and constituted an Inquiry Committee to probe into the matter, whereafter the Inquiry Committee submits his final report. Copies of office order and Inquiry report are attached as annexure.....**C&D**
- 5- That it is important to mention here that the Appellant and her colleagues once again filed a complaint vide dated 22/06/2023 against the abusive behavior of private respondent. Copy of complaint is attached as annexure.....**E**
- 6- That it is pertinent to mention here that upon the various complaints of the Appellant and her colleagues, inspite to solve the problems facing by the Appellant and her colleagues from the belligerent behavior of the private respondent, astonishingly, the respondents issued the impugned transfer order dated 23/10/2023 of Appellant on administrative grounds whereby the Appellant has been transferred from DHQ Teaching

Hospital Kohat to DHQ Hospital Karak, whereafter the respondent No 3 through subsequent impugned office order dated 23/10/2023, relieved the Appellant from the post of Charge Nurse DHQ Teaching Hospital KDA Kohat. Copies of the both the impugned orders are attached as annexure.....**F&G**

7- That feeling aggrieved from impugned orders, the Appellant preferred departmental representation, which was regretted vide impugned order dated 20/11/2023. Copy of the departmental representation and order dated 20/11/2023 are attached as annexure.....**H&I.**

8- That Appellant aggrieved from the impugned transfer order and having no other remedy preferred the instant service appeal on the following grounds:-

GROUND:

A- That both the impugned transfer orders dated 03/10/22023 & appellate order dated 20/11/2023 being contrary to law and rules, hence not tenable in the eye of Law and needs interference of this Honorable Court to be set aside.

B- That Appellant has not been treated by the respondent department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.

C- That the treatment meted out to the Appellant is highly discriminatory and in clear violation of the notification of the Election Commission of Pakistan as mandated under Articles 218 (3), 220 of the Constitution of Islamic Republic of Pakistan. Copies of Notification & Transfer posting Policy are attached as Annexure.....**J & K.**

D- That the treatment meted out to the Appellant is a clear violation of the Fundamental Rights of the Appellants as enshrined in the Constitution of Pakistan 1973.

E- That both the impugned orders are also violative of Rules 12 of Appointment, Promotion & Transfer Rules, 1989.

F- That as the children of the Appellant were admitted in Army Public School Kohat Cantt and through impugned orders, the Appellant has been transferred to DHQ Hospital Karak and in District Karak, there is no Army Public School, so to admit the

16
-4-

children of the Appellant to continue their schooling. Copy of receipt is attached as annexure.....L

- G-** That the Appellant seek permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.


APPELLANT

THROUGH:


**NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT**


UMAR FAROOQ MOHMAND


WALEED ADNAN


**MAHMOOD JAN
ADVOCATES HIGH COURT**

VERIFICATION:

It is verified that no other earlier Service Appeal was filed between the parties.


DEPONENT

17
-5-

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

CM NO. _____ -P/2023

In

Service Appeal NO. _____ -P/2023

MISS RASHIDA BEGUM

VS

THE GOVT: OF KPK & OTHERS

AFFIDAVIT

I, Miss Rashida Begum, Nurse (BPS-16) DHQ Teaching Hospital KDA, Kohat, do hereby solemnly affirm that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.




DEPONENT

18
-6-

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

C.M NO. _____-P/2023

In

Service Appeal NO. _____-P/2023

MISS RASHIDA BEGUM

VS

THE GOVT: OF KPK & OTHERS

APPLICATION FOR SUSPENSION OF OPERATION OF BOTH THE IMPUGNED ORDERS DATED 03/10/2023, WHEREBY THE APPELLANT HAS BEEN TRANSFERRED FROM DHQ HOSPITAL KOHAT TO DHQ HOSPITAL KARAK AND THROUGH SUBSEQUENT ORDER, THE APPELLANT HAS BEEN RELIEVED FROM HER POST AT DHQ HOSPITAL KOHAT, TILL THE DISPOSAL OF THE MAIN APPEAL.

R/SHEWETH:

- 1- That the above mentioned appeal along with this application has been filed the appellant before this august Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above mentioned appeal against both the impugned orders dated 03/10/2023, whereby the appellant has been transferred from DHQ Hospital Kohat to DHQ Hospital Karak and through subsequent order, the appellant has been relieved from her post at DHQ Hospital Kohat.
- 3- That all the three ingredients necessary for the stay is in favor of the appellant.
- 4- That both the impugned orders dated 03/10/2023 had been issued by the respondents in utter disregard of law and prevailing Rules.

It is therefore, most humbly prayed that on acceptance of this application the operation of both the impugned orders dated 03/10/2023 may very kindly be suspended till the disposal of the above mentioned service appeal.

THROUGH:

APPLICANT

NOOR MOHAMMAD KHATTAK
ASC

19

7-

"A" 6

OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KDA KOHAT

No. 134 / PF

Date Kohat the 15 / 02 / 2023

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

Subject: FINAL WARNING

Memo: It has been brought into the notice of the undersigned that you've misbehaved with your working colleagues by using abusive language, bullying them via character assassination and showing rowdyism and disruptive behavior in the nursing hostel. Further, you have shown no regret and also used harsh words for the hospital management as well.

Moreover, it has also been reported that in contradiction to the hostel rules you are allowing male persons to visit you in the Nursing Hostel.

Your consistent violation and defiance of the Medical Superintendent Orders is not acceptable. Therefore, consider this letter as a warning to refrain from such activities forthwith, improve your behavior and familiarize yourself with the hospital policies and do your best to comply with them. As you are aware that this institution is extremely particular with rules and regulations and anyone who fails to adhere to them, the office will not hesitate in taking strict actions against them. Take this as a final warning and appropriate disciplinary action will be proceeded against you according to service rules for misconduct, if the same is noticed at any time in future.

[Signature]
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT

Encl: No. and Date Even:

Copy forwarded to the:

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. Regional Director Health Services (South) Khyber Pakhtunkhwa.
3. Deputy Medical Superintendent (Admin) DHQ Teaching Hospital KDA Kohat for information.
4. Provost DHQ Teaching Hospital KDA Kohat for information.
5. Nursing Superintendent DHQ Teaching Hospital KDA Kohat for information.

[Signature]
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT

~~ATTESTED~~

ADD. ATTESTE
[Signature]
TUS Copy

**OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KDA KOHAT**

No. 654/PF

Dated Kohat, the 15/02/2023

To

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

Subject:- **FINAL WARNING**

Memo:

It has been brought into the notice of the undersigned that you've misbehaved with your working colleagues by using abusive language, bullying them via character assassination and showing and disruptive behavior in the Nursing Hostel. Further, you have shown no regret and also used harsh words for the hospital management as well.

Moreover, it has also been reported that in contradiction to the hostel rules you are allowing male persons to visit you in the Nursing Hostel

Your consistent violation and diligence of the Medical Superintendent Orders is not acceptable. Therefore, consider this her as a warning to refrain from such activities forthwith, improve your behavior and familiarize yourself with the hospital and do your best to comply with them. As you are aware that this Institution is extremely particular with rules and regulations and anyone who falls to adhere to them, the office will not hesitate in take strict actions against them, Take this as a final warning and appropriate disciplinary action will be proceeded you according to service rules for misconduct, if the same is noticed at any, time in future.

Medical Superintendent
DHQ Teaching Hospital
Kohat

Endst: No. and Data Even

Copy forwarded to the

1. Director General Health Services Cyber Pakhtunkhwa Peshawar.
2. Regional Director Health Services (South) Khyber Pakhtunkhwa.
3. Deputy Medical Superintendent (Admin) DHQ Teaching Hospital KDA Kohat for Information
4. Provost DHQ Teaching Hospital KDA Kohat for information.
5. Nursing Superintendent OHO Teaching Hospital KDA Kohat for Information

ATTESTED

MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT

"B"
-8-

A-4

To
The medical superintendent
Dhq hospital kda kohat

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

Respected sir,

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

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

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

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

Date 3-4-023

Sincerely and regards

RNO's of nursing hostel

RNO KASHIDA Hibbas - RASHID

RNO - KASHIDA Begum - RASHID

RNO SHABNAM - JALIB

~~RNO KASHIDA Hibbas - RASHID~~

RNO Saira Naz - RASHID

RNO Yasmeen - JALIB

RNO Gulshan Hameeda - RASHID

RNO - Shazia Sadiq - SHIBBI
RNO - RIBI HARYA - RASHID

RNO Nahed Akbar - RASHID

RNO - FORZIA - JALIB

RASHID

ATTESTED

ATTESTED
Copy

To

The Medical Superintendent
DHQ Hospital KDA Kohat

Subject: REPORTING AGAINST AGGRESSIVE AND ASSAILING
BEHAVIOR OF R/N NAJAM FRIDOUS

Respected sir,

I would like to bring into your kind consideration of hostile behavior of one of our colleague Najam Firdous, she has violent and rude behavior, she always misbehaves using very rough tone language with derogatory remarks at hostel with each and everyone one. Her marriage sister and nice are residing in hostel with her (has no concern with hospital or health department) have violent sometimes beat them up, recently she and her sister sneak into our colleagues room abused her and beat her.

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

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

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

Your obediently and regards

~~ATTESTED~~

-9-

8

To

The Medical Superintendent
DHQ Teaching Hospital KDA Kohat.

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

Respected Sir,

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

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

I shall be thankful,

Yours truly,

Rashida Begum

Ms. Rashida Begum
Charge Nurse
DHQ Teaching Hospital KDA Kohat

*D. Naeem Shah Chairman
W. Muneer member
W. Talib member
are nominated to conduct
Fact finding inquiry and
submit the report with the
copy to proceed
Acer*

Dated: 27/03/2023

*Call both
Miss Najma
Ms. Rashida*

*Permitted
on 28/3/23*

ATTESTED
to be true Copy

28
20

24

"C" - 10 - B - ①

OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KDA; KOHAT

OFFICE ORDER

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

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

SD/-
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT

No. 1207 /K-18

Dated Kohat the 28 /03/2023

Copy forwarded to the:-

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

ATTESTED

ATTESTED
to be *[Signature]* Copy

[Signature]
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT

"D"

-11-

(19)

D-

Dated Kohat the: 03/04/2023

INQUIRY REPORT

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

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

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

[Signature]
 Member
 Dr. Musarat Ali
 MLO / PMO
 DHQ Teaching Hospital
 Kohat
 Principal Medical Officer
 DHQ Teaching Hospital
 Kohat

[Signature]
 Member
 Dr. Syed Tanir Shah
 DMS (Coord:)
 DHQ Teaching Hospital
 Deputy Medical Superintendent
 DHQ Teaching Hospital Kohat

[Signature]
 Chairman
 Dr. Naeem Shah
 DMS (Estab: / HR)
 DHQ Teaching Hospital
 Deputy Medical Superintendent
 DHQ Teaching Hospital Kohat

[Signature]

ATTESTED
[Signature]

"E" -12-

Date

④ 47

22/06/2023

To

The Medical Superintendent
DHO. KDA Hospital.

Respected Sir

With due respect I beg to say that we are living in nursing hostel. At our hostel one Rno Najma Firdoos she is disturbing all the nurses hostel. She have living one married sister in this hostel & her kids some time when the Najma own duty her sister "Shazia" she is disturbing the nurses. She tears the uniforms, broke the kitchen items etc. The both sis tomuch disturbed the nursing hostel. The both sisters abusing the nurses. Kindly we request you please Rno Najma separate from us in hostel because we are very mently upset from this girl. Our male visitors specially our husband when they came on vaccation. please allow our husband to meet us in nursing hotel. Because our husbands are govt serrant. if we found the out side house for us. How to we manage with out male in private house please kindly solve our problems. we are sure inshallah you will solve our problems.

Thanks.

List of Register Nurses Officer

- | | | |
|---|-----------------|------|
| ① | Asia | Asia |
| ② | Rashida Begum | R |
| ③ | Gulshan Hameeda | G |
| ④ | Rashida Abbas | R |
| ⑤ | Fouzia | F |
| ⑥ | Shabnum | S |
| ⑦ | Naheed | N |
| ⑧ | Yasmin | Y |
| ⑨ | Saira Naz | S |
| ⑩ | Saira Noreen | S |
| ⑪ | Shazja Sadiq | S |

All the nurses agree with-

This application.

REGISTERED

-14- "F" 12



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to The Director General Health Services Peshawar and not to any official by name
Office: (011) 921-2410/2411/2412/2413/2414/2415/2416/2417/2418/2419/2420/2421/2422/2423/2424/2425/2426/2427/2428/2429/2430/2431/2432/2433/2434/2435/2436/2437/2438/2439/2440/2441/2442/2443/2444/2445/2446/2447/2448/2449/2450/2451/2452/2453/2454/2455/2456/2457/2458/2459/2460/2461/2462/2463/2464/2465/2466/2467/2468/2469/2470/2471/2472/2473/2474/2475/2476/2477/2478/2479/2480/2481/2482/2483/2484/2485/2486/2487/2488/2489/2490/2491/2492/2493/2494/2495/2496/2497/2498/2499/2500

OFFICE ORDER

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

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

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

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

No 5717-25 /E.II. Dated Pesh The 03/10/2023.

Copy forwarded to the:-

- 01. Medical Supdt: DHQ Hospital Kohat for information w/r to his letter No.654/PF dated 15.02.2023
- 02. Medical Supdt: DHQ Hospital Karak.
- 03. District Health Officer Kohat for information w/r to his letter No.3606/DHO/Kohat dated 25 09.2023.
- 04. Medical Superintendent Shaheed Farid Khan DHQ Hospital, Hangu.
- 05. District Account Officer, Kohat.
- 06. District Account Officer, Hangu
- 07. District Account Officer, Karak.
- 08. Registered Nurse Officer concerned.
- 09. DA-concerned, DGHS KP Peshawar.

For information and necessary action.

est- Secy / Act Secy
done w/ful Acti
pleased

[Signature]
ADDI: DIRECTOR (NURSING)
DIRECTORATE GENERAL HEALTH SERVICES, KP PESHAWAR
2/10/2023

[Signature]
3/10/2023

ATTESTED

-15- "9" (11)

OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KDA; KOHAT

OFFICE ORDER

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

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

SD/-
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT

No. 4115-23/PFDated Kohat the 03/10/2023

Copy forwarded to the:-

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

For information and further necessary action.

M. Mithay
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT

ATTESTED**ATTESTED**

-16-

بھنخور جناب ڈائریکٹر جنرل صاحب ہیلتھ پشاور

"H" (16)

درخواست، برادرین انصاف فراہم کرنے سا نکلہ بوجہات ذیل

جناب عالی! سا نکلہ حسب ذیل عرض رساں ہے۔

۱۔ یہ کہ سا نکلہ ایک معزز اور عزت دار گھرانے سے تعلق رکھتی ہے اور اپنی سرورس کے دوران کسی بھی بالا آفیسر کو شکایت کا موقع تک نہ دیا۔

۲۔ یہ کہ سا نکلہ و نچرہ فردوس کیساتھ کسی بات پر لڑائی ہوئی اور نچرہ فردوس اور اسکی بہن شازیہ بی بی نے سا نکلہ سے لڑائی جھگڑا ہوا۔ اسی بات سا نکلہ نے اپنے آفیسر MS صاحب DHQ ہسپتال میں درخواست گزار دی جس پر واقعہ کا نوٹس لیتے ہوئے ایک کمیٹی مقرر کی گئی۔ اور مذکورہ کمیٹی میں مخالف پارٹی یعنی نچرہ فردوس کو بھی مریض (Psychiatrist Patient) بنا کر اس کے خلاف کوئی کارروائی نہ کی گئی جبکہ نچرہ فردوس کے خلاف اس پہلے بھی ٹیکہ میں باقی اسٹاف سے روایہ ٹھیک نہ ہونے کی وجہ سے کافی Warning دی گئی۔ اور اس قبل بھی Administrator صاحبان سے تلخ کلامی ہوئی ہے۔

۳۔ یہ کہ نچرہ فردوس جو کہ سیاسی اثر و سونخ کی حامل ہے اور بھنخور کسی وجہ کے سا نکلہ کے خلاف کارروائی کر کے سا نکلہ کو ہراسنہ کر گیا۔ بعد از ہر وہ فریقین کے مابین راضی نامہ ہوا۔ لیکن نچرہ فردوس کی دماغی حالت ٹھیک نہ ہونے کی وجہ سے باقی اسٹاف سے لڑائی جھگڑا کرتی رہی۔ بعد از DG ہیلتھ پشاور سے ایک اور انکوائری مقرر کی گئی اور اس میں بھی بلا وجہ سا نکلہ کو نشانہ بنایا گیا اور اس کے خلاف قانونی کارروائی کی گئی۔

۴۔ یہ کہ سا نکلہ کا اب ٹرانسفر ضلع کرک میں ہوا ہے جبکہ سا نکلہ کے بچے زیر تعلیم کوہاٹ APS سکول میں ہیں اور ضلع کرک میں APS سکول نہ ہونے کی وجہ سے سا نکلہ کے بچوں تعلیم کے زیور سے محروم ہو سکتے ہیں۔ لہذا سا نکلہ کو ٹرانسفر واپس کوہاٹ میں کیا جائے یا پھر دوبارہ بی انکوائری کر کے سا نکلہ کو انصاف فراہم کیا جائے۔

نوٹ: (نقل نقولات ہمراہ درخواست لف ہیں)۔

لہذا استدعا کی جاتی ہے کہ حسب مضمون درخواست منظور فرمائی جا کر مشکور فرمائیں۔

مورخہ ۱۵-۹-۲۰۲۳

رضیہ بیگم چارجز DHQ کوہاٹ

D/o Chahar Sada, G.P.O.

ATTESTED
TO BE THE CLERK

ATTESTED

"I" -17-



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

All communications should be addressed to the Director General
Health Services, Peshawar and not to any other office.
The Director General Health Services, Peshawar, P.O. Box 197, Peshawar, P.K.

No. 6374

16/11 Dated Pesh the

27/11/2023

To


The Medical Superintendent
DHQ Hospital Kohat

Subject
Memo:-

APPEAL

Reference to the subject noted above and state that the request for
cancellation of transfer order in respect of Mrs. Rashida Begum RNO BS-16 DHQ
Hospital Kohat under transfer to DHQ Hospital Karak is hereby regretted

Please direct the above RNO concerned to report for duty at DHQ
Hospital Karak immediately


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

15/11/23

ATTESTED

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

NO 6394/E-III, Dated Pesh: The 20/11/2023

To

The Medical Superintendent
DHQ Hospital, Kohat

Subject:- **APPEAL**

Reference to the subject noted above and state that the request for cancellation of transfer order in respect of Mrs. Rashida Begum RNO BS-16 DHQ Hospital Kohat under transfer to DHQ Hospital Karak is hereby regretted.

Please direct the above RNO concerned to report for duty at DHQ Hospital Karak immediately.

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

ATTESTED

35
"J"-18-
ELECTION COMMISSION OF PAKISTAN
NOTIFICATION

Islamabad the 22nd January, 2023

F.No.2(1)/2023-Cord.- WHEREAS, the Provincial Assemblies of Punjab and Khyber Pakhtunkhwa under Article 112 of the Constitution of the Islamic Republic of Pakistan stand dissolved on 14th and 18th January, 2023 respectively.

AND WHEREAS, the Election Commission of Pakistan is mandated with the constitutional duty to organize and conduct elections in terms of Article 218(3) of the Constitution and to make such arrangements as are necessary to ensure that the elections are conducted honestly, justly, fairly and in accordance with the law and that corrupt practices are guarded against;

AND WHEREAS, it has become imperative that the Election Commission shall take all necessary steps under the Constitution and prevalent law for smooth conduct of General Elections to the Provincial Assemblies of Punjab and Khyber Pakhtunkhwa.

NOW THEREFORE, in exercise of the powers conferred upon it under Articles 218(3), 220 of the Constitution of the Islamic Republic of Pakistan, Sections 4, 5, 8(c) read with Section 230 of the Elections Act, 2017 and as supported by the Workers' Party case through Akhtar Hussain Advocate, General Secretary and 6 others Versus Federal of Pakistan and 2 others reported in PLD 2012 SC 681, and all the other powers enabling it in that behalf, the Election Commission of Pakistan, to ensure transparent election and to provide a level playing field for all contesting candidates and political parties, hereby directs the Caretaker Governments of Punjab and Khyber Pakhtunkhwa:-

- (a) To assist the Election Commission to hold elections in accordance with law as provided under section 230(1)(b) of the Elections Act, 2017.
- (b) To ensure the compliance of all the notifications, directives and the provisions as laid down in Section 230 of the Act *ibid*.
- (c) Not to post or transfer any public official after the issuance of this notification within and to / from Punjab & Khyber Pakhtunkhwa without prior approval in writing of the Election Commission as laid down in Clause 2(f) of Section 230 of the Elections Act, 2017.
- (d) Ensure that all kinds of recruitments in any Ministry, Division, Department or Institution under the Provincial Governments and Local Governments of Punjab and Khyber Pakhtunkhwa are banned with immediate effect, except recruitments by the Provincial Public Service Commissions and those government organizations where test / interviews have already been conducted before this day.
- (e) Not to announce / execute any kind of Development Schemes in Punjab and Khyber Pakhtunkhwa Provinces except those which are ongoing and approved before the issuance of this notification. Moreover, the Provincial Governments and Local Governments of Punjab and Khyber Pakhtunkhwa shall not issue tenders of such schemes till culmination of General Elections of both Assemblies.

Contd...Page-2

Commission of Pakistan

ATTESTED

CS CamS

ATTESTED
to be true
ATTEST

- (f) All development funds relating to Local Government institutions of Punjab and Khyber Pakhtunkhwa and Cantonment Boards falling in the jurisdiction of Punjab and Khyber Pakhtunkhwa shall stand frozen with immediate effect till announcement of results of the said General Elections.
- (g) To ensure immediate termination of services of all heads of the institutions appointed on political basis and to send their lists to the Commission forthwith.
- (h) To ensure vacation of the government residential facilities from Ex-Chief Ministers and their advisors, Ex-Provincial Ministers and Ex-Members of the Provincial Assemblies of Punjab and Khyber Pakhtunkhwa, besides ensuring withdrawal of official vehicles from them. Furthermore, the dignitaries shall be provided security / protocol as per their entitlement and any extra deployment of security / protocol be withdrawn from them forthwith.
- (i) The Caretaker Governments shall perform their functions and attend to day-to-day matters which are necessary to run the affairs of the Provinces in accordance with law.
- (j) The Chief Minister or a Minister or any other member of Caretaker Governments shall, within three days from the date of assumption of office, submit to the Commission, a statement of assets and liabilities including assets and liabilities of his spouse and dependent children as on the preceding 30th day of June on Form B.

This Issues with the approval of Election Commission of Pakistan.

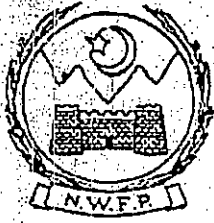
(Omar Hamid Khan)
Secretary

Election Commission of Pakistan

ATTESTED

CS CamScanner

ATTESTED
10/12/2013



35
-20-
K
E

GOVERNMENT OF NWFP
ESTABLISHMENT & ADMINISTRATION
DEPARTMENT
(Regulation Wing)

POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT.

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posing/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
- v) { }
vi) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, NWFP needs to be obtained
- ¹While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP needs to be obtained. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor NWFP shall be obtained.
- vi (a) All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for atleast eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.
- viii) No posting/transfers of the officer's/officials on detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- x) All the posting/transferring authorities may facilitate the posting/transfer of the unmarried female government Servants at the station of the residence of their parents.

~~ATTESTED~~

ATTESTED

Para-1(v) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No: SOR-VI (E&AD) 1-4/2008/Vol-VI, dated 3-6-2008. Consequently authorities competent under the NWFP Government Rules of Business, 1985, District Government Rules of Business 2001, Posting/Transfer Policy and other rules for the time being in force, allowed to make posting/transfer subject to observance of the policy and rules. Added vide Urdu circular letter No. SOR-VI(E&AD)1-4/2003, dated 21-09-2004

36

-21-

17

- xi) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement
 DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales;
- xii) In terms of Rule-17(1) and (2) read with Schedule-III of the NWFP Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column 2 thereof:

Outside the Secretariat		
1.	Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above.	Chief Secretary in consultation with Establishment Department and Department concerned with the approval of the Chief Minister.
2.	Other officers in BPS-17 and above to be posted against scheduled posts, or posts normally held by the APUG, PCS(EG) and PCS(SG).	-do-
3.	Heads of Attached Departments and other Officers in B-19 & above in all the Departments.	-do-
In the Secretariat		
1.	Secretaries	Chief Secretary with the approval of the Chief Minister.
2.	Other Officers of and above the rank of Section Officers: a) Within the Same Department b) Within the Secretariat from one Department to another.	Secretary of the Department concerned. Chief secretary/Secretary Establishment.
3.	Officials up to the rank of Superintendent: a) Within the same Department b) To and from an Attached Department c) Within the Secretariat from one Department to another	Secretary of the Department concerned. Secretary of the Dept in consultation with Head of Attached Department concerned. Secretary (Establishment)

- xiii) While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:
- a) To ensure the posting of proper persons on proper posts, the Performance Evaluation Report/annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered.
- b) Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.

ATTESTED

Added vide Urdu circular letter No: SOR-VI (E&AD)/1-4/2005, dated 9-9-2005.

ATTESTED

xiv) Government servants including District Govt. employees feeling aggrieved due to the orders of posting/transfer authorities may seek remedy from the next higher authority / the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/ transfer orders could be exercised only in the following cases.

- i) Pre-mature posing/transfer or posting transfer in violation of the provisions of this policy.
- ii) Serious and grave personal (humanitarian) grounds.

2. To streamline the postings/transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the North West Frontier Province District Government Rules of Business 2001 read with schedule - IV thereof is referred. As per schedule-IV the posting/transferring authorities for the officers/officials shown against each are as under:-

S. No.	Officers	Authority
1.	Posting of District Coordination Officer and Executive District Officer in a District.	Provincial Government.
2.	Posting of District Police Officer.	Provincial Government
3.	Other Officers in BPS-17 and above posted in the District.	Provincial Government
4.	Official in BPS-16 and below	Executive District Officer in consultation with District Coordination Officer.

3. As per Rule 25(2) of the Rules mentioned above the District Coordination Department shall consult the Government if it is proposed to:

- a) Transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure.
- b) Require an officer to hold charge of more than one post for a period exceeding two months.

4. I am further directed to request that the above noted policy may be strictly observed /implemented.

All concerned are requested to ensure that tenures of the concerned officers/officials are invariably mentioned in summaries submitted to the Competent Authorities for Posting/Transfer.

{Authority: Latter No: SOR-VI/E&AD/1-4/2003 dated 24-6-2003}.

It has been decided by the Provincial Government that posting/transfer orders of all the officers up to BS-19 except Heads of Attached Departments irrespective of grades will be notified by the concerned Administrative Departments with prior approval of the Competent Authority obtained on the Summary. The Notifications/orders should be issued as per specimen given below for guidance.

All posting/transfer orders of BS-20 and above and Heads of Attached Departments (HAD) shall be issued by the Establishment Department and the Administrative Departments shall send approved Summaries to E&A Department for issuance of Notifications.

ATTESTED

ATTESTED
BY THE COPY

Parents Copy

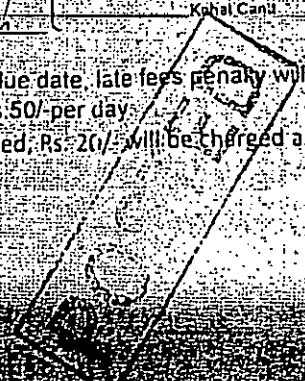
ARMY PUBLIC SCHOOL & COLLEGE
KOHAT CANTT

Allied Bank Bannu Road Branch Kohat A/C No: 00100173994240040		Bank AL Habib Ltd Collection A/C # 0080-901156-01 (Collecting Branches of KPK)	
Admission No		14006	
Class	6th-F(B)	Name	Muhammad Alyan
Cal	FC(S)	Billing Month	Oct-23
Issue date: 1 Oct 23		Due date: 20th of every month	

Ser	Nature of Fee / Fund	Amount
1	Admission Fee	0
2	Security Fee	0
3	Tuition Fee	1310
4	Exam Fund (Six Monthly)	0
6	Science Fund	50
7	Ribbon / Cards	0
7	Bank Chalan	0
8	Computer Fund	50
9	News Letter / P/Files	0
11	Misc Fund	558
TOTAL		1968
12	Late Fee	0
13	Arrear	0
Fee to be deposited		1968

Bank Cashier: 
 Accountant: 
 Army Public School & College
 Kohat Cantt

- Note:
1. Submission of fees after due date, late fees penalty will be imposed in next fee bill @ Rs.50/- per day.
 2. If Fee Bill is lost or damaged, Rs. 20/- will be charged as duplicate Fee Bill.



ATTESTED

ATTESTED

Handwritten marks: a circled 'A' and a signature.

Handwritten text: '-23-' and '"K"'

Handwritten number: '38'

4139

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

SERVICE APPEAL NO. 2445/2023

**SCANNED
KPST
Peshawar**

Rashida Begum.....Appellant

2/2/24

Versus

Government of Khyber Pakhtunkhwa & others**Respondents**

Index

S. No.	Description	Annexure	Pages No.
1	Comments		1-2
2	Order dated 04/05/2007	A	3-5
3	Letter dated 03/04/2008	B	6-23
4	Inquiry Report	C	24-28
5	Office Order dated 03/10/2023	D	29-31
6	Office Order dated 14/11/2023	E	32
7	Notification dated 15/12/2023	F	33
8	Affidavit		34
9	Authority letter		35

09.2.24

Peshawar

40
BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,
PESHAWAR.

2/2/24

Service Appeal.No.2445-P/2023.

Miss Rashida Begum, Nurse (BPS-16)

DHQ Teaching Hospital KDA Kohat.....Appellant

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 10976

Dated 02-02-2024

VERSUS

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

Comments on behalf of Respondents No.1to3.

Preliminary Objections.

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

RESPECTFULLY SUBMITTED.

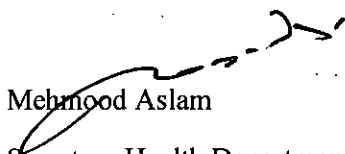
1. Correct to the extent that the Appellant was appointed by respondent No.2 as Charge Nurse BPS-16 vide office order No:11727-883/E.II,Dated Pesh.The 04-05-2007 at Serial No:47. Ever since appointment she is posted at DHQ Kohat.(Annex-A)
Regarding of Appellant efficiency and complaint; she has been remained unsatisfactory and multiple times absenteeism from duties in her entire service. (Annex-B)
2. Incorrect. The final warning was issued to respondent No.4 on 15.02.2023 by respondent No.3 who was staff nurse at that time in DHQ Hospital Kohat for misbehaving, bullying and allowing male persons to visit her in the Nursing Hostel.
3. Correct upto the extent that respondent No.3 constitute an inquiry committee vide office order No.1207/k-18 Dated.28/03/2023 in response of complaint launched by appellant against respondent No.4 Mst. Najma Firdous Charge Nurse for their conflict on entertaining the outsiders/ relatives in the Nursing hostel violating the hostel rules.
4. Correct. The inquiry committee submitted report to respondent No.3on 03/04/2023 by mentioning last warning and cancellation of hostel allotment to appellant for keeping illegal residents her hostel room.(Para 8 Inquiry Report Anexx-C)
5. Correct. Respondent No.4 had launched appeal for re-inquiry to Respondent No.2 who had constituted inquiry against Appellant and Respondent No.4.
6. Incorrect. The appellant and Respondent No.4 had exercising quarrels and abusive languages on many occasions.During inquiry proceedings on 16th September 2023, Deputy Medical Superintendent on duty at Night Shift submitted an incident report of quarrel between nurses of the hostel especially appellant and Respondent No.4 and in continuation of the incident report Deputy Medical Superintendent on duty at Evening shift on 17/09/2023 write letter to SHO Police station KDA for Police contingents especially Ladies Police for evacuation of outsider and illegal occupants from hostel.


41
On recommendation of inquiry report Respondent No.2 who is the competent authority issued transfer order of Appellant and Respondent No.4 on administrative ground.(Copies attached as Annex-D)

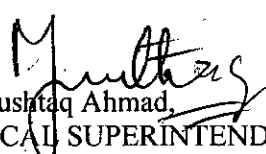
7. Correct.
8. Incorrect. The appellant had not resumed duty in joining time and reports for non compliance has been submitted to Respondent No.2. by Medical Superintendent DHQ Hospital Karak vide Letter No.2237/Admn/DHQH/KK Dated 14/11/2023. (Copy attached as Annex-E)

GROUNDS:

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


Mehmood Aslam
Secretary Health Department,
Government of Khyber Pakhtunkhwa.
Respondent No-1.


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


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

42

A

1

**DIRECTORATE GENERAL HEALTH
SERVICES, NWFP, PESHAWAR.**

OFFICE ORDER.

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

S.No.	Name	From	To	Remarks
1.	Bibi Ajmeena D/O Abbns Khan	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
2.	Rehm-un-Nisa D/O Ajab Khan	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
3.	Farhat Bibi D/O Abdul Wahid	Ist. Appointment	DHQ Teaching Hospital DIKhan	Against the vacant Post.
4.	Aneela Gul D/O Ghulam Muhammad	Ist. Appointment	DHQ Teaching Hospital, DIKhan	Against the vacant Post.
5.	Janet Rose D/O Pervaz Akhtar	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
6.	Shazia Aslam D/O Muhammad Aslam Khan	Ist. Appointment	Mufti Mehmood Teaching Hospital DIKhan	Against the vacant Post.
7.	Shazia Bibi D/O Ghulam Asghar	Ist. Appointment	DHQ Teaching Hospital, DIKhan	Against the vacant Post.
8.	Jane Rose D/O Pervaz Akhter	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
9.	Uzma Atta D/O Atta Muhammad	Ist. Appointment	City Hospital, Lakki Marwat	Against the vacant Post.
10.	Saima Gul D/O Misal Khan	Ist. Appointment	Mufti Mehmood Teaching Hospital, DIKhan	Against the vacant Post.
11.	Necelam D/O Aseem Khan	Ist. Appointment	Mufti Mehmood Teaching Hospital, DIKhan	Against the vacant Post.
12.	Farzana D/O Khurshid Alam	Ist. Appointment	City Hospital, Lakki Marwat	Against the vacant Post.
13.	Samia Begum D/O Raza Khan	Ist. Appointment	Mufti Mehmood Teaching Hospital, DIKhan	Against the vacant Post.
14.	Rozina Begum D/O Taj Muhammad	Ist. Appointment	City Hospital, Lakki Marwat	Against the vacant Post.
15.	Rifat Jehan D/O Ameerullah	Ist. Appointment	City Hospital, Lakki Marwat	Against the vacant Post.
16.	Seema Akhtar D/O Nazir	Ist. Appointment	City Hospital, Lakki Marwat	Against the vacant Post.
17.	Asia Begum D/O Sardar Gul	Ist. Appointment	City Hospital, Lakki Marwat	Against the vacant Post.
18.	Naheed Begum D/O Fazli Raziq	Ist. Appointment	City Hospital, Lakki Marwat	Against the vacant Post.
19.	Reshma Nowshad D/O Nowshad Khan	Ist. Appointment	DHQ Hospital, Bannu	Against the vacant Post.
20.	Nuzrat Parveen D/O Zahid Khan	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
21.	Kalsoom Bibi D/O Zahir Shah	Ist. Appointment	DHQ Hospital, DIKhan	Against the vacant Post.
22.	Azeb Nisa D/O Zard Ali Khan	Ist. Appointment	DHQ Hospital, Karak	Against the vacant Post.
23.	Romana Shamsher D/O Shamsher Hussain	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
24.	Parveen Akhter D/O Nazir Bal	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
25.	Kousar Shaheen D/O Gul Nawaz Khan	Ist. Appointment	THQ Hospital Banda Daud Shah (Karak)	Against the vacant Post.
26.	Shazia Akhter D/O Ghulam Shabir	Ist. Appointment	DHQ Hospital, DIKhan	Against the vacant Post.
27.	Dali Rashid D/O Rashid	Ist. Appointment	Mufti Mehmood Teaching Hospital, DIKhan	Against the vacant Post.
28.	Salam Tabassum D/O Muhammad Nasir	Ist. Appointment	DHQ Hospital, Karak	Against the vacant Post.
29.	Zahida Khatoon D/O Noor Sakhi Jan	Ist. Appointment	THQ Hospital, Banda Daud Shah (Karak)	Against the vacant Post.
30.	Samreen Ali D/O Khurshid Ali Khan	Ist. Appointment	DHQ Hospital, Bannu	Against the vacant Post.
31.	Samreen Maqsood D/O Maqsood Ahmad	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.

32.	Farzana Bibi D/O Muhammad Rai Khan	Ist. Appointment	DHQ Hospital Karak	Against the vacant Post.
33.	Shabana Lal D/O Heera Lal	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
34.	Samina Bibi D/O Shah Muhammad	Ist. Appointment	DHQ Hospital, Karak	Against the vacant Post.
35.	Gul Naz D/O Nablullah	Ist. Appointment	DHQ Hospital, Bannu	Against the vacant Post.
36.	Balqis Akhtar D/O Muhammad Ashraf	Ist. Appointment	Mufti Mehmood Teaching Hospital, DIKhan	Against the vacant Post.
37.	Nasreen Akhtar D/O Ashraf	Ist. Appointment	THQ Hospital, Banda Daud Shah (Karak)	Against the vacant Post.
38.	Jaweria Kiran D/O Shoukat Hayat	Ist. Appointment	Mufti Mehmood Teaching Hospital, DIKhan	Against the vacant Post.
39.	Sheela Gul D/O Umer Bakhsh Malik	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
40.	Naveeda D/O Sabir Muhammad	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
41.	Sabeeta Kumari D/O Nawab Chand	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
42.	Fozia Bibi D/O Sher Muhammad Babar	Ist. Appointment	Mufti Mehmood Teaching Hospital, DIKhan	Against the vacant Post.
43.	Nosheen Paracha D/O Salaud-Din Paracha	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
44.	Sharna Rani D/O Das Chand	Ist. Appointment	DHQ Hospital, Bannu	Against the vacant Post.
45.	Saira Norcen D/O Inayatullah Khan	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
46.	Shahnaz Akhtar D/O Muhammad Gul	Ist. Appointment	DHQ Hospital, DIKhan	Against the vacant Post.
47.	Rashida Begum D/O Ghulam Sadique	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
48.	Tasleem Hayat D/O Hayatullah	Ist. Appointment	DHQ Hospital, DIKhan	Against the vacant Post.
49.	Zar Zobana D/O Zahir Shah	Ist. Appointment	DHQ Hospital, Bannu	Against the vacant Post.
50.	Bushra Hanif D/O Muhammad Hanif	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
51.	Feroz-un-Nisa D/O Rahim Badshah	Ist. Appointment	DHQ Hospital, Karak	Against the vacant Post.
52.	Gohar Sultan D/O Mashal Din	Ist. Appointment	THQ Hospital, Banda Daud Shah (Karak)	Against the vacant Post.
53.	Saima Andleeb D/O Qureshi Fida Hussain	Ist. Appointment	DHQ Hospital, DIKhan	Against the vacant Post.
54.	Masroof Jan D/O Minaz Gul	Ist. Appointment	DHQ Hospital, Karak	Against the vacant Post.
55.	Tabassum D/O Muhammad Sharif	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
56.	Niazmeen Akhtar D/O Lal Khanan	Ist. Appointment	DHQ Hospital, Karak	Against the vacant Post.
57.	Zainab Bibi D/O Mir Wali Khan	Ist. Appointment	DHQ Hospital, Karak	Against the vacant Post.
58.	Shahla Gul D/O Ghulam Rasool	Ist. Appointment	DHQ Hospital, DIKhan	Against the vacant Post.
59.	Ruqia Naz D/O Hayat Khan	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
60.	Abida Naz D/O Jamshad Naz	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
61.	Tahmina Anjum D/O Khalid Zubair	Ist. Appointment	DHQ Hospital, Kohat	Against the vacant Post.
62.	Yasmin Begum D/O Syed Hussan Khan	Ist. Appointment	DHQ Hospital, DIKhan	Against the vacant Post.
63.	Salma Bibi D/O Sultan Khan	Ist. Appointment	DHQ Hospital, Bannu	Against the vacant Post.
64.	Tasleem Bibi D/O Mir Zaman	Ist. Appointment	Mufti Mehmood Teaching Hospital, DIKhan	Against the vacant Post.
65.	Saima Mehmood D/O Sheik Mehmood	Ist. Appointment	Mufti Mehmood Teaching Hospital, DIKhan	Against the vacant Post.
66.	Tahira Sultana D/O Ghazi Khan	Ist. Appointment	Mufti Mehmood Teaching Hospital, DIKhan	Against the vacant Post.
67.	Raheela Tahir D/O Muhammad Mushal Khan	Ist. Appointment	Mufti Mehmood Teaching Hospital, DIKhan	Against the vacant Post.

Ahsan

Ahsan

01. They will be on probation initially for a period of two years extendable for a further period not exceeding one year.
 02. Their Services can be dispensed with during the probation period, if their work and conduct found unsatisfactory.
 03. Their appointment will be subject to medical fitness and verification of character and antecedents/Educational qualification etc.
 04. They will not be entitled to any TA/DA for medical examination and joining the first appointment.
 05. They will be governed by such Rules and orders as may be issued by the Government for the category of Government Servant to which they belong.
 06. They shall for all intents and purposes be Civil Servant, except for the purpose of Pension and Gratuity. In lieu of the same they will be entitled to receive Contributory provided Fund. For the said fund 10% contribution will be made by the provincial Govt. and 10% by the Civil Servant concerned in the prescribed manner. Provided further that in the event of death of the Civil Servant whether before or after retirement, their family shall be entitled to receive the said amount if it has already not been received by concerned deceased Civil Servant.
 07. They are liable to serve any where in the NWFP/FATA.
 08. They will serve the Government of NWFP Health Department for a period of 05 years being under bond failing which they will deposit a sum of Rs.50,000/- as bond money into Government treasury.
 09. They will submit an under taking on judicial stamp paper to the Director General Health Services, NWFP Peshawar that the documents submitted are genuine and not fake. Moreover they have not been dismissed from service by any Govt. or semi Govt. organization.
 10. If they wish to resign from Service after completion of bond period they shall resign in writing by giving prior notice of one month OR deposit one month pay in lieu of one month advance notice, in the Government treasury. However they will continue to serve the Govt. till their resignation is accepted by the competent authority.
- If the above terms and conditions are acceptable to them they should report in the institutions mentioned against their names for duty within (14) days of receipt of this order.

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

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

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

04-05-2007.

1. Secretary to Govt. of NWFP Health Department Peshawar, for information
2. Executive District Officers (Health), DIKhan, Kohat, Bannu, Hangu, Karak and Lakki Marwat
3. Medical Supdt. DHQ Hospitals, DIKhan, Kohat, Bannu, Hangu, Karak and Lakki Marwat.
4. Medical Supdt. City Hospital, Lakki Marwat
5. Medical Supdt. Mufli Mahmood Teaching Hospital, DIKhan.
6. District Accounts Officers, DIKhan, Kohat, Bannu, Hangu, Karak and Lakki Marwat.
7. Bibi Ajmeena D/O Abbas Khan, Village Faqir Abad, P.O. Shakardara, Tehsil & District Kohat.
8. Rehm-un-Nisa D/O Ajab Khan, P.O. Sabir Abad, Village Deli Meta, Mohla Zakola, Tehsil & District Karak.
9. Faihat Bibi D/O Abdul Wahid, Basti Tareen Abad near Degree College House No.701-B, DIKhan.
10. Aneela Gul D/O Ghulam Muhammad, Mohallah Toyana Wala, District DIKhan.
11. Janet Rose D/O Pervaz Akhter, C/O Dr. Musarrat Jabeen, Liaquat Memorial Hospital, Kohat.
12. Shazia Aslam D/O Muhammad Aslam, Asstt. Professor Deptt. of Soil Science Faculty of Agriculture Gomal University DIKhan.
13. Shazia Bibi D/O Ghulam Asghar, Kot Jal, Tehsil Paharpur, District DIKhan.
14. Jane Rose D/O Pervaz Akhter, U.P. Church, Shimla Pahar, Kohat.
15. Nuzrat Parveen D/O Zahoor Khan, Village Mir Ahmad Khail, Near Ayaz General Store, Tehsil & District Kohat.
16. Uzma Atta D/O Atta Muhammad, Mohallah Ibrahim Khel, Tangi Nusrat Zal,

Attentive
[Signature]

45

B

Dated:03/04/2008

To,

Medical Superintendent
DHQ Hospital KDA Kohat.

Subject: Complaint / Enquiry

Sir,

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

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

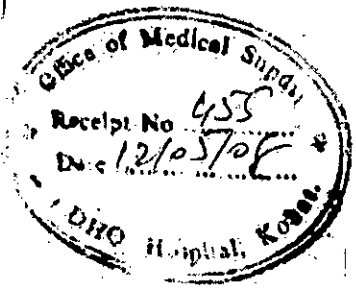
[Signature]
Mrs. Musarrat Jabeen
Nursing Superintendent
DHQ Hospital KDA Kohat

Direct her to attend
the office of the undersigned
today.

File P.F.
12/05/08

[Signature]
03/04/08

[Signature]



46
OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ HOSPITAL KDA KOHAT.

NO. 4563.....(PF)
Dated, Kohat the 07.10.08.

TO:

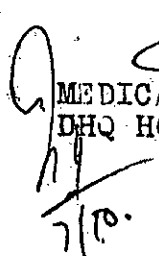
Mst. Rasheeda,
Charge Nurse, DHQ
Hospital, KDA Kohat.


SUBJECT: FINAL NOTICE.

Memo:

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

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


MEDICAL SUPERINTENDENT
DHQ HOSPITAL KDA KOHAT.

Asif


47

OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ HOSPITAL KDA KOHAT

No. 4522 IPF

Dated: 06 / 10 / 2008

To,

The Executive District Officer (Health)
Kohat.

Subject:-

ABSENT REPORT

Sir,

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

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

Report is submitted for disciplinary action under the rules.

[Handwritten signature]
[Handwritten signature]

[Handwritten signature]
Medical Superintendent
DHQ Hospital KDA Kohat

48

CO

No. 3640-13 /E-16,
From:

Dated Kohat the 9 /10/2008.

The Executive Distt Officer,
(Health) Kohat.

- To,
1. Miss. Saima Charge Nurse
DHQ Hospital, KDA, Kohat.
 2. Miss. Ajmeena Charge Nurse
DHQ Hospital, KDA, Kohat.
 3. Miss. Rasheeda Charge Nurse
DHQ Hospital, KDA, Kohat
 4. Miss Mina Kuniari Charge Nurse
DHQ Hospital KDA, Kohat.

Subject: ABSENT REPORT

Memo:

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

- | | |
|----------------------|--------------------------|
| 1. Miss. Saima | 03/10/2008 to 5/10/2008. |
| 2. Miss. Ajmeena | 04/10/2008. |
| 3. Miss. Rasheeda | 04/10/2008. |
| 4. Miss. Mina Kumari | 04/10/2008. |

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

W/O
Executive Distt Officer,
(Health) Kohat.

Handwritten signature

No. 3614 /E-16,

Dated Kohat the 9 /10/2008.

Copy forwarded to the Medical Superintendent DHQ Hospital KDA, Kohat with reference to his letter referred to

Recd. / PP

Office of Medical Superintendent
Kohat
963-66
10/10/08

W/O
Executive Distt Officer,
(Health) Kohat.

Handwritten initials

49

**OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ HOSPITAL KDA, KOHAT**

No: 5536 (PF)

Dated, Kohat the 03/12/2008

To:

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

Subject: **ABSENT FROM DUTY**

Memo:

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

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

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

No: 5537 / (PF)

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

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

550

RECEIVED
NOV 11 2009

No. 5536 / 03

Dated, 03.12.09

To:

Mr. Ahida,
Charge Nurse

SUBJECT: ABSENCE FROM DUTY / IN

Memo:

As reported by CMQ, Dr. ... that ... were absent from duty on, 2.12.2009, without any intimation/ proper permission from competent authority.

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

[Signature]
02/12

No. 5537 / P

Copy for record ...
for information.

[Signature]
02/12

[Signature]

[Signature]
[Signature]

551
OFFICE OF THE
MEDICAL SUPERINTENDENT
HQ: HOSPITAL, KDA, KOHAT

NO. 5698-5703 /PF,
Dated Kohat 16/12/2008.


To,

1. Mss: Romana Gilaxni, C/Nurse.
2. Mss: Aasia Sultana. C/Nurse.
3. Mss: Rashida. C/Nurse.
4. Mr: Abdul Wahid. W/Orderly.
5. Mr: Sabir Rehman. W/Orderly.
6. Mr: S. Qasim Ali Shah W/Orderly.

Subject: = WARNING.
Memo;

Ref: your reply to explanation is not found satisfactory.


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

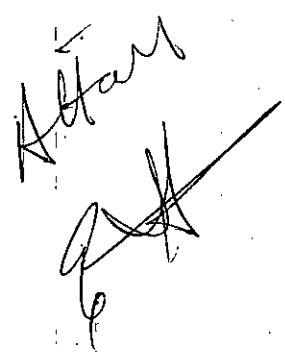

MEDICAL SUPERINTENDENT
HQ: HOSPITAL, KDA, KOHAT.

NO.

/PF,

Copy forwarded to the N/Supdt: HQ:Hosp:Kt: for information and n/action;


MEDICAL SUPERINTENDENT
HQ: HOSPITAL, KDA, KOHAT.



52
OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ HOSPITAL, KDA, KOHAT.

NO. 159 / PF.

Dated Kohat 31/01/2011.

To:

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

Subject:- LEAST IN GOVT DUTIES.
INTEREST

Memo:

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

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

Amir
MEDICAL SUPERINTENDENT
DHQ HOSPITAL, KDA, KOHAT.

Even No. & date.

Copy forwarded to the.

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

Amir
MEDICAL SUPERINTENDENT
DHQ HOSPITAL, KDA, KOHAT.

553

OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ HOSPITAL, KDA, KOHAT

No. 9617 / PF

Dated Kohat 06 /06/2012

To,

C/N Rashida Begum

Subject:- EXPLANATION

Memo:

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

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

Attest
[Signature]

20

[Signature]
MEDICAL SUPERINTENDENT
DHQ HOSPITAL, KDA, KOHAT

554

OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ HOSPITAL, KDA, KOHAT

No. 9598 / PF

Dated Kohat 04 /06/2012

To,

- | | |
|----------------------|------------|
| 1. C/N Rashida Begum | 03/06/2012 |
| 2. C/N Sadia Faiz | 03/06/2012 |
| 3. Usman (Sweeper) | 03/06/2012 |

Subject:- EXPLANATION

Memo:

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

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

Attest
[Signature]

[Signature]

MEDICAL SUPERINTENDENT
DHQ HOSPITAL, KDA, KOHAT

55

OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ HOSPITAL, KDA, KOHAT

No. 9595 /PF

Dated Kohat 02 /06/2012

To,

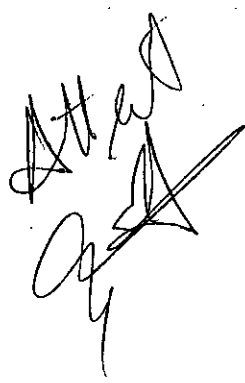
- | | |
|-------------------------------|---------------|
| 1. Asma Dai | 02/06/2012 |
| 2. Nasir Ahmad | 01-02/06/2012 |
| 3. Younas (Sweeper) | 02/06/2012 |
| 4. Rashida Begum (N/Reliever) | 02/06/2012 |
| 5. Shashi Kapoor (Sweeper) | 01/06/2012 |
| 6. Imran (Sweeper) | 01/06/2012 |


Subject:- **EXPLANATION**

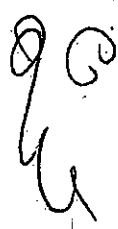
Memo:

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

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




MEDICAL SUPERINTENDENT
DHQ HOSPITAL, KDA, KOHAT



56
OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL KOHAT

No. 1348 /PF

Dated: 10/06/2016

To,

1. C/N Rashida Begam (ICU).
2. M/N Imran Ali (CCU).
3. W/O Amir Zeb (ICU).
4. W/O Ilyas (Medical A Ward).

Subject: **EXPLANATION**

Memo:



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

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


Medical Superintendent
DHQ Teaching Hospital Kohat

Even No & Date.

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



Medical Superintendent
DHQ Teaching Hospital Kohat

3257

OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KDA; KOHAT

No. 1380 /PF

Dated Kohat the 16 /06/2016

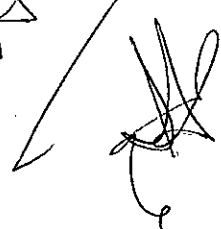
To


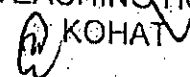
Ms. Rashida Begum (Charge Nurse)
DHQ Teaching Hospital KDA Kohat.

Subject:- WARNING

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

You are hereby strictly warned to be careful in future.

Attended



MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT


58
OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KDA; KOHAT

No. 1248 /PF

Dated Kohat the 20/06/2017

To

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

Subject:-

WARNING

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

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

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


MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT

Even No. & Dated:

Copy forwarded to the:

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


MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT

59
OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KDA; KOHAT

No. 4139 /PF

Dated Kohat the 16 /10/2017

To

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

Subject:- EXPLANATION

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

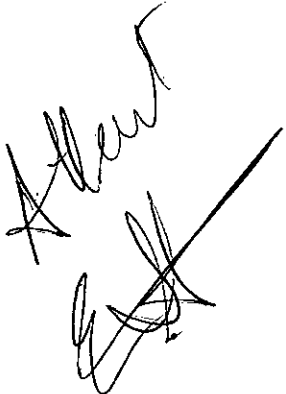
You are hereby called upon to explain your position within 03 days of the issuance of this notice, otherwise strict disciplinary action will be initiate against you.



MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT

Even No. & Dated:

Copy forwarded to the:

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


MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT


13/10/17

60
OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KDA; KOHAT

No. 4166 /PF

Dated Kohat the 17/10/2017

To

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

Subject:- WARNING

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

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

MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT

Even No. & Dated:

Copy forwarded to the:

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

MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT

116/17

661
OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KDA; KOHAT

No. 4238 /PF

Dated Kohat the 19 /10/2017

To

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

Subject:-

EXPLANATION

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

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



MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT

Even No. & Dated:

Copy forwarded to the:

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


MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT



62
OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KDA; KOHAT

No. 4849 /PF

Dated Kohat the 04/12/2017

To

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

Subject:- EXPLANATION (Last Warning)

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

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


MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL

KOHAT
4/04/17

Even No. & Dated:

Copy forwarded to the:

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






MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL

KOHAT
4/04/17

63

OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KDA, KOHAT

No. 2476-77 /PF

Dated Kohat the 10 /05/2022

To

1. Ms. Naveeda (Charge Nurse)
2. Ms. Rashida Begum (Charge Nurse)

Subject:- EXPLANATION

Memo:

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

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

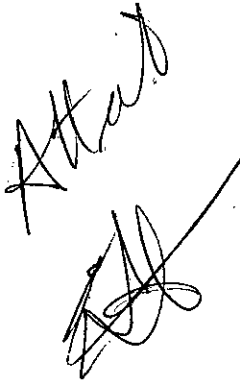

MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT

Even No. & Dated:

Copy forwarded for information to the:-

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


MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT





84

110

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

BACKGROUND:

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

ALLEGATIONS (Pages 6):

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

MODE OF INQUIRY:

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

INSPECTION OF THE HOSTEL:

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

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

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

STATEMENTS:

- i) Dr. Mushtaq, Medical Superintendent, DHQH, KDA, Kohat responded that according to the PC-I, the nursing hostel is bachelor one and he does not know about the male persons who visit the hostel; however, he clarified that only entitled persons have been allowed to reside (Page 13).

The Inquiry Committee was given a questionnaire regarding its one-pager report and the committee responded. However, no attachment was found. The committee has further written that no warden or housekeeper is looking after the hostel, and the post is vacant. The inquiry committee report is entirely based on personal criticism and has attempted only to remove Mst. Najma Firdous from the hostel as well as the hospital because of her problematic nature (Pages 14-16).

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

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

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

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

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

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

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

Handwritten signature/initials

Handwritten mark

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

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

FACT FINDINGS:

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

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

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

Handwritten signature/initials

67

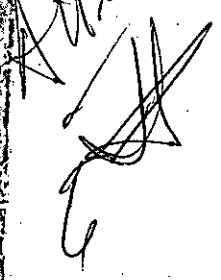
OFFICE

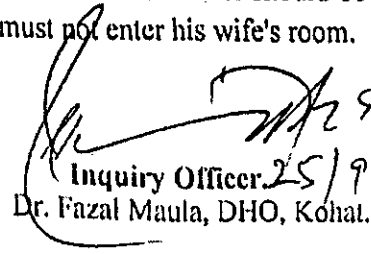
Mst. Najma Firdous beat up a nurse with a stick on Saturday, September 21, 2023, and pulled out her hair. Her sister, who resides in the hostel illegally, was with her. For future reference, pictures of the nurse's attire and the wounds she received as a result of Mst. Najma Firdous' beating has been saved. The verbal statements of a number of nurses and doctors were recorded, and they all insist that Mst. Najma Firdous is infamous for violence and regularly beats staff members with pipes, sticks, and whatever else she happens to have in her hands. The incident of September 21, 2023 night is a live example of Ms. Najma Firdous plucked a nurse's hair, tore her clothes, and left bruises on her. She also brings legal action against government employees without getting permission from the appropriate department (section 31, Govt. servant conduct rules 1947).

RECOMMENDATIONS:

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

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

Attent



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

68



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

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

No. 5735 /E.II,

Dated Pesh. The 03/10 2023

To

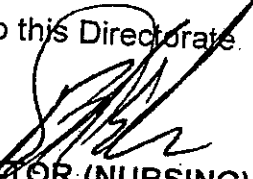
The Medical Superintendent
DHQ Hospital Kohat.

Subject: -
Memo:-

INEQUIRY REPORT.

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

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


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

3/10/2023

K-18

Attache


CA- Sedu
Yundher
29/12/2023

5769

D



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

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

OFFICE ORDER

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

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

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

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

No. 5717-25 /E.II, Dated Pesh. The 03/10/2023.

Copy forwarded to the:-

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

For information and necessary action.

[Handwritten signatures and initials]

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

2/10/2023



70

D.

DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

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

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


To

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

Subject: OFFICE ORDER.
Memo:-

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

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


ADDI: DIRECTOR (NURSING)
DIRECTORATE GENERAL HEALTH
SERVICES, KP PESHAWAR. 7/11/2023

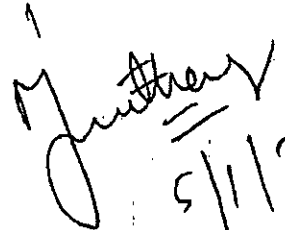
25
5/11/2023

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

PF

ext. Selia

Im n/a please


5/11/2023.

71

D2

OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KDA; KOHAT

OFFICE ORDER

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

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

SD/-
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT

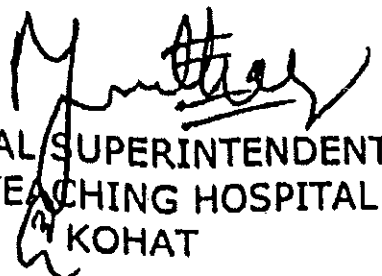
No. 4115-23 /PF


Dated Kohat the 03 /10/2023

Copy forwarded to the:-

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

For information and further necessary action.


MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT





**OFFICE OF THE MEDICAL SUPERINTENDENT
DISTRICT HEADQUARTER HOSPITAL KARAK**

No. 2237 / Admn / DHQH / KK

Dated. 16 / 11 / 2023

E
=

To

The Director General Health Services,
Khyber Pakhtunkhwa Peshawar

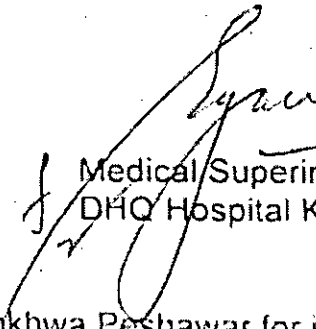
Subject: - OFFICE ORDER

Respected Sir:

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

I have the honour to state that Mst: Rashida Begum RNO BS-16 transferred from DHQ Hospital Kohat to DHQ Hospital Karak has not submitted arrival report till date 14-11-2023 for duty.

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


Medical Superintendent
DHQ Hospital Karak

Even No & date:

Copy forwarded to:

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


Medical Superintendent
DHQ Hospital Karak



7873

F

ELECTION COMMISSION OF PAKISTAN

NOTIFICATION



Islamabad the 15th December, 2023

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

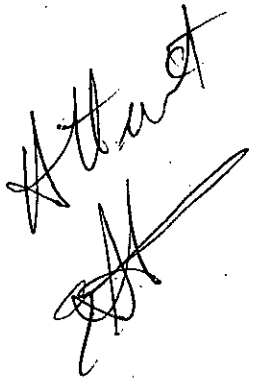
- i. No Government, autonomous / semi-autonomous organization or any authority in the Federation and the Provinces shall post or transfer any officer / official, till the publication of the names of the Returned candidates in the official Gazette. In case of any exigency proposals of postings / transfers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

By Order of the Election Commission of Pakistan.


www.786Times.com
15-12-2023
(Muhammad Nasir Khan)
Deputy Director (Coord.)

The Manager,
Printing Corporation of Pakistan Press,
Islamabad.

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



7774

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

SERVICE APPEAL NO. 2445/2023

Rashida Begum.....Appellant

Versus

Government of Khyber Pakhtunkhwa & othersRespondents.

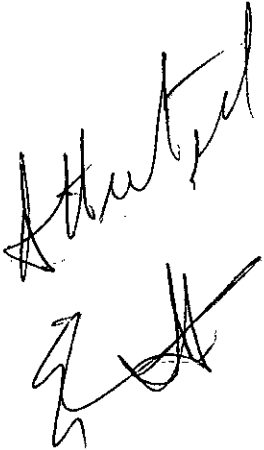
Affidavit

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




Deponent

02 FEB 2024





8075

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

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

AUTHORITY LETTER

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

**Director General Health Services
Khyber Pakhtunkhwa, Peshawar**

-24- 76

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

SCANNED
KPST
Peshawar

APPEAL No /2023

MISS RASHIDA BEGUM (APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

GOVT OF KPK (RESPONDENT)
(DEFENDANT)

I/We MISS RASHIDA BEGUM

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. / /202

Rashida
CLIENT

ACCEPTED

NMK
NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

WAdnan
WALEED ADNAN

Umar
UMAR FAROOQ MOHMAND

M Ayub
MUHAMMAD AYUB

&

Mahmood
MAHMOOD JAN
ADVOCATES

OFFICE:
Flat No. (TF) 291-292 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)

77
"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No. ICS

2445 SB
23
Appeal No. Rashida Begum of 20

Sey Health Peshawar Appellant/Petitioner

Medical Superintendent DHA Teaching Hospital Respondent
KDA Kohat Respondent No.

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... 7/11

Given under my hand and the seal of this Court, at Peshawar this.....
Day of.....20

Pov Reply

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

4178
 "B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
 JUDICIAL COMPLEX (OLD), KHYBER ROAD,
 PESHAWAR.

No. ICS

SB

Appeal No. 2445 of 20 23
Kashida Begum Appellant/Petitioner

Sey Health Peshawar Respondent
 Respondent No. (4)

Notice to: Miss Najma Firdous, Charge Nurse, Shaheed
Rovid Khan DHQ Hospital Otangan.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 13/12/2023 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition. ✓

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 7th
 Day of Dec 2023.

For Reply

[Signature]

Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

79
"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR. SB

No.

245
Appeal No. Rashida Begum of 20 23
Appellant/Petitioner

Secy Health

Respondent

Govt of KPK through Secy Health Peshawar.
Respondent No.

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 13/12/2023 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition. ✓

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... 7/12

Given under my hand and the seal of this Court, at Peshawar this.....
Dec 23
Day of.....20 ..

For Reply

[Signature]

[Signature]
12/12/2023
10:05 AM

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

4780
"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

Appeal No.

2445

of 2023

SB

Rashida Begum

Appellant/Petitioner

Sevgi Health

versus

Respondent

Respondent No.

(27)

Notice to: —

DG Health KPK Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....13/12/2023.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this.....

Day of.....Dec.....2023

For Reply

[Signature]

Received

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.