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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

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Mst. Seema Gul vs Health Department

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Incharge Judicial Branch

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Posts/scale had taken place after the introduction of these scales.

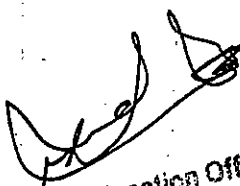
ii) Government employees who are allowed selection grade shall be granted one premature increment from 1-6- 1991 as is allowed in the case of promotion.

5. Grant of advance increment to officials for possessing/attaining higher educational qualifications.

i) From 1-6-1991 onwards advance increments shall be allowed without the condition of the second Division to the officials in BPS-1-15 for possessing or acquiring higher educational qualification over and above the prescribed qualification as in the relevant Recruitment Rules, to the extent given below:-

	No. of advance increments for obtaining			
	<u>Matric</u>	<u>F.A/F.Sc</u>	<u>B.A/B.Sc</u>	<u>M.A/M.Sc</u>
a) Where the prescribed qualification is Non-Matric.	2	4	6	8
b) Where the prescribed qualification is Matric	Nil	2	4	6
c) Where the prescribed qualification is FA/F.Sc	Nil	Nil	2	4
d) Where the prescribed qualification is BA/B.Sc	Nil	Nil	Nil	2

The advance increments already allowed in terms of pra 6 of O.M. No. F.1/7/IM). II/87 dated 1st July, 1987 would be allowed from 1-6-1991.


Distt: Education Officer
(Male) Swazi

..... P/4

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

BEFORE: **KALIM ARSHAD KHAN** ... **CHAIRMAN**
MUHAMMAD AKBAR KHAN ... **MEMBER (Executive)**

Service Appeal No.7587/2021

Date of presentation of Appeal.....11.10.2021
Date of Hearing.....02.05. 2024
Date of Decision.....02.05. 2024

Mst. Seema Gul, P.H.C Technician MCH (LHV) BPS-12 at THQ Hospital Sadda, R/O Sadda Bazar, Tehsil Sadda and District Kurram
.....(*Appellant*)

Versus

1. **District Health Officer (DHO)**, District Kurram.
2. **Secretary Health**, Government of Khyber Pakhtunkhwa, Khyber Road, Peshawar.
3. **DG Health** Government of Khyber Pakhtunkhwa, Warsad Road, Peshawar.....(*Respondents*)

Present:

Mr. Muhammad Nasir Ghilzai, Advocate.....For the appellant
Mr. Muhammad Jan, District AttorneyFor respondents

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED OFFICE ORDER NO.2054-60/DHO/LK/CK/ADMIN/TER DATED 18.05.2021 PASSED BY DISTRICT HEALTH OFFICER (DHO) DISTRICT KURRAM, WHEREBY THE APPELLANT HAS BEEN TERMINATED FROM SERVICE WITHOUT ANY JUSTIFIED, LEGAL AND REASONABLE GROUNDS. IN THIS RESPECT HAS FILED DEPARTMENTAL APPEAL ON DATED 14.06.2021 VIDE DIARY NO.20483 WITH THE DG HEALTH, BUT NOT RESPONSE THE INSTITUTION OF INSTANT APPEAL.

JUDGMENT

KALIM ARSHAD KHAN CHAIRMAN: Appellant's case in brief, as per the averments of the Appeal, is that she was appointed Lady Health Visitor (BPS-09) vide order dated 10.05.2000 and was promoted to the

SC
Khyber Pakhtunkhwa
Peshawar

post of P.H.C Technician (BPS-12). While serving in the said capacity, vide impugned order dated 18.05.2021, she was terminated from service.

2. Feeling aggrieved of the impugned order dated 18.05.2021, the appellant filed departmental appeal on 08.06.2021, which was not responded, therefore, she filed the instant service appeal.

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

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

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

6. Perusal of impugned order dated 18.05.2021 shows that the appellant was **terminated** from service on the basis of different allegations i.e. absence from duty, denial of performance of duty as well as non-submission of replies to the official correspondence. Allegations have been mentioned in the impugned order, but there is nothing annexed with the reply of respondents, to show the mentioned correspondence nor is the word **terminated** mentioned anywhere in the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, rather it is mentioned in Section-11 of the Khyber Pakhtunkhwa

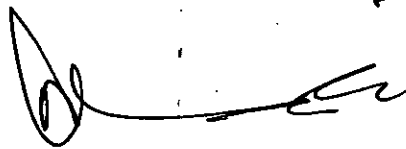
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6. Civil Servants Act, 1973, but that would be relevant if the appellant was on probation, but in this case, the appellant was not on probation.

7. Besides, neither charge sheet/statement of allegations have been issued nor the appellant has been cross-examined which shows that the appellant has not been given proper opportunity of defense which is the requirement of law.

8. Keeping in view the situation, instant service appeal is accepted. The impugned order is set aside with the direction to the respondents to conduct proper inquiry into the matter strictly in accordance with the provisions of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 and then pass appropriate but speaking order. Appellant is reinstated for the purpose of inquiry. The issue of back benefits shall be subject to the outcome of inquiry, which to be conducted within 60 days of the receipt of this judgment. Costs shall follow the event. Consign.

9. *Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 2nd day of May, 2024.*



KALIM ARSHAD KHAN
Chairman



MUHAMMAD AKBAR KHAN
Member (Executive)

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2024 01. Counsel for the appellant present. Mr. Habib Anwar,
Addl. AG for the respondents present.

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var
02. Learned counsel for the appellant requested for
adjournment in order to further prepare the brief. Granted. To
come up for arguments on 02.05.2024 before the D.B. Parcha
Peshi given to the parties.

7587/2021

(FARIEHA PAUL)
Member (I)

(RASHIDA BANO)
Member (J)

R.

2024 1. Learned counsel for the appellant present. Mr.
Muhammad Jan, District Attorney for the respondents present.

2. Vide our detailed judgment of today placed on file, instant
service appeal is accepted. The impugned order is set aside with
the direction to the respondents to conduct proper inquiry into the
matter strictly in accordance with the provisions of the Khyber
Pakhtunkhwa Government Servants (Efficiency and Discipline)
Rules, 2011 and then pass appropriate but speaking order.
Appellant is reinstated for the purpose of inquiry. The issue of
back benefits shall be subject to the outcome of inquiry, which to
be conducted within 60 days of the receipt of judgment. Costs
shall follow the event. Consign.

3. *Pronounced in open Court at Peshawar and given under
our hands and the seal of the Tribunal on this 2nd day of May,
2024.*

(Muharriq Akbar Khan)
Member (E)

(Khalid Arshad Khan)
Chairman


1st June, 2023.


1. Learned counsel for appellant present. Mr. Fazal S. Mohmand, Additional Advocate General for respondents present.

2. Learned counsel for appellant requested for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 13.09.2023 before D.B. P.P given to the parties.

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Peshawar

Mutazem Shah


(Salah-Ud-Din)
Member (J)


(Kalim Arshad Khan)
Chairman

13.09.2023


Mr. Muhammad Ayub, Advocate as proxy for learned counsel for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

Mr. Muhammad Ayub, Advocate stated at the bar that learned counsel for the appellant informed him that due to his engagement before the Hon'ble Peshawar High Court, Peshawar he is unable to attend this Tribunal today. Last opportunity granted. To come up for arguments before the D.B on 04.01.2024. Parcha Peshi given to the parties.

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Peshawar

Naeem Amin


(Fareeha Paul)
Member (E)


(Salah-ud-Din)
Member (J)

19.12.2022

Counsel for the appellant present. Naseer Ud Din Shah
learned Assistant Advocate General for respondents present.

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Peshawar

Former made a request for adjournment in order to further
prepare the brief. Adjourned. To come up for arguments on
21.03.2023 before D.B.

(Fareeha Paul)
Member (E)

(Rozina Rehman)
Member (J)

21.03.2023

Junior to counsel for the appellant present.

Fazal Shah Mohmand, Additional Advocate General for
the respondents present.

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Peshawar

Former made a request for adjournment as senior counsel
for the appellant is busy before Hon'ble Peshawar High Court,
Peshawar. Adjourned. To come up for arguments on
01.06.2023 before D.B. Parcha Peshi given to the parties.

(Muhammad Akbar Khan)
Member (E)

(Rozina Rehman)
Member (J)

12.05.2022

Junior to counsel for appellant present.

Muhammad Adeel Butt, learned Additional Advocate General present. Nemo for respondent Department.

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Peshawar

Reply on behalf of respondents is still awaited. Notice be issued to respondents for submission of comments. To come up for written reply/comments on 19.07.2022 before S.B.

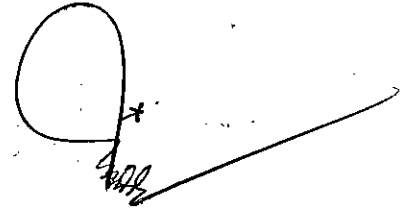


(Rozina Rehman)
Member (J)

19.07.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Omèr Tufail, S.O (Litigation) for the respondents present.

~~is~~ ^{are} Reply/comments on behalf of respondents submitted which ~~is~~ placed on file and copy of the same is handed over to learned counsel for the appellant. Adjourned. To come up for rejoinder, if any, and arguments on 20.10.2022 before D.B.



20th Oct., 2022

Junior to counsel for the ^(Mian Muhammad) appellant present. Mr. Muhammad Riaz Khan Paindakhel, Asstt. Advocate General for the respondents present.

Request for adjournment was made due to engagement of learned senior counsel before the Hon'ble High Court today. Adjourned. To come up for arguments on 19.12.2022 before D.B.

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Peshawar



(Fareeha Paul)
Member (E)



(Kalim Arshad Khan)
Chairman

17.12.2021

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant contended that the appellant is aggrieved of the impugned order of respondent No.1 dated 18.05.2021 whereby services of the appellant were terminated with immediate effect. The appellant preferred department appeal to respondent No. 3 on 08.06.2021. However, no order was passed on the departmental appeal of appellant within the statutory period, hence, the instant service appeal was filed in the Service Tribunal on 11.10.2021. It was further argued that no regular enquiry has been conducted against the appellant and no charge sheet/statement of allegation or show cause notice issued to her. The appellant has not been provided an opportunity of personal hearing and as such condemned unheard not fulfilling the ends of justice. The impugned order is, therefore void ab-initio not maintainable in the eyes of law, is liable to be set aside.

The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to respondents for submission of reply/comments. To come up for reply/comments on 24.02.2022 before S.B.

24.02.2022

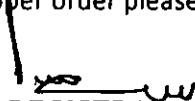

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 12.05.2022 for the same as before. (Mian Muhammad)
Member(E)


Reader

FORM OF ORDER SHEET

Court of _____

Case No.- 7587 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/10/2021	<p>The appeal of Mst. Seema Gul resubmitted today by Mr. Muhammad Nasir Ghilzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>17/12/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>


11

The appeal of Mst. Seema Gul PHC Technician MCH District Kurram received today i.e. on 11.10.2021 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal may be attested.
- 4- Certificate be given to the effect that appellants has not been filed any service appeal earlier on the subject matter before this Tribunal.
- 5- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 6- Copies of charge sheet, statement of allegation, show cause notice, enquiry report and replies thereto are not attached with the appeal.
- 7- Copy of appointment order mentioned in para-2 of the memo of appeal (Annexure-A) is not attached with the appeal which may be placed on it.
- 8- Copy of impugned order is illegible which may be replaced by legible/better one.

No. 2027 /S.T,

Dt. 11/10 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. M. Nasir Ghilzai Adv.

Respected Sir

Subject case is re-submitted herewith after removal of office objection. It is further added that no any copies of termination order, copies of charge sheet, statement of allegation, show cause notice, enquiry report has not been provided to the appellants, however the appellants has managed to obtain the copy of termination order through her own very difficultly, so it is requested that case may kindly be processed accordingly.

Date: 13/10/2021


Counsel

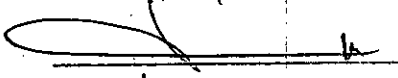
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST

Case Title: Deena Gul vs DHO Dist Peshawar

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

Signature: 

Dated: 11/10/2021

**BEFORE THE KHYBER PAKHTUNKHWAK SERVICES TRIBUNAL
PESHAWAR**

Service Appeal No. 7587 / 2021

**SCANNED
KPST
Peshawar**

Mst Seema Gul, PHC Technician MCH (LHV), BPS-12 at THQ Hospital Sadda), R/O Sadda Bazar, Tehsil Sadda and District Khurram

.....Appellant

VERSUS

1. District Health Officer (DHO) District Kurram
2. Secretary Health, Government of Khyber Pakhtunkhwa, Khyber Road Peshawar
3. DG Health Government of Khyber Pakhtunkhwa, Warsak Road, Peshawar

.....Respondents

INDEX SHEET

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2.	Affidavit		4
3	Copy of the impugned office termination order dated 18/05/2021 & Better Copy	A	5-7
4.	Copy of Departmental Appeal & CNIC	B	8-11
5.	Wakalat Nama		

APPELLANT

Seema Gul

Through Counsel

Muhammad Nasir Ghilzai
Advocate High Court

Amin Ullah Jan
Advocate High Court

Muhammad Ismail
Advocate High Court

Aziz Khan Khattak
Advocate High Court

Office Address: BILS Law Firm, Al Mansoor Flats, 3rd Floor, Opposite Gul Bahar Police Station, GT Road, Peshawar (Contact No. 0316-6007600)



**BEFORE THE KHYBER PAKHTUNKHWAK SERVICES TRIBUNAL
PESHAWAR**

Service Appeal No. 7587 / 2021

Mst Seema Gul, PHC Technician MCH (LHV), BPS-12 at THQ Hospital Sadda), R/O Sadda Bazar, Tehsil Sadda and District Khurram

Khyber Pakhtunkhwa
ServiceAppellant

VERSUS

Diary No. 7719

Dated 11/10/2021

1. District Health Officer (DHO) District Kurram
2. Secretary Health, Government of Khyber Pakhtunkhwa, Khyber Road Peshawar
3. DG Health Government of Khyber Pakhtunkhwa, Warsak Road, Peshawar

.....Respondents

APPEAL U/S 4 OF THE KP SERVICES TRIBUNAL ACT, 1974, AGAINST THE
IMPUGNED OFFICE ORDER NO. 2054-60/DHO/LK/CK/ADMIN/TER DATED
18/05/2021 PASSED BY DISTRICT HEALTH OFFICER (DHO) DISTRICT KURRAM,
WHEREBY THE APPELLANT HAS BEEN TERMINATED FROM SERVICE
WITHOUT ANY JUSTIFIED, LEGAL AND REASONABLE GROUNDS. IN THIS
RESPECT HAS FILED DEPARTMENTAL APPEAL ON DATED 14/06/2021 VIDE
DIARY NO. 20483 WITH THE DG HEALTH, BUT NOT RESPONSE THE
INSTITUTION OF INSTANT APPEAL

PRAYER

On acceptance of the instant appeal, the Impugned office order No. 2054-60/DHO/LK/CK/ADMIN/TER dated 18/05/2021 passed by District Health Officer (DHO) District Kurram, may kindly be set aside being illegal, void ab-initio and unlawful, and the appellant may kindly be reinstated into service with all back benefits. And any other relief and remedy deems justified by this Hon'ble Tribunal may also be passed in favour of the appellant for the interest of justice and fair play.

Respectfully Sheweth:-

The appellant humbly submits as under:-

1. That the appellant belongs to an educated, social and well to do family having a modest status in the society.
2. That the appellant was appointed as MCH (LHV).
[REDACTED]
3. That the appellant has put more than 20 years unblemished service on her credit and the appellant since her appointment performed her duties with great, zeal, zest, Enthusiasm and to the entire satisfaction of her superiors.

Filed to
Registrar
11/10/2021

Address

4. That the appellant never resorted to make herself absent from duty and performed duty whole heartedly even during racial crisis as well as Moharam Ul Haram, also performed duty during Eidain, even in the era of Taliban when law and order situation in the area were quite fragile and service record of the appellant to this effect is self explanatory.
5. That while posted as PHC Technician MNCH (LHW) BS-12 DHQ SADA, District Lower and Central Kurram, the appellant was surprised to receive the impugned office termination order dated 18/05/2021, which was issued by an incompetent authority, without adopting proper procedure under Khyber Pakhatunkhwa Efficiency & Disciplinary Rules 2011, hence the impugned order dated 18/05/2021 is void abi initio, Coram non-judice, not sustainable in the eyes of law. It is worth mentioning that the same has not been communicated to the appellant by the department, however the appellant on her own got copy of the same.
- (Copy of the impugned office termination order dated 18/05/2021 is attached as Annexure A).**

6. That the appellant filed departmental appeal before the competent authority i.e DG Health on dated 14/06/2021, but till date no any response has been intimated to the appellant.
- (Copy of Departmental Appeal is attached as Annexure B)**

7. That feeling aggrieved from the impugned order dated 18/05/2021 and after passing of statutory period, the appellant approach this Hon'ble Tribunal on the following grounds: -

GROUND:

- A. That the impugned order dated 18/05/2021 is against law, rules, principles of Natural justice, hence void ab-initio and not sustainable in the eye of law.
- B. That the decision is based on malafide intention having no solid footing.
- C. That no law or rule has been followed while issuing the impugned order dated 18/05/2021 against the appellant.
- D. That the impugned order dated 18/05/2021 is issued by an incompetent authority as the same has been issued by the Deputy District Health officer who is not the competent authority, hence the impugned order dated 18/05/2021 being Coram non judice is liable to be set aside on this score alone.
- E. That no proper procedure as mentioned in Khyber Pakhtunkhwa Efficiency & Disciplinary Rules 2011 has been adopted while terminating the appellant from service which is sufficient to prove that the appellant has not been treated under the law.
- F. That the penalty is imposed without due process of laws and rule in vogue.

- G. That the removal order is technically not correct.
- H. That no charge sheet has been issued which is mandatory under the Khyber Pakhtunkhwa Efficiency & Disciplinary Rules 2011 and this fact is sufficient to term the whole proceedings null and void.
- I. That no any regular inquiry has been conducted as mentioned in the impugned order nor did the appellant was provided any opportunity to defend herself.
- J. That no charge sheet, statement of allegation issued/served on the appellant which is mandatory under E & D Rules 2011.
- K. That the appellant has been condemned unheard as no opportunity of personal hearing or defense has been provided to the appellant by the inquiry Officer or the competent authority which is fundamental right of the appellant.
- L. That neither statement of any witness has been recorded nor did the appellant was confronted with anything.
- M. That the appellant has not been confronted with any documentary or oral evidence and the appellant was treated inhumanly.
- N. That no any show cause notice has been issued /Served as mentioned in the impugned order and the allegation leveled against the appellant are self made and having no sound footings.
- O. That no inquiry has been conducted against the appellant and no charge sheet, statement of allegations, notice on given address or through press / publication has been issued and served upon the appellant in service.
- P. That since the illegal impugned order, the appellant fundamental rights as enshrined in the constitution of Pakistan 1973 have been put at stake, hence the instant appeal.
- Q. That other grounds will be discussed at the time of arguments with prior permission of this Hon'ble Court.

On acceptance of the instant appeal, the impugned office order No. 2054-60/DHO/LK/CK/ADMIN/TER dated 18/05/2021 passed by District Health Officer (DHO) District Kurram, may kindly be set aside being illegal, void ab-initio and unlawful, and the appellant may kindly be re-instated into service with all back benefits. And any other relief and remedy deems justified by this Hon'ble Tribunal may also be passed in favour of the appellant for the interest of justice and fair play.

11/10/2021

Seema Gul
Seema Gul

Through Counsel

Muhammad Nasir Ghilzai

Muhammad Ismail

Muhammad Nasir Ghilzai
Advocate High Court

Muhammad Ismail
Advocate High Court

Amin Ullah Jan
Advocate High Court

Aziz Khan Khattak
Advocate High Court

**BEFORE THE KHYBER PAKHTUNKHWAK SERVICES TRIBUNAL
PESHAWAR**

Service Appeal No. _____ / 2021

Mst Seema Gul VERSUS District Health Officer Kurram & Others

AFFIDAVIT

As per instructions, Mst Seema Gul (PHC Technician MCH (LHV), BPS-12 at THQ Hospital Sadda), R/O Sadda Bazar, Tehsil Sadda and District Khurram, do hereby solemnly affirm and states on oath that the contents of accompanying appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

_____ / 2021

Seema Gul
Deponent _____

ATTESTED

IDENTIFIED BY

[Signature]
11/10/21
Muhammad Nasir Ghilzai
Advocate High Court



11/10/21.
Deponent

Certificate:

It is certified that no such appeal filed on the subject matter, except the present one.

Appellant
Seema Gul
Seema Gul



OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT LOWER & CENTRAL KURRAM
Ph: 0926-520522 Fax: 0926-520523

No. 2054-60 /DHO/LK/CK/Admin/Ter

Dated: 18/05/2021

To

Mst. Seema Gul
PHC Technician MCH (LHV) BPS-12 THQH Sadda.

Subject: TERMINATION FROM SERVICES:

Where As, you are presentably working at MCH Centre THQ Hospital Sadda, District Kurram

AND WHERE AS, it has been observed that your performance is not satisfactory and you are habitual absentee from your official duties.

AND WHEREAS, Explanation has been called from you vide this office Letter No. 411/THQ dated 06.07.2017, Letter No.2565-88/AAS dt 07.07.2017, Letter No.4379-84/AAS dated 21.11.2017, Letter No. 339-44/AAS dated 16.01.2018, letter No.4345-51/DHO/EXP dated 16.08.2019, Letter No.4815-21/DHO/EXP dt 04.09.2019 and Letter No.230-34/DHO/EXP dated 10.01.2020.

AND WHERE AS, You did not submit your reply to any explanation.

AND WHERE AS, You were issued final warning vide this office letter No.4917-23 dated 12.09.2019, but again you did not submit your reply to final warning letter.

AND WHERE AS, in wake of Covid-19 emergency situation all type of leave were cancelled vide this office Notification No.1230-38/DHO/Admin dated 13.03.2020.

AND WHERE AS, you are assigned morning shift duty at MCH Centre THQH Sadda but you were reported absent from your duties for the last 06 days without any prior permission /application by incharge THQH Sadda vide Letter No. 195/THQ/Sadda dt 06.03.2020.

AND WHERE AS, an inquiry was constituted against you vide letter No.1917-26/DHO/LK/CK dated 08.04.2020, wherein you are asked for the submission of your educational Certificate and LHV Diploma with PNC Card vide this office letter No.2423-33/DHO/Admin dated 16.04.2020, but you failed to submit it.

AND WHERE AS, Final Show cause notice was issued to you via this office letter No.2862-70/DHO/LK/CK/Admin Dated 28-04-2020 and wherein you failed to submit your reply to the subject notice.

AND WHERE AS, You have been assigned the duty at CVC Sadda for female client vaccination via this office letter No.2027-31/DHO/LK/CK/Admin Dated 17-05-2021 and wherein you have been informed about the subject duty by Focal Person Dr Muhammad Javid Coordinator NP telephonically and wherein you refused to perform the subject duty despite the fact that you are well aware that Government of Khyber Pakhtunkhwa, Health department has declared health emergency in the province.

Attended by Council

[Signature]

(6)



**OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT LOWER & CENTRAL KURRAM**

Ph: 0926-520522

Fax: 0926-520523

No. _____/DHO/LK/CK/Admin/Ter

Dated: ____/____/2021.

NOW THEREFORE, Consequent upon the above chronic poor performance, negligence irresponsible and professional attitude to precedence and lack of interest in your duties, the undersigned being the competent authority, is pleased to terminate your services with immediate effect, in the best public interest.

~~District Health Officer~~
District Lower & Central Kurram

No. & Date is Even:

Copy To:

1. The Secretary Health Department, Govt. of Khyber Pakhtunkhwa.
2. The Director General Health Services, Khyber Pakhtunkhwa.
3. The Deputy Commission, District Kurram.
4. The District Accounts Officer, District Kurram.
5. The Assistant Commissioner, Lower/Central Kurram at Sadda.
6. Incharge THQ Hospital Sadda for information.

~~District Health Officer~~
District Lower & Central Kurram

Attested by *Council*

[Signature]

Khyber Pakhtunkhwa
Government
District Lower & Central Kurram
Sadda

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7
BETTER COPY

**OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT LOWER & CENTRAL KURRAM**

Ph: 0926-520522

Fax: 0928-520523

No. 2054-60/DHO/LK/CK/Admin/Ter

Dated: 18/05/2021

To:

Mst Seema Gul
PHC Technician MCH (LHV) BPS-12 THQH Sadda

Subject: TERMINATION FROM SERVICES

Where As, you are presentably working at MCH Centre THQ Hospital Sadda, District Kurram.

AND WHERE AS, it has been observed that your performance is not satisfactory and you are habitual absentee from your official duties.

AND WHEREAS, Explanation has been called from you vide this office Letter No. 411/THQ dated 06.07.2017, Letter No. 2565-88/AAS dt 07.07.2017, Letter No. 4379-84/AAS dated 21.11.2017, Letter No. 339-44/AAS dated 16.01.2018, letter No. 4345-51/DHO/EXP dated 16.08.2019, Letter No. 4815-21/DHO/EXP dt 04.09.2019 and Letter No. 230-34/DHO/EXP dated 10.01.2020.

AND WHERE AS, you did not submit our reply to any explanation.

AND WHERE AS, you were issued final warning vide this office letter No. 4917-23 dated 12.09.2019, but again you did not submit your reply to final warning letter.

AND WHERE AS, in wake of Covid-19 emergency situation all type of leave were cancelled vide this office Notification No. 1230-38/DHO/Admin dated 13.03.2020.

AND WHERE AS, you are assigned morning shift duty at MCH Centre THQH Sadda but you were reported absent from your duties for the last 06 days without any prior permission/ application by incharge THQH Sadda vide Letter No. 195/THQ/Sadda 195/THQ/Sadda dt 06.03.2020.

AND WHERE AS, an inquiry was constituted against you vide letter no. 1917-26/DHO/LK/CK dated 08.04.2020, wherein you are asked for the submission of your educational Certificate and LHV Diploma with PNC Card vide this office letter No. 2423-33/DHO/Admin dated 16.04.2020, but you failed to submit it.

AND WHERE AS, Final show cause notice was issued to you via this office letter No. 2862-70/DHO/LK/Admin Dated 28-04-2020 and wherein you failed to submit your reply to the subject notice.

AND WHERE AS, You have been assigned the duty at CVC Sadda for female client vaccination via this office letter no. 2027-31/DHO/LK/CK/Admin dated 17-05-2021 and wherein you have been informed about the subject duty by Focal Person Dr Muhammad Javid Coordinator NP telephonically and wherein you refused to perform the subject duty despite the fact that you are well aware that Government of Khyber Pakhtunkhwa, Health department has declared health emergency in the province.

NOW THEREFORE Consequence upon the above chronic poor performance, negligence irresponsible, unprofessional attitude, absence and lack of interest of in your duties, the undersigned being the competent authority is pleased to terminate your service with immediate effect in the best public interest.

Attest by Counsel

[Signature]
District Health Officer
District Lower & Central Kurram

duty at CVC Sadda
LK/CK Admin dated
duty by Focal Person

To:

The Director General
Health Services
Khyber Pakhtunkhwa, Peshawar

20483/ET/1
14/6/2021

Subject: Departmental Appeal Against the impugned Termination Order dated 18/05/2021 where by the appellant has been terminated from her services in utter violation and disregards to laws, rules and principles of natural justice

PRAYERS

On acceptance of the Departmental appeal, the impugned termination order dated 18/05/2021 may kindly be declared illegal, void abi-initio and kindly set aside the same and the appellant may kindly be re-instated into service along with all back benefits. Any other remedy as deems justified by your good self may also be awarded to the appellant.

Respected Sir,

With due regard the subject appeal is submitted on the following grounds: -

1. That the appellant belongs to an educated, social and well to do family having a modest status in the society.
2. That the appellant has put more than 20 years unblemished service on her credit and the appellant since her appointment performed her duties with great, zeal, zest, Enthusiasm and to the entire satisfaction of her superiors.
3. That the appellant never resorted to make herself absent from duty and performed duty whole heartedly, during racial crisis as well as Moharam Ul Haram, also performed duty during Eidain, even in the era of Taliban when law and order situation in the area were quite fragile and service record of the appellant to this effect is self explanatory.
4. That while posted as PHC Technician MNCH (LHW) BS-12 DHQ SADA, District Lower and Central Kurram whereby the appellant was surprised to receive the impugned termination order dated 18/05/2021 which was issued by an incompetent authority, without adopting proper procedure under Khyber Pakhatunkhwa Efficiency & Disciplinary Rules 2011, hence the impugned order dated 18/05/2021 is void abi initio, Coram non iudice, not sustainable in the eyes of law. It is worth mentioning that the same has not communicated to me by the department. however the appellant on her own got copy of the same (copy of the impugned order dated 18/05/2021 is annexure A):

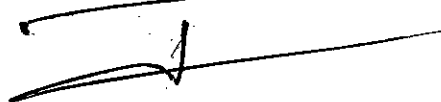
Attested by
counsel

That feeling aggrieved from the impugned order dated 18/05/2021 the appellant having no other remedy hence filling the instant appeal on the following grounds;

GROUNDS:

- A. That the impugned order dated 18/05/2021 is against law rules principles of Natural justice hence void ab initio not sustainable in the eye of law.
- B. That the decision is based on mala fide intention having no solid footing.
- C. That no law or rule has been followed while issuing the impugned order dated 18/05/2021 against the appellant.
- D. That the impugned order dated 18/05/2021 is issued by an incompetent authority as the same has been issued by the Deputy District Health officer who is not the competent authority hence the impugned order dated 18/05/2021 being Coram non iudice is liable to be set aside on this score alone.
- E. That the punishment of termination awarded to the appellant is nowhere mentioned in Khyber Pakhtunkhwa Efficiency & Disciplinary Rules 2011 which is sufficient to prove that the appellant has been treated under the law of jungle mala fide.
- F. That the penalty is imposed without due process of laws and rule in vogue.
- G. That the removal order is technically not correct.
- H. That no charge sheet has been issued which is mandatory under the Khyber Pakhtunkhwa Efficiency & Disciplinary Rules 2011 which is sufficient to term the whole proceedings null and void.
- I. That no regular inquiry has been conducted as mentioned in the impugned order nor did the appellant was provided any opportunity to defend herself.
- J. That no charge sheet statement of allegation issued/served on the appellant which is mandatory under E & D Rules 2011.
- K. That the appellant was condemned unheard as no opportunity of personal hearing or defense has been provided to the appellant by the inquiry Officer or the competent authority which is fundamental right of the appellant.
- L. That neither statement of any witness has been recorded nor did the appellant was confronted with anything.
- M. That the appellant has not been confronted with any documentary or oral evidence and the appellant was treated under the law of jungle.
- N. That no show cause has been issued /Served as mentioned in the impugned order and all of a That the allegation leveled against the appellant are self made and having no sound footings. The appellant has requested for provision of the records/ charges leveled against the appellant, however the office of DHO has denied providing the same and due to this reason the appellant has been constrained to approach Right to Information Commission for redressal of her grievance/ procurement of record to reply her stance in this regard.

Attested by counsel.



- O. That no inquiry has been conducted against the appellant and no charge sheet, statement of allegations, notice on given address or through press / publication has been issued and served upon the appellant in service.
- P. That the appellant has not been provided opportunity of defending herself while taking this harsh unilateral action.
- Q. That the appellant has been subjected to discrimination as the appellant has been guaranteed equal protection of law and entitled for due course of law however the same has been refused to the appellant thus Article 25 of the constitution of Islamic Republic of Pakistan 1973 has been violated.
- R. That since the illegal impugned order the appellant fundamental rights of the enshrined in the constitution of Pakistan 1973 have been put at stake, hence the instant appeal.

It's therefore requested that the instant departmental appeal may kindly be accepted as prayed for in the heading.

Yours Obediently

Seema Gul

Mst Seema Gul
PHC Technician MCH (LHV), BPS-12
THQ Hospital Sadda, District Lower
and Central Kurram.

Dated: 08/06/2021

Attested by Counsel

[Signature]



PAKISTAN National Identity Card

ISLAMIC REPUBLIC OF PAKISTAN

Name

Seema Gul

سیما گل

Husband Name

Rehman Gul

رحمان گل

Country of Stay

F Pakistan

Identity Number

21302-1505370-0

Date of Birth

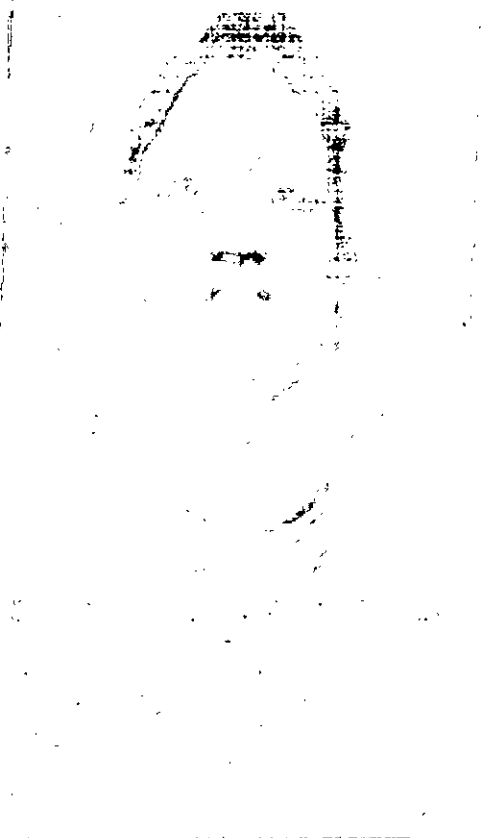
29.07.1978

Date of Issue

14.12.2018

Date of Expiry

14.12.2028



Holder's Signature

(11)

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محکمہ شاہی، سدا، تحصیل اوڑھ کرم، ضلع کرم
پنجس

21302-1505370-0



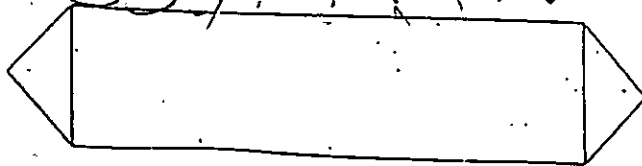
محکمہ شاہی، سدا، تحصیل اوڑھ کرم، ضلع کرم
پنجس

101341155387

Usman Y. Mobin
Registrar General of Pakistan

گمشدہ کارڈ ملنے پر قریبی لیڈ بکس میں ڈال دیں

۱۱-۱۱



12

سجاول ٹی بسٹ سٹیٹ ہائیڈرو پاور

2 پنجاب سجاول

سجاول پن نام 2000

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ

محمد اسحاق علی حلیمی
آمین اللہ تعالیٰ
ابن علی علیہ السلام
ذکر الکل
الذکر

کلیے محمد ناصر حسین خاں، محمد علیہ خان صاحب

آن مقام انوار

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

General of Rahimabad
سجاول رجسٹرڈ ایڈووکیٹ
Saeed

الرقوم

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Accepted
Accepted

Handwritten signatures and stamps, including a circular stamp with the number 20.

الع
مقام

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 7587 OF 2021

Seema Gul.....Appellant

Versus

Through Secretary Health & others.....Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO. 01 TO 03

Respectfully Sheweth:

Preliminary Objections:-

1. That the appellant has got neither cause of action nor locus standi to file the instant appeal.
2. That the appellant has filed the instant appeal just to pressurize the respondents.
3. That the instant appeal is against the prevailing Law and Rules.
4. That the appeal is not maintainable in its present form and also in the present circumstances of the issue.
5. That the appellant has filed the instant appeal with mala-fide intention hence liable to be dismissed.
6. That the appellant has not come to this Honorable Tribunal with clean hands.
7. That the appeal is barred by law and limitation.
8. That the Honorable Tribunal has no Jurisdiction to adjudicate upon the matter.
9. That the instant appeal is bad for mis-joinder of unnecessary and non-joinder of necessary parties.
10. That the appeal is badly barred by law and limitation.

ON FACTS:

1. Needs to be proved.
2. Correct.
3. Incorrect as per report of Respondent No. 1 (Annex-A), the appellant had very poor performance and irresponsible attitude towards performance of her duties through her service tenure.
4. Incorrect as in preceding para.
5. Incorrect as per report of Respondent No. 1, the appellant was poor performer, absent and refused her legitimate duties specially when she was assigned emergency duties at CVC Sadda for female vaccination via DHO office letter dated 17/05/2021, informed her by the Focal person of LHWs Program, she refused to perform her emergency duties at CVC Sadda, resultantly DHO being competent has terminated the appellant order dated 18/05/2021 already attached with the appeal of the appellant.
6. Pertains to record.

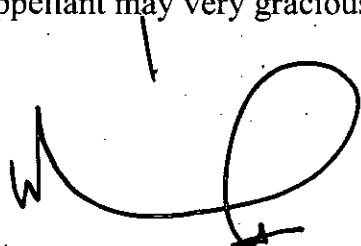
7. Incorrect. Due to the above reasons, the appellant has no right to file the instant appeal.

ON GROUNDS:

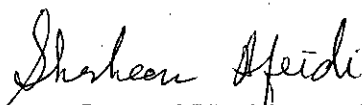
- A. Incorrect. The impugned order was issued under E&D Rules, 2011 due to her habitual absenteeism, irresponsible attitude towards legitimate duties and refusal from emergency duties.
- B. Incorrect as in preceding para.
- C. Incorrect as in the preceding paras.
- D. Incorrect, irrelevant provision as per E&D Rules duly complied with.
- E. Incorrect as per attached report, proper procedure was adopted in her termination process.
- F. Incorrect, as explained in para-A above.
- G. Incorrect, as per attached report, proper procedure was adopted in her termination process.
- H. Incorrect & denied.
- I. Incorrect. Relevant provisions as per E&D Rules duly complied with.
- J. Incorrect and denied, as the appellant was absent from duty therefore, provision of personal hearing was against the spirit of law, hence denied.
- K. Incorrect, as per the E&D Rules no such statement required while taking the adverse action against the Govt. Servant.
- L. Incorrect and denied.
- M. Incorrect and denied, as the appellant was absent.
- N. Incorrect and denied.
- O. Incorrect and denied. No such fundamental rights of the appellant violated.
- P. Answering respondents also seek prior permission of this Honorable Tribunal to adduce additional grounds at the time of arguments.

PRAYER:

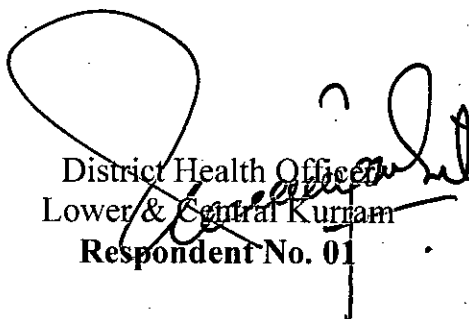
It is therefore humbly prayed that on acceptance of the comments, the instant appeal of the appellant may very graciously be dismissed with costs.



Secretary to Govt. of Khyber Pakhtunkhwa
Health Department
Respondent No. 02



Director General Health Services
Khyber Pakhtunkhwa
Respondent No. 03



District Health Officer
Lower & Central Kurram
Respondent No. 01

29



**OFFICE OF THE DISTRICT HEALTH OFFICER,
DISTRICT LOWER & CENTRAL KURRAM**

Ph: 0926-520522

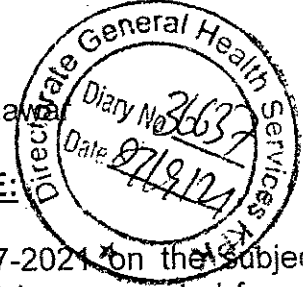
Fax: 0926-52052

No. 4272-78 /DHO/LK/CK/Admin

Dated: 21 /09 /2021

To

The Add: Director General (HRM),
Directorate General Health Services, KP-Peshawar

Subject: **REQUEST FOR RE-INSTATEMENT INTO SERVICE:**

Please refer your office letter No;8259/AE.VI, Dated:08-07-2021 on the subject cited above wherein Mst:Seema Gul Ex-PHC Tech (MCH) BS-12 has requested for re-instatement into service. In this connection below are detail comments,

1. That she was working at MCH Centre THQ Hospital Sadda, District Kurram.
2. That her performance was not satisfactory and was habitual absentee from her duties.
3. That her personal file is self-explanatory wherein explanations has been called from her vide this office letter No. 411/THQ dated 06.07.2017, letter No. 2565-88/AAS dated 07.07.2017, letter No. 4379-84/AAS dated 21.11.2017, letter No. 339-44/AAS dated 16.01.2018, letter No. 4345-51/DHO/EXP dated 16.08.2019, letter No. 4815-21/DHO/EXP dated 04.09.2019 and letter No. 230-34/DHO/EXP dated 10.01.2020.
4. That she failed to submit her replies to any explanation.
5. That she was issued final warning vide this office letter No. 4917-23 dated 12.09.2019, but again she did not submit her reply to final warning letter.
6. That in wake of COVID-19 emergency situation all type of leaves were cancelled vide this office Notification No. 1230-38/DHO/Admin dated 13.03.2020.
7. That she was assigned morning shift duty at MCH Centre THQ Hospital Sadda but she was reported absent from her duties by incharge THQ Hospital Sadda vide his office letter 195/THQ/Sadda dated 06.03.2020.
8. That an inquiry was constituted against her vide letter No. 1917-26/DHO/LK/CK dated 08.04.2020, wherein was asked to appear before the inquiry committee for recording her statement and was directed for the submission of her Educational documents/Certificate of LHV Diploma along with PNC Card vide this office letter No. 2423-33/DHO/Admin dated 16.04.2020, but she failed to submit it.
9. That inquiry committee recorded her statement and concluded their recommendation as to either issue her final warning or terminate her as she has accepted that she cannot perform morning shift duties without any solid justification except for that she was running her private clinic at sadda at morning and also she failed to submit her original diploma and PNC card.
10. That final Show Cause Notice was issued to her via this office letter No. 2862-76/DHO/LK/CK/Admin dated 28.04.2020 and wherein she failed to submit her reply to the subject notice.
11. That she was assigned the duty at CVC Sadda for female client vaccination via this office letter No. 2027-31/DHO/LK/CK/Admin dated 17.05.2021 and wherein she has also been informed about the subject duty by Focal Person Dr. Muhammad Javid Khan NP Coordinator telephonically and wherein she refused to perform the subject duty despite the fact that she was well aware that

[Handwritten signature]
27-9-21



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OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT LOWER & CENTRAL KURRAM

Ph: 0926-520522

Fax: 0926-52052

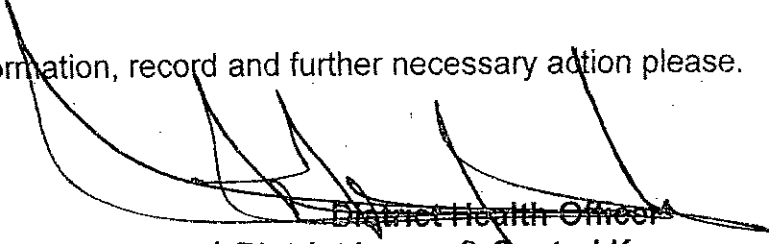
No. _____ /DHO/LK/CK/Admin

Dated: ____ / ____ /2021

Government of Khyber Pakhtunkhwa, Health department has declared health emergency in the province.

12. That because of her disobedience, unprofessional attitude and refusal from COVID-19 Emergencies duties without any justification she tried to creates disturbances in the administrative affairs of the office of the undersigned.
13. That Consequent upon the above, chronic poor performance, negligence, irresponsible, unprofessional attitude, disobedience and lack of interest in her duties, she was terminated from her services with immediate effect, in the best public interest.

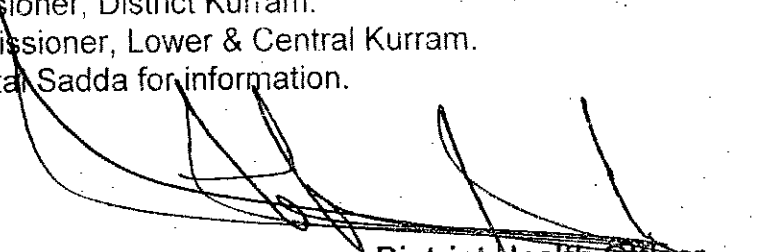
Submitted for information, record and further necessary action please.


District Health Officer
District Lower & Central Kurram

No. & Date is Even:

Copy forwarded to:

1. The Secretary Health Department, Govt of Khyber Pakhtunkhwa.
2. The Director General Health Services, Khyber Pakhtunkhwa.
3. The Add Director General Health Services, Khyber Pakhtunkhwa.
4. The Deputy Commissioner, District Kurram.
5. The Assistant Commissioner, Lower & Central Kurram.
6. Incharge THQ Hospital Sadda for information.


District Health Officer
District Lower & Central Kurram

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 7587/2021

Seema Gul

-----Appellant

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary

-----Respondent

AFFIDAVIT.

I Mohammad Tufail Section Officer (Lit-II) govt. of Khyber Pakhtunkhwa Health Department do hereby solemnly affirm and declare that the joint parawise comments in Service Appeal No. 7587/2021 at Page-1-2 is submitted on behalf of respondents is true and correct to the best of my knowledge, belief and that nothing has been concealed from this Hon'ble Court.

M. Tufail 19/7/22

Section officer (Lit-II)
Govt: of Khyber Pakhtunkhwa
Health Department

Identified by:-

~~_____~~
~~_____~~



PST-2
07/05/2008

Offer of Appointment

Consequent upon the approval of Departmental Selection Committee, the Competent Authority is pleased to offer appointment to

Ms Secoma Gul ~~or~~ Muhamamad Sadique
Resident of Plot No. 224, Hoshangri, Peshawar, P.O. Karimpora
as Lady Health Visitor NPS - 9 (1605-97-3060) Plus usual allowances as admissible under the Rules.

Her appointment will be subject to the following terms and conditions :-

1. That her appointment is purely on contract basis for a period of one year or till the life of the project which ever comes first, under the developmental scheme "13 KCH centers in rented building"
2. That she is declared Medically fit for Government Service.
3. That she will be governed by such Rules and order as may be issued by the Government of NWFP from time to time for the category of Government servants to which he belongs.
4. That if she wishes to resign at any time, she will resign in written with 30 days notice or pay in lieu thereof and will continue to serve the Government till the acceptance of his/her resignation by the competent authority.
5. That she will be posted any where in FATA.
6. That she will not be entitled to any TADA for Medical Examination and joining the 1st appointment.
7. That if she accept the post on these conditions, she should report for duty to AS... KURRAM within 15 fifteen days. The offer will be cancelled if she fails to report duty within above mentioned period.
8. That the offer will be subjected to the availability of vacant post.
9. That her appointed is subject to verification of qualification certification and domicile by issuing authority etc.
10. That she will not be entitled to any pension or gratuity for the service rendered by her.
11. That her appointment is subject to productions of bond for serving for the life of the project in health institutions in FATA on Government Stamp Paper duly countersigned by magistrate 1st class.

sd
Director Health Services,
FATA, Peshawar.

9058-64
No. /SAP/Admn/Interview of paramedics. Date: 10/5/2008.

Copy forwarded to the :

1. Director General Health Services, NWFP, Peshawar.
2. Accountant General AGPR Peshawar.
3. Agency Surgeon/District Health Officer/Medical Superintendent Concerned.
4. Agency/District Accounts Officers Office.
5. Person File.
6. Official Concern.

File. - seen file
15/5/2008

Director Health Services,
FATA, Peshawar.