

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

SERVICE APPEAL NO. 505/2024

Nosheen Saba.....Appellant

Versus

Government of Khyber Pakhtunkhwa & othersRespondents

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Deponent



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

1

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 505 OF 2024

Nosheen SabaAppellant

Versus

Govt. of Khyber Pakhtunkhwa and others.....Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO.01 TO 02

Respectfully Sheweth:

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 16179

Dated 30-09-24

Preliminary Objections:-

1. That the appellant has got no cause of action or 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 instant appeal is bad for mis-joinder of unnecessary and non-joinder of necessary parties.

ON FACTS:

1. Correct.
2. Correct.
3. Incorrect. The appellant was relieved from MMC Mardan on administrative grounds on 05/12/2017 (Annex-A) and subsequently posted to Bacha Khan Medical Complex Swabi on 19/01/2018 (Annex-B) however she did not join

duty over there and absented herself from official duty (Copy of letter from Principal /C.E GKMC/BKMC Swabi is attached Annex-C, CI).

- 4. Related to Hospital Director MTI MMC Mardan, who is not cited as respondent in the panel of respondents however detailed reply has been given in Para-03 above.
- 5. Incorrect, as stated in Para-03 above that the appellant was relieved from MMC Mardan on 05/12/2017 who was subsequently posted to BKMC Swabi on 19/01/2018 however she did not report there in compliance of the posting order and remained willfully absent therefore she was proceeded under Rule,9 of the Khyber Pakhtunkhwa Efficiency and Disciplinary Rules, 2011. She was served absence notice on her home address however she again failed to join her new place of posting thereafter the absence notices were published in Daily Mashriq Peshawar, and Daily Aaj Peshawar on 17/10/2018. (Annex-D, E). Hence after fulfilling all the codal formalities under Rule, 9 of the E&D Rules, 2011 she was removed from service vide order dated 04/01/2019 (Annex-F).
- 6. Incorrect. The Appellant did not annexe any documents which may support her contention of communication of the appellate order however in case if she would have not been received the appellate order she was legally bound to file service appeal after expiry of 90 days as per Sec 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1994 however she did not comply the provisions of sec 4 of the ibid Act, 1974. Infact the appellate order was communicated well within time however in order to make a time barred service appeal within time she mala-fidly sign as received a copy of the appellate order therefore the instant appeal being badly time barred for more than 04 years is liable to be dismissed on this score alone.
- 7. Incorrect. No vested right of the appellant has been violated by the replying respondent therefore she is not an aggrieved person however reply on the grounds are as under:

GROUND

- A. Incorrect. The impugned orders dated 04/01/2019, 13/03/2019 (Annex-F) are according to law, rules and principles of natural justice hence denied.
- B. Incorrect. The appellant was proceeded under Rule, 9 of E&D Rules, 2011 after fulfilling all the codal formalities as per the above referred rule.

- C. Incorrect. Absence notices were served upon the appellant at her home address as mentioned in detail in Para-05 of the facts.
- D. Incorrect. Already replied in Para-B above.
- E. Incorrect. As discussed in Para-05 of the facts that the appellant was proceeded under Rule, 9 of the E&D Rules, 2011 after fulfilling all the codal formalities. The apex court has held in 2010 PLC CS Supreme Court 924 that every case has different facts and circumstances needs to be decided on its own facts on merit. Furthermore the appellant has never denied her willful absence in the departmental as well as in the instant appeal therefore she is not entitled for any relief from this Hon'ble Tribunal.
- F. Incorrect. Already replied in the preceding paras. Furthermore the appellant has never denied her willful absence in the departmental as well as in the instant appeal therefore she is not entitled for any relief from this Hon'ble Tribunal.
- G. Incorrect. Already replied in Para-05 of the facts and Para E of the grounds.
- H. Incorrect. For will-full absence procedure in Rule, 9 of the E&D Rules is specifically mentioned which has been followed by the respondents in its true letters and spirits.
- I. Incorrect. There is no regular inquiry required in the proceedings under Rule, 9 of the E&D Rules, 2011 Furthermore the appellant has never denied her willful absence in the departmental as well as in the instant appeal therefore she is not entitled for any relief from this Hon'ble Tribunal. As per consistent view of the apex court in case of admitted absence there is not need of regular inquiry reliance is placed on 2021 SCMR 144, 2022 PLC CS SC 1177 2021 SCMR 959.
- J. Incorrect. The referred judgment is not applicable to the instant appeal however detailed reply has been given in Para-H of the grounds
- K. As per Para-H of the grounds.
- L. Incorrect. The referred judgment is not applicable to the instant appeal however detailed reply has been given in Para-H of the grounds
- M. Incorrect. The appellant being a civil servant was duty bound to comply the order of the competent authority or even challenge her transfer order before the Hon'ble Tribunal if she was considering herself aggrieved from the

transfer order however she admittedly opted to remain absent willfully therefore she was proceeded under Rule,9 of ibid Rules.

N. Incorrect. Already replied in Para-H of the grounds.

O. Incorrect. There is no such option after expiry of 90 days and it is mandatory to file service appeal within 30 days after expiry of 90 days. Therefore the instant appeal is badly time barred.

P. Incorrect. Already replied in the preceding paras.

Q. The replying respondents seek permission of the Hon'ble Court to adduce other grounds during final hearing of the case.

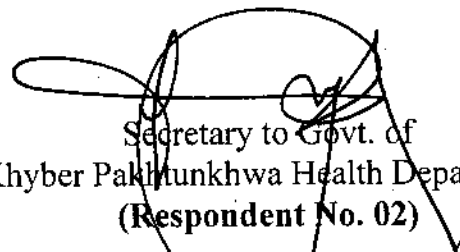
PRAYER:

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



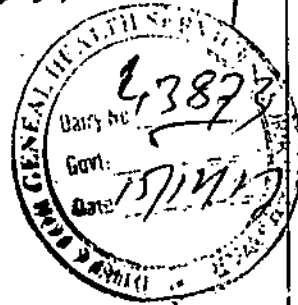
Director General Health Services
Khyber Pakhtunkhwa
(Respondent No. 01)

DR. MUHAMMAD SALEEM



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

MR. ADEEL SHAH



"A"
57
Mardan Medical Complex,
Teaching Hospital Mardan

No. 15354-58 MMC/17/17

Dated, 5/12- /2017

OFFICE ORDER

Consequent upon the recommendation of Disciplinary Committee, Mrs. Nosheen Saba I/O Inqad Ullah Charge Nurse is hereby relieved from MTI, MMC Mardan on administrative ground with immediate effect to Director General Health Services Khyber Pakhtunkhwa Peshawar for further posting.

Hospital Director
MTI, MMC Mardan

Copy to:

1. Director General, Health Services Khyber Pakhtunkhwa Peshawar for information and further posting (copy Disciplinary Committee is attached)
2. Medical Director MTI, MMC Mardan
3. Nursing Director MTI, MMC Mardan
4. Director Finance MTI, MMC Mardan
5. Official concerned for information and compliance

Hospital Director
MTI, MMC Mardan

Attached



**DIRECTORATE
GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

OFFICE ORDER.

On her relieving from MMC Teaching Hospital Mardan Mst. Nousheen Saba D/O Imdadullah Khan, Charge Nurse (BPS-16) is hereby posted to Bacha Khan Medical Complex, Swabi in place of Mst. Bushra Sadiq Charge Nurse in the interest of public service with immediate effect.

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

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

No. 262-67

/E.II Dated Pesh. The 19 / 01 / 2018.

Copy forwarded to the:-

01. Hospital Director, MTI MMC Teaching Hospital Mardan w/r to his office order No. 15354-58/MMC/MTI, dated 05.12.2017.
02. Medical Superintendent, Bacha Khan Medical Complex, Swabi.
03. DAO, Mardan.
04. DAO, Swabi.
05. Mrs. Nousheen Saba D/O Imdadullah Khan, Charge Nurse Moh: Maingan, Ibrahimzai, Tehsil & District Charsadda.
06. DA-concerned, DGHS Office Peshawar.

For information and necessary action.


DEPUTY DIRECTOR (NURSING),
DGHS KHYBER PAKHTUNKHWA
PESHAWAR.

12/1/18



All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.

E-Mail Address: nwipdghs@yahoo.com
Office Ph# 091-9210269
Exchange# 091-9210187, 9210196
Fax # 091-9210230

B
39
6



**OFFICE OF THE PRINCIPAL/CHIEF EXECUTIVE GAJJU KHAN
MEDICAL COLLEGE/BACHA KHAN MEDICAL COMPLEX SWABI**

(Khyber Pakhtunkhwa)

Phone# +92-938-280421 Fax # +92-938-280221 Email: gkmc.swabi@gmail.com

website: www.gkmc.edu.pk



65
7

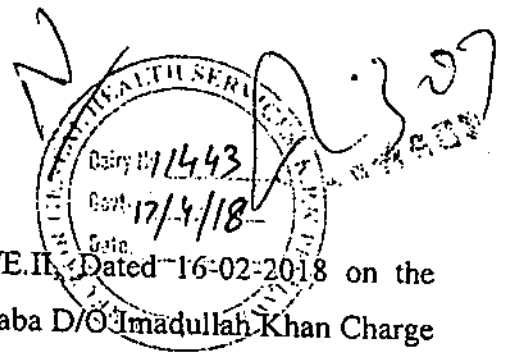
[Handwritten signature]

No. 2720K/Adm/16/04/17

1778-79

Date: 12/03/2018

The Director General Health Services,
Khyber-Pakhtunkhwa



Sub:
Memo,

CHARGE ASSUMPTION REPORT

Reference your office letter No. 745-47/E.II, Dated 16-02-2018 on the subject noted above and to state that the Mrs: Nosheen Saba D/O Imadullah Khan Charge Nurse BPS-16 posted to Bacha Khan Medical Complex Swabi vide Endst: No. 262-67/E.II dated 19-01-2017 has not joined duties at Bacha Khan Medical Complex Swabi till date.

[Handwritten signature]

(PRINCIPAL/CHIEF EXECUTIVE)
Gajju Khan Medical College/Bacha Khan
Medical Complex Swabi

Endst: No. & Date Even:

Copy forwarded for information to:

1. Medical Superintendent Bacha Khan Medical Complex Swabi.

[Handwritten signature]

(PRINCIPAL/CHIEF EXECUTIVE)

[Handwritten signature]

**OFFICE OF THE PRINCIPAL GAJJU KHAN MEDICAL COLLEGE
& CHIEF EXECUTIVE BACHA KHAN MEDICAL COMPLEX SWABI**

(Khyber Pakhtunkhwa)

Phone# +92-938-280421 Fax # +92-938-280221 Email: gkmc.swabi@gmail.com

website: www.gkmcs.edu.pk



7/8
C-1

F.No. 2-8/2018/Admin/CX/MS

12718-19

Date: 3/05/2018

To

The Director General Health Services,
Khyber Pakhtunkhwa

Peshawar

1079

Sub: CHARGE ASSUMPTION REPORT

CAMP 1079-022

Memo;

14263
1087218

39

Reference your office letter No. 1192-94/E-II dated 13.04.2018 and to state that Mrs. Nousheen Saba D/O Imdad Khan Charge Nurse BPS-16 posted to Bacha Khan Medical Complex Swabi has not joined her duties till date.

(PRINCIPAL/CHIEF EXECUTIVE)
Gajju Khan Medical College/Bacha Khan
Medical Complex Swabi

Endst: No. & Date Even:

Copy forwarded for information & n/a to the:
Medical Superintendent Bacha Khan Medical Complex Swabi.

(PRINCIPAL/CHIEF EXECUTIVE)

Registered/AD



**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. 2406-8 /E-II Dated Pesh: the 22 / 06 / 2018.

To:-

Miss. Nousheen Saba D/O Imdad Ullah Khan,
Village & P.O. Ibrahim Zai, Tehsil & District
Charsadda. (2)

Subject:-
Memo :-

ABSENT FROM DUTY.

Reference this Directorate letter No. 1709-11/E-II, dated 21-05-2018, on the subject noted above and you have been relieved by the Hospital Director MTI MMC Mardan on 05-12-2017 and already posted to Bacha Khan Medical Complex, Swabi vide this Directorate office order bearing Endst. No. 262-67/E-II, dated 19-01-2018, as reported by Medical Supdt. Bacha Khan Medical Complex, Swabi you have not yet reported for duty at Bacha Khan Medical Complex, Swabi.

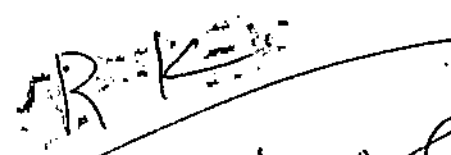
You are hereby directed to immediately report to Bacha Khan Medical Complex, Swabi for duty, failing which disciplinary action will be taken against you under E & D Rules-2011.


DEPUTY DIRECTOR (NURSING),
DGHS KHYBER PAKHTUNKHWA
PESHAWAR.

C.C.

01. Medical Supdt. Bacha Khan Medical Complex, Swabi for information w/r to his letter No. 2-7/2018/Admin/11778-79, dated 12.03.2018, and No. 2-8/2018/Admin/12718-19, dated 03.05.2018 and this Directorate letter No. 17009-11/E-II, dated 21-05-2018. Latest position regarding arrival report of the Charge Nurse concerned may be intimated to this Directorate for further necessary action.

02. Hospital Director MTI MMC Mardan for information.



P.S. Put up for Reminder
on 15/7/2018

Registered/AD



**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. 1709-11 / E.II Dated Pesh: the 21 / 05 / 2018.

To:-

Miss. Nousheen Saba D/O Imdad Ullah Khan,
Village & P.O. Ibrahim Zai, Tehsil & District
Charsadda.

Subject:-
Memo :-

ABSENT FROM DUTY.

You have been relieved by the Hospital Director MTI MMC Mardan on 05-12-2017 and already posted to Bacha Khan Medical Complex, Swabi vide this Directorate office order bearing Endst. No. 262-67/E-II, dated 19-01-2018, as reported by Medical Supdt. Bacha Khan Medical Complex, Swabi you have not yet reported for duty at Bacha Khan Medical Complex, Swabi.

You are hereby directed to immediately report to Bacha Khan Medical Complex, Swabi for duty, failing which disciplinary action will be taken against you under E & D Rules-2011.

Asst. Dir. Health Services
G.C.C.

[Signature]
**DEPUTY DIRECTOR (NURSING),
DGHS KHYBER PAKHTUNKHWA
PESHAWAR.**

[Signature]
18/5/18

01. Medical Supdt. Bacha Khan Medical Complex, Swabi for information w/r to his letter No. 2-7/2018/Admin/11778-79, dated 12.03.2018, and No. 2-8/2018/Admin/12718-19, dated 03.05.2018. Latest position regarding arrival report of the Charge Nurse concerned may be intimated to this Directorate for further necessary action.

02. Hospital Director MTI MMC Mardan for information.

R.K
Pr. put up for
Reminder on 10/6/18

Registered/AD



**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. 2998-3000 /E.II Dated Pesh: the 06 / 08 / 2018.

To:-

Miss. Nousheen Saba D/O Imdad Ullah Khan,
Village & P.O. Ibrahim Zai, Mohallah Mian Ghan,
Tehsil & District **Charsadda**

Subject:-
Memo :-

ABSENT FROM DUTY.

Reference this Directorate letter No. 1709-11/E-II, dated 21-05-2018, No. 2564-66/E-II, dated 04-07-2018 and reminder No. 2876-78/E-II, dated 26-07-2018, on the subject noted above and you have been relieved by the Hospital Director MTI MMC Mardan on 05-12-2017 and already posted to Bacha Khan Medical Complex, Swabi vide this Directorate office order bearing Endst. No. 262-67/E-II, dated 19-01-2018, as reported by Medical Supdt. Bacha Khan Medical Complex, Swabi you have not yet reported for duty at Bacha Khan Medical Complex, Swabi.

You are hereby directed to immediately report to Bacha Khan Medical Complex, Swabi for duty, failing which disciplinary action will be taken against you under E & D Rules-2011.

**DEPUTY DIRECTOR (NURSING),
DGHS KHYBER PAKHTUNKHWA
PESHAWAR.**

C.C.

01. Medical Supdt. Bacha Khan Medical Complex, Swabi for information w/r to his letter No. 2-7/2018/Admin/11778-79, dated 12.03.2018, and No. 2-8/2018/Admin/12718-19, dated 03.05.2018 and this Directorate letter No. 17009-11/E-II, dated 21-05-2018. Latest position regarding arrival report of the Charge Nurse concerned may be intimated to this Directorate for further necessary action.

02. Hospital Director MTI MMC Mardan for information.

R.K

Pr. Pataap for Peshawar
on 25/8/2018

Registered/AD



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 - 9210259) Exchange (091 - 9210187, 091 - 9210196) Fax (091 - 9210230)

No. 3319-21 /E.II Dated Pesh: the 28 / 08 / 2018.

To:-

Miss. Nousheen Saba D/O Imdad Ullah Khan,
Village & P.O. Ibrahim Zai, Mohallah Mian Ghan,
Tehsil & District Charsadda

Subject:-
Memo :-

ABSENT FROM DUTY.

Reference this Directorate letter No. 1709-11/E-II, dated 21-05-2018, No. 2564-66/E-II, dated 04-07-2018, reminder No. 2876-78/E-II, dated 26-07-2018 and No. 2998-3000/E-II, dated 06.08.2018, on the subject noted above and you have been relieved by the Hospital Director MTI MMC Mardan on 05-12-2017 and already posted to Bacha Khan Medical Complex, Swabi vide this Directorate office order bearing Endst. No. 262-67/E-II, dated 19-01-2018, as reported by Medical Supdt. Bacha Khan Medical Complex, Swabi you have not yet reported for duty at Bacha Khan Medical Complex, Swabi.

You are hereby directed to immediately report to Bacha Khan Medical Complex, Swabi for duty, failing which disciplinary action will be taken against you under E & D Rules-2011.

[Signature]
DEPUTY DIRECTOR (NURSING),
DGHS KHYBER PAKHTUNKHWA
PESHAWAR.

C.C.

01. Medical Supdt. Bacha Khan Medical Complex, Swabi for information w/r to his letter No. 2-7/2018/Admin/11778-79, dated 12.03.2018, and No. 2-8/2018/Admin/12718-19, dated 03.05.2018 and this Directorate letter No. 17009-11/E-II, dated 21-05-2018 and No. No. 2998-3000/E-II, dated 06.08.2018. Latest position regarding arrival report of the Charge Nurse concerned may be intimated to this Directorate for further necessary action.

02. Hospital Director MTI MMC Mardan for information.

[Handwritten notes]
B.K
P.P. Part of Letter received on 18/9/2018

13

مختلف مقامات پر وارڈا میں 3 مہینوں کا امتحان

ایس ڈی ایف ڈی وارڈا میں ایس ڈی ایف ڈی کے امتحانات درج ذیل کے مختلف شعبوں میں کر دیے جائیں گے۔ (1) وارڈا میں ایس ڈی ایف ڈی کے امتحانات درج ذیل کے مختلف شعبوں میں کر دیے جائیں گے۔ (2) وارڈا میں ایس ڈی ایف ڈی کے امتحانات درج ذیل کے مختلف شعبوں میں کر دیے جائیں گے۔ (3) وارڈا میں ایس ڈی ایف ڈی کے امتحانات درج ذیل کے مختلف شعبوں میں کر دیے جائیں گے۔

اضامین پبلک سٹریٹس کے باعث ایشیائی لاکھوں کا نقصان

پشاور (تاریخ کار) ضلع نوشہرہ کے علاقے ایشیائی ڈیم میں گھاس پھوس کے باعث ایشیائی لاکھوں کا نقصان ہوا ہے۔ اس کے باعث ایشیائی لاکھوں کا نقصان ہوا ہے۔ اس کے باعث ایشیائی لاکھوں کا نقصان ہوا ہے۔

چیمبروں کی کارکنی ٹیکہ سے 7 اہل نوجوان جان بحق

پشاور (تاریخ کار) چیمبروں کی کارکنی ٹیکہ سے 7 اہل نوجوان جان بحق ہوئے۔ اس کے باعث ایشیائی لاکھوں کا نقصان ہوا ہے۔ اس کے باعث ایشیائی لاکھوں کا نقصان ہوا ہے۔

ڈائریکٹوریٹ جنرل ہیلتھ سروسز خیبر پختونخوا پشاور

نوٹس غیر حاضری

آپ سہ ماہی نوٹس صابقت امداد اللہ خان چارج نرس BPS-16 آپ کو ہسپتال ڈائریکٹر ایم ایس (MIT) مردان نے ڈائریکٹر جنرل ہیلتھ سروسز خیبر پختونخوا کو Relieve کیا تھا اس کے بعد ڈی جی ہیلتھ نے آپ کی تبدیلی باجا خان میڈیکل کیمپس صوابی کو کر دی لیکن آپ نے وہاں پر رپورٹ نہیں کیا، آپ مورخہ 05-12-2017 سے اپنی ڈیوٹی سے غیر حاضر ہے، آپ مرالس نمبر II-E-11/1709 مورخہ 21-05-2018، مرالس نمبر II-E-11/2564-66 مورخہ 04-07-2018، مرالس نمبر II-E-11/2876-78 مورخہ 26-07-2018 اور مرالس نمبر II-E-11/998-3000 مورخہ 04-12-2017 آپ کو گھر کے پتہ پر ہدایت کی گئی کہ فوڈ ڈیوٹی پر حاضر ہو جائیں اور طویل غیر حاضری کی وجہ بیان کریں لیکن آپ ایسا کرنے میں ناکام رہیں۔۔۔ اب آپ کو اس نوٹس کے ذریعے آخری بار ہدایت کی جاتی ہے کہ اس کی اشاعت کے 14 دنوں کے اندر اندر اپنی ڈیوٹی پر حاضر ہو جائیں اور طویل غیر حاضری کی وجہ بیان کریں ورنہ آپ کی جگہ گورنمنٹ سرورٹس E&D رولز 2011 کے تحت یکطرفہ کارروائی کی جائے گی جو کہ آپ کی سرکاری نوکری سے برطرفی پر منتج ہو سکتی ہے اور بعد میں آپ کاغذ قابل قبول نہ ہوگا۔



ایڈیشنل ڈائریکٹر جنرل

ڈائریکٹوریٹ جنرل ہیلتھ سروسز خیبر پختونخوا
INF(P) 4030 / www.khyberpaktunkhwa.gov.pk

وائلڈ لائف ہمارا اثاثہ ہیں ان کی حفاظت کریں

آسامی خالی ہے

زیر دستگی کو ایک حاضری آسامی کو پر کرنے کیلئے چترال گول ٹینل پارک وائلڈ لائف ڈویژن کے حدود سے تعلق رکھنے والے ذیل کوائف کے حامل امیدواروں سے سادہ کاغذ پر درخواستیں مطلوب ہیں جو کہ دفتر ذرا کو ہمنو تصدیق شدہ نقل (Valid) لائسنس (LTV) اسٹیشنر یا اسٹیشنر قومی شناختی کارڈ اور دو میسج مورخہ 130 اکتوبر 2018 کو دن پانچ بجے تک دستی یا ڈیڑھ ڈاک موصول ہو جانے چاہئیں۔

نمبر	نمبر	نمبر	نمبر	نمبر	نمبر
01	01	01	01	01	01

نوٹ: (1) امیدوار لگانے پر رابطہ نمبر ضرور درج کرے (2) صرف چترال گول ٹینل پارک وائلڈ لائف ڈویژن کے حدود سے تعلق رکھنے والے امیدوار اہل ہوں گے (3) متعلقہ لائلڈ میں تجربہ رکھنے والے افراد کو ترجیح دی جائے گی (4) سرکاری ملازمین اپنی درخواستیں لکھناڑے سے ارسال کریں (5) شارٹ لسٹ امیدواروں کو انٹرویو کیلئے بلا یا جائیگا (6) مقررہ تاریخ کے بعد کوئی درخواست موصول نہیں کی جائے گی (7) انٹرویو کیلئے آنے والوں کو کوئی TADA نہیں دیا جائیگا۔

ڈویژنل فارسٹ آفیسر وائلڈ لائف

چترال گول ٹینل پارک وائلڈ لائف ڈویژن چترال بمقام ٹینٹیشن نزد چترال سٹیشن آفیسر میں چترال
فون نمبر: 0943-412659
INF(P) 4014 also available on www.khyberpaktunkhwa.gov.pk

CE AND TECHNOLOGY
(922-52914794, 5291501 Ext: 4794)

FOR AUCTION

on "AS IS WHERE IS BASIS" will be
Indus High way road Kohat.
FOLLOW:

Remarks
"AS IS WHERE IS BASIS"
"AS IS WHERE IS BASIS"

Band opened at 11:30 AM on the
who may choose to attend.
may be obtained from the office of
form fee of Rs.1000/- for each
website i.e. www.kvst.edu.pk, and
a tender form.

Committee

نیلام

تحصیل ایس ڈی ایف ڈی پشاور میں 2018-19 کیلئے لائلڈ لائسنس (LTV) اسٹیشنر یا اسٹیشنر قومی شناختی کارڈ اور دو میسج مورخہ 130 اکتوبر 2018 کو دن پانچ بجے تک دستی یا ڈیڑھ ڈاک موصول ہو جانے چاہئیں۔

نمبر	نمبر
1	بیس بیٹھیا سولہ
2	سائن بورڈ
3	بیس بیٹھیا گرنی
4	پارکینگ اور ٹائٹل ڈیوٹی

نوٹ: (1) امیدوار لگانے پر رابطہ نمبر ضرور درج کرے (2) صرف چترال گول ٹینل پارک وائلڈ لائف ڈویژن کے حدود سے تعلق رکھنے والے امیدوار اہل ہوں گے (3) متعلقہ لائلڈ میں تجربہ رکھنے والے افراد کو ترجیح دی جائے گی (4) سرکاری ملازمین اپنی درخواستیں لکھناڑے سے ارسال کریں (5) شارٹ لسٹ امیدواروں کو انٹرویو کیلئے بلا یا جائیگا (6) مقررہ تاریخ کے بعد کوئی درخواست موصول نہیں کی جائے گی (7) انٹرویو کیلئے آنے والوں کو کوئی TADA نہیں دیا جائیگا۔

INF(P)4021

بجگم ڈاکٹر عمر حیات خاں

Handwritten notes and signatures on the left side of the page, including names like 'بجگم ڈاکٹر عمر حیات خاں' and 'مہربان'.

17-10-18
فورنامہ آ. ج. لہنیاور

Handwritten notes and signatures at the bottom of the page, including 'مہربان' and 'مہربان'.

تعمیراتی اور تعمیراتی کاموں کے لیے... 22

تعمیراتی اور تعمیراتی کاموں کے لیے... 23

تعمیراتی اور تعمیراتی کاموں کے لیے... 22

تعمیراتی اور تعمیراتی کاموں کے لیے... 23

تعمیراتی اور تعمیراتی کاموں کے لیے... 22

تعمیراتی اور تعمیراتی کاموں کے لیے... 23

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تعمیراتی اور تعمیراتی کاموں کے لیے... 22

TENDER Frontier Constabulary...

Table with 2 columns: S.No, Name of Contract

- 1. Tender documents and BOQ...

For Com Frontier Constabulary...

شوکار و تیس

مسی زاہد اقبال، NTFP سپروائزر مرغان ڈائریکٹوریٹ آف ٹان...

INF(P) 4013

ڈائریکٹوریٹ جنرل ہیلتھ سروسز خیبر پختونخوا ایشیاور

آپ ساتوشین صباغت امداد اللہ خان چارج نرس BPS-16 آپ کو ہسپتال ڈائریکٹر...

INF(P) 4030



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 22 091 - 9210187, 091 - 9210196 Fax: 091 - 9210230

OFFICE ORDER.

01. **WHEREAS** Disciplinary proceedings under E & D Rules were initiated against Mrs. Nousheen Saba D/O Imdadullah Khan, Charge Nurse BPS-16 Bacha Khan Medical Complex, Swabi on account of her absence from duty w.e. from 05.12.2017, without any information / permission of the competent authority.
02. **AND WHEREAS** the above named Charge Nurse was directed at her home address as well as through press published in Daily "Mashriq" Peshawar and Daily "Aaj" Peshawar on 17.10.2018, directing her to resume duty within 14 days failing which ex parte action will be taken against her under E & D Rules 2011, but she did not respond to the said notice.
03. Now therefore I, Director General Health Services, Khyber Pakhtunkhwa Peshawar, being Competent Authority, in exercise of Powers conferred under Khyber Pakhtunkhwa Govt. Servants E & D Rules 2011 am pleased to impose major penalty of "**Removal from Service**" upon Mrs. Nousheen Saba D/O Imdadullah Khan, Charge Nurse BPS-16 Bacha Khan Medical Complex, Swabi with immediate effect on account of her willful absence from duty w.e. from 05.12.2017.

Sd/-
DIRECTOR GENERAL HEALTH
SERVICES, KP PESHAWAR.

No. 70 - 74 /E.II, Dated Peshawar. the 04/01/2019
Copy forwarded to the: -

01-Medical Supdt. Bacha Khan Medical Complex, Swabi.

02-DAO, Swabi.

Registered/AD.

03-Mrs. Nousheen Saba D/O Imdadullah Khan, Charge Nurse BPS-16
Village & PO Ibrahim Zai, Mohallah Mian Ghan, Tehsil & District
Charsadda.

04-DA-concerned, DGHS office Peshawar.

For information and necessary action.

DIRECTOR GENERAL HEALTH
SERVICES, KHYBER PAKHTUNKHWA
PESHAWAR.

عیت لیاڑ شہسوئی

عیت لیاڑ شہسوئی

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. 1216 /E.II, Dated Peshawar the 13 / 03 /2019

To:-


Mrs. Nousheen Saba D/O Imdadullah Khan,
Village & PO Ibrahim Zai, Mohallah Mian Ghan,
Tehsil & District Charsadda.

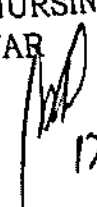
Subject: -
Memo:-

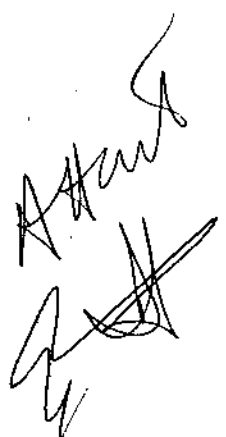
RE-INSTATEMENT INTO SERVICE.

Reference your application dated 28.02.2019, on the subject
noted above.

Your request for re-instatement into service cannot it is
regretted be acceded to, as on account of your absence you were removed from
service after fulfilling of all codal formalities w.e.from 05.12.2017 vide this
Directorate office order bearing Endst: No. 70-74/E.II, dated 04.01.2018.


DEPUTY DIRECTOR (NURSING),
DGHS KP PESHAWAR


12/3/19



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

SERVICE APPEAL NO. 505/2024

Nosheen Saba.....Appellant

Versus

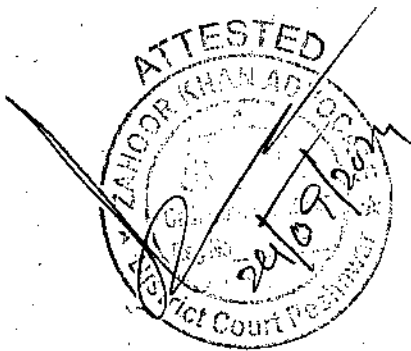
Government of Khyber Pakhtunkhwa & othersRespondents

Affidavit

I, Dr. Muhammad Saleem, 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'ble 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 / costs.

Deponent

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





**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to the Director General Health Services

Peshawar and not to any official by name

Office # 091-9210269 Fax # 091-9210230

AUTHORITY LETTER

Muhammad Yousaf Jamal Focal Person Litigation Section Directorate General Health Services Khyber Pakhtunkhwa is hereby authorized to attend/defend the court cases and file Parawise Comments / Reply on behalf of the undersigned before the Honorable Khyber Pakhtunkhwa Service Tribunal and its Camp Courts.

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