


## FORM OF ORDER SHEET


Court of \_\_\_\_\_

**Appeal No. 1452/2024**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13-Sep-24	<p>The appeal of Mr. Muhammad Jehangir today by Mr. Mir Zaman Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 25-Sep-24. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The present appeal was returned to the counsel for the appellant for completion and resubmission within 15 days. To day he resubmitted the same without removing the object no. 1.

Report submitted for perusal please.

  
19/8/24  
Assistant  
Institution Section

~~Answer~~  
objection sustain as every  
file has to be complete  
in all respect and will be  
decided accordingly. so directed  
to annex the seniority list,  
with in ten days. R

28/8/24.

NO. 650.

Dated: 02/09/2024

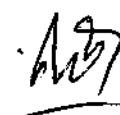
Sr

The identical appeal titled Maroof vs Health  
Department already noticed to the respondents  
on the same seniority list while the appellant  
and one other Maroof also preferred application  
for through RTI but complete seniority list has  
not been provided yet. Hence appeal in hand  
may kindly be put up before the bench.

11/09/2024  
05.09.2024

Let it be  
before sb. R  
12/9/24.

objection is still stand.



The appeal of Mr. Muhammad Jehangir received today i.e on 13.08.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

① Copy of seniority list mentioned in the memo of appeal (Annexure-D) is incomplete and illegible be completed and replaced by legible/better one.

No. 593 /Inst./2024/KPST,

Dt. 15/8 /2024.

*Amatullah*  
OFFICE ASSISTANT  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mir Zaman Safi Adv.  
High Court at Peshawar.

*Sir,*

That identical appeal Mr. Maroof vs Health Deptt: already admitted for regular hearing on the same seniority list which is fixed for reply on 09.08.2024 therefore the instant appeal may very kindly be fixed for preliminary hearing and be clubbed with the above titled appeal.

*M. Qureshi*  
19/08/2024.

**PESHAWAR**

APPEAL NO. 1452/2023

**MUHAMMAD JEHANGIR**

**VS**


**HEALTH DEPTT:**

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**APPELLANT**

**THROUGH:**

  
**MIR ZAMAN SAFI**  
**ADVOCATE**

Office: Room No. 6-E, 5<sup>th</sup> Floor,  
Rahim Medical Centre, Hashtnagri,  
Peshawar.

Cell: 0333-9991564

**PESHAWAR**

**APPEAL NO. 1452 /2023**

Mr. Muhammad Jehangir, Ex- Junior PHC Technician MP (BPS-12),  
District Health Officer, District Abbottabad.....**APPELLANT**

**VERSUS**

- 1- The Secretary, Health Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director General Health Services Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Health Officer, District Abbottabad.

.....**RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR THE GRANT OF PROFORMA PROMOTION TO THE POST OF SENIOR PHC MP TECHNICIAN (BPS-14) AND SUBSEQUENT PROMOTION TO THE POST OF HEALTH TECHNOLOGIST (BPS-16) WITH EFFECT FROM THE DATE WHEN COLLEAGUES AND JUNIOR COLLEAGUES OF THE APPELLANT HAVE BEEN PROMOTED WITH ALL CONSEQUENTIAL BENEFITS INCLUDING FIXATION OF SENIORITY IN ALL THE CADRES AGAINST THE CORRECT SENIORITY POSITION**

**PRAYER:**

That on acceptance of this appeal the appellant may very kindly be granted/awarded pro-forma promotion to the post of Senior PHC Technician MP (BPS-14) and Health Technologist (BPS-16) with all consequential benefits including Seniority against the correct seniority position. Any other relief which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

**Brief facts giving rise to the present appeal are as under:-**

- 1- That the appellant was initially appointed against the post of Malaria Supervisor vide order date 09.05.1985 and later on was posted as Junior PHC Technician. That the appellant has served the department from the date of initial appointment till retirement on superannuation basis quite efficiently and upto the entire satisfaction of his superiors. Copies of the appointment order and service book are attached as annexure  
..... **A & B.**

seniority list which has been collected by the appellant through application under RTI Act, 2013, whereby the appellant was enlisted at Serial No. 1468 of the said Seniority List. Copies of the application & Seniority list are attached as annexure .....C & D.

- 3- That the appellant while performing his duty against the post of PHC Technician (BPS-12) many colleagues and junior colleagues of the appellant have been promoted to the post of the Senior PHC Technician (MP) (BPS-14) vide order dated 08.07.2021 and to the post of Health Technologist (BPS-16) vide order dated 04.11.2022 but the appellant has been ignored due to missing the name of appellant from the onward seniority lists. Copies of the orders are attached as annexure ..... E & F.
- 4- That the appellant time and again requested the authorities for inclusion of his name in the seniority list and for promotion to the post of Senior PHC Technician (MP)(BPS-14) and subsequent promotion to the post of Health Technologist (BPS-16) but no positive response had been received from the quarter concerned and as such during the pendency of application for promotion, the appellant has got retired from service on superannuation basis w.e.f 09.04.2023 vide order dated 13.04.2023. Copies of the application & retirement order are attached as annexure .....G & H.
- 5- That feeling aggrieved the appellant filed departmental appeal for the grant of pro-forma promotion to the post of Senior PHC Technician (BPS-14) and Health Technologist (BPS-16) w.e. from the date when his colleagues and junior colleagues have been promoted but the same is un-responded. Coy of the departmental appeal is attached as annexure.....I.
- 6- That feeling aggrieved and having no other remedy the appellant filed the instant service appeal on the following grounds amongst the others.

#### **GROUND:**

- A- That the inaction of the respondents by not allowing/granting pro forma promotion to the appellant to the posts of Senior PHC Technician (MP) (BPS-14) & Health Technologist (BPS-16) is against the law, facts, norms of natural justice and materials on the record.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department 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 inaction of the respondents by not allowing/granting pro forma promotion to the appellant to the posts of Senior PHC Technician (MP) (BPS-14) & Health Technologist (BPS-16) is based on malafide and arbitrary intentions and as such the same is violative of the principle of natural justice.

name of the appellant in the seniority list prepared for the cadre of PHC Technicians.

E- That the respondents acted in arbitrary and malafide manner by not allowing/ granting pro-forma promotion to appellant to the posts of Senior PHC Technician (MP) (BPS-14) & Health Technologist (BPS-16) despite the fact that the appellant was the senior most employee of the respondent department, hence the appellant is eligible for proforma promotion according to service rules.

F- That the inaction of the respondents by not allowing/granting pro-forma promotion to the appellant to the posts of Senior PHC Technician (MP) (BPS-14) & Health Technologist (BPS-16) is violative of section-9 of the Civil Servant Act 1973 read with Rule-7 of the (Appointment, Promotion & Transfer) Rules 1989.

G- That as per Rules and regulation the appellant is entitle for pro-forma promotion to the posts of Senior PHC Technician (MP) (BPS-14) & Health Technologist (BPS-16) with all consequential benefits.


H- That appellant seeks 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.

Dated: 12.08.2024.

APPELLANT

  
MUHAMMAD JEHANGIR

THOROUGH:   
MIR ZAMAN SAFI  
ADVOCATE

**CERTIFICATE:**

It is certified that no other earlier appeal was filed between the parties:

  
DEPONENT

**LIST OF BOOKS:**

- 1- CONSTITUTION OF PAKISTAN, 1973
- 2- SERVICES LAWS BOOKS
- 3- ANY OTHER CASE LAW AS PER NEED

**PESHAWAR**

APPEAL NO. \_\_\_\_\_/2023


**MUHAMMAD JEHANGIR**

**VS**

**EDUCATION DEPTT:**

**AFFIDAVIT**

I Mir Zaman Safi, Advocate High Court, Peshawar on the instructions and on behalf of my client do hereby solemnly affirm and declare 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 Court.



**MIR ZAMAN SAFI,**  
Advocate  
High Court, Peshawar



OFFICE ORDER

Consequent on finalization of the Selection Board held at Zonal Headquarter, Malaria Control Programme, Hazara Zone, Abbottabad on 6-5-85, the following candidates have been selected and appointed as Junior Clerk and Malaria Supervisors against the existing vacancies of this Zone. They reported arrival for duty on 9-5-85 (Foriston) and taken on strength of this Zone from the same date. They have been medically examined by the Medical Superintendent, PHQ Hospital, Abbottabad and reported fit.

They will be in receipt of Pay under Scale No. 5 i.e. Rs. 520-18-380 consolidated from the date of their appointment:-

- |  |                    |
|--|--------------------|
| 1. Mr. Sain Gul son of Mohammad Rafiq.           | J/Clerk.           |
| 2. Mr. Mohammed Javed s/o Mohammad Aslam Khan    | Malaria Supervisor |
| 3. Mr. Mohammad Dervez s/o Abdur Razaq Khan.     | -do-               |
| 4. Mr. Khan Afsar s/o Allah Dad Khag.            | -do-               |
| 5. Mr. Mohammad Irahad s/o Sardar Bahadur.       | -do-               |
| 6. Mr. Rafiqat Ali s/o Sher Bahadur.             | -do-               |
| 7. Mr. Mohammad Ilyas s/o Sardar Bahadur.        | -do-               |
| 8. Mr. Mohammad Jahangir s/o Dost Mohammad Khan. | -do-               |
| 9. Mr. Sarfaraz s/o Mohammad Daud.               | -do-               |
| 10. Mr. Rashid Ahmad s/o Mohammad Yousaf.        | -do-               |

24/5/85

No. MOP-31/00/70/ 326 /Adm.  
Dated 9 May, 1985.

M.C.P. Hazara Zone.

- Attn:-
1. Officials concerned.
  2. M.S Zone, Abbottabad.
  3. Accountant.
  4. P.Filed. ✓
  5. O.Corr.

Fabric

Salmonia supermicro

"B"

-6-

District Health Officer  
Abbottabad

1. Name (نام).....

Mrs. Mohammad Jahangir,  
Pakistan.

2. Nationality and Religion .....

(قومیت اور مذہب)

3. Residence (مستقل رہائش).....

Village TARAKA, P.O. Ghambear,  
P.S. Lora, Teh. & Distt. Abbottabad

4. Father's name and residence.....

(والد کا نام اور پتہ)

Dast-Mohammad.

5. Date of birth by Christian era as  
nearly as can be ascertained.....

(تاریخ پیدائش مطابق سن عیسوی)

10-4-1963.

6. Exact height by measurement.....

(قد و قامت)

Small Scar just above the outer part  
of the right eye brow.

7. Personal mark for identification.....

(نشان شناخت)

8. Left hand/right hand thumb and finger-impresions of (Non-gazetted) officer

(مرد کی صورت میں بائیں اور صورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger (چوہنگیا)

Ring Finger (چوہنگیا کے ساتھ کی انگلی)

Middle Finger (انگشت میاں)



Fore Finger (انگشت شہادت)

Thumb (انگولہ)



9. Signature of Government servant.....

(سرکاری ملازم کے دستخط)

Mahomed Jahangir

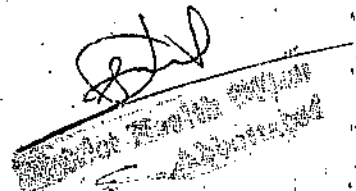
محمد جاہانگیر  
اداریہ امور

10. Signature and designation of the

Head of the Office, or other Attesting  
Officer.....

(تصدیق کنندہ افسر کے دستخط اور مہر)

Administrative Officer  
Malaria Control Programme  
Hazara Zone, Abbottabad



Note.—The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule.

اس دفعہ کے مندرجات کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر ۹-۱۰ میں دستخطوں کے لیے تاریخ ہونی چاہئے۔ انگلیوں کے نشانات کے لیے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں۔

1	Name of post	Whether substantive and whether permanent or temporary	If substituting, (i) substantive or (ii) whether acting vice counts for position under rule 3-20 of C.S.R. (P.S. Volume II	Pay in substantive position	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government servant
8	Sub. Advisor	Sub.	Scale no. S. 520-18-880	9 5/5	1.12.87	Sub.	Sub.	
7	Sub.	Sub.	Scale no. S. 520-18-880	9 5/5	1.12.87	Sub.	Sub.	
6	Sub.	Sub.	Scale no. S. 520-18-880	9 5/5	1.12.87	Sub.	Sub.	
5	Sub.	Sub.	Scale no. S. 520-18-880	9 5/5	1.12.87	Sub.	Sub.	
4	Sub.	Sub.	Scale no. S. 520-18-880	9 5/5	1.12.87	Sub.	Sub.	
3	Sub.	Sub.	Scale no. S. 520-18-880	9 5/5	1.12.87	Sub.	Sub.	
2	Sub.	Sub.	Scale no. S. 520-18-880	9 5/5	1.12.87	Sub.	Sub.	
1	Sub.	Sub.	Scale no. S. 520-18-880	9 5/5	1.12.87	Sub.	Sub.	

Sign  
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 office  
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9	10	11	12	13		14	15
Signature and Designation of the Head of the office or other Attesting officer in attestation of columns 1 to 8:	Date of termination or appointment	Reason of termination (such as promotion, transfer dismissal etc)	Signature of the Head of the office of other Attesting Officer	LEAVE چھٹی		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment or censure or reward or praise of the Government servant
				Nature and duration of leave taken	Allocation of periods of leave on average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debited to another Government		
				Period	Govt. to which debited		
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انتقال ملازمت ترقی، تبادلہ یا برطرفی	دستخط افسر مجاز	رخصت کی نوعیت و معیار	مجازیہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین	دستخط افسر مجاز	مجازیہ پر ایسا عہد نامہ کارکردگی کا ریکارڈ
			Selected and appointed as a Malania Supervisor against the existing vacancy of MCF Hazara Zone & taken on strength from 9-5-1985 vide G.O. no. 326/Adm dt: 9-5-85.			Administrative Officer Malaria Control Program Hazara Zone, Abbottabad.	
	30 <sup>11</sup> / <sub>88</sub> annual increment allowed					District Health Officer	Abbottabad
Adm Officer M.H.O. ATD	30 <sup>11</sup> / <sub>88</sub>	Adm Officer District Health Officer Abbottabad		Service from 2-5-85 to 2-11-85 verified from pay bills and other record		District Health Officer Abbottabad	All right
Adm Officer D.H.O. ATD	30 <sup>11</sup> / <sub>87</sub>	Annual Increment Allowed				Adm Officer, D.H.O. Abbottabad	

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating, and whether permanent or temporary	If officiating, state (i) substantive appointment or (ii) whether service count for pension under rules 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government service
درجہ ملازمت	عارضی، مستقل یا قائم مقام	اگر عارضی ہے تو کیا وہ رول کے مطابق پبشن کا مستحق ہے	تختہ بلور عارضی ملازمت	زائد تختہ بلور قائم مقام	سوائے تختہ بلور دیگر الاوتس	تاریخ تقرری	دستخط سرکاری ملازم
			RS. P	PS. P			
		Scale No. 5-	700-25-	1200			
Inspector	Sub	—	750/-	—	—	1.7.97	CP
			775/-	—	—	1.12.97	CP
			800/-	—	—	1/98	CP

Signature of Government service

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment or (ii) whether service count for pension under rules 3.20 of C.S.A. (Pb.) vol II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government service
درجہ ملازمت	عارضی، مستقل یا قائم مقام	اگر عارضی ہے تو کیا وہ رول کے مطابق پبش کا مستحق ہے	تنخواہ بلور عارضی ملازمت	زائد تنخواہ بلور قائم مقام	میسوائے تنخواہ دیگر الاؤنس	تاریخ تقرری	دستخط سرکاری ملازم
			RS.P.	PS.P.			
<del>230-10220-111/1</del>	<del>111/1</del>	<del>111/1</del>	<del>111/1</del>	<del>7500</del>	<del>111/1</del>	<del>1.7.08</del>	<del>111/1</del>
<del>111/1</del>	<del>111/1</del>	<del>111/1</del>	<del>111/1</del>	<del>7275</del>	<del>111/1</del>	<del>111/1</del>	<del>111/1</del>

9	10	11	12	13		14	15
Signature and Designation of the Head of the office or other Attesting officer in attestation of columns 1 to 8  دستخط افسر مجاز	Date of termination or appointment  تاریخ انقطاع ملازمت	Reason of termination (such as promotion, transfer dismissal etc)  وجوہات انتقال ملازمت ترسی، تبادلہ یا برطرفی	Signature of the Head of the office of other Attesting Officer  دستخط افسر مجاز	LEAVE		Signature of the head of the office or other Attesting officer  دستخط افسر مجاز	Reference to any recorded punishment or censure or reward or praised of the Government servant  سزا یا جزا یا تعزیر یا کارکردی کا ریکارڈ
				Nature and duration of leave taken  رخصت کی نوعیت و مدت	Allocation of periods of leave on average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debited to another Government  چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین		
				Period	Govt. to which debited  گورنمنٹ جسے رقم ادا ہوگی		
Pay fixed in Revised Basic Pay Scale						By c 6035/- advised w/ 1-9-07 with arrears Pay = 1700 PRA = 1312 DP = 257	
Vide Govt. of M.V.F.P Finance Department							
Notification No. FDC (PBC) 1.1.2007							
and (01.07.2007 RPS) A-9							
As b035: P.M							
E.O. HEALTH KOSHATAI							
Annual increment allowed				Service verified up to 1.12.2006 to 30.11.2007			
Executive District Officer (H) ABBOTTABAD.				Executive District Officer (G) ABBOTTABAD.			
				Amount of cap. fund Advance Rs. 10000.00 Ten thousand (10000) office sanction No. 25 Dated 21.03.2008			
				Executive District Officer (H) ABBOTTABAD.			
Rs. 10000. Ten thousand of cap. fund amount was not advised of official concerned due to missing schedule in cap. fund register for 7.2007 to ab. 2007				Executive District Officer (H) ABBOTTABAD.			

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3/09/2023 19:11

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1197	11/01/2021	17/03/1961	Charsadda	CHNO	11/01/1983	10/05/2006	EPI Techno-BS-05 PPEC Techno-BS-09	Abdul Latif S/O Muhammad Rafiq
1191	10/01/2021	11/01/1961	Charsadda	CHNO	10/07/1983	11/08/2015	EPI Techno-BS-05 PPEC Techno-BS-09	Alian / Zahoor Shah S/O Khan Iqbal Subhan
1190	31/03/2023	01/06/1961	Peshawar	CHNO	11/07/1983	10/05/2006	EPI Techno-BS-05 PPEC Techno-BS-09	Akhter Hussain S/O Mohd Iqbal Uddin
1189		07/06/1961	Peshawar	CHNO	11/07/1983	11/08/2015	EPI Techno-BS-05 PPEC Techno-BS-09	Ali Akhter Hussain S/O Mohd Iqbal Uddin
1188		14/03/1961	Mardan	CHNO A Abad	11/07/1983	10/05/2006	EPI Techno-BS-05 PPEC Techno-BS-09	Muhammad Farid S/O Muhammad Aslam
1187		06/08/1961	Abbottabad	CHNO	10/07/1983	10/05/2006	EPI Techno-BS-05 PPEC Techno-BS-09	Fahar Zaman S/O Muhammad Zaman
1186		02/07/1961	Abbottabad	CHNO	10/07/1983	10/05/2006	EPI Techno-BS-05 PPEC Techno-BS-09	All Asghar S/O Wali Muhammad
1185	19/12/2021	20/12/1963	Charsadda	CHNO	10/07/1983	11/08/2015	EPI Techno-BS-05 PPEC Techno-BS-09	Qaiser Khan S/O Sher Afzal
1184		01/05/1963	Abbottabad	CHNO	10/07/1983	10/05/2006	EPI Techno-BS-05 PPEC Techno-BS-09	Hafeez Muhammad S/O Iqbal Muhammad
1183	11/10/2020	11/11/1960	Peshawar	CHNO	07/07/1983	11/08/2015	EPI Techno-BS-05 PPEC Techno-BS-09	Kooh Chah S/O Samah Gul
1182	01/03/2021	01/01/1961	Charsadda	CHNO	01/07/1983	10/05/2006	EPI Techno-BS-05 PPEC Techno-BS-09	Ataulah Jan S/O Amib Gul
1181		10/08/1961	Peshawar	CHNO	10/08/1983	11/08/2015	EPI Techno-BS-05 PPEC Techno-BS-09	Shah S/O Khan S/O -
1180	06/02/1965		Peshawar	CHNO	17/06/1983	10/05/2006	EPI Techno-BS-05 PPEC Techno-BS-09	Iqbal Gul S/O Masood Gul
1179	20/10/2021	24/10/1964	Peshawar	CHNO	11/08/2015	10/05/2006	EPI Techno-BS-05 PPEC Techno-BS-09	Mir Kazim Shah S/O Abdul Latif Shah
1178		05/07/1961	Peshawar	CHNO	11/08/2015	10/05/2006	EPI Techno-BS-05 PPEC Techno-BS-09	Sajid Gul S/O Muzal Gul
1177	15/01/2023	10/01/1964	Peshawar	CHNO	10/05/2006	10/05/2006	EPI Techno-BS-05 PPEC Techno-BS-09	Easem Shah S/O Saiboo Shah
1176	16/11/2021	15/01/1961	Mardan	CHNO	15/06/1983	11/08/2015	EPI Techno-BS-05 PPEC Techno-BS-09	Far Ahmad S/O Mubshir Khan
1175	08/08/2023	01/09/1961	Mardan	CHNO	14/06/1983	11/08/2015	EPI Techno-BS-05 PPEC Techno-BS-09	Fazal Shah S/O Fazal Muhammad
1174	31/05/2021	01/08/1965 Dte	Lower	CHNO Dte	01/06/1983	11/08/2015	EPI Techno-BS-05 PPEC Techno-BS-09	Fazal Zaheer S/O Fazal Rabbin
1173	11/02/2023	13/02/1963 Dte	Lower	CHNO Dte	01/06/1983	11/08/2015	EPI Techno-BS-05 PPEC Techno-BS-09	Iqbal Jan S/O Mushtaq Jan
1172		03/01/1963	Swat	CHNO Swat	01/06/1983	10/05/2006	EPI Techno-BS-05 PPEC Techno-BS-09	Muhammad Saleem S/O Fahir Jan
1171		20/06/1959	Swat	CHNO Swat	01/06/1983	10/05/2006	EPI Techno-BS-05 PPEC Techno-BS-09	Muhammad Faraz S/O Muhammad Faraz
1170	07/03/1964	11/08/1963	Khan	CHNO KH	12/05/1983	11/08/2015	EPI Techno-BS-05 PPEC Techno-BS-09	Muhammad S/O Mubshir
1169	11/07/2019	12/07/1959	Kohat	CHNO Kohat	10/05/2006	11/08/2015	EPI Techno-BS-05 PPEC Techno-BS-09	Muhammad Ismail
1168								Muhammad Ismail
1167								Muhammad Ismail
1166								Muhammad Ismail
1165	11/01/1965	11/01/1965	Mardan	AS NWA	06/01/1981	11/08/2015	EPI Techno-BS-05 PPEC Techno-BS-09	Muhammad S/O Subhan Ali

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1167	Noor Wali Khan S/O Sahib Ali	Malaria Sups: BS-05 JPHC Tech: (MP)MP BS-09 PHC Tech: (MP) BS-12	06.04.1983 10.05.2006 11.08.2015	AS NWA	11.01.1965 Miranshah	
1168	Maroof S/O Dost Mohammad	Malatia Sups: BS-05 JPHC Tech: (MP)MP BS-09 PHC Tech: (MP) BS-12	01.01.1981 10.05.2006 11.08.2015	DHO Abbottabad	15.01.1963 Abbottabad	
1169	Shashad Hussain S/O Muhammad Ismail	EPI Technician: BS-05 JPHC Tech: (MP)MP BS-09 PHC Tech: (MP) BS-12	16.05.1983 10.05.2006 11.08.2015	DHO Kohat	12.07.1959 Kohat	
1170	Irfanullah S/O Sadullah	Vaccinator: BS- 05 JPHC Tech: (MP)MP BS-09 PHC Tech: (MP) BS-12	18.05.1983 10.05.2006 11.08.2015	DHO D.I Khan	01.01.1961 D.I.F.han	
1171	Muhammad Parvaiz S/O Rehman Gul	EPI Technicians: BS-05 JPHC Tech: (MP)MP BS-09 PHC Tech: (MP) BS-12	01.06.1983 16.05.2006 11.08.2015	DHO Swat	20.06.1959 Swat	
1172	Muhammad Saleem S/O Dilbar Jan	EPI Technicians: BS-05 JPHC Tech: (MP)MP BS-09 PHC Tech: (MP) BS-12	01.06.1983 16.05.2006 11.08.2015	DHO Swat	03.04.1963 Swat	
1192	Abdul Latif S/O Muhammad Rahim	EPI Technicians: BS-05 JPHC Tech: (MP)MP BS-09 PHC Tech: (MP) BS-12	01.06.1983 16.05.2006 11.08.2015	DHO Swat	20.06.1959 Swat	





**DIRECTORATE GENERAL  
HEALTH SERVICES, KHYBER  
PAKHTUNKHWA, PESHWAR**

E-15

**OFFICE ORDER:-**

Consequent upon approval accorded by the Departmental Promotion Committee, the following PHC Technicians (MP) (BS-12) are hereby promoted to the post of Senior PHC Technicians (MP) (BS-14) with immediate effect:-

S.No	Name	Place of Posting
1.	Zohra Begum D/O Fazal ulah	DHO Charsadda
2.	Zahida Khatoon D/O Azizur Rehman	DHO Manshera
3.	Muhammad Hanif Jan S/O Muhammad Shurif	DHO Charsadda
4.	Suleman Shah S/O Faqir Shah	DHO Charsadda
5.	Abdullah Jan S/O Rab Nawaz	DHO Charsadda
6.	Naghmana Shabnam D/O Abdul Ghafar	DHO Larki Marwat
7.	Aamjad Habib S/O Habibullah Khan	DHO Nowshera
8.	Hummat Raz D/O Gul Raziq	DHO Malakand
9.	Gul Noorain D/O Saeedullah Khan	DHO Larki Marwat
10.	Muhammad Aamjad S/O Muhammad Akbar	DHO Manshera
11.	Kousar Parveen D/O Muzaffar Shah	DHO Manshera
12.	Nargis Begum D/O Roghayan Gul	DHO Charsadda
13.	Shah Yasmin S/O Hafsa Khan	DHO Tank
14.	Nafeesa Bibi D/O Gul Rehman	DHO Peshawar
15.	Abdul Basit S/O Abdul Hameed	DHO Manshera
16.	Sameena Bibi D/O Sarwar Khan	DHO Abbotabad ✓
17.	Muhammad Ilyas S/O Akbar Ali	DHO Abbotabad ✓
18.	Khurshid Anwar S/O Wazir Jang	DHO Kohat
19.	Fazal Rahim S/O Muhammad Zamin	DHO Shangla
20.	Shah Malook S/O Samber Khan	DHO SW
21.	Shukila D/O Atta ur Rahman	DHO Malakand
22.	Muhtiar Zaman S/O Bahir Zaman	DHO Charsadda
23.	Soraj Parkash S/O Khurshid Lal	DHO Shangla
24.	Liaquat Ali S/O Khalil ur Rahman	DHO Manshera
25.	Shagufta D/O Sher Afzal	DHO Nowshera
26.	Shamim Kausar D/O Mian Muhammad	DHO Manshera
27.	Fahim Jan S/O Fatch Muhammad	DHO Larki Marwat
28.	Azra Jabeen D/O Muhammad Ayub	DHO Hosp. Haripur
29.	Dilshad Bibi D/O Fida Muhammad	DHO Manshera

*(Signature)*

*(Signature)*

208	S/O Muhammad Saeed ur Rehman	DHO	Manshera	DHO	Manshera	Do-
209	Abdul Raheed S/O	DHO	Manshera	DHO	Manshera	Do-
210	Muhammad Rizq S/O	DHO	Manshera	DHO	Manshera	Do-
211	Riaz S/O	DHO	Manshera	DHO	Manshera	Do-
212	Muhammad Zaman	DHO	Manshera	DHO	Manshera	Do-
213	Shah Shah S/O	DHO	Manshera	DHO	Manshera	Do-
214	Muhammad Shakir	DHO	Kohistan	DHO	Kohistan	Do-
215	Dhawal Shah	DHO	Kohistan	DHO	Kohistan	Do-
216	Shahid Khalid S/O	DHO	Manshera	DHO	Manshera	Do-
217	Abdur Raziq	DHO	Charsadda	DHO	Charsadda	Do-
218	Imtiaz Ahmad S/O	DHO	Charsadda	DHO	Charsadda	Do-
219	Naveed Khan	DHO	Charsadda	DHO	Charsadda	Do-
220	Shakeel	DHO	Charsadda	DHO	Charsadda	Do-
221	Saeedur Rahman S/O	DHO	Charsadda	DHO	Charsadda	Do-
222	Amindilak	DHO	Charsadda	DHO	Charsadda	Do-
223	Ijaz Ahmad S/O Syal	DHO	Charsadda	DHO	Charsadda	Do-
224	Muhammad	DHO	Charsadda	DHO	Charsadda	Do-
225	Glulam Abbas S/O	DHO	Charsadda	DHO	Charsadda	Do-
226	Muhammad Chaffar	DHO	Charsadda	DHO	Charsadda	Do-
227	Khan	DHO	Charsadda	DHO	Charsadda	Do-
228	Habibullah S/O	DHO	Kohistan	DHO	Kohistan	Do-
229	Shamsh Khan	DHO	Kohistan	DHO	Kohistan	Do-
230	Muhammad Ibrahim	DHO	Kohistan	DHO	Kohistan	Do-
231	S/O Saib Khan	DHO	Manshera	DHO	Manshera	Do-
232	Siyar Khan S/O	DHO	Manshera	DHO	Manshera	Do-
233	Mawof Shah	DHO	Charsadda	DHO	Charsadda	Do-
234	S. Faraz Ahmad S/O	DHO	Charsadda	DHO	Charsadda	Do-
235	S. Zakki Ud Din	DHO	Charsadda	DHO	Charsadda	Do-
236	Tarveer Ahmed S/O	DHO	Manshera	DHO	Manshera	Do-
237	Muhammad Yaqoob	DHO	Manshera	DHO	Manshera	Do-
238	Hasnullah S/O	DHO	Manshera	DHO	Manshera	Do-
239	Chaman Fagir	DHO	Manshera	DHO	Manshera	Do-
240	Abdul Muqadir S/O	DHO	Charsadda	DHO	Charsadda	Do-
241	Buzar Jamil	DHO	Charsadda	DHO	Charsadda	Do-
242	Akhtay Khan S/O	DHO	Charsadda	DHO	Charsadda	Do-
243	Muhammad Noor	DHO	Charsadda	DHO	Charsadda	Do-
244	S/O Abdul Hakim	DHO	Charsadda	DHO	Charsadda	Do-
245	Farmullah S/O	DHO	Charsadda	DHO	Charsadda	Do-
246	Waseem Bad	DHO	Charsadda	DHO	Charsadda	Do-
247	Imran Ali S/O	DHO	Charsadda	DHO	Charsadda	Do-
248	Lukman Khan	DHO	Charsadda	DHO	Charsadda	Do-
249	Abdul Karim	DHO	Charsadda	DHO	Charsadda	Do-
250	Mir Muhammad S/O	DHO	Charsadda	DHO	Charsadda	Do-
251	Rehman Gul	DHO	Charsadda	DHO	Charsadda	Do-
252	Khalid Khan S/O	DHO	Charsadda	DHO	Charsadda	Do-
253	Farmullah	DHO	Charsadda	DHO	Charsadda	Do-
254	Azam Hussain S/O	DHO	Charsadda	DHO	Charsadda	Do-
255	Taj Hussain	DHO	Charsadda	DHO	Charsadda	Do-
256	Sheher Yar S/O	DHO	Charsadda	DHO	Charsadda	Do-
257	Saeed Khan	DHO	Charsadda	DHO	Charsadda	Do-

208

265.	Muhammad Salim S/O Khair Abad	DHO Peshawar	DHO Peshawar	Do-
266.	Im Muhammad S/O Muhammad Rehman	DHO Swat	DHO Swat	Do-
267.	Munzoor Hussain S/O Muhammad Haroon	DHO Manshera	DHO Manshera	Do-
268.	Ismail S/O Malook	DHO Swat	DHO Swat	Do-
269.	Fida Muhammad S/O Khan Sher	DHO Charsadda	DHO Charsadda	Do-
270.	S. Farid Shah S/O Mahmood Shah	DHO Manshera	DHO Manshera	Do-
271.	Asghar Ali S/O Noor Mal	DHO Charsadda	DHO Charsadda	Do-
272.	Noor Zaf Khan S/O Lal Azam Khan	DHONW Miranshah	DHO Lakki	Do-
273.	Muhammad Iqbal S/O Ghulam Jan	DHO Khyber	DHO Kohat	Do-
274.	Thasimullah S/O Muhammad Ghazi	DHO NWA	DHO Lakki	Do-
275.	Muhtasib Ahmad S/O Muhammad Hanayun	DHO Manshera	DHO Manshera	Do-
276.	Muhammad Riaz S/O Rehman	DHO Manshera	DHO Manshera	Do-
277.	Ali Asghar S/O Chohan Haider	DHO Manshera	DHO Manshera	Do-
278.	Shabir Hussain S/O Sultan Hussain	DHOKurram	DHO Hangu	Do-
279.	Bashir Ahmad S/O Moeen Khan	DHO Abbotabad	DHO Abbotabad ✓	Do-
280.	Javid Hussain S/O Zarah Gul	DHO Kohat	DHO Kohat	Do-
281.	Rehmat Din S/O Ali Bahadar	DHO Manshera	DHO Manshera	Do-


N.B: Annual Departure should be submitted to this Directorate for record.

Sd/xxxx  
Director General Health Services,  
Khyber Pakhtunkhwa Peshawar

No. R371-847 (Promotion Cell) Dated Peshawar the 08/07/2021  
Copy forwarded to the:

1. All DHOs of Health Services in Khyber Pakhtunkhwa.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. All District Account Officers in Khyber Pakhtunkhwa.
4. Deputy Director (Paramedics), DGHS, KPK, Peshawar.
5. PA to DG Health Services Khyber Pakhtunkhwa Peshawar.
6. Official Concerned.
7. Suptt. Promotion Cell, DGHS, KPK, Peshawar.
8. Personal Files.

For information and necessary action.

  
Additional Director General (H&M)  
Directorate General Health Services,  
Khyber Pakhtunkhwa Peshawar.

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

18

**OFFICE ORDER:-**

The competent authority on the recommendation of Departmental Promotion Committee in its meeting held on 20/09/2022, is pleased to promote the following Sr. PHC Technicians MP (BS-14) to the post of Chief PHC Technicians (MP) (BS-16) on rotational basis with effect from 20/09/2022.

S.No	Name/Father Name	Place of posting
1	Muhammad Jamil S.O Pirm Gid	DHO Hangu
2	Muhammad Faraz S.O Hamish Gul	DHO Bajaur
3	Riaz Ali S.O Muhammad Salim Khan	DHO Mardan
4	Samitullah Shah S.O Ratiullah Shah	DHO Peshawar
5	Sajid Khan S.O Mukatam Khan	DHO Peshawar
6	Fida Muhammad Shaid S.O Fazal Muhammad	DHO Peshawar
7	Ishfaq Khan S.O Mir Ahmad	DHO Peshawar

On their promotion as Chief PHC Technicians (MP) (BS-16) the following posting, transfer are hereby ordered in the interest of public service:-

S.No	Name/F. Name of Officials	From	To	Remarks
1	Muhammad Jamil S.O Pirm Gid	DHO Hangu	DHO Hangu	Against the vacant post
2	Muhammad Faraz S.O Hamish Gul	DHO Bajaur	DHO Bajaur	Do
3	Riaz Ali S.O Muhammad Salim Khan	DHO Mardan	DHO Mardan	Do
4	Samitullah Shah S.O Ratiullah Shah	DHO Peshawar	DHO Peshawar	Do
5	Sajid Khan S.O Mukatam Khan	DHO Peshawar	DHO Peshawar	Do
6	Fida Muhammad Shaid S.O Fazal Muhammad	DHO Peshawar	DHO Peshawar	Do
7	Ishfaq Khan S.O Mir Ahmad	DHO Peshawar	DHO Peshawar	Do

N.B: Arrival/Departure should be submitted to this Directorate for record

Sd/xxxx

Director General Health Services,  
Khyber Pakhtunkhwa Peshawar

No. 15704/834 (Promotion Cell) Dated Peshawar the 11/11/2022

Copy forwarded to the:-

- All Sub-offices of Health Services in Khyber Pakhtunkhwa.
- All Hospital Directors (MTIs) in Khyber Pakhtunkhwa.
- All Deans/ Principal of Medical Colleges in Khyber Pakhtunkhwa Peshawar.
- Accountant General Khyber Pakhtunkhwa Peshawar.
- All District Account Officers in Khyber Pakhtunkhwa.
- Deputy Director (Paramedics) DGHS-KPK Peshawar.
- Deputy Director (DHIS) DGHS-KPK Peshawar.
- PA to DG Health Services Khyber Pakhtunkhwa Peshawar.
- Official concerned.
- Sub-Cell Promotion Cell DGHS-KPK Peshawar.
- Personal File.
- For information and necessary action.

RECEIVED  
11/11/2022

**HEALTH SERVICES KHYBER  
PAKHTUNKHWA PESHAWAR**

**OFFICE ORDER:-**

The competent authority on the recommendations of Departmental Promotion Committee in its meeting held on 20.10.2022 is pleased to promote the following Sr. PHC Technicians MP BS-14 to the post of Chief PHC Technicians MP BPS-16 on notional basis with effect from 20.09.2022.

SNO	Name father name	Place of posting
1	Muhammad Jamal SO Pira Gul	DHO Hangu
2	Muhammad Faraz SO Hamish Gul	DHO Bajaur
3	Riaz Ali SO Muhammad Salim Khan	DHO Mardan
4	Sanaullah Shah SO Rafiullah Shah	DHO Peshawar
5	Saleem Khan SO Mukaram Khan	DHO Peshawar
6	Fida Muhammad Shahid SO Fazal Muhammad	DHO Peshawar
7	Jehangir Khan SO Mir Ahmad	DHO Peshawar

On their promotion as Chief PHC Technicians MP BS-16 the following posting transfer are hereby ordered on the interest of public service:-

S.NO	Name F, Name of Official	From	To	Remarks
1	Muhammad Jamal SO Pira Gul	DHO Hangu	DHO Hangu	Against the vacant post
2	Muhammad Faraz SO Hamish Gul	DHO Bajaur	DHO Bajaur	Do.
3	Riaz ali SO Muhammad Salim khan	DHO Mardan	DHO Mardan	Do.
4	Samiullah Shah SO Rafiullah Shah	DHO Peshawar	DHO Peshawar	Do.
5	Saleem Khan SO Muhammad Khan	DHO Peshawar	DHO Peshawar	Do.
6	Fida Muhammad Shahid SO Fazal Muhammad	DHO Peshawar	DHO Peshawar	Do.
7	Jehangir Khan SO Mir Ahmad	DHO Peshawar	DHO Peshawar	Do.

NB arrival/ Departure should be submitted to the directorate for record

SD/xxxxxx

Director General Health services  
Khyber Pakhtunkhwa Peshawar

No.15704-834/(Promotion Cell) Dated Peshawar the 11/11/2022

Copy forwarded to all concerned.



Ex. PhC Technician  
DPO

13/10/2021

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- 20 - "H"




OFFICE OF THE DISTRICT HEALTH  
OFFICER ABBOTTABAD.

OFFICE ORDER

Mr. Muhammad Jehangir, Jr. PHC Technician (BPS-12) MP/Malaria working at Malaria Control Program undersigned office is hereby stands retired from Government service w.e.f 09.04.2023 (AN) on superannuation.


Sanction for encashment of 365 days' pay in lieu of L.P.R is hereby accorded to him as admissible vide Government of Khyber Pakhtunkhwa, Finance Department Notification No. SO (FR) FD 5-92/2005/Vol-0V dated 13.12.2012.

  
District Health Officer  
Abbottabad.

No. 412-415 / Estab/D/R.O Dated Abbottabad the 21/4/2023.

Copy forwarded to the: -

1. District Accounts Officer, Abbottabad for information and necessary action.
2. Accounts Section Malaria Control Program undersigned office.
3. Official concerned.
4. DHIS Cell.  
For information & necessary action.

  
District Health Officer  
Abbottabad.

District Health Officer Link Road, Abbottabad.

The Director General Health Services Department,  
Khyber Pakhtunkhwa, Peshawar

Subject: DEPARTMENTAL APPEAL FOR THE GRANT OF PRO  
FORMA PROMOTION TO THE POST OF PHC MP  
TECHNICIAN BPS-14 AND SUBSEQUENTLY TO THE POST  
OF HEALTH TECHNOLOGIST BPS-16 WITH EFFECT  
FROM THE DATE WHEN COLLEAGUES AND JUNIOR  
COLLEAGUES OF THE APPELLANT HAVE BEEN  
PROMOTED WITH ALL CONSEQUENTIAL BENEFITS  
INCLUDING FIXATION OF SENIORITY

Respected Sir,

With great reverence it is most humbly stated that the applicant was the employee of your good self department and was serving as PHC Technician BPS-12 at District Health Officer, Abbottabad quite efficiently and upto the entire satisfaction of his superiors.

That during service of the applicant many colleagues and junior colleagues of the applicant have been promoted to the post of Senior PHC MP Technician BPS-14 vide order Endst: No. 8371-8471 dated 08.07.2021 and subsequently to the post of Health Technologist BPS-16 vide office order No.15704-834 dated 04.11.2022 while the applicant has been ignored from the same benefit of promotion due to missing the name of applicant from the seniority list of PHC Technicians.

That the applicant has been retired from government service on superannuation basis vide order dated 13/04/2023 with effect from 09.04.2023 without availing the benefit of promotion to the above mentioned next higher scales such like his colleagues and junior colleagues despite of having eligibility and seniority.

That the applicant time and again requested the authorities for his promotion to the next higher scale i.e. Senior PHC Technician BPS-14 and to the post of Health Technologist (BPS-16) but the authority concerned refused the repeated requests made by the applicant.

That feeling aggrieved the applicant preferred the instant departmental appeal before your good self.

It is therefore most humbly prayed that on acceptance of this

granted in favor of the applicant.

Dated: 29.04.2024.

APPLICANT



MUHAMMAD JEHANGIR, Ex-JPHC (BPS-12),  
O/O the District Health Officer, Abbottabad

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

OF 2024

Muhammad Jehangir

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

VERSUS

Health Department

(RESPONDENT)  
(DEFENDANT)

I/We Muhammad Jehangir

Do hereby appoint and constitute **MIR ZAMAN SAFI, Advocate, Peshawar** 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. \_\_\_/\_\_\_/2024



CLIENT



ACCEPTED

MIR ZAMAN SAFI  
ADVOCATE

OFFICE:

Room No.6-E, 5<sup>th</sup> Floor,  
Rahim Medical Centre, G.T Road,  
Hashtnagri, Peshawar.  
Mobile No.0333-9991564  
0317-9743003