


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

1493/2024


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	20/09/2024	<p>The appeal of Mr. Muhammad Suleman resubmitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 30.09.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Muhammad Suleman received today i.e on 10.09.2024 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 departmental appeal attached with the appeal is incomplete.

No. 755 /Inst./2024/KPST,


Dt. 12/9/2024.


OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Noor Muhammad Khattak Adv.
District Court at Peshawar.

R/si,

Re-submitted


2
12/9/24

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

SERVICE APPEAL No 1493 / 2024

MUHAMMAD SULEMAN

VS

HEALTH DEPTT:

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Dated: -09-2024

APPELLANT

THROUGH:

NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

-1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

APPEAL NO. 1493/2024

Mr. Muhammad Suleman, PHC Technician (MP) (BPS-12),
DHO Office Hangu.

..... APPELLANT

VERSUS

1. The Secretary to Government of Khyber Pakhtunkhwa, Health Department, Peshawar.
2. Director General Health Services, Government of Khyber Pakhtunkhwa, Peshawar.

..... RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED INACTION OF THE RESPONDENT BY VIOLATING THE SERVICE RULES NOTIFIED ON 10/05/2016 AS AMENDED VIDE NOTIFICATION DATED 04/10/2020 OF THE RESPONDENT DEPARTMENT, WHEREBY THE RESPONDENTS ARE GOING TO PROMOTE THE MASTER IN PUBLIC HEALTH DEGREE HOLDER TO THE POST OF PHC TECHNOLOGIST MULTIPURPOSE (BPS-17) ON THE BASIS OF MASTER IN PUBLIC HEALTH DEGREE HOLDER AND AGAINST THE INACTION OF THE RESPONDENTS BY NOT DECIDING THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal, the impugned action of the respondents by promoting Master in Public Health Degree Holder to the post of PHC Technologist (MP) {BPS-17} in utter violation of service rules of the Health Department, may kindly be set aside and the respondents may kindly be restrained, not to promote the Degree Holder of Master in Public Health to the post of PHC Technologist (MP) {BPS-17}. Any other remedy which this august Court deems fit may also be awarded in favor of appellant.

R/SHEWETH:

ON FACTS:

- 1) That appellant was initially appointed as PHC Technician BPS-12 and start performing his duties quite efficiently and to the entire satisfaction of his superior.
- 2) That it is important to mention here that the appellant applied for acquiring his degree for which the respondent department issued

NOC to the appellant and after fulfilling all the legal and codal formalities, the appellant got admission in the relevant field of technology at Khyber Medical University, whereafter the appellant acquired the degree in the relevant field. Copy of the degree is attached as annexure.....A

3) That the Health Department published in the official gazette through notification dated 10/05/2016 framed service rules as amended in the year, 2020. It is important to mention here that according to ibid rules and specifically amendment in the rules provided that the degree holder of Master in Public Health shall be considered for promotion only for those categories, where degree in the relevant technology does not exists, in this the MPH degree holder shall only be promoted to the PHC Technologists (MCH) and Clinical Technologist Pharmacy as there is no degree exists in these two categories of technology. Copy of service rules is attached as annexure.....B

4) That it is also pertinent to mention here that the respondent No 1 through letters dated 10/03/2021 & 06/06/2023 clarify that only BS Health Technology, BS Emergency Care Technology & BS ICU Technology can be considered for the post of PHC Technologist Multipurpose and the appellant acquired degree in BS ICU Technology and is eligible for promotion to the post of PHC Technologist (MP) and accordingly the MPH Degree holder is not eligible to be promoted to the post of PHC Technologist MP in accordance with these letters and according to the service rules. Copies of letters dated 10/03/2021 & 06/06/2023 are attached as annexure.....C

5) That vide notification dated 20/03/2024 the respondent department made promotion to PHC Technologist (MP) BPS-17 from the degree holder in the relevant technology, which clarify that degree course of PHC Technologist (MP) exists. Copy of the notification dated 20/03/2024 is attached as annexure.....D

6) That the respondents just to facilitate blue-eyed persons, a meeting of pre departmental promotion committee was held on 02/08/2024 for the promotion of MPH degree holder, which is violation of the service rules of the respondent department and also against the letters mentioned in the aforesaid Paras. Copy of the letter dated 23/07/2024 is attached as annexure.....E

7) That it is important to mention here that the respondent department vide dated 03/09/2024 scheduled a meeting of Departmental Promotion Committee for the promotion to the post of PHC Technologist (MP) (BPS-17) from other technologies as well as from MPH degree holders, which is clear from the heading

of the said letter dated 03/09/2024. Copy of the letter dated 03/09/2024 is attached as annexure.....F

- 8) That felling aggrieved appellant preferred departmental appeal before the respondents, but no response has been given by the respondent department till the expiry of statutory period of ninety days. Copy of the departmental appeal is attached as annexure.....G
- 9) That having no other remedy the appellant filed the instant appeal on the following grounds amongst the others:-

GROUND:

- A) That the inaction of the respondents by promoting the MPH Degree Holders to the post of PHC Technologist (MP) is against the law, facts and norms of natural justice.
- B) That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- C) That the respondent Department acted in arbitrary and malafide manner by promoting the MPH Degree Holders to the post of PHC Technologist (MP).
- D) That the appellant has been discriminated by the respondent Department on the subject noted above and as such the respondent violated the principle of natural justice.
- E) That the action and inaction of the respondents is violative Section-9 of the civil servant Act, 1973 read with Rule-7 of the appointment, promotion and transfers Rules, 1989.
- F) That the action and inaction of the respondents is violative Article 38-E of the Constitution of Pakistan, 1973.
- G) That the respondents are going to facilitate the blue eyed employees by promoting the MPH Degree Holders to the post of PHC Technologist (MP).
- H) That the respondent department also violating their own service rules by promoting the MPH Degree Holders to the post of PHC Technologist (MP).
- I) That MPH degree shall not be considered for promotion where degree in the relevant technology exists.

- J) That it is important to mention here that in the category/cadre of PHC Technician (MP), the degree of health technology, ICU Technology & Emergency Technology exists, therefore, those PHC Technician who did not acquired degree in the relevant technology may not be promoted to the Health Technologist (MP) on the basis of MPH Degree.
- K) That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: -09-2024


APPELLANT

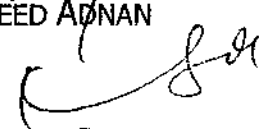
THROUGH:

NOOR MUHAMMAD KHATTAK
 ADVOCATE SUPREME COURT

UMAR FAROOQ MOHMAND

WALEED ADNAN

&


KHANZAD GUL
 ADVOCATE HIGH COURT

CERTIFICATE:

No such like appeal is pending or filed between the parties on the subject matter before this Honorable Tribunal.


 Advocate

AFFIDAVIT

I, Muhammad Suleman, (the appellant), do hereby solemnly affirm on oath that the contents of the above appeal are true and correct to the best of my knowledge and believe and nothing has been concealed from this Honorable Tribunal.


DEPONENT

-5-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

SERVICE APPEAL No _____ / 2024
MUHAMMAD SULEMAN VS HEALTH DEPTT:

APPLICATION FOR SUSPENSION OF THE LETTER DATED 03/09/2024
WHEREBY THE RESPONDENTS SCHEDULED THE MEETING OF
DEPARTMENTAL PROMOTION COMMITTEE (DPC) ON 10/09/2024
AND FURTHER RESTRAINED NOT TO ISSUE PROMOTION
NOTIFICATION TO THE EXTENT OF DEGREE HOLDER OF MASTER
PUBLIC HEALTH, TILL THE FINAL DISPOSAL OF THE INSTANT
SERVICE APPEAL.

Respectfully Sheweth:

- 1- That the above mentioned appeal along with this application has been filed the appellant before this august Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above mentioned appeal against the impugned inaction of the respondent by violating the service rules notified on 10/05/2016 as amended vide notification dated 04/10/2020 of the respondent department, whereby the respondents are going to promote the Master in Public Health Degree Holder to the post of PHC Technologist Multipurpose (BPS-17) on the basis of Master in Public Health Degree Holder, preferred departmental appeal/representation before the competent authority/ respondent, but no response has been given within the stipulated period.
- 3- That all the three ingredients necessary for the stay is in favor of the appellant.
- 4- That impugned inaction of the respondents in utter disregard of law and prevailing Rules.

It is therefore, most humbly prayed that on acceptance of this application, the operation of the letter dated 03/09/2024 whereby the respondents / scheduled the meeting of Departmental Promotion Committee (DPC) on 10/09/2024 may kindly be suspended and further restrained the respondents not to issue promotion notification to the extent of degree holder of master Public Health till the final disposal of the instant service appeal.

Dated: -09-2024


APPELLANT

THROUGH:

NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

AFFIDAVIT

I, Muhammad Suleman, (the appellant), do hereby solemnly affirm on oath that the contents of the above application are true and correct to the best of my knowledge and believe and nothing has been concealed from this Honorable Tribunal.


DEPONENT

Serial No.: 223417/23061



Reg. No.: 2017/KMU/NHIMS/HT/39

Session: Annual, 2021

KHYBER MEDICAL UNIVERSITY
PESHAWAR, PAKISTAN.

has conferred upon

MUHAMMAD SULAIMAN s/o AMAN ULLAH KHAN

of National Institute of Health & Management Sciences, Peshawar

the degree of

Bachelor of Science (Honors) in Health Technology

Given this nineteenth day of October two thousand and twenty two

Controller of Examinations

Registrar

Vice Chancellor

EXTRAORDINARY
GOVERNMENT



REGISTERED NO. PIII
GAZETTE

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, TUESDAY, 10TH MAY, 2016

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

NOTIFICATION

Peshawar dated the 10th May, 2016.

No. SOH-III/IDA-5/2014 - In pursuance of the provision contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all Notifications issued in this behalf by the Health Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualification and other conditions specified in column 3 to 5 of the Appendix to the posts of Paramedical Staff in the Health Department specified in column 2 of the said Appendix.

APPENDIX

S. No.	Nomenclature of the post.	Qualification for appointment by initial recruitment.	Age limits.	Method of recruitment.
1	2	3	4	5
1	<u>Principal Technologist</u> (i) Principal Clinical Technologist Dental; (ii) Principal Clinical Technologist Pharmacy; (iii) Principal Clinical Technologist Radiology; (iv) Principal Clinical Technologist Pathology;			By promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technologists and Chief PIC Technologists with five years service in BS-19 or seventeen years service in BS-17 and above as such in the relevant technology.

	<p>(v) Principal Clinical Technologist Anaesthesia; (vi) Principal Clinical Technologist Cardiology; (vii) Principal Clinical Technologist Surgical; (viii) Principal Clinical Technologist Dialysis; (ix) Principal Clinical Technologist Physiotherapy; (x) Principal Clinical Technologist Pulmonology; (xi) Principal Clinical Technologist Gastroenterology; and (xii) Principal Clinical Technologist Ophthalmology / otorhinolaryngology; and</p> <p>Principal PHC Technologist</p> <p>(i) Principal PHC Technologist (Multi Purpose); and (ii) Principal PHC Technologist (MCH).</p>			
2	<p>Chief Technologist</p> <p>(i) Chief Clinical Technologist Dental; (ii) Chief Clinical Technologist Pharmacy; (iii) Chief Clinical Technologist Radiology; (iv) Chief Clinical Technologist Pathology; (v) Chief Clinical Technologist Anaesthesia; (vi) Chief Clinical Technologist Cardiology; (vii) Chief Clinical Technologist Surgical; (viii) Chief Clinical Technologist Dialysis; (ix) Chief Clinical Technologist Physiotherapy; (x) Chief Clinical Technologist Pulmonology; (xi) Chief Clinical Technologist Gastroenterology; and (xii) Chief Clinical Technologist Ophthalmology/ Otorhinolaryngology; and</p>			<p>By promotion, on the basis of seniority-cum-fitness, from amongst Senior Technologists and Senior PHC Technologists with seven years service in HPS-18 or twelve years service in DPS-17 and above as such in the relevant technology.</p>

	<p><u>Chief PHC Technologist</u></p> <p>(i) Chief PHC Technologist (Multi-Purpose); and (ii) Chief PHC Technologist (MCH)</p>			
3	<p><u>Senior Technologist</u></p> <p>(i) Senior Clinical Technologist Dental; (ii) Senior Clinical Technologist Pharmacy; (iii) Senior Clinical Technologist Radiology; (iv) Senior Clinical Technologist Pathology; (v) Senior Clinical Technologist Anesthesia; (vi) SCT Senior Clinical Technologist Cardiology; (vii) Senior Clinical Technologist Surgical; (viii) Senior Clinical Technologist Dialysis; (ix) Senior Clinical Technologist Physiotherapy; (x) Senior Clinical Technologist Pulmonology; (xi) Senior Clinical Technologist Gastroenterology; and (xii) Senior Clinical Technologist Ophthalmology/Otorhinolaryngology; and</p> <p><u>Senior PHC Technologist</u></p> <p>(i) Senior PHC Technologist (Multi-Purpose); and (ii) Senior PHC Technologist (MCH).</p>	<p>At least Second Class Master's Degree or H.S.C Honours/ HS (04-years) in the relevant technology or equivalent qualification from a recognized University/ Institution.</p>	<p>20-35 years</p>	<p>(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Technologists and PHC Technologists with five years service as such in the relevant technology; and (b) fifty percent by initial recruitment.</p>
4	<p><u>Technologist</u></p> <p>(i) Clinical Technologist Dental; (ii) Clinical Technologist Pharmacy; (iii) Clinical Technologist Radiology; (iv) Clinical Technologist Pathology; (v) Clinical Technologist Anesthesia;</p>	<p>At least Second Class Bachelor's Degree in the relevant Technology from a recognized University/ Institution.</p>	<p>15-32 years</p>	<p>(a) Forty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technicians and Chief PHC Technicians with three years service as such in the relevant technology;</p>

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-10-

	<p>(vi) Clinical Technologist Cardiology; (vii) Clinical Technologist Surgical; (viii) Clinical Technologist Dialysis; (ix) Clinical Technologist Physiotherapy; (x) Clinical Technologist Pulmonology; (xi) Clinical Technologist Gastroenterology; and (xii) Clinical Technologist Ophthalmology / Otorhinolaryngology); and</p> <p>PHC Technologist</p> <p>(i) PHC Technologist (Multi-Purpose); and (ii) PHC Technologist (MCH).</p>		<p>(b) twenty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technicians, Senior Technicians and Technicians having qualification prescribed for initial recruitment with three years service as such in the relevant technology</p> <p><u>Note:</u> For the purpose of promotion, there shall be maintained a joint seniority list of Chief Technicians, Senior Technicians and Technicians with reference to the dates of their acquiring qualification prescribed for initial recruitment as in column No. 3:</p> <p>Provided that if two or more officials acquired the qualification prescribed for initial recruitment in the same session, then the official who obtains the highest marks or grade in the examination shall be deemed to be senior to the other officials; and</p> <p>(c) forty percent by initial recruitment.</p>
<p>5</p>	<p>Chief Technician</p> <p>(i) Chief Clinical Technician Dental; (ii) Chief Clinical Technician Pharmacy; (iii) Chief Clinical Technician Radiology; (iv) Chief Clinical Technician Pathology; (v) Chief Clinical Technician Anaesthesia; (vi) Chief Clinical Technician Cardiology; (vii) Chief Clinical Technician Surgical; (viii) Chief Clinical Technician Dialysis; (ix) Chief Clinical Technician Physiotherapy; (x) Chief Clinical Technician Pulmonology; (xi) Chief Clinical Technician Gastroenterology; and</p>		<p>By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Technicians and Senior PHC Technicians with at least two years service as such in the relevant technology.</p>

	<p>(ii) Chief Clinical Technician Ophthalmology, (Otorhinolaryngology); and</p> <p>Chief PIC Technician</p> <p>(i) Chief PIC Technician (Multi-Purpose); and (ii) Chief PIC Technician (MCH).</p>			
6	<p>Senior Technician</p> <p>(i) Senior Clinical Technician Dental; (ii) Senior Clinical Technician Pharmacy; (iii) Senior Clinical Technician Radiology; (iv) Senior Clinical Technician Pathology; (v) Senior Clinical Technician Anesthesia; (vi) Senior Clinical Technician Cardiology; (vii) Senior Clinical Technician Surgical; (viii) Senior Clinical Technician Dialysis; (ix) Senior Clinical Technician Physiotherapy; (x) Senior Clinical Technician Pulmonology; (xi) Senior Clinical Technician Gastroenterology; and (xii) Senior Clinical Technician Ophthalmology/ Otorhinolaryngology); and</p> <p>Senior PIC Technician</p> <p>(i) Senior PIC Technician (Multi-Purpose); and (ii) Senior PIC Technician (MCH).</p>			By promotion, on the basis of seniority-cum-fitness, from amongst the Technicians and PIC Technicians with at least two years service as such in the relevant technology.
7	<p>Technician</p> <p>(i) Clinical Technician Dental; (ii) Clinical Technician Pharmacy; (iii) Clinical Technician Radiology; (iv) Clinical Technician Pathology; (v) Clinical Technician Anesthesia; (vi) Clinical Technician Cardiology; (vii) Clinical Technician Surgical; (viii) Clinical Technician Dialysis; (ix) Clinical Technician Physiotherapy; (x) Clinical Technician Pulmonology; (xi) Clinical Technician Gastroenterology; and</p>	<p>(i) Technician/PIC Technician: At least Second Division Secondary School Certificate with Science from a recognized Board with Diploma in the relevant Paramedical Technology from Khyber Pakhtunkhwa Medical Faculty or Diploma in the relevant Paramedical technology from any recognized institution; provided that the same is registered with the Medical Faculty Khyber Pakhtunkhwa Peshawar; and</p>	18-30 years	By initial recruitment

-12-

EXTRAORDINARY
GOVERNMENT



REGISTERED NO. PIII
GAZETTE

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, FRIDAY, 6TH NOVEMBER, 2020.

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

NOTIFICATION

Peshawar dated the 04th November, 2020

No. SOH-III/R-60/2020/Paramedics/SSRC/1440-82:- In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Health Department, in consultation with the Establishment Department and the Finance Department, hereby directs that in this Department's Notification No. SOH-III/ID/3-5/2014, dated: 10-05-2016, the following amendments shall be made, namely:-

AMENDMENTS

In the Appendix:-

- (a) against Serial No. 1, in Columns No. 2 and 5, for the existing entries, the following shall be substituted, namely:

2	5
Principal Technologist.	"By promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technologists and Chief PHC Technologists with five years service in BPS-19 or seventeen years service in BPS-17 and above as such. Note: A joint seniority of Chief Technologists and Chief PHC Technologists shall be maintained for the purpose of promotion."

- (b) against Serial No. 2, in Columns No. 2 and 5, for the existing entries, the following shall be substituted, namely:

2	5
Chief Technologist/ Chief PHC Technologist.	"By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Clinical Technologists and Senior PHC Technologists with seven years service in BPS-18 or twelve years service in BPS-17 and above as such. Note: A joint seniority of Senior Clinical Technologists and Senior PHC Technologists shall be maintained for the purpose of promotion."

- (c) against Serial No. 3, in Columns No. 2, 3, 4 and 5, for the existing entries, the following shall be substituted, namely:

<u>Gastroenterology</u>			
xii)	Senior Clinical Technologist Ophthalmology/Otolaryngology		
xiii)	Senior PIC Technologist (Multi Purpose)		
xiv)	Senior PIC Technologist (MCH)		

(d) against Serial No. 4,-

(i) in Column No. 3, for the existing entries, the following shall be substituted, namely:

"At least Second Class BS/BSc (04-years) (Honors)/ Master Degree in the relevant technologies from a recognized University.

Note: For the purpose of clause (b), in Column No. 5, apart from the enhanced qualification, B.Sc two years Degree from a recognized University shall be applicable up to seven (07) years from the commencement of this amending notification."

(ii) in Column No. 4, for the existing entries, the following shall be substituted, namely:

"22-35 Years"; and

(iii) in Column No. 5, in clause (b), after the proviso, the following shall be inserted, namely:

"Note: Master in Public Health Degree from a recognized University shall be considered for promotion only for those categories where Degree in the relevant technologies does not exist. In case of non availability of MPH or relevant degree in their relevant categories, vacant posts shall be considered for promotion on the basis of seniority-cum-fitness, from amongst the Chief Clinical Technicians and Chief PIC Technicians in their relevant Technologies with at least three years service as such."

(e) against Serial No. 5, in Column No. 5, for the existing entries, the following shall be substituted, namely:

"By promotion, on the basis of Seniority-cum-fitness, from amongst the Senior Clinical Technicians (BS-14) and Senior PIC Technicians (BS-14) with two years service in the relevant Technology as such. In case the required length of service is less than two years then one fourth service in lower basic scales shall be counted as service in BPS-13.

Note: (i) The counting of one fourth service in lower basic scales as service in BS-14 shall be one time exercise in order to remove the anomaly created in the Paramedics service structure after the up-gradation of posts in (BS-12) without upgrading the incumbents to higher grades vide Finance Department Notification of even No. dated: 15-05-2018. Upon promotion of the existing incumbents this relaxation shall be discontinued.

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(ii) A separate seniority list of Senior Clinical Technicians and Senior PHC Technicians of relevant technology shall be maintained for the purpose of promotion.”;

(f) against Serial No. 6, in Column No. 5, for the existing entries, the following shall be substituted, namely:

“By promotion, on the basis of Seniority-cum-fitness, from amongst the Technicians and PHC Technicians with two years service as such in the relevant Technology.” And

Note: A separate seniority list of Technicians and PHC Technicians shall be maintained in the relevant technology for the purpose of promotion.”; and

(g) against Serial No. 7, in Columns No. 3 and 4, for the existing entries, the following shall be substituted, namely:

3	4
<p>(i) Technician/ PHC Technician:</p> <p>At least Second Division Secondary School Certificate in science from a recognized Board and two years Diploma in the relevant Paramedical Technology from recognized Medical Faculty or F.Sc Medical Technology in the relevant Technology from a recognized Board;</p>	<p>18-32 Years.”</p>
<p>(ii) PHC Technician (MCH):</p> <p>At least Second Division Secondary School Certificate in science from a recognized Board and Diplomas of LHV and Midwifery from recognized a Nursing Examination Board and having valid registration with Pakistan Nursing Council as LHV.</p>	

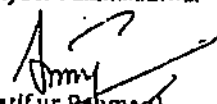
SECRETARY TO
GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

2	3	4	5
<p>Senior Technologists/ Senior PHTC Technologist.</p> <p>i) Senior Clinical Technologist <u>Dental</u>.</p> <p>ii) Senior Clinical Technologist <u>Pharmacy</u>.</p> <p>iii) Senior Clinical Technologist <u>Radiology</u>.</p> <p>iv) Senior Clinical Technologist <u>Pathology</u>.</p> <p>v) Senior Clinical Technologist <u>Anaesthesia</u>.</p> <p>vi) Senior Clinical Technologist <u>Cardiology</u>.</p> <p>vii) Senior Clinical Technologist <u>Surgical</u>.</p> <p>viii) Senior Clinical Technologist <u>Dialysis</u>.</p> <p>ix) Senior Clinical Technologist <u>Physiotherapy</u>.</p> <p>x) Senior Clinical Technologist <u>Pulmonology</u>.</p> <p>xi) Senior Clinical Technologist</p>	<p>At least MS/ M.phil in the relevant technologies from a recognized University.</p>	<p>23-40 Years.</p>	<p>(a) Seventy percent (70%) by promotion, on the basis of seniority-cum-fitness, from amongst the Clinical Technologists and PHTC Technologists with five years service in the relevant technologies as such. In case the required length of service is less than five years then half of the service in BS-16 and one fourth service in below BPS-16 shall be counted as service in BPS-17 in the relevant technology:</p> <p>Note: A joint seniority list of Clinical Technologists and PHTC Technologists shall be maintained for the purpose of promotion; and</p> <p>(b) thirty percent (30%) by initial recruitment</p>

Encls: even No and Date.

Copy forwarded to the:-

1. The Additional Chief Secretary, Newly Merged Areas, Khyber Pakhtunkhwa.
2. The Secretary to Governor, Khyber Pakhtunkhwa.
3. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
4. All Administrative Secretaries to Govt of Khyber Pakhtunkhwa.
5. Senior Member, Board of Revenue, Khyber Pakhtunkhwa.
6. The Secretary, Provincial Assembly, Khyber Pakhtunkhwa.
7. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
8. The Director General, Health Services, Khyber Pakhtunkhwa.
9. The Director General, Drug Control & Pharmacy Services, Khyber Pakhtunkhwa.
10. The Registrar, Peshawar High Court, Peshawar.
11. All Deputy Commissioners, Political Agents, District & Session Judges/District Nazims, Khyber Pakhtunkhwa.
12. The Chairman, Khyber Pakhtunkhwa, Service Tribunal, Peshawar.
13. PS to Vice Chancellor, KMU, Peshawar.
14. The Inspector General of Prisons, Khyber Pakhtunkhwa.
15. The Director General, Social Security, Khyber Pakhtunkhwa.
16. The Director General, PHSA, Khyber Pakhtunkhwa.
17. Director, Local Fund Audit, Khyber Pakhtunkhwa.
18. The Treasury Officer, Peshawar.
19. The Chief HSRU, Health Department.
20. The Chief Planning Officer Health Department.
21. Director Health Services, Merged Areas, Peshawar.
22. All Hospital Directors/Medical Directors, MTIs, Khyber Pakhtunkhwa.
23. All Medical Superintendents of DHQ/THQ Hospitals in Khyber Pakhtunkhwa.
24. All District Health Officers, Khyber Pakhtunkhwa.
25. The Chief Executive Officer, Faculty of Paramedical & Allied Health Sciences, Khyber Pakhtunkhwa.
26. The Director of Information, Khyber Pakhtunkhwa.
27. All District Health Officers of Merged Areas.
28. All Principals of Medical Colleges in Khyber Pakhtunkhwa.
29. The Principal, ZAB/PGPI, Peshawar.
30. The Principals, All PIMT in Khyber Pakhtunkhwa.
31. All District Accounts Officers in Khyber Pakhtunkhwa.
32. All District Accounts Officers, Merged Areas.
33. The Section Officers (Budget-VII) Health Department.
34. PSO to Chief Secretary Khyber Pakhtunkhwa.
35. PS to Minister for Health, Khyber Pakhtunkhwa.
36. Manager Govt. Printing Press & Stationery for publication in the Official Gazette.
37. PS to Minister Health, Khyber Pakhtunkhwa.
38. PS to Secretary Health, Khyber Pakhtunkhwa.
39. PS to Special Secretary Health, Khyber Pakhtunkhwa.
40. PA to Additional Secretary (Estab) Health, Khyber Pakhtunkhwa.
41. PA to Deputy Secretary (Admn) Health, Khyber Pakhtunkhwa.


(Latif ur Rehman)
Section Officer-III

"C"
-17-



**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 - 9210209 Exchange : 091 - 9210187, 091 - 9210196 Fax : 091 - 9210230

No. 1170-71/AE.VI, Dated Pesh: the 10/03/2021.

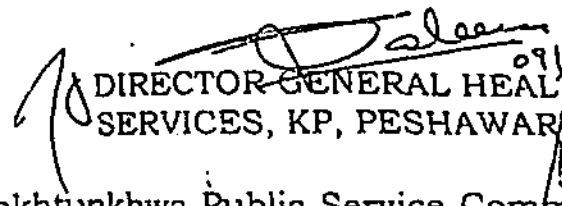
To:-

The Secretary to Govt. of Khyber Pakhtunkhwa,
Health Department Peshawar.

Attention: Section Officer-III

Subject:- REQUEST FOR CLARIFICATION OF THE REQUIRED
QUALIFICATION CRITERIA FOR PHC TECHNOLOGIST (MP) IN
HEALTH DEPARTMENT ADVT: NO. 02/2019 S.NO. 19 (A.B).

With reference to your letter No. SOH-III/8-60/2021 dated 05.03.2021 on the subject noted above, I have the honour to state that the matter was discussed in detail in meeting Chaired by Vice Chancellor, Khyber Medical University Peshawar on 03.03.2020 in the office of Registrar, Khyber Medical University Peshawar, where it was unanimously decided that only BS Health Technology, BS Emergency Care Technology and BS ICU Technology can be considered for the posts of PHC Technologist (MP).


DIRECTOR GENERAL HEALTH
SERVICES, KP, PESHAWAR. 09/03/20
MP 09/

C.C

Assistant Director-III, Khyber Pakhtunkhwa Public Service Commission
Peshawar for information.



-18-

**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 - 0210200 Extension No. 001 - 0210107 001 - 0210106 Fax: 091 - 0210230

No. 5490 /AE-VI

Dated Pesh: 6, 6 /2023

To

The Secretary to Govt. of Khyber Pakhtunkhwa,
Health Department Peshawar.

Attention: SECTION OFFICER-III

Subject: - REQUEST TO WITHDRAW/CANCELLATION OF THE RELEVANCY
NOTIFICATION AND CONSIDERATION OF THE PRIORITY
NOTIFICATION FOR THE POST OF THE (MP) TECHNOLOGIST BS-17.

Sir,

In continuation of this Directorate letter No. 2581/AE-VI dated 26/04/2023 with refer to your letter No. SOH-III/8-60/2023(Ijaz Ahmad & Others/Appeal) dated 20/03/2023 on the subject noted above and to state that in a meeting held on 03/03/2021 in the office of Registrar Khyber Medical University Peshawar, it was unanimously decided to recommend that only the following Technologies may be considered for the subject posts as per below priorities.

1. BS Health Technology 1st Priority.
2. BS Emergency Care Technology 2nd Priority.
3. BS ICU Technology 3rd Priority.

2
ADDL: DIRECTOR GENERAL (HRM)
DIRECTORATE GENERAL HEALTH
SERVICES, KP PESHAWAR.



GOVT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT



Dated: Peshawar the 20th March 2024

NOTIFICATION

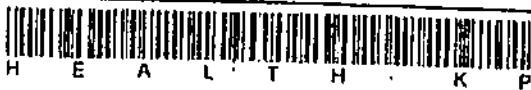
SOH-III/8-60/2023 (Paramedics): In continuation of this Department's Notification of even number, dated 25-01-2024, the Competent Authority, is pleased to order posting/transfer of the following PHC/Clinical Technicians (BS-12), Senior PHC/Clinical Technicians (BS-14) and Chief PHC/Clinical Technicians (BS-16) to the posts of PHC/Clinical Technologists (BS-17) against the vacant post with immediate effect, in the public interest.

**1. CLINICAL TECHNOLOGIST (PATHOLOGY) BPS-17
(PROMOTED ON THE BASIS OF SENIORITY-CUM-FITNESS)**

S. No	Name & F/Name	From	To /Disposal
1	Ziara Khan S/O Adam Khan 15401-9889589-9	DHO: Hospital Battikela	Category-B Hospital Dargai Malakand
2	Muhammad Iqbal S/O Makhozaei 15101-0400293-5	DHO: Hospital Daggar Buner	DHO: Hospital Daggar Buner
3	Amjad Khan S/O Abdul Majid 17301-1828144-5	LRH Peshawar	HKBM Hospital Peshawar.
4	Niaz Khan S/O Gul Said 17301-1780872-1	MMC Mardan	DHO, Mardan
5	Iftikhar Ahmad S/O Wasit Khan 17301-1577709-9	Services Hospital Peshawar	Services Hospital Peshawar

**2. PHC TECHNOLOGIST (MP) BPS-17
(PROMOTED ON THE BASIS OF HIGHER QUALIFICATION)**

S. No	Name & F/Name	From	To /Disposal
1	Muhammad Idress S/O Khair Muhammad 11201-9658597-9	DHO Lakki Marwat	DHO Lakki Marwat.
2	Hayat Ullah S/O Rahani Badshah 15302-6311844-5	DHO Dir Lower	DHO Dir Lower
3	Muhammad Javed S/O Iqbal Khan 14301-3889712-9	DHO Kohat	DHO Kohat.
4	Khaib-Ur-Rehman S/O Habib-Ur-Rehman 15302-6311844-5	DHO: Hospital Lakki	DHO: Hospital Lakki Marwat.
5	Samiullah Khan S/O Saad Ullah Khan 11101-3856151-1	DHO Lakki Marwat	DHO Lakki Marwat.
6	Zir Ali Khan S/O Sher Zamin Khan 11101-3856151-1	DHO Bajaur	DHO Bajaur
7	Basuor Ahmad S/O Munir Khan 17301-0789586-5	DHO Peshawar	DHO Peshawar
8	Amjad Khan S/O Muhammad Amin 18102-1780441-7	DHO Mardan	DHO Mardan.
9	Muhammad Naeem S/O Luqman Hakeem 21203-6658493-7	DHO Khyber	DHO Charsadda.
10	Niaz Zada S/O Rahim Zada 15302-1133552-5	DHO Dir Lower	DHO Dir Lower.
11	Usman Ali S/O Hazrat Zada 17102-2068130-3	DHO Charsadda	DHO Charsadda



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-20-

**GOVT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**



12	Fawad Ali S/O Kharsid 17101-7849210-1	DHO Charsadda	DHO Charsadda
13	Nahid Shah S/O Yar Wali 21264-0766814-3	DHO Khyber	DHO Nonshera
14	Muhammed Rab Nawaz S/O Meera Dar 14301-4289191-1	DHO Kohat	DHO Kohat
15	Haroon Ur Rashid S/O Rahim Din 14202-8109557-7	DHO Karak	DG, PHSA
16	Hamayun Khan S/O Gul Nawaz Khan 11101-1432412-3	DHO Lakh Mawat	DHO Lakh Mawat

**3. CLINICAL TECHNOLOGIST (PATHOLOGY) BPS-17
(PROMOTED ON THE BASIS OF HIGHER QUALIFICATION)**

S. No	Name & F/Name	From	To /Disposal
1	Amjid Ali S/O Hubab Khan 15601-1008561-7	DHO Swat	DHO Swat
2	Salim Muhammad S/O Nazir Muhammad 15701-4404877-9	DHQ: Hospital Dir Upper	DHQ: Hospital Dir Upper
3	Siraj-Ud-Din S/O Saïd Hakeem 15302-0935675-3	DHQ: Hospital Dir Lower	DHQ: Hospital Dir Lower vido

**4. CLINICAL TECHNOLOGIST (OPHTHALMOLOGY) BPS-17
(PROMOTED ON THE BASIS OF HIGHER QUALIFICATION)**

S. No	Name & F/Name	From	To /Disposal
1	Razi Shah S/O Saïd Kamel Shah 15101-8417434-7	DHQ: Hospital Buner	NKBM Hospital Peshawar

**SECRETARY HEALTH
KHYBER PAKHTUNKHWA**

End of even No and Date:

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar
3. Director General, PHSA, Khyber Pakhtunkhwa, Peshawar.
4. District Health Officer, concerned.
5. Hospital Director, MTI concerned.
6. Medical Superintendent, DHQ/THQ Hospital, concerned.
7. District Accounts Officer, concerned.
8. PS to Secretary Health, Khyber Pakhtunkhwa.
9. PS to Special Secretary (E&A) Health, Khyber Pakhtunkhwa.
10. PA to Additional Secretary (Estab) Health, Khyber Pakhtunkhwa.
11. PA to Deputy Secretary (Admn) Health Department.
12. Officers concerned.

(Signature)
**(NASEER AHMAD)
SECTION OFFICER (III)**



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Page 2/2

H E A L T H K P

"E" -21-



GOVT. OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

No SOH-III/8-60/2024(Abdul Majeed & Others/MPH)
Dated the Peshawar 30th July, 2024

To

20/7/24
08:40 PM

1. The Secretary to Govt. of Khyber Pakhtunkhwa,
Establishment Department

2. The Secretary to Govt. of Khyber Pakhtunkhwa,
Finance Department

Subject: WORKING PAPER FOR PROMOTION OF MPH DEGREE HOLDERS:-

Dear Sir,

I am directed to refer to the subject noted above and to state that a meeting of Pre-Departmental Promotion Committee (DPC) is scheduled to be held on 02-08-2024 at 1100 Hour under the Chairmanship of Secretary Health in his office.

2. It is therefore, requested to depute representatives well conversant with the subject matter to attend the said meeting, on the date, time & venue, mentioned above, please

Working Papers are enclosed.

Yours faithfully,

Signature
(NASEER AHMAD)
SECTION OFFICER-III

Encl: of even no & date,

Copy forwarded to:-

- 11 Director General, Health Services, Khyber Pakhtunkhwa, Peshawar with the request to kindly attend the subject meeting, please.
- 12 PS to Secretary Health, Khyber Pakhtunkhwa
- 13 PS to Special Secretary (E&A) Health, Khyber Pakhtunkhwa.
- 14 PA to Additional Secretary (E&A) Health, Khyber Pakhtunkhwa.
- 15 PA to Deputy Secretary (Admin), Health Department.

Signature
SECTION OFFICER-III

WF -22-

GOVT. OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

No. SOE-III/ID/3-5/2024 (Abdul Majid B. Othman/11)
Dated the Peshawar 03rd September, 2024



To

(03)

26/9/24

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.

Subject: PROMOTION OF QUALIFICATION CHIEF PHC TECHNICIAN (BS-16) SENIOR PHC TECHNICIAN (BS-14) PHC TECHNICIAN (BS-12) TO THE POST OF PHC TECHNOLOGIST MP (BS-17).

Dear Sir,

I am directed to refer to the subject noted above and to state that a meeting of Departmental Promotion Committee (DPC) is scheduled to be held on 10-09-2024 at 1200 Hours under the Chairmanship of Secretary Health in his office.

2. It is therefore, requested to depute representatives well conversant with the subject matter to attend the said meeting, on the date, time & venue, mentioned above please.

Working Papers have already been circulated.

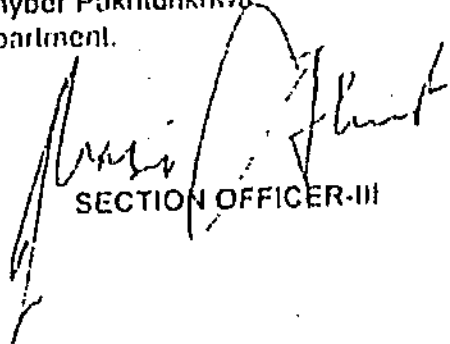
Yours faithfully,


(NASEER AHMAD)
SECTION OFFICER-III

Endst: of oven no & date.

Copy forwarded to:-

3. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar with the request to kindly attend the subject meeting, please.
4. PS to Secretary Health, Khyber Pakhtunkhwa.
5. PS to Special Secretary (E&A) Health, Khyber Pakhtunkhwa.
6. PA to Additional Secretary (E&A) Health, Khyber Pakhtunkhwa.
7. PA to Deputy Secretary (Admin), Health Department.


SECTION OFFICER-III

KHYBER MEDICAL UNIVERSITY

KMU ROAD, PHASE-V, HAYATABAD, KHYBER PAKHTUNKHWA,

PESHAWAR, PAKISTAN

Telephone No. 091-9217000 Fax No. 091-9217704



No. KMUS/SA/AC/2024/15-31/2834

Date: 17-04-2024

The Section Officer-III,
Government of Khyber Pakhtunkhwa,
Health Department, Peshawar.

Application for nomination as III Section Officer

Kindly refer to your letter No. SO11-III/8-607024 (Abdul Majid Khan) dated the
Peshawar 17-04-2024 on the subject cited above and to state that BS Degree in PHC (MEd) is not
offered by Khyber Medical University, Peshawar.

REGISTRAR

Copy for information to:

1. The Director IPMS, KMU w.r.t the telephonic conversation on the subject matter
2. The Director Academics & Admissions, KMU
3. SPS to Vice Chancellor, KMU
4. Office file

28/4

"4" 16/11/2011
- 23 -

The Secretary, Health,
Govt of Khyber Pakhtunkhwa at Peshawar

Subject: Application against Promotion on basis MPH.

Respected Sir,

With due respect it is stated in your honor that we have come to know through a reliable source that some MPH degree holder are going to make Amendment in Paramedics service structure to illegally promote to BPS 17 posts of PHC (MP) Technicians which is unfair to senior and degree holder PHC(MP) Technicians having relative degree. Because

It is clearly mentioned in the service structure of Paramedics that the degree of MPH is not eligible for promotion in the categories of Allied Health Sciences which have degree programs and MPH is also not basic qualification for PHC(MP) initial appointment.

MPH is also a non-paramedical Non-Graduated and Non-Clinical course.

Additionally MPH is purely a management cadre 2 years course which can't be be use for the purposes of promotion as e.g. Doctors after basic education MBBS and Nurses after completion their basic nursing education are also getting MPH course to help them in the selection for Management posts which are already exists in the above two mention cadres. While paramedic has no such management cadre. So it is illegal that give promotion on PHC(M) clinical posts on the basis of MPH. We suggested and requested to develop a management cadre in paramedics to entertain MPH degrees holders on right and lawful way.

In the existing enhancement of paramedics posts, all available post of PHC Bps 17 are purely clinical and only Senior and technicians and Technologists have the right to be promoted on relevant degree / education or seniority base rather than on

SSH/ECAX
AS-ESTI
AS-MTI
DS-Admin
DS-Legal
DG-ESTI

06-08-11
SECRET
Said the news
must be
cancel

-23/A-

irrelevant non paramedical degree holders, managers like MPH degrees holders on the basis of following facts.

- 1) MPH is a non paramedical degree, not mentioned in 18 Categories of Paramedics.
- 2) MPH is Two years, 4 semesters duration totaling 36+ credit hours of study while for other eligible BPS 17 Basic Bachelors/Degrees in Health are 4 years 8 semesters and 132+ credit hours of study.
- 3) MPH is not used for promotion purposes in any other discipline of Health department i.e Doctors and Nurses as it is not basic health education i.e not used for clinical posts promotion only used for management cader.

Therefore we request in your kind honor that please this promotion on basis MPH be kindly cancelled. Departmental Promotion Cell is also requested to please inquire how these MPH degree holders and others get their degree. Whether their educational qualification meets the eligibility criteria for MPH admission or not and also whether they have applied for admission in MPH as per rules and regulations of Health department.

We shall be very thankful to you.

Yours Sincerely,

All BS Degree Holder(Health)

Khyber Pukhtonkhwa

Copy forwarded to the:-

Director General Health Services Khyber Pukhtonkhwa

Siraj ul Bari. (Signature)
03459161274.

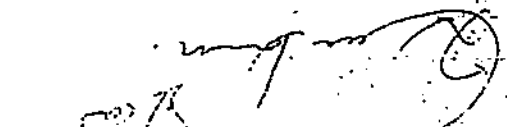
- | Sl. No. | Name | Signature |
|---------|------------------|-----------|
| 1 | Khairul Anam | |
| 2 | Muhammad Hanif | |
| 3 | Farooq Ali | |
| 4 | Fazal Malik | |
| 5 | Ibrahim Malik | |
| 6 | Imrat Ali | |
| 7 | Muhammad Umar | |
| 8 | Muhammad Zahoor | |
| 9 | Mudassar Khan | |
| 10 | Abdul Wahid | |
| 11 | Shahid Shah | |
| 12 | Shakeeb | |
| 13 | Nisara | |
| 14 | Dr. Shabir (PHD) | |
| 15 | Ahmed Saad | |
| 16 | Zubair Ali | |
| 17 | Anam Malik | |
| 18 | Hayat Bilal | |
| 19 | Muhammad Imran | |
| 20 | Ghous Beghar | |
| 21 | Ferman Ali | |
| 22 | Sajid Ali | |
| 23 | Solomon | |
| 24 | Hayat Umar | |
| 25 | Muhammad Arif | |
| 26 | Ali ul Haq | |
| 27 | Kiran Malik | |
| 28 | Masood Jan | |
| 29 | Masood Malik | |
| 30 | Syed Imran | |
| 31 | Nisara Muhammad | |

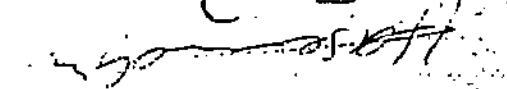
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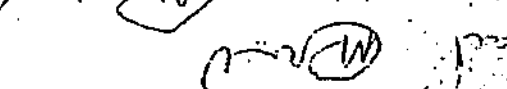
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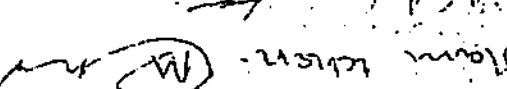
Signature







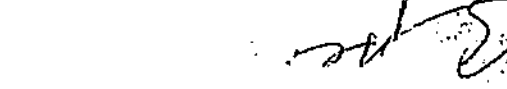


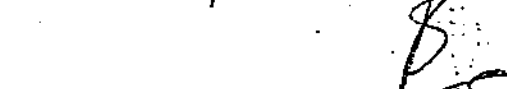


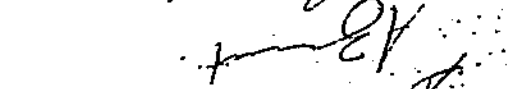













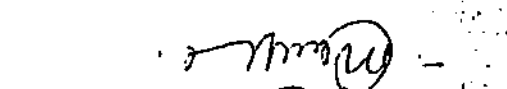












NO

Name

33)

Asad Khan

34)

Zahid Khan

35)

Hussain Khan

36)

Hussain Khan

37)

Muhammad Imad

38)

Muhammad Olan Khan

39)

Muhammad Khan

40)

Near Gup

41)

Ashtul Jamal

42)

Sajid Ali

43)

Shaym Zada

44)

Arman

45)

Nehru Shukla

46)

Fazal Ahmad

47)

Large Shale

48)

Harid Khan

49)

Muhammad Subhan

50)

Muhammad Ahmad

51)

Muhammad Ahmad

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appel No. /20 29

M. Sulman

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Health dept

(RESPONDENT)
(DEFENDANT)

I/we M. Sulman

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

Dated. ___/___/202


CLIENT

ACCEPTED


NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT


WALEED ADNAN


UMAR FAROOQ MOHMAND


KHANZAD GUL

&


ABID ALI SHAH
ADVOCATES

OFFICE:

Flat No. (TF) 291-292 3rd Floor,
Deans Trade Centre, Peshawar Can'tt.
(0311-9314232)