


# FORM OF ORDER SHEET

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

**Appeal No.** 1680/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	30 /09/2024	<p>The appeal of Mr. Qaiser Iqbal presented today by Syed Noman Ali Bukhari Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 03.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR.

Appeal No. 1680 /2024


Qaiser Iqbal

V/S


Health Deptt:

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APPELLANT  
Qaiser Iqbal

THROUGH:

  
(SYED NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT

&  
  
(UZMA SYED)  
ADVOCATE HIGH COURT

①

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. 1680 /2024

Qaiser Iqbal S/O Fazli Qadar,  
Supervisor , Registered Nursing Officer (BPS-16), ,  
DHQ Teaching Hospital, Mardan.

**APPELLANT.**

**VERSUS**

1. The Secretary, Health Deptt., Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. The Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
3. The Medical Superintendent, DHQ Teaching Hospital Mardan.

..... RESPONDENTS

.....

**APPEAL UNDER SECTION 4 OF THE KP SERVICE TRIBUNAL'S ACT 1974, AGAINST THE TRANSFER ORDER DATED 13/06/2024 WHEREBY THE APPELLANT WAS TRANSFERRED ON POLITICAL INFLUENCE AND AGAINST THE RELIVING ORDER DATED 22/06/2024 AND AGAINST NOT DECIDING DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF 90 DAYS.**

**PRAYER:**

**THAT ON THE ACCEPTANCE OF THIS APPEAL, THE IMPUGNED TRANSFER ORDER DATED 13/06/2024, AND RELIVING ORDER DATED 22/06/2024 MAY PLEASE BE SET-ASIDE BEING, PASSED POLITICALLY MOTIVATED AND IN VIOLATION OF POSTING/TRANSFER POLICY. THE RESPONDENT DEPTT: MAY FURTHER PLEASE BE DIRECTED NOT TO TRANSFER THE APPELLANT IN VIOLATION OF POSTING/TRANSFER POLICY AND POLITICALLY MOTIVATED. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT**

.....

**RESPECTFULLY SHEWETH:**

**ON FACTS:**

1. That the appellant is a law abiding citizen of Pakistan and has every legal and constitutional rights duly protected under law of the Land.
2. That the appellant is Registered Nursing Officer BPS-16 and performing his duties as Supervisor at District Head Quarter Teaching Hospital Mardan from March, 2017 and appellant was performing his duty with great zeal and dedication as per the direction of his superiors and no complaints was received against the appellant.
3. That on 13/06/2024 the appellant was transferred on direction of ~~MPA~~ MPA PK-58 from DHQ Mardan to Saidu Group of teaching, Swat without showing any reason in violation of Public interest and in pursuance of the same the appellant was relieved via order dated 22/06/2024. The appellant feeling aggrieved filed departmental appeal on 01/07/2024 against the impugned transfer order. **Copy of the Minister letter, impugned order, relieving order and departmental appeal are attached as annexure-A, B, C & D.**
4. That it is pertinent to mentioned here that the MS, DHQ Teaching Hospital Mardan Wrote letter dated 15/06/2024 to DG Health Services KP, Peshawar, wherein he stated that the appellant is a dutiful, Punctual and well experienced Staff/supervisor and there is no any complaint against him, his services are required in this hospital and requested to retain appellant at DHQ teaching Hospital Mardan but despitthat the appellant was relieved from service on political pressure. **Copy of letter is attached as annexure- E.**
5. The Addl: Director Nursing o/o Directorate General Health Services, wrote letter dated 27/08/2024 to MS DHQ Hospital Mardan, wherein, he stated that the appellant was transferred on the recommendation of Local MPA. **Copy of letter is attached as annexure-F.**
6. That the appeal of the appellant was not responded within statutory period of 90 days. So, the Appellant having no other remedy filed the instant appeal on the following grounds amongst the others.

**GROUND:**

- A- That, impugned transfer order dated 13/06/2024 and relieving order dated, 22/06/2024 are against the Law, policy, rules, superior court judgment, facts and norms of natural justice.

- B-** That the impugned order is politically motivated and has been passed without using independent mind and also passed in violation of Public Interest. The principle held in Supreme Court judgment cited as **2023 PLC (cs) 166, 2016 PLC Cs 221 and 2007 SCMR 599.**
- C-** That it is pertinent to mentioned here that the MS, DHQ Teaching Hospital Mardan Wrote letter to DG Health Services KP, Peshawar, wherein he stated that the appellant is a dutiful, Punctual and well experienced Staff/supervisor and there is no any complaint against him, his services are required in this hospital and requested to retain appellant at DHQ teaching Hospital Mardan, but despite that appellant was relieved from service illegally due to political pressure.
- D-** That the impugned transfer order was made on the basis of external influence and not as a routine transfer, so without showing any cogent reasons is against the law rules, posting transfer policy.
- E-** That, relevant law, rules and regulations have blatantly bypassed/ violated by the respondents and the relevant law, rules and regulations have never been taken into consideration by the respondents and thus the notification so passed by the respondents have no legal sanctity in the eyes of law.
- F-** That, the impugned order has neither been in the best interest of public service nor in exigencies of service, hence, not tenable and liable to be set aside.
- G-** That, the impugned order is violative of clause-I, and II of the transfer/ posting policy of the Government of Khyber Pakhtunkhwa as the appellant has been transferred from his current post.
- H-** That, the powers or jurisdiction are vested in authority to exercise it justly, fairly, honestly, judiciously and in accordance with law, rules and regulations but the respondents have transgressed upon their powers while dealing with the matter in hand.
- I-** That to ensure de-politicization of the bureaucracy. The arbitrary and whimsical nature of transfers is a major cause for civil servants to prioritize loyalty to the ruling elite over their institution and service cadre. Short tenures and untimely transfers make it challenging to hold officers accountable for their performance and significantly diminish the quality of public service delivery.
- J-** That the impugned order is not in line with the established principles of good governance, and it appears to have been made with malicious intent, nepotism, favoritism, and malfeasance.
- K-** That the appellant has been consistently treated in a manner, which is inconsistent with the principle of good governance and the norms of public service.

- L- That the grounds taken in departmental appeal also consider integral part of this appeal.
- M- That It has been laid down by the Constitutional Courts. that, every action of the Government or a public Functionary shall meet the requirements of reasonableness, rationality and fairness, which is lacking in the instant case. It has been held in a plethora of judgments that State Authority is a sacred trust and the bearers thereof shall be seen as fiduciaries, who shall observe certain codes and procedures instead of acting at their own whims and wishes.
- N- That Hon'ble Tribunal may very kindly note that each of the orders annexed herewith contain that these were issued in the best public interest. The term best public interest has also been defined by the Constitutional Courts in a plethora of judgments to signify the fiduciary nature of the orders. The respondents are required to show as to which best interest of the public was served by making the appellants a scapegoat.
- O- That the judgments rendered by the August Supreme Court are binding across the country under Article 189 of the constitution of Islamic republic of Pakistan 1973 and the impugned order not only violates the directions of the Apex Court but is also contemptuous.
- P- The order/notification appears to be in direct violation of Transfer /posting policy. This order has created numerous difficulties for appellants and his family. Furthermore, it is pertinent to mention that the August Supreme Court, Honorable High Court and Service Tribunal have given numerous directions/judgments regarding with transfer/posting policy, and the decision should not be made politically motivated. **Copy of posting transfer policy is attached as Annexure-G.**
- Q- That In the case of the appellants, all the prevailing laws have been abused / misused and the department has tried to victimize the appellants. Such treatment of the department is not covered under Para -1 of the posting transfer policy.
- R- That it is a cherished principle of law, that where a law requires a thing to be done in a particular manner, then the same is to be done in that manner and not otherwise.
- S- That the appellants have 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.
- T- That as per list issued by the MS DHQ Mardan, the tenure of the appellants is 5 years and the other Charge Nurses of the hospital having tenure more than appellants upto 20 years on one station. But the appellants were not transferred ordinarily but on the basis of

political recommendation which is illegal and against the law.  
Copy of list is attached as annexure-H.

- U- That Supreme Court of Pakistan in his Judgment Cited as 2013 PLD SC 195 stated Principles-- Transfers of civil servants by political figures which were capricious and were based on considerations not in the public interest was not legally sustainable.
- V- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

*[Handwritten Signature]*

APPELLANT  
Qaiser Iqbal

THROUGH:

*[Handwritten Signature]*

(SYED NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT

&

*[Handwritten Signature]*

(UZMA SYED)  
ADVOCATE HIGH COURT

**CERTIFICATE:**

It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.

*[Handwritten Signature]*

DEPONENT

**LIT OF BOOKS:**

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The ESTA CODE
3. Any other case law as per need.

*[Handwritten Signature]*

(SYED NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT

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**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR**

**SERVICE APPEAL NO. \_\_\_\_\_/2024**


Qaiser Iqbal

V/S

Health Deptt:

**AFFIDAVIT**

I, Qaiser Iqbal (Appellant) do hereby affirm that the contents of this service appeal are true and correct, and nothing has been concealed from this Honorable Tribunal.



DEPONENT



(7)

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

Appeal No. \_\_\_\_\_/2024

Qaiser Iqbal

V/S

Health Deptt:

.....

**APPLICATION FOR SUSPENSION OF  
OPERATION OF ORDER DATED 13/06/2024  
& 22/06/2024 OF APPELLANT TILL THE  
DISPOSAL OF MAIN APPEAL.**

**RESPECTFULLY SHEWETH:**

1. That the appellant has filed an Appeal along-with application in which no date has been fixed so far.
2. That the appellant has good prime facie case and all the ingredients of stay is in favour of appellant.
3. That the grounds of main appeal may also be considered as integral part of this application.
4. That the impugned order has passed on favouritism and nepotism and has been passed in-violation of Posting, Transfer Policy.
5. That the appellant the order dated 13/06/2024 and 22/06/24 is politically motivated and without any reasons.
6. That the impugned order has passed on favoritism and nepotism and has been passed in-violation of Posting, Transfer Policy.
7. That if the order dated 13/06/2024 & 22/06/2024 is not suspended. Its not only badly effect the right of appellant but also creates hurdles for the appellant to performed her duties efficiently.

It is, therefore, most humbly prayed that the order dated 13/06/2024 & 22/06/2024 may be suspended till the disposal of main appeal: Any other remedy, which this august

tribunal deems fit that may also be awarded in favour of appellant.

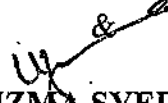


APPELLANT  
Qaiser Iqbal

THROUGH:



(SYED NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT



(UZMA SYED)  
ADVOCATE HIGH COURT

**AFFIDAVIT:**

It is affirmed and declared that the contents of this Application are true and correct to the best of my knowledge and belief.



DEPONENT

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PROVINCIAL ASSEMBLY OF KHYBER PAKHTUNKHWA

Muhammad

Ibrahim

BPS-17 Nursing Superintendent at DHO

Hospital Mardan

Raiser

RNO at DHO Hospital Mardan.

May please be transfer from

Mardan To any other district.

Abdul Salam Afridi

MPA P.K.S. &

Mardan.

Attested



B

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**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. 081 - 9210286 Exchange. S. 091 - 9210197, 091 - 9210196 Fax. 091 - 9210230

**OFFICE ORDER.**

Mr. Qaisar Iqbal S/O Fazli Qadar RNO/ Charge Nurse BPS-16 DHQ Hospital, Mardan is hereby transferred and posted at Saidu Group of Teaching Hospital Swat against the vacant post with immediate effect in the public interest.

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


Sd/-  
DIRECTOR GENERAL HEALTH  
SERVICES, KP, PESHAWAR


No. 2949-54 /E.II. Dated Pesh. The 13 / 06 / 2024.

Copy forwarded to the:-

01. Medical Superintendent, DHQ Hospital, Mardan.
02. Medical Superintendent, Saidu Group of Teaching Hospital Swat.
03. District Accounts Officer, Mardan.
04. District Accounts Officer, Swat.
05. Registered Nurse Officer, (RNO) concerned.
06. Nursing Promotion Cell DGHS KP Peshawar.

For information and necessary action.

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

  
11/6/2024

  
Syed Noman Ali Bukhari  
Advocate  
Attested



OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT HEADQUARTER HOSPITAL MARDAN  
Ph # 0937-9230145 Fax # 9230226

No \_\_\_\_\_/MS

Dated \_\_\_\_\_/\_\_\_\_\_/2024.

Office Order.

In pursuance of Director General Health Services Khyber Pakhtun Khwa Peshawar Order No. 2949-54/E-II dated 13-06-2024. Mr. Qaisar Iqbal S/O Fazli Qadar register Nurse BPS-16 is hereby relieved from DHQ Hospital Mardan and reported to Medical Superintendent Saidu Group Teaching Hospital Swat immediately.

Departure report along with the Clearance Certificate submitted to the office of undersigned.

Medical Superintendent  
DHQ Hospital Mardan.

No 4340-45MS

Dated 22-06-2024

Copy forwarded to the:

1. Director General Health Service, KPK Peshawar, for information with reference as above.
2. DMS-I, DHQ Hospital Mardan.
3. District Comptroller of Accounts Mardan.
4. Accountant, DHQ Hospital Mardan.
5. Chief Nursing Suptt: DHQ Hospital Mardan.
6. Official concerned.

for information and further n/action.

  
Medical Superintendent  
DHQ Hospital Mardan.

Syed Noman Ali Bukhari  
Attended

Dary No. 7019  
Date 1-7-24  
Health Department

D - 12

To,

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

Subject: APPEAL FOR CANCELLATION MY POSTING ORDER.

Respected Sir,

It is stated that I am Registered Nursing Officer BPS-16 performing my duty as Supervisor at District Head Quarter Teaching Hospital Mardan since March 2017. I have been posted at Saidu Group of Teaching Hospital Swat.  
ref letter no 2949-54/E-II. dated 13/6/24

There was no harm; if the posting was on necessity basis but it is a purely political based and bad faith. The main reason of this posting is a local person who is personal servant of a local MPA. His wife is employee of health department. The said person wishes that his wife should be given duty as per her wishes. He declare openly that his transfer has been done by him through political strength (proof attached).

After my posting order my medical superintendent wrote a letter to the Director General Health Services in my favor for retaining my duty at present station. This letter represents my own sincerity, character and dedication to profession (letter attached).

Sir, I am already performing duty out of my station and now due to a Political pressure my posting has been done in a remote area/swat.

I have two requests in this regard from you:

- 1) The first request is to conduct a fair inquiry into this matter.
- 2) Secondly, it is my sincere request please cancel my posting order.
- 3) I will be thankful to you for this act of kindness.

Sol III

Qaisar r Iqbal S/O Fazli Qadar,  
Registered Nursing Officer

BPS-16  
Syed Noman Ali Bukhori  
Syst No. 0334518908  
Attested



OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT HEADQUARTERS HOSPITAL MARDAN  
Ph # 0937-9230145 Fax # 9230226  
msdhq09379230145@gmail.com

E

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No. 1283 /Supdt:

Dated 15-6/2024.

To,

The Director General Health,  
Services Khyber Pakhtunkhwa  
Peshawar.


Subject: **OFFICE ORDER.**

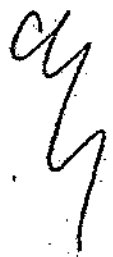
R/Sir,

It is for your kind information that Mr. Qaiser Iqbal S/O Fazli Qadar is working as RNO/ Charge Nurse BPS-16, at DHQ Teaching Hospital Mardan since March 2018 under the control of the Undersigned and transferred to Saidu Group of Teaching Hospital Swat vide your office letter No. 2949-54/E.II, dated 13-06-2024.

The above named RNO is a dutiful, punctual and well experienced staff/ supervisor and there is no any complaint against him. His services are required in this hospital. He is our highly trusted RNO who takes his profession seriously and is exemplary dedicated to institutional duties.

It is therefore requested that he may be retain at DHQ Teaching Hospital Mardan for the best interest of public services.

  
Medical Superintendent,  
D.H.Q Teaching Hospital,  
Mardan.

  
Syed Noman Ali Bukhari  
Advocate  
Attested



**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 - 9210262) Exchange (091 - 9210187, 091 - 9210196) Fax (091 - 92102)

No. **9524** /E.II,

Dated Pesh: the **27/08/2024**

To:-


The Medical Superintendent  
DHQ Hospital Mardan.

Subject: - **OFFICE ORDER.**  
Memo:-

Reference your letter No. 4283/Supdt: dated 15.06.2024 on the  
subject noted above.

Mr. Qaisar Iqbal RNO BPS-16 has been transferred from DHQ  
Hospital Mardan to Saidu Group of Teaching Hospital Saidu Sharif Swat on the  
recommendation of Local MPA and you have stated that the above named  
RNO is a dutiful, punctual and well experienced staff supervisor and there is no  
any complaint against him and requesting for his retention in DHQ Hospital  
Mardan in the best of public service.

Please explain the factual position in the matter.

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

  
Syed Noman Ali Bukhari  
Advocate  
Attested



G G

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Subject: POSTING /TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT.

I am directed to refer to the subject noted above and to say that in supersession of all policy instructions issued in this behalf, the competent authority has approved the following posting Transfer Policy.

i. All the postings /transfers shall be strictly in public interest and shall not be abused misused to victimize the Government servants.

ii. All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting /transfer authorities for seeking posting /transfers of their choice and against the public interest.

iii. All contract Government employees, appointed against specific posts, cannot be posted against any other post.

iv. The normal tenure of posting shall be three years subject to the condition that for the officers /officials posted in unattractive areas, the tenure shall be two-years and for hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.

v. Months of March and July are fixed for posting /transfer of the officers /officials excluding the officers in B-19 and above in the Province. Posting /transfer in Education and Health Departments shall be made in March while the remaining Departments shall make posting /transfers in July. There shall be a ban on posting/transfers throughout the year excluding the aforesaid two months. However; there shall be no restriction in cases where posting /transfer of Government employees become inevitable in other months due to promotion /retirement /creation of new posts/return from long leave/involvement in

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disciplinary proceedings and adjustment of surplus staff for which specific relaxation shall be obtained from the Chief Minister.

vi. While making postings transfers from settled areas to FATA and vice versa specific approval of the Governor, NWFP needs to be obtained.

vii. Officers may be posted on executive /administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thana) of his area /resident is situated.

viii. No postings /transfers of the officers/officials on detailment basis shall be made.

ix. Regarding the posting of husband /wife, both in Provincial services, efforts where possible would be made to post such persons at one station and this will be subject to the public interest.

x. All the posting /transferring authorities may facilitate the postings /transfers of the unmarried female Government Servants at the station of the residence of their parents.

xi. Officers /officials except DCOs and SPs who are due to retire within one year may be posted on their option, on posts in the Districts of their domicile and be allowed to serve till the retirement.

xii. In terms of Rules-17 (1) and (2) read Schedule-III of the Government of NWFP Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against.

Syed Noman Ali Bukhar  
Advocate  
Attested

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**Outside the Secretariat**

i. Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above.

ii. Other officers in BPS-17 and above to be posted against schedule posts, or posts normally held by the APUG, PCS (EG) and PCS (SG).

iii. Head of Attached Departments and other Officers in B-19 & above in all Departments.

**In the Secretariat:**

iv. Secretaries.

v. Other Officers of and above the rank of Section Officers:-

- a. Within the Same Department.
- b. Within the Secretariat from one Department to another.

vi. Officials upto the rank of Superintendent:-

- a. Within the same Department.
- b. To and from an Attached Department.

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Chief Secretary in consultation with the Establishment Department and the Department concerned with the approval of the Chief Minister.

--do--

--do--

Chief Secretary with the approval of Chief Minister.

Secretary of the Department concerned.  
Chief Secretary/Secretary Establishment.

Secretary of the Department concerned.  
Secretary of the Department in consultation

Syed Noman Ali Bukhari  
Advocate  
Attested

ATTESTED

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c. Within the Secretariat from one Department to another.

with Head of Attached Department concerned. Secretary (Establishment)

ATTESTED

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xiii. While considering postings /transfers proposals all the concerned authorities shall keep in mind the following

a. To ensure the posting of proper persons on proper posts, the annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered.

b. Tenure on present post shall also be taken into consideration and the posting transfers shall be in the best public interest.

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

i) pre-mature posting/transfer or posting/transfer in violation of the provisions of this policy.

ii) Serious and grave personal (humanitarian) grounds.

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

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

ATTESTED

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4.	Official in BPS-16 and below.	Executive District Officer in consultation with District Coordination Officer.
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As per Rule 25(2) of the Rules above the District Coordination Department shall consult the Government if it is proposed to :

- a. transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure; and
- b. require an officer to hold charge of more than one post for a period exceeding two months.

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

ATTN

Better Copy-21

OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT HEADQUARTERS HOSPITAL MARDAN  
PH # 0937-9230145 Fax # 9230226  
Madhq09379230145@mail.com

No. 8474 / MS/CC

Dated 7/17 / 2022

To,

The Director General Health  
Khyber Pakhtunkhwa, Peshawar.

Subject:-

**INFORMATION REGARDING SANCTIONED POSTS AND DETAIL OF NURSING STAFF.**

Memo:

reference your letter No. 5141-5241/E11 dated 17/10/2022, on the subject noted above.

Enclosed please find herewith the requisite information detail are as under on prescribed format, for further necessary action please.

Proforma - I

S.No.	BPS	Sanctioned Posts of Nursing Staff as per 2022-2023 Budget Book	Remarks
1.	16	Registered Nursing Officer Sanctioned Posts = 36	
2.	17	Specialist Nurse = 20, quality control Nurse = 02, Head Nurse = 20 & Clinical nursing Instructor = 02	
3.	18	Senior Head Nurse Manager = 10, Senior Clinical Nursing Instructor = 02, Senior Specialist Nurse = 12 Nursing Superintendent = 01 & Deputy Quality Control Nurse = 02	
4.	19	Deputy Chief Nursing Superintendent = 01, Chief Specialist Nurse = 06, Chief Quality Control Nurse = 02 & Chief Clinical Nursing Instructor = 02	
5.	20	Chief Nursing Superintendent = 01/	

Profmorma - I

Detail Information of Nursing Staff and their original BPS

S.No.	Name with father name	BPS (Original)	Domicile	Tenure at present place of posting	Spouse status	Remarks
1.	Mst. Samina Naz D/o Aurang Zeb	16	Mardan	25 Years		
2.	Mst. Nusrat Ali D/o Hassan Ali	16	Mardan	25 Years		
3.	Mst. Rashida Naz D/o Atab Ud Din	16	Mardan	20 Years		
4.	Mst. Arbia D/o Nawab Malik	16	Mardan	20 Years		
5.	Mst. Kifayat Hassan W/o Mir Hassan	16	Mardan	15 Years		
6.	Mst. Noreena Ali D/o M. Ali Khan	16	Mardan	15 Years		
7.	Mst. Iffat Abid D/o Hazrat Muhammad	16	Mardan	15 Years		
8.	Mst. Azra Bibi D/o Hazrat Muhammad	16	Mardan	15 Years		
9.	Mst. Shagufta Naz D/o Mutahir Shah	16	Mardan	14 Years		
10.	Mst. Saeeda Naz D/o Wali Muhammad	16	Mardan	14 Years		
11.	Mst. Shahi Haram D/o Wali Muhammad	16	Mardan	14 Years		
12.	Mst. Zarshada D/o Arsh Ullah	16	Mardan	14 Years		

OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT HEADQUARTERS HOSPITAL MARDAN

PH # 0937-9230145 FAX # 9230226  
mrdhg073792301@gmail.com

No. 907/MSIC/2022 Dated 17/10/2022



The Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar.

Attention: Addl. Director General (HRM),

Subject: INFORMATION REGARDING SANCTIONED POSTS AND DETAIL OF NURSING STAFF

Reference your letter No. 5141-5241/E.II, dated 17-10-2022, on the subject noted above.  
Enclosed please find herewith the requisite information detail as under on prescribe format,  
for further necessary action please.

Form - 1

S. No.	BPS	Sanctioned Posts of Nursing Staff as per 2022-2023 Budget Book	Remarks
1.	16	Registered Nursing Officer Sanctioned Posts = 36	
2.	17	Specialist Nurse = 20, Quality Control Nurse = 02, Head Nurse = 20 & Clinical Nursing Instructor = 02	
3.	18	Senior Head Nurse Manager = 10, Senior Clinical Nursing Instructor = 02, Senior Specialist Nurse = 12, Nursing Superintendent = 01 & Deputy Quality Control Nurse = 02	
4.	19	Deputy Chief Nursing Superintendent = 01, Chief Specialist Nurse = 06, Chief Quality Control Nurse = 02 & Chief Clinical Nursing Instructor = 02	
5.	20	Chief Nursing Superintendent = 01	

Form - 1  
Detail Information of Nursing Staff and their original BPS.

S. No.	Name with father name	BPS	Domicile (Original)	Tenure at present place	Spouse status	Remarks
1.	Mrs. Samra Naz D/O Aung Zeb	16	Mardan	25 Years		
2.	Mrs. Nurul Ali D/O Hassan Ali	16	Mardan	25 Years		
3.	Mrs. Rashida Naz D/O Anab Ud Din	16	Mardan	20 Years		
4.	Mrs. Arbia D/O Nawab Malik	16	Mardan	20 Years		
5.	Mrs. Kiyat Hassan W/O Mir Hassan	16	Mardan	15 Years		
6.	Mrs. Noorun AH D/O M. Ali Khan	16	Mardan	15 Years		
7.	Mrs. Ibtisam W/O Abid	16	Mardan	15 Years		
8.	Mrs. Azra Bibi D/O Hazrat Muhammad	16	Mardan	15 Years		
9.	Mrs. Sharifa Naz D/O Muahid Shah	16	Mardan	14 Years		
10.	Mrs. Saeeda Naz D/O Muahid Shah	16	Mardan	14 Years		
11.	Mrs. Shabi Harun D/O Wali Muhammad	16	Mardan	14 Years		
12.	Mrs. Zahida D/O Arif Ullah	16	Mardan	14 Years		

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Better Copy-22

S.No.	Name with father name	BPS (Original)	Domicile	Tenure at present place of posting	Spouse status	Remarks
13	Mst. Mehnaz Said D/o Said Rehman	16	Mardan	14 Years		
14	Mst. Ilhad begum D/o Muhammad Khalil	16	Mardan	14 Years		
15	Mst. Uzma D/o Abdul Sattar	16	Mardan	14 Years		
16	Mst. Irum Naz D/o Said Aslam	16	Mardan	14 Years		
17	Mst. Waheeda D/o Abdullah	16	Mardan	14 Years		
18	Mst Farzana Rubi D/o Muhammad Shah	16	Mardan	14 Years		
19	Mst. Akhter Begum D/o Fazal Bacha	16	Mardan	13 Years		
20	Mst. Lubna D/o Wajid Ali	16	Mardan	13 Years		
21	Mst. Neelam Daulat D/o Daulat Khan	16	Mardan	13 Years		
22	Mst. Nabeela Javed D/o Immanuel Javid	16	Mardan	13 Years		
23	Mst. Nusrat Jabeen W/o Amjad Ali	16	Mardan	13 Years		
24	Mst. Nasira Raheem D/o Abdaul Raheem	16	Mardan	13 Years		
25	Mst. Gulnaz Wazir D/o Wazir Muhammad	16	Mardan	11 Years		
26	Mr. Shah Faisal S/o Ajab Khan	16	Mardan	11 Years		
27	Mst. Gulzari D/o Ghulam Muhammad	16	Mardan	10 Years		
28	Mst. Ayesha Sameen D/o Sameen Jan	16	Mardan	09 Years		
29	Mst. Sarwat Begum D/o Muhammad Zubair	16	Mardan	09 Years		
30	Mst. Huma Begam D/o Munir Khan	16	Mardan	09 Years		
31	Mr. Akhter Munir S/o Noor Muhammad Khan	16	Mardan	09 Years		
32	Mst. Tabassum Naz D/o Muhd: Sharif	16	Mardan	09 Years		
33	Khushnuma Begum D/o Safdar Hussain	16	Mardan	09 Years		
34	Mst. Ishrat Sharif D/o Miraj Ud Din	16	Mardan	09 Years		
35	Mst. Safia Maqbool D/o Maqbool ur Rehman			09 Years		
36	Mst. Mumlikat D/o Amir Khan	16	Mardan	09 Years		
37	Mst. Shehnaz Begam D/o Abdul Ali	16	Mardan	09 Years		
38	Mst. Hussan Bano D.O M. Rahim	16	Mardan	08 Years		
39	Mst. Ishrat Asif D/o Barkat Masih	16	Mardan	08 Years		
40	Naseem Akhter D/o Missal Khan	16	Mardan	08 Years		
41	Mr. Wajid Ahmed S/o Sarfaraz Khan	16	Mardan	07 Years		
42	Mr. Rafique S/o Ghulam Qadir	16	Mardan	06 Years		
43	Mr. Sajid Ali S/o Shaukat Ali	16	Mardan	06 Years		
44	Mst. Komal Khan D/o Akhter Ali	16	Mardan	06 Years		
45	Miss Seema Gul D/o Muhammad Rahim	16	Mardan	06 Years		
46	Mr. Asadullah S/o Sultan Ud din	16	Mardan	06 Years		
47	Mr. M. Asif Ali S/o Sher Bandshah	16	Mardan	06 Years		
48	Mr. Ismail Khan S/o Ali Khan	16	Mardan	06 Years		
49	Mr. Hakeem Khan S/o Momin Khan	16	Mardan	06 Years		
50	Mst. Ambareen D/o Muhammad Saleem	16	Mardan	06 Years		
51	Miss Shahana D/o Gul Hussain	16	Mardan	06 Years		
52	Mst. Zainab D/o Sar Zameen	16	Mardan	06 Years		
53	Mr. Sami Ullah S/o Fazal Karim	16	Mardan	06 Years		
54	Mr. Jehangir Shah S/o Waseem Shah	16	Mardan	06 Years		
55	Mst. Sehrish D/o Bin Yamin	16	Mardan	06 Years		
56	Mst. Zulfat D/o Raham Badshah	16	Mardan	06 Years		
57	Mst. Farzana Tawab W/o Moazam Shah	16	Mardan	06 Years		
58	Mst. Maria Shah Pasand D/o Shah Pasand	16	Mardan	06 Years		
59	Miss Shabina Said D/o Said Rehman	16	Mardan	06 Years		
60	Mst. Nihar D/o Akbar Ali	16	Mardan	06 Years		
61	Mst. Musrrat Begum D/o Khaista Rehman	16	Mardan	06 Years		
62	Mst. Gul Naz Junior D/o Sher Alam	16	Mardan	06 Years		
63	Mst. Nazima Javed D/o Javed Khan	16	Mardan	06 Years		






**Medical Superintendent**  
**DHO Hospital Mardan**

Sl. No.	Name with other name	DPS (Original)	Domestic	Years of present place	Spouse status	Remarks
105	Mrs. Shabana D/O Amir Muhammad	16	Mardan	03 Months		
104	Mrs. Saba Raziq D/O Fazal Raziq	16	Mardan	06 Months		
103	Mrs. Shabnum Muneeb D/O Munir Khan	16	Mardan	01 Years		
102	Mrs. Humaira Naz D/O Ghani Ur Rehman	16	Mardan	01 Years		
101	Mrs. Tamana W/O Saraj Moya	16	Mardan	01 Years	Spouse Policy	
100	Mr. Abdur Rehman S/O Abdul Latif	16	Mardan	01 Years		
99	Mr. Faiz Muid; Shab S/O Arman Gul	16	Mardan	01 Years		
98	Mrs. Bushra Jamal D/O Nasrullah	16	Mardan	01 Years		
97	Miss. Shaheen Begum D/O Abdul Rauf	16	Mardan	01 Years		
96	Mrs. Shaista Gul D/O Azam Khan	16	Mardan	02 Years		
95	Mr. Irfan Ali S/O Sharar Khan	16	Mardan	03 Years		
94	Mrs. Yasmeen Akhtar D/O Mumtaz Ali	16	Mardan	03 Years		
93	Mrs. Fatima Bibi D/O Parou Din	16	Mardan	03 Years		
92	Mrs. Neelum Amir D/O Mir Badshah	16	Mardan	03 Years		
91	Mrs. Rasheda Rehman D/O Rehman Shah	16	Mardan	03 Years		
90	Mrs. Zakia Begum D/O Abdul Ghani	16	Mardan	03 Years		
89	Mrs. Nabeed Akhtar D/O Shah Pasand	16	Mardan	03 Years		
88	Mrs. Farhanda Fazal D/O Fazal Karim	16	Mardan	03 Years		
87	Mrs. Sehresh Samuel D/O Samuel Yagooob	16	Mardan	03 Years		
86	Mrs. Shahnaz Junior D/O Wali Muid;	16	Mardan	04 Years		
85	Mrs. Guliam D/O Ahmad Jan	16	Mardan	04 Years		
84	Mrs. Fozelat Junior D/O Sardar Khan	16	Mardan	04 Years		
83	Mrs. Perveen Akhtar D/O Saqlain	16	Mardan	04 Years		
82	Mrs. Huzaila D/O Saeed Muhammad	16	Mardan	04 Years		
81	Mr. Abdur Rahman S/O Noor Rehman	16	Mardan	04 Years		
80	Mrs. Sadia Fagir D/O Fagir Gul	16	Mardan	04 Years		
79	Mrs. Nadia Shaheen D/O Dary Khan	16	Mardan	04 Years		
78	Mrs. Farzana D/O Jamal Khan	16	Mardan	04 Years		
77	Mrs. Khalida D/O Janab U Din	16	Mardan	05 Years		
76	Mrs. Tauheed Begum D/O Shah Pasand	16	Mardan	05 Years		
75	Mrs. Naila D/O Fazil Rabi	16	Mardan	05 Years		
74	Mr. Qaisar Iqbal S/O Fazil Qadar	16	Mardan	05 Years		
73	Mrs. Busliaz D/O Fazal Dad	16	Mardan	05 Years		
72	Mrs. Shahzad Akhtar D/O Mumtaz Ali	16	Mardan	05 Years		
71	Mrs. Robina Bibi D/O Mirza Rehman	16	Mardan	05 Years		
70	Mrs. Farhana D/O Gul Rehman	16	Mardan	05 Years		
69	Mrs. Mubarkha Begum D/O Hazrat Muid;	16	Mardan	05 Years	Spouse Policy	
68	Mrs. Saqyat Jehon D/O Muid Qamar	16	Mardan	05 Years		
67	Mrs. Bushra Islam D/O Islam Gul	16	Mardan	05 Years		
66	Mrs. Marjium D/O Shaida Muhammad	16	Mardan	05 Years		
65	Mrs. Laila Haleez D/O Haleez Ullah	16	Mardan	06 Years		

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قیمت 50 روپے	57431	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
ایڈویکٹ: Syed Noman Ali Bukhari	بار کونسل ایسوسی ایشن نمبر: RC-15-5743	  
رابطہ نمبر: 0306-5109438		

بعدالت جناب:

مخانب: Qaiser Alam (Appellant)	دعویٰ:
Qaiser Iqbal	علت نمبر:
بنام	مورخہ:
Health Deptt	جرم:
	تھانہ:

### باعت تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام سبٹا اور کیلے سید نومان علی بخاری و علی محمد کوڈیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کی رضی نامہ کرنے و تقریر نمائندگی و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظرتانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزو کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخلہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب الخوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب باہم ذمہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

Syed Noman Ali Bukhari  
Advocate  
Attested  
Attested

PESHAWAR BAR ASSOCIATION  
KHYBER PAKHTOONKHWA

المرقوم: 1/20

المواہد العبد  
مقام منشیانہ کے لیے منظور ہے۔