# FORM OF ORDER SHEET

Court of\_\_\_\_

# Appeal No.

# 1680/2024

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5.No.	Date of order proceedings	Order or other proceedings with signature of judge	
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1-	30 /09/2 <b>02</b> 4	The appeal of Mr. Qaiser Iqbal presented	today b
		Syed Noman Ali Bukhari Advocate. It is fixed for pro-	eliminar
		hearing before Single Bench at Peshawar on 03	.10.2024
		Parcha Peshi given to counsel for the appellant.	an ta ta <del>t</del> a ta ta ta ta
		By order of the Chairma	in .
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# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

1680 12024 Appeal No.

Qaiser Iqbal

V/S

Health Deptt:

# INDEX

S.N	Documents	Annexure	Page No.
1	Memo of Appeal		
2.	Stay Application		01-06
·3.	Copy of MPA letter	A	09
4.	Copy of impugned transfer order	В	10
5.	Copy of relieving order	C	11
6.	Copy of departmental appeal	D	12
7.	Copy of letter	E	13
8.	Copy of letter	F	14
9.	Copy of posting transfer policy	G	15-20
10.	Copy of list	H	21-23
11.	Vakala Nama		24

APPELLANT Qaiser Iqbal

# THROUGH:

(SYED NOMÁŇ ÁLI BUKHARI) ADVOCATE HIGH COURT &

(UZMA(SYED) ADVOCATE HIGH COURT

#### BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1680 12024

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

#### <u>APPELLANT.</u>

#### 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:

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

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#### **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 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 vie 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.

#### **GROUNDS:**

A- That, impugned transfer order dated 13/06/2024 and reliving 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 appellant 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 appellant and his family. Furthermore, it is pertinent to mention that the August Supreme Court, Honorable High Court and Service Tribunal have given numerous direction/judgment 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 appellant, all the prevailing laws have been abused / misused and the department has tried to victimize the appellant. 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 be done in that manner and not otherwise.
- S- 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.
- T- That as per list issued by the MS DHQ Mardan, the tenure of the appellant is 5 years and the other Charge Nurses of the hospital having tenure more than appellant upto 20 year on one station. But the appellant was 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.

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.

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.

APPELLANT Qaiser Iqbal

#### THROUGH:

(SYED NOMAN ALI BUKHARI) ADVOCATE HIGH COURT

# (UZMA SYED) ADVOCATE HIGH COURT

#### **<u>CERTIFICATE:</u>**

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

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.

(SYED NOMAN ALI BUKHARI) ADVOCATE HIGH COURT

# 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.

1 DEPONENT

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



V/S

Qaiser Iqbal

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

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

APPELLANT Qaiser Iqbal

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#### THROUGH:

(SYED NOMAN ALI BUKHARI) ADVOCATE HIGH COURT (UZMA SYED) ADVOCATE HIGH COURT

DEPONENT

#### AFFIDAVIT:

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

PROVINCIAL ASSEMBLY OF KHYBER PAKHTUNKHWA

Mulammaol Ibratim BPS-17 Nousing Superintendent at DHR Hospital Mardan Raiser RNO at DHR Hospital Mardan May please be transfer from Mardan To any other district. Abdul Salan Afridi MPA PK58 Macdan.

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 (1001 - 0210205Exchange 5: 001 - 0210197, 001 - 0210205Exchange 5: 001 - 0210197, 001 - 0210205Exchange 5: 001 - 0210197, 001 - 0210197, 001 - 0210205Exchange 5: 001 - 0210197, 001 - 0210197, 001 - 0210205Exchange 5: 001 - 0210197, 001 - 0210197, 001 - 0210205Exchange 5: 001 - 0210197, 001 - 0210197, 001 - 0210205Exchange 5: 001 - 0210205Exchange 5: 001 - 0210197, 001 - 0210197, 001 - 0210205Exchange 5: 001 - 0210197, 001 - 0210197, 001 - 0210205Exchange 5: 001 - 0210197, 001 - 0210197, 001 - 0210205Exchange 5: 001 - 0210205Exchange 5: 001 - 0210197, 001 - 0210197, 001 - 0210205Exchange 5: 001 - 0210205Exchange 5: 001 - 0210197, 001 - 0210205Exchange 5: 001 - 0210205Exchange 5: 001 - 0210197, 001 - 0210197, 001 - 0210205Exchange 5: 001 - 0210205Exchange 5: 001 - 0210197, 001 - 0210197, 001 - 0210205Exchange 5: 001 - 0210205Exchange 5: 001 - 0210205Exchange 5: 001 - 0210197, 001 - 0210205Exchange 5: 001 - 02105Exchange 5: 001 - 02105Exchange 5: 001 - 02105Exchange 5: 001 - 02105Exchange 5

#### OFFICE ORDER.

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Mr. Qaisar Iqbal S/O Fazii Qadar RNO/ Charge Nurse BPS-16 DHO 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.

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

6/2024

Ali Bukhos Sved No! Advocate Attested

	C	
DISTRICT HEADQUARTE	NICAL SUPERINTENDENT R HOSPITAL MARDAN 30145.Eax # 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.

No 4340-49 Copy forwarded to the:

Medical Superintendent DHQ Hospital Mardan. -2024

1. Director General Health Service, KPK Peshawar, for information with reference as above.

Dated

- 2. DMS-I, DHQ Hospital Mardan.
- 3. District Comptroller of Accounts Mardan.
- 4. Accountant, DHQ Hospital Mardan.
- 5. Chief Nursing Suptt: DHQ Hospital Mardan.
- Official concerned. for information and further n/action.

Medical Superintendent DHQ Hospital Mardan.

Ali Bukha

Dairy No. 7019 Date <u>1-7-74</u> Health Department 12

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:

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- 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.

Qaisar r Iqbal S/O Fazli Qadar, Registered Nursing Officer, KNO<sup>O</sup> BPS-16 Ali BUKNO<sup>O</sup> Synol No. 0334 5408908 Add 5408908

Γlο,



OFFICE OF THE MEDICAL SUPERINTENT DISTRICT HEADQUARTERS HOSPITAL MARDAN Ph # 0937-9230145 Fax # 9230226 midhq09379230145@gmail.com

No. (12.83 /Supdi:

15- 6 J2024, Dated

ľo.

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.

ji Bukhai Syed Nom Attested

## DIRECTORATE GENERAL HEALTH SERVICES, KHYBER PAKHTUNKHWA PESHAWAR

All communications Should be Addressed to The Director General Uentth Services Peshawar and not to any official by tunne Office th (1091 - 92102928achange \$ 1091 - 9210187, 1091 - 921019619ax (\* 1091 - 92102

524 No. Dated Pesh: the 271 08 / 2024 Æ.İL To:-

The Medical Superintendent DHQ Hospital Mardan.

Subject: - OFFICE ORDER.

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 r 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.

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

Syed Noman Attested

#### NO.SOR-II (E&AD) 1-1/85(VOL-II) Dated Peshawar the 15<sup>th</sup> February 2003

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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 anyother post.

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.

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

werd Norman Ali Bukha

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.

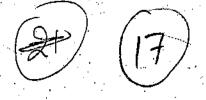
vii.Officers may be posted on executive /administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and Superintend of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thana) of his area /resident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

Sved Nomar All Bukhar 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 be the APUG, PCS (EG) and PCS (SG).

iii.Head of Attached Departments and otherOfficers in B-19 & above in allDepartments.

#### 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:-

b. To and from an Attached Department.

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

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

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# c. Within the Secretariat from on-Department to another.

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# with Head of Attached Department concerned. Secretary (Establishment)

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xiii: While considering postings /rransfers 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 tile 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 Distinct Officer in a District.	Provincial Government	
2.	Posting of District Police Officer.	Provincial Government.	<u> </u>
3.	Other Officer in BPS-17 and above posted in the District.	Provincial Government.	

24 Official in BPS-16 and below.

Executive District Officer in consultation with Distinct Coordination Officer.



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.

# Better Copy-21

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

#### No. 8474 / MS/CC

Dated 7/17 / 2022

The Director General Health Khyber Pakhtunkhwa, Peshawar.

Subject:-

Τo,

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

Memo:

reference your letter No. 5141-5241/E11 dated 1710.2022, on the subject noted above.

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

Profor	ma – I	processary action please.	
S.No.	BPS	Sanctioned Posts of Nursing Staff as per 2022-2023 Budget Book	Domestic
1.	16	Registered Nursing Officer Sanctioned Posts = 36	Remarks
- <b>2.</b> Subjec	17	Specialist Nurse = 20, quality control Nurse = 02, Head Nurse = 20 & Clinical nursing Instructor = 02	
<b>3.</b> Maaraa	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	<u>├</u> ──	
2	Mst. Nusrat Ali D/o Hassan Ali	16	Mardan	25 Years		
<u>3  *.</u>	Mst. Rashida Naz D/o Atab Ud Din	16	Mardan	20 Years	·	
4	Mst. Arbia D/o Nawab Malik	16	Mardan	20 Years	·	
<u>5</u>		16	Mardan	15 Years	· · · · · · · · · · · · · · · · · · ·	- <u> </u>
6'	Mst. Noreena Ali D/o M. Ali Khan	16	Mardan	15 Years	·	
7	by o haziat wuhammad	16	Mardan	15 Years		<u> </u>
3	Mst. Azra Bibi D/o Hazrat Muhammad	16	Mardan	15 Years		
)	Mst. Shagufta Naz D/o Mutahir Shah	16	Mardan	14 Years		<u> </u>
10.	Mst. Saeeda Naz D/o Wali Muhammad	16	Mardan	14 Years		- به المرقي المارية - ۲۰۰۰ - <u>- المرقي المرقي - /u> - المرقي - ال
11	Mst. Shahi Haram D/o Wali Muhammad	16	Mardan			
12	Mst. Zarshada D/o Arsh Ullah	16	Mardan	14 Years 14 Years		

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#### Addin Director General (IIIRM). (401)431)V

#### 24910 INFORMATION REGARDING SATISTIONED POSTS AND DETAIL OF NURSING 33 0

LOUIDIN .

Reference your lener No. 5141-5241/E.II. dated 17-10-2022, on the subject noted above.

Fuctored please find herewith the requisite information detail are as under on preseribe format,

	Chiel Nursing Superintendent = 01	OZ	5
	Deputy Chief Varsing Superintentent = 71, Chief Specialist Nume = 06, Chief Varsing Superintentent = 02 & Chief Clinical Numer =	6!	*
	Senior Head Nurse Manager = 10, Senior Clinical Nursing Instructor = 02, Senior Specialist Nurse = 12, Nursing Superintendent = 01 & Deputy Quality Control Nurse = 33	81	۲,
	Specialist Nurse = 20, Quality Control Nurse = 02, Head Nurse = 20 & Clinical Nursing Instructor = 02	41	Έ.
	Registered Nursing Officer Sonctioned Posts = 36	91	· · · I
Remarks	Sanctioned Posts of Nursing Staff as per 2012-2023 Budget Book	BPS	'0N

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No.		BPS (Original)	Domicile	1	ure at sent place	Spouse status	Remarks
		(Original)			place		
	Mst. Mehnaz Said D/o Said Rehman	16	Marda	<u> </u>	4 Years		
	Mst. Ilhad begum D/o Muhammad Khalil	16	Marda		4 Years		<u> </u>
	Mst. Uzma D/o Abdul Sattar	16	Marda	n i	4 Years		
5	Mst. Irum Naz D/o Said Aslam	16	Marda	n 📑	L4 Years		<u> </u>
5' 7	Mst. Waheeda D/o Abdullah	16	Marda	n:	14 Years		<u> </u>
, 3	Mst Farzana Rubi D/o Muhammad Shah	16	Marda		14 Years	<u> </u>	<u> </u>
9	Mst. Akhter Begum D/o Fazal Bacha	16	Marda		13 Years	l	<u> </u>
0	Mst. Lubna D/o Wajid Ali	16	Marda		13 Years	ļ	
1	Mst. Neelam Daulat D/o Daulat Khan	16	Marda		13 Years	<b>↓</b>	
2.0.	Mst. Nabeela Javed D/o Immanuel Javid	16	Marda		13 Years	<u> </u>	
.3	Mst. Nusrat Jabeen W/o Amjad Ali	16	Marda		13 Years	<b></b>	
4	Mst. Nasira Raheem D/o Abdaul Raheem	16	Marda		13 Years		
5	Mst. Gulnaz Wazir D/o Wazir Muhammad	16	Mard		11 Years		
26	Mr. Shah Faisal S/o Ajab Khan	16	Mard		11 Years		
27	Mst. Gulzari D/o Ghulam Muhammad	16	Mard		10 Years		
28	Mst. Ayesha Sameen D/o Sameen Jan	16	Mard		09 Years		
29	Mst. Sarwat Begum D/o Muhammad	16	Mard	an	09 Years		
	Zubair		Marc		09 Years		+
30	Mst. Huma Begam D/o Munir Khan	16	Marc		09 Years		
91	Mr. Akhter Munir S/o Noor Muhammad	16	ward		V3 (Cala		
	Khan	10	 		09 Years		
32	Mst. Tabassum Naz D/o Muhd: Sharif	16	Mar		09 Years		
33	Khushnuma Begum D/o Safdar Hussain	16	Mar		09 Years		
34	Mst. Ishrat Sharif D/o Miraj Ud Din	10			09 Years	<del> </del>	
35	Mst. Safia Maqbool D/o Maqbool ur				00 10010		11 year 14 14 year 14
77	Rehman	16	/   Mar	dan	09 Years		
36	Mst. Mumlikat D/o Amir Khan		Mai		09 Years		
-37	Mst. Shehnaz Begam D/o Abdul Ali	16		dan	08 Years		
38	Mst. Hussan Bano D.O M. Rahim	16		dan	08 Years		
39	Mst.Ishrat Asif D/o Barkat Masih	16		rdan	08 Years		
40	Naseem Akhter D/o Missal Khan	16		rdan	07 Years		
41	Mr. Wajid Ahmed S/o Sarfaraz Khan	16		rdan	06 Years		
42	Mr. Rafique S/o Ghulam Qadir	$-+-\frac{10}{16}$		rdan	06 Year:		
43	Mr. Sajid Ali S/o Shaukat Ali	16	+	rdan	06 Year	s	
44	Mst. Komal Khan D/o Akhter Ali	16		rdan	06 Year		
45	Miss Seema Gul D/o Muhammad Rahim	10		rdan	06 Year	\$	
46	Mr. Asadullah S/o Sultan Ud din	16		ardan	06 Year	'S	
47	Mr. M. Asif Ali S/o Sher Bandshah			ardan	06 Year	s	
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53	Mr. Sami Ullah S/o Fazal Karim			ardan	06 Yea	irs	
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	9 Miss Shabina Said D/o Said Rehman		· · · · · · · · · · · · · · · · · · ·	Aardar			
6	0 Mst. Nihar D/o Akbar Ali			Marda	· · · · · · · · · · · · · · · · · · ·		
. 1.6	Mist. Musrrat Begum D/o Khaista Rehm			Marda			
	Mst. Gul Naz Junior D/o Sher Alam			Marda			
	3 Mst. Nazima Javed D/o Javed Khan		<u> </u>				

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ď يثاور بارايسوى اليشن، خسيبر بخستونخواه 57431 Syl Nomen Al: Buldian : 11 PESHAWAR BAR ASSOCIATION باركونسل اايسوى ايش نمبر:<u>Rc-15-5743 - 15-</u> رابط نمر: <u>306-569458 - 6050</u> بعدالت جنا Claiser Alam (Appleur) د عولى: Quiser IOM علت تمبر بنام مورخها :**7**7 HeallDeptt نه بسیا<del>ی من تحریر انکه</del> مقدمه مندرجه عنوان بالاین اپنی طرف سے واسط پیروی وجواب دہی کاروائی متعلقہ مقدمه مندرجه عنوان بالاین اپنی طرف سے واسط پیروی وجواب دہی کاروائی متعلقہ مقدمه مندرجه عنوان بالاین اپنی طرف سے واسط پیروی وجواب دہی کاروائی متعلقہ مقدمه مندرجه عنوان بالاین اپنی طرف سے واسط پیروی وجواب دہی کاروائی متعلقہ مقدمه مندرجه عنوان بالاین اپنی طرف سے واسط پیروی وجواب دہی کاروائی متعلقہ مقدمه مندرجه عنوان بالاین اپنی طرف سے واسط پیروی وجواب دہی کاروائی متعلقہ مقدمه مندرجه عنوان بالاین اپنی طرف سے واسط پیروی وجواب دہی کاروائی متعلقہ مقدمه مندرجه عنوان بالاین اپنی طرف سے واسط پیروی وجواب دہی کاروائی متعلقہ مقدمه مندرجه عنوان بالاین اپنی طرف سے واسط پیروی وجواب دہی کاروائی متعلقہ الین مقدمہ مندرجہ عنوان بالاین اپنی طرف سے واسط پیروی وجواب دہی کاروائی متعلقہ کاروائی متعلقہ کاروائی متعلقہ کاروں مقدم مندرجہ عنوان بالاین اپنی طرف سے واسط پیروی دی ماد تقانية: آن مقام <u>معبُّ</u> کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاردائی کا کالن آختیار ہوگا ، نیز وکیل ص Attested. راضی نامہ کرنے وتقر لا الت و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواشت از ہر شم زری پر دستخط کرمنے کا اختیار ہوگا ، نیز بصورت عدم بیردی یا ڈگری کیطرفہ یا ایل کی برآ بدگی ادر من دائر كرف ايل تكران ونظرتاني و بيردى كراف كالمخار موكا اور بصورت ضرورت مقدمه مذكوره حك كل باج دوك كاروائى ك والسط اور وكل يا مخار قانون كوالي مراه يا الي بجائ تقر ركا إختار موكا ادر صاحه 124 مقرر شده کو دبی جمله مدکوره بالا اختیادات حاصل ہو ل کے اور اس کا ساخت پر داخته منظور و قبول ہو گا الوالی مقدمہ کے سبب سے ہوگا ول تاریخ میں مقام دورہ یا حد سے دوران مقدمه میں جو خرچنی مابند نه بول في كه بروى مرور مري النوا وكالت نام لك ديا تاكه سند رب باهر ہو تو وکیل صاحبہ AWAR BAR ASSO الرقوم : \_ /20 **ــــواه شـد** ال \$ مقام -کے لیے منظور ہے <u>اح</u>

نوا ، اس د کامت نامه کی نو او کانی نا تا بل تبول ، وگی ۔