BEFORE THE HONORABLE KHYBER PAKHTUNKHWA

SERVICE APPEAL NO. /2024

SERVIC

Dr. Ghafoor Ahamad

VERSUS

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

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<u>с</u> і. 3.	copies of the charge report and other	"A & B"	
SEI	documents		0+0
<u>,</u> 4	Copy of Notification dated 12.09.2024	"C"	\mathcal{L}
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Dated: 08.10.2024

Respondent No.4 Through counsel NAILA JAN ASC

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

413 ہوج: 13 SERVICE APPEAL NO. /2024 Khyber Pakhtukhwa Service Tribunal Diary No. 16510

Dated 09-10-24 Dr. Ghafoor Ahamad..... Appellant

VERSUS

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

REPLY/ COMMENTS ON BEHALF OF PRIVATE RESPONDENT 04

Respectfully Sheweth:

Preliminary Objections:-

- 1. That the Appellant has got neither cause of action nor did locus standi to file the instant Appeal.
- 2. That the Appellant has filed the instant Appeal just to pressurize the respondents.
- 3. That the instant Appeal is against the prevailing Law and Rules.
- 4. That the Appeal is not maintainable in its present form and also in the present circumstances of the issue.
- 5. That the Appellant has filed the instant Appeal with mala-fide intention hence the appeal is liable to be dismissed.
- ¹ 6. That the Appellant has not come to the Tribunal with clean hands.
 - 7. That the instant Appeal is bad for mis-joinder of unnecessary and non-joinder of necessary parties.
 - 8. That the instant appeal has been filed in utter violation of Section 4 of the Khyber Pakhtunkhwa service Tribunal Act 1974.
- 9. That instant appeal is not maintainable under Section 4 of the Khyber Pakhtunkhwa service Tribunal Act 1974,
- Facts:

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- 1. No comments however the appellant as well as the replying respondents both belongs to General cadre.
- 2. The para is based on mala fide, misleading concocted and
 - misstatement hence denied.

In fact being blue eyed chap of the department he was rewarded with the post of MS THQ Hospital SPKM Puran Shangla on <u>look after Charge</u> when he was in BS 17 General Cadre since July 2017 for 05 long years till his promotion to BS-18.After promotion to Senior Medical Officer (BS-18), he was posted in the same hospital as SMO BS- 18 only for the purpose of Actualization thereafter again on political motivations he was again adjusted against the post of MS THQ Hospital SPKM Puran Shangla on the basis on **OPS** Vide Notification dated 29/11/2022. It is further to bring in to the notice of the honorable tribunal that it is the prerogative of the competent authority to post a civil servant on OPS as a stop gap arrangement however the civil servant has no right to claim a vested right on the basis of OPS he may be transferred from the pôst as and when the competent authority deems fit.

2.5

- Incorrect. The private respondent no 04 is not a blue eyed chap rather due to the tireless efforts and devotions towards duty was kept in mind by the official respondents and was posted as LHW
 Coordinator furthermore the appellant as well as the replying respondents both belongs to general cadre however posted against the posts of Management cadre.
- 4. Incorrect. The appellant has no political affiliation however the annexed due letter is somehow managed by the appellant mala-fidly to black mail the replying respondent and even after completing more than his normal tenure he is using the tactics to pressurize the official respondents for the sole purpose stick to the post of MS which is not his vested rights.
- 5. The para is based on mala fide, misleading concocted and misstatement hence denied. Already replied in para 4 above. As Shangla is hard area and normal tenure for the hard areas is one year, whereas the appellant even on the basis of OPS remained posted and spent 07 long years on the said post therefore the appellant has no right to claim further posting on the same post. It is the prerogatives of the competent authority to post a civil servant against any post and utilize his services. It is noteworthy that the Supreme Court in <u>2020 PLCCS 1207 Supreme Court</u>, has held as under

"PLACE of servicePrerogatives of employer...Government servant was required to serve anywhere his employer wanted him to serve; it was not a choice or prerogative of the employee to claim a right to serve at a place that he chose to serve."

6. Pertains to official respondents however it is evident from the summary that a summary has already been moved for posting of a proper incumbent of the post from the relevant cadre and till then look after charge has been given to the appellant till further order. Detail reply has been given in the preceding paras.

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- 7. The para is based on mala fide, misleading concocted and misstatement hence denied. The appellant concealed the material 5 facts from the Honorable Tribunal that the Notification dated 06/08/2024(Annexure "F" of the appeal) was substituted by another Notification of the same No & dated i.e. 06/08/2024 wherein he was transferred and posted at the disposal of the DHO Shangla. The Appellant concealed the facts that on his own request being blue eyed chap the official respondents has further transferred and posted as a focal person for TB Control Program in district shangla Vide Notification dated 12/09/2024. He already implemented the Notifications hence the instant appeal become infructuous. The private respondent No 04 has already assume the charge on 10/08/2024 and since then performing his duties with full devotion. (copies of the charge report and other documents are annexure A & B).
- 8. Pertains to official respondents however being posted on OPS no vested rights of the appellant has been violated. However due to his subsequent posting vide Notification dated 12/09/2024 the instant appeal became infructuous and he is estopped by his own conduct to claim the relief through the instant appeal. (Copy of Notification dated 12.09.2024 is attached as annexure "C").
- 9. Since posting of an incumbent on the basis of OPS dose not created vested rights especially when he/she already served on the same post for 7 years therefore the appellant is not an aggrieved person hence not entitled for any relief from the honorable Tribunal however Reply on the grounds are as under;

GROUNDS

- A. The para is based on mala fide, misleading concocted and misstatement hence denied. The impugned notification dated 06/08/2024 and appellate orders dated 15/08/2023 are in accordance with law, rules and principles of natural justice.
- B. Incorrect. Already replied in para A above.
- **C.** The para is based on mala fide, misleading concocted and misstatement hence denied. There is no political pressure or consideration while issuing the impugned Notifications. The impugned order has been issued in accordance with Law and Rules on tenure basis in the public interest. The Apex Court has held in <u>2024 PLC Cs Supreme Court 77</u>

"Civil service---- Transfer and posting....interference in Tribunals transfer and posting by or Courts....Encroachment domain upon of executive...Transfer of a government official from one place or post to another to meet the exigencies of services was within the exclusive domain and competence of the competent authority of the executive Organ of the State and, ordinarily, it is not amenable to interference except an extra ordinary circumstances......Said principles is subject to the condition that the terms and conditions of service are not adversely affected. Moreover, an official has no vested right to claim to be posted /transferred to any particular place of his choice, nor is there a vested right to continue to hold a particular post at a particular place...transfer and posted of a Government servant is limited to the given tenure, if any or at the pleasure of the competent authorityQuestion of whether the posting and transfer made by the competent authority was in the public interest is not opened to judicial review by a tribunal or court and utmost caution and restraint ought to be exercised in interfering with or encroaching upon the exclusive domain of the executive authorities ... "

In 2023 PLC Cs Supreme Court 292 as under;

"(b)Civil Service--- 'Transfer' and 'posting'----Scope---Transfer of an employee/public servant fell within the ambit of "terms and conditions" of service ,which included transfer and posting...transfer and posting was part of service and it was for the authority to determine where services of any staff member were required."

The apex court has laid down following principles in a reported judgment **2017 SCMR 798**:

- It is within the competence of the authorities to transfer a civil servant from one place or post to another to meet the exigencies of service or administration; provided his terms and conditions of service are not adversely affected.
- A Civil servant has no vested rights to claim posting or transfer to any particular place of his choice nor has any right to continue to hold a particular post at a particular place.
- iii. <u>His transfer and posting is limited to the given</u> <u>tenure, or at the pleasure of the competent</u> <u>authorities</u>.
- iv. Normally, he is not required to acquire any specialized skill or professional training in order to serve the new post or place.
- v. His seniority and progression of career in terms of promotion and other benefits of the services are not affected by the transfer and he remains pegged to his batch or group to which he was initially appointed after completing the required common and specialized trainings and after passing the required departmental examinations conducted by the FPSC,
- vi. He is posted and transferred routinely in the same grade or scale that he possesses in his service or group; unless the rule requires so or allows so. The appellant has been treated in accordance with the above dictum of the apex court.

Similarly in another judgment reported as <u>2004 PLC (CS)</u> <u>705 Supreme Court</u> "(b) Validity... Civil servant could not claim posting at a particular station or at the place of his choice. Competent authority, under S 9 of the Punjab civil servant Act 1974, was empowered to transfer any civil servant from one place to other at any time in exigencies of service or on administrative ground."

The Honorable Tribunal also dismissed Service Appeal No. 7035/2021 titled "Dr. Ejaz Ahmad vs Govt. of KPK" dated 24-05-2022 on the basis of the above referred judgment.

- D. Incorrect. The impugned Notifications are issued in accordance with transfer posting policy of the provincial government.
- E: Incorrect the impugned notifications have been issued in public interest in the exigencies of services.
- F. Already replied in the preceding paras as the impugned Notification has been issued under section 10 of the Khyber Pakhtunkhwa Civil Servant Act 1973.
- G. Incorrect. Already replied in para "A" above. The apex court has held that mala fide cannot be attributed to public pfunctionaries.
- H. The replying respondent also seeks permission of the honorable tribunal to adduce other grounds during final hearing of the appeal.

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

Dated: 08.10.2024

Respondent No.4, Through counsel NAILA JAN

ASC

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL

SERVICE APPEAL NO. /2024

Dr. Ghafoor Ahamad.....Appellant

VERSUS

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

<u>AFFIDAVIT:-</u>

I, Dr. Iftikhar Ahmad Respondent No.4, do hereby solemnly affirm and declare on oath that all the contents of above reply/comments are true and correct to the best of my knowledge and belief and nothing has been misstated or concealed from this Hon'ble Court.

Deponent



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• ``	COVERNMENT OF KUVBER PAKHTUNKHWX	
	CERTIFICATE OF TRANSFER OF CHARGE.	
	Certified that I. Dr.IETIKHAR AHMAD CO-ORDINATOR UNW PROG.BPS-17	y.
		<u> </u>
	there this day before noon taken over charge of the office look after the work of <u>MS 3100</u>	•
• • •	After relinquished	1
•	SPMIK FIIQ Hospital Paran District Shangla. With reference to the Order of the	÷,
	Khyber Palihunkhwa Government No. SOII (E-V)2-2/2024_6317-24 Dated: 064	
	August . 2024	•
• [•]	Transferring Mr.	
•	To	
	Particulars of cash and Important/ Secret / Confidential documents handed over / taken	· .;
	over are noted on the reverse. Signature of relived_	
	Government Servant	
•	Station, SPAIK THO (H) Puran	
	Designation:	•
	Dated:- 09/08/2024 Signature of Government Servant receiving	
۰.	Charge	•
• •	Designation. <u>Coordinator LHW Prog: BPS-17</u>	
	Endos No. 4771-73 /MS/SPMK (Puran)/PF Dated /15/ 59 /2024-	·· ` .
	From:	•.
	Medical Superintendent	
· ·	SPMK Category "C" Hospital Puran Shangla.	
	To.	
• •	1. The Director General Health Services Klyvner Pakhtunkhwa Pesanwar.	
: · · ·	 The Regional Director Health Malakand Division at Makanbagh Swat The PS to Secretary Health Govt: of Khyber Pakhtunkhwa Peshawar 	• •
•	 4. The Deputy Commissioner District Shangla. 	
	 The District Health Officer District Shangla. The District Accounts Officer Shangla. 	14 C
•	7. The A/C Section of this office.	
	8. The concern officer Personal File.	
•	The charge of the office of MS Category "C" Hospital Puran Shangla	-,
`	Was transfer from Dr.IFTIKHAR AHMAD COORDINATOR LHW PROG: BPS-17	
• •		•
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	On the fore noon of the 09/08/2024	•
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•	MEDICAL SUPERINTENDENT	
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Oppice of the DISTON OFFICE OF THE MEDICAL SUPERINTENDENT SHAHEED PIR MOHAMMAD KHAN, CATEGORY "C" HOSPITAL PURAN DISTRICT SHANGLA. 0996-653351 ster Phone: i Emull: Spinkh.puran@igniall.com Dated. 74.1 08 12024. No. 7. 17 MS/SPMK(H)HMC To. The District Health Officer District Shangla. REPLACEMENT OF HMC CHAIRMAN Subject:-R/Sir, In light of the trausfer of Dr.Ghafoor Ahmad Ex-Medical SuperIntendent SPMK Category "C" Hospital Puran; vide Secretary Health Government of Khybeo Pakhtunkhwa Peshawar office Notification No.SOH9E-V)2-2/2024/ 6317-74 dated 6th August 2024. Therefore you are requested to please notify the Dr.Hilkhar Ahmad Medical Superintendent / the undersigned as Chairman of Health Management Committee of SPMK Category "C" Hospital Puran in the best public interest. SUPERINTENDENT MEDICAU SPMK Cat: "C" Hospital Puran Shangla." Endost: No & Date Even: Copy forwarded to the:-1. Director General Health Services Khyber Pakhtunkhwa Peshawar. 2. Regional Director General Health Malakand Division at Swat. 3. Deputy Commissioner District Shangla. For information please. SUPERINTENDENT MEDICAL SPMIC Cat:"C" Hospital Puran Shangla.

Better Copy No.



OFFICE OF THE MEDICAL SUPERINTENDENT

SHAHEED PIR MOHAMMAD KHAN, CATEGORY "C"

HOSPITAL PURAN DISTRICT SHANGLA

Email: Spmkh.puran@gmail.com

Phone: 0996853151

No. 356-60/MS/SPMK(H)/HMC

Dated: 30/08/2024

Τo,

The Manager

Bank of Khyber Aloch Puran

Subject: **<u>REPLACEMENT OF HMC CHAIRMAN</u>**

Memo,

Reference to the District Health Officer District Shangla Notification No. 3594-99/DHO/SH/PCMC/24/7 dated 28/08/2024, regarding the replacement of Chairman of HMC SPMK Category "C" Hospital Puran and others. (Copy attached)

Therefore your honour is humbly requested to please consider the Signature of the newly Chairman of Health Management Committee of SPMK Category "C" Hospital Puran in the best public interest. The specimen signature of the New Chairman HMC SPMK Category "C" Hospital Puran is as under.

1.____

2._____

3._____

Medical Superintendent SPMK Category "C" Hospital Puran Shangla

The above named Officers/ Officials and community members.
The Manager Bank of Khyber Alpura, Puran and Bisham Branch.

DISTRICT HEALTH OFFICER SHANGLA

OFFICE OF THE MEDICAL SUPERINTENDENT SHAHEED PIR MOHAMMAD KHAN, CATEGORY "C" HOSPITAL PURAN DISTRICT SHANGLA. 19995 851151 Lewish: Spatha puran a greath com Dated. 30 1 0 5 12024. Ser Cr IMSISPMK(H)/HMC No 10. The Manager Bank of Hayber Aloch Puran REPLACEMENT OF HMC CHAIRMAN. Subject:-Reference to the District Health Officer District Shangla Notification Ru 3594-Memo, 59/DHO/SH/PCMC/24/7 dated 28/08/2024, regarding the replacement of Chairman of HMC SPMK Category "C" Hospital Puran and others.(Copy attached) Therefore your honour is humbly requested to please consider the Signature of the newly Chairman of Health Management Committee of SPMK Category "C" Hospital Puran in the best public interest. The specimen signature of the New Chairman HMC SPMK Category "C" Hospital Puran as is under. Medical Superintendent SPMK Cat: "C" Hospital Puran Shansin Endost: No & Date Even: Copy forwarded to the:-1. Director General Health Serveries Khyber Pakhtunkhwa Peshawar. 2. Regional Director Health (Malakand) at Taimargara. 3. Deputy Commissioner District Shangla. 4. District Health officer District Shangla. For Information please. MedicalSuperintendent SPMK Cat: "C" Hospitat Puran Shangla anrea Unicersyonicidis and community members. i The Manger Bank of Khyber Alpura, Puran and Bisham Branch 6. ACT HEALTH OFFIC SHANGLA.

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	OF THE MEDICAL SUPERINTENDENT	
SHAH		\sum
	HOSPITAL PURAN DISTRICT SHANGLA.	
Email. Spmkh.puran@gmail.com		
No. 868-711 /MS/SP	MK(H). Datad. 217 1. 5 3 / 2024.	
and the second s		
Subject. MEET	ING / IJLAS.	
Memo: It is stated that the l	Hospital Management Committee (HMC) meeting/ijlas (24) has 09/2024 under the chairmanship of the undersigned at Madical Peterony "C" Hospital Puren at 11:00AM.	
Sup riale i Joni Ollico of SPMN V	equested to please attend/ ensure your presence for the subject	
impere guilde an insertioned date		
Date of musting. Venue. Time.	02/09/2024. MS Office SPMK Cat:"C" Hospital Puran. 11:00AM.	•.
The committe	e members are following.	
1. Drittikhar Ahmad 2. Dr.Riaz Ahmad	MS Chairperson. DMS Storatary/Member. WMO stember.	
3. Dr Najma bogum 4. T ^o O Puran 5. E. Liagat Ali 5. D. Tarig Ahmad 7. Mas Rafagat Bibl	Member. Member. LHV Member.	
	MEDICAL SUPERINTENDENT SPMK Cat; "C" Hospital Puran Shangla.	•
Endost: No & Date Eve	warded to the:-	
Director Sensral Heal 2. Regional Director Hea	lih Server is Khyber Pakhtunkhwa Meshawar. alih (Melakand).	
3 Deputy Commissione 4. District Health officer	Jist ot Shangla.	
 5 Fourt Person Health : 6 The above mumpers 	management Committee Shangla.	1
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	SPMK Cat: "C" Hospity Puran Shangla.	
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Better Copy No. **1** OFFICE OF THE MEDICAL SUPERINTENDENT SHAHEED PIR MOHAMMAD KHAN, CATEGORY "C" HOSPITAL PURAN DISTRICT SHANGLA

Email: <u>Spmkh.puran@gmail.com</u>		Phone: 0996853151
No. 868-74/MS/SPMK(H)	Dated	: 30/08/2024

Subject:	4	MEETING	/ IJLAS
Memo			

It is stated that the Hospital Management Committee (HMC) meeting/ Ijlas (24) has been schedule to be held on 02/09/2024 under the chairmanship of the undersigned at Medical Superintendent Office of SPMK Category "C" Hospital Puran at 11:00 AM.

Therefore you are requested to please attend/ ensure your presence for the subject meeting/ ijlas on mentioned date venue and time below.

Date of meeting.	02/09/2024.
Venue.	MS Office SPMK Cat: "C" Hospital Puran.
Time.	11:00 AM

The committee members are following

1. Dr. Iftikhar Ahmad	MS	Chairperson
2. Dr. Riaz Ahmad	DMS	Secretary/Member.
3. Dr. Najma begum	WMO	Member.
4. TMO Puran 🕠		Member.
5. Mr. Liagat Ali		Member.
, 6. Dr. Tariq Ahmad		Member.
7. Mrs. Rafaqat bibi	LHV	Member.

MEDICAL SUPERINTENDENT SPMK Cat: "C" Hospital Puran Shangla

Endost: No & Date Even:

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Copy forwarded to the:-

- 1. Director General Health Services Khyber Pakhtunkhwa'Peshawar.
- 2. Regional Director Health (Malakand)
- ¹ 3. Deputy Commissioner District Shangla
- 4. District Health Officer District Shangla
- + 5. Focal Person Health management committee Shangla
- 6. The above members of HMC committee. For information please.

MEDICAL SUPERINTENDENT SPMK Cat: "C" Hospital Puran Shangla



OFFICE OF THE MEDICAL SUPERINTENDENT SHAHEED PIR MOHAMMAD KHAN, CATEGORY "C" HOSPITAL PURAN DISTRICT SHANGLA.

Email: Spnikh.puran@gmail.com	Phone.	0996 853151	
	·····		

No. _ S. 8.7 - 9.3 _/MS/SPMK(II).

Datad. ____/__]. / 2024.

MINUTES OF THE MEETING.

Meeting:-Agenda:-Health Management Committee (HMC) 24th (Aeeting, Purchase of Batterles, Repair of Stabilizers/Electricity, purchase new UPS, Purchase of Life Saving Drugs/Emergency, Drugs for Emergency Unit, Hiring Electrician daily wages bases and purchase of Contingency Item, Equipment's/ Items repair Venue:-Uffice of the Medical Superintendent SPMK Category "Host 's Puran. Timing:-

Timing:-Date:-

> Meeting started with few versus from Holy Quran. Meeting chaired by Dr.Iftikhar Ahmad Medical Superintendent SPMK Categor, C Hospital Puran District Shangla, (Chairperson HMC) and the following participants have attended the meeting.

2. 3. 4.	Dr.lftikhar Ahmad Dr.Rlaz Ahmad Dr.Najma Begum Rep: of TMO Mr.Liaqat Ali	MS DMS WMO TMO Local Notable	Chairman Secretary Member Member Member	
6 .	Mr.Liaqat Ali Dr.Tariq Ahmad Mrs.Rifaqat bibi	Local Notable Local Notable	Member Member	`

02/09/2024.

The Chair welcomed all the participants after threadbare discussion. The following decision has

	oeen maue.		Decision	Responsibility j
S#	Agenda Point	Discussion	the second se	
	1. Purchase of Batteries for UPS X-Ray Department.	Being the Chairperson Dr. Iftikhar Ahmad briefed all the members of HMC regarding the objectives, purpose,	5PMK Category	Chairperson and Secretary of Health Management Committee of
	2. Repair of stabilizer/Electri city,	targets, goals, achievements, of HMC at SPN IK Category "C" Hospital Purjan, it was discussed	Puran decided	SPAK Category "C" Hospital

Better Copy No. 13 OFFICE OF THE MEDICAL SUPERINTENDENT SHAHEED PIR MOHAMMAD KHAN, CATEGORY "C" HOSPITAL PURAN DISTRICT SHANGLA

Email: Spmkh.puran@gmail.com		Phone: 0996853151
No. 949-54/MS/THQ	Dated	: 7/9/2024

OFFICE ORDER.

Consequent upon the recommendation/ Approval of the Hospital Management Committee in its meeting held on 02/09/2024 under the Chairmanship of the undersigned, and dire need of electrician to SPMK Category "Hospital Puran, the following daily verger is hereby directed to work under the control of the undersigned as electrician till further order in the large interest of Hospital as well as public, with effect from 02/09/2024.

S.No	Name	Father	Name	Position	Resident	Monthly Salary
1	Mr. Salman	Mr.	Abdul	Electrician	Nimkalay	20000/-
		Wahab			Puran	

Dr. Iftikhar Ahmad MEDICAL SUPERINTENDENT SPMK Cat: "C" Hospital Puran Shangla

Endost: No & Date Even:-

Copy forwarded to the:-

- 1. Director General Health Services Khyber Pakhtunkhwa, Peshawar.
- 2. Regional Director Health Malakand Division at Mingora Swat
- 3. Deputy Commissioner District Shangla
- 4. District Health Officer District Shangla with the request to please grant approval in the best public interest as well as smooth running of the Hospital.
- 5. Official concerned.
- 6. Master File.

For Information please

MEDICAL SUPERINTENDENT SPMK Cat: "C" Hospital Puran Shangla

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	996 853151		- بېن ىت ىن] s _i	imkh.puran@gma	hil.com
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	EORDER.				- ·	
dire ne Hirecte	Consequent thee in its meeting ed of electrician to d to work under t interest of Hospital a Name Mr.Salman	SPMK Category he control of the	124 under the C * lospital Puran • understand • with effect from	hairmanship o , the following is electrician t 102/09/2024. Resident	s the undersigned s daily verger is i	no, and hereby in the Salary
		·		AAEDIC	Itikhar Aliman AL SUPERINTI AK Cat: "C' Hosp Puran Shaneta	NDENI
k S Endos	st:No & Date E	ven:-			· · · ·	• •
1. 2. 3. 4.		al Health Servin or Health Mala ssioner District Officer District best public in ed.	kand Divisio Shangla	with the o Il as smooth		lease grant he Hospital.
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OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT

CEPTH OPPICATION

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**- 0996- 850653	وحميهم والمتوني		E-mell: udohshon	<u>la@gmall.com</u>	، بينين سيا مر ، بزد ، الماد مار ها مايس	<u> </u>)824

No. 3686-11 /DHO/SH/

Dated: <u>03</u>/08/2024

To

Dr. Ghafoor Ahmad, Ex-MS SPMK Cat-C (H) PuraⁿSMO Health Department Shangla. (Home Address).

Subject:

NON-COMPLIANCE TOWARDS RETURN OF OFFICIAL VEHICLE TOYOTA HILUX DOUBLE CABIN BEARING REGISTRATION NO. A-9420 & HEALTH DEPARTMENT (POSTING/TRANSFER) NOTIFICATION.

Sir,

It is stated that your services have been placed at the disposal of the undersigned vide Health Department Notification No. SOH(E-V)/2-2/2024 Dated Peshawar the 6th August 2024, but so far you have not report for duty nor you have return the official vehicle of TB Control Program shape "Toyota Hilux Double Cabin bearing registration No. A-9420" up till now. However, you were also advised vide this office letter No. 2385-90/DHO/SH Dated 20.06.2024 as well as telephonically regarding the return of mentioned official vehicle, but still you have not return the said vehicle.

Therefore, you are hereby once again advised that to return the subject official vehicle immediately and report for duty without further delay. So as to avoid any unlawful and unpleasant situation please.

T HEALTH OFFICER SHANGI

CamScanner

Endst: No. & Date Even:

Copy is forwarded to:

- 1- PS to Minister Health Government of Khyber Pakhtunkhwa Peshawar.
- 2- PS to Secretary Health Government of Khyber Pakhtunkhwa Peshawar.
- 3- Director General Health Services Khyber Pakhtunkhwa Peshawar.
- 4- Deputy Commissioner District Shangla.
- 5- Regional Director Health Services Malakand Division at Mingora Swat.

RICT HEALTH OFFICER SHANGLA.



GOVT OF KHYBER PAKHTUNKHWA HEALTH DEPARTMENT



Dated: Peshawar the 12th September 2024

NOTIFICATION

NO.SOH(E-V)/2-2/2024 Consequent upon recommendation of Project Manager, Provincial TB Control, DR. GHAFOOR AHMAD (1550506114007) S/O KHURSHAID KHAN, Senior Medical Officer (BS-18), DHO office Shangla is hereby nominated as Focal Person for TB Control in District Shangla by relieving Dr. Shahi Said, Senior Medical Officer (BS-18), THQ Hospital Puran Shangla of the responsibility with Immediate effect, in the best public interest.

7408-14

No._____/Notification of even No.& dated Copy of the above is forwarded to the:

- 1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
- 3. Additional Director Director (HRM), DGHS Office, Peshawar.
- 4. District Health Officer(s), concerned.
- 5. District Account Officer(s), concerned.
- 6. Deputy Director (IT), Health Department, Khyber Pakhtunkhwa.
- 7. PS to Secretary Health Department, Khyber Pakhtunkhwa.
- 8. PS to Special Secretary (E&A) Health Department, Khyber Pakhtunkhwa.

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- 9. Officer(s) concerned.
- 10. Master file.

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SECTION OFFICER (E.V)

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