



Form-A

FORM OF ORDERSHEET

Court of _____

Case No. 686/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	18/05/2018	<p>The appeal of Mst.. Lubna Salahuddin presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	28/05/18.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>29/05/18</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

30.05.2018

Learned counsel for the appellant present. Preliminary arguments heard. Learned counsel for the appellant argued that she was appointed as SST (BPS16) in Government of Punjab Education Department vide order dated 05.5.1997. That she made a request for Inter Provincial Transfer, which was approved vide order dated 20.10.2000. That the appellant submitted an application for permanent absorption in the Khyber Pakhtunkhwa Education Department and NOC was granted by the Government of Punjab Education Department on 18.06.2004. Thereafter, she submitted applications from time to time for absorption in Education Department Khyber Pakhtunkhwa but to no avail. According to the present service appeal a departmental appeal was again filed on 16.04.2018 which remained not responded. Subsequently, she filed writ petition no. 1866-P/2016 in Peshawar High Court and vide judgment dated 13.02.2018 the matter was referred to the departmental authority for disposal as it fell in their exclusive domain. Finally vide impugned order dated 23.04.2018 she was relieved of her duty with directions to report to her parent department.

Learned counsel for the appellant when confronted on the point whether an employee of Government of Punjab Education Department could invoke the jurisdiction of Khyber Pakhtunkhwa Service Tribunal. He candidly opined that it could not be done. Similarly when asked why departmental appeal was not filed against the impugned order dated 13.4.2018, he was unable to give any convincing reply. Let pre-admission notice be issued to the Addl: AG to assist the Tribunal on these points. To come up for further preliminary hearing on 07.06.2018 before S.B.


(Ahmad Hassan)
Member

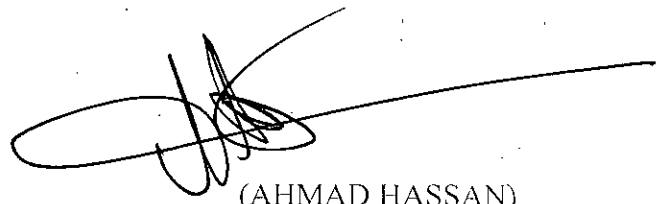
07.06.2018

Counsel for the appellant present. Preliminary arguments heard and case file perused. Learned counsel for the appellant argued that the appellant an employee of Government of Punjab Education Department was allowed Inter Provincial Transfer vide order dated 2.10.2000. Thereafter she submitted an application for permanent absorption in Govt: of Khyber Pakhtunkhwa Elementary and Secondary Education Department: NOC was granted by the Government of Punjab Education Department on 18.06.2004. Despite repeated departmental appeals her case was not decided by the respondents. Being a civil servant of the Government of Punjab, a pre-admission notice was given to the Addl: AG to assist this Tribunal whether jurisdiction of Khyber Pakhtunkhwa Service Tribunal can be invoked in the service appeal in hand?

Learned Addl: AG argued that according to Sub-Section(1)(b) of Section-2 of Civil Servant Act 1973, "civil servant" means a person who is a member of civil service of the province, or who holds a civil post in connection with the affairs of the province, but does not include- (i) a person who is on deputation to the province from the Federation or any other province or other authority. As the appellant is an employee of Government of Punjab so she cannot invoke the jurisdiction of this Tribunal.

In view of the above the appeal is dismissed in limine. However, she is at liberty to agitate her grievances before the competent forum subject to all just legal objections. File be consigned to the record room.

Announced:
07.06.2018



(AHMAD HASSAN)
MEMBER


This is an appeal filed by Mst. Lubna Salahuddin today on 07.05.2018 against non absorption of the appellant in KP against which she preferred/made a departmental appeal dated 16-04-2018 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and removing the following deficiencies.

- 1- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 2- Page no. 33 and 42 of the appeal are illegible which may be replaced by legible/better one.

No. 970 /S.T.

Dt. 08/05 /2018


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Noor Muhammad Khattak Adv. Pesh.

Note:

Sir,

That Departmental appeal of appellant has been rejected vide order dated 23/4/2018 in shape of relieving order and the other two objections have been removed hence re-submitted today dated 18/5/2018.

18/5/2018

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. 686 /2018

MST: LUBNA SALAHUDIN VS EDUCATION DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
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3.	Appointment order	B	15- 16 .
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APPELLANT

THROUGH:

**NOOR MUHAMMAD KHATTAK
ADVOCATE**

BEFORE THE KHYBER PAKHTUHWA SERVICE TRIBUNAL
PESHAEAR

APPEAL NO. 686 /2018

Diary No. 665

Mst: Lubna Salahuddin, SST (BPS-16),
GGHS Jehangira Swabi, District Swabi..... **APPELLANT**

Dated 10-7-2018

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (F), District Swabi.

..... **RESPONDENTS**

APPEAL UNDER SECTION- 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED APPELLATE ORDER/LETTER DATED 23.4.2018 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT FOR ABSORPTION IN THE RESPONDENT DEPARTMENT I.E. (E&SE) DEPARTMENT KHYBER PAKHTUNHWA HAS BEEN REJECTED/TURNED DOWN WITHOUT ASSIGNING ANY REASON AND INSPITE OF THE FACT THAT THE EDUCATION DEPARTMENT OF PUNJAB HAS ISSUED NOC TO THE APPELLANT VIDE LETTER DATED 18.6.2004

PRAYER: That on acceptance of this appeal the impugned order/letter dated 23.4.2018 may very kindly be set aside and the respondents may be directed to absorb the appellant in the E&SE Department Khyber Pakhtunkhwa as SST (BPS-16) in light of the NOC granted by the Punjab Education Department vide letter dated 18.6.2004. Any other remedy which this Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

- 1- That appellant was appointed as Secondary School Teacher (BPS-16) in the Education Department of Punjab after following all the codal formalities and on the proper recommendation of the Departmental selection committee vide order dated 5.5.1997. Copies of the Educational testimonials and appointment order are attached as annexure
- A & B.**

Filed to-day
Registrar,
7/5/18.

Re-submitted to-day
and filed.
18/5/18
Registrar

- 2- That upon selection as SST (BPS-16) the appellant submitted her arrival report at GGHS Khanpur (Punjab) and served there till 26.10.2000.
- 3- That appellant is basically belongs to the Province of Khyber Pakhtunkhwa, however her family was settled at Punjab. After her marriage it became difficult for the spouses to live together, as her husband was serving in national bank of Pakistan at Peshawar. That the appellant requested for her transfer to the province of KPK in light of the spouse policy and as such the Province of KPK sent a requisition vide letter dated 29.8.2000 to Government of Punjab where upon the Government of Punjab granted NOC for her transfer to KPK vide letter dated 17.10.2000. Copies of the record are attached as annexure **C.**
- 4- That appellant was where after transferred to Khyber Pakhtunkhwa E&SE Department on deputation basis w.e.f. 27.10.2000 initially for a period of three years upon completion of three years period the appellant was further allowed one year extension. That later on the appellant requested for permanent absorption in the KP E&SE Department. That the education Department of Punjab vide letter dated 18.6.2004 granted NOC for the permanent transfer/absorption of the appellant in the E&SE Department of Khyber Pakhtunkhwa, Peshawar. Copies of the record are attached as annexure **D.**
- 5- That where after the appellant umpteenth time requested the respondent Department for her permanent transfer/absorption as SST (BPS-16) but the respondents succumbed on the said requests of the appellant. That finally the appellant preferred writ petition No.1866-P/2016 in the august Peshawar High Court Peshawar and as such the same was disposed of with the direction to the appellate authority to decide the Departmental appeal of the appellant vide judgment dated 13.2.2018. Copies of the writ petition, Departmental appeal and judgment are attached as annexure **E, F and G.**
- 6- That vide impugned order/letter dated 23.4.2018 wherein the respondent No.2 directed the respondent No.3 to relieve the appellant from the post of SST (BPS-16) in spite of the fact that the Punjab Education Department had granted NOC to the appellant. Copy of the impugned appellate order/letter is attached as annexure **H.**
- 7- That appellant having no other remedy prefer the instant appeal on the following grounds amongst the others.

GROUND:

- A- That the impugned order dated 23.4.2018 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the respondents acted in arbitrary and malafide manner by not absorbing the appellant and relieving the appellant from respondent Department.
- C- That the appellant has not been treated in accordance with law and Rules by the respondents on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Pakistan 1973.
- D- That the action and inaction of the respondents by not absorbing the appellant and relieving her to Education Department of Punjab Government inspite of NOC issued by the Education Department of Punjab is the clear violation of the existing law and Rules on the subject.
- E- That appellant had served the respondent Department for almost 16 years on the said post and as such in light of the service Rules of the respondent Department the appellant is eligible in all respects for the subject post, therefore under the principle of natural justice the appellant may be absorb on the said post.
- F- That on the same issue one employee Mst: Noor Jehan has been benefited by the respondent Department but in the case of the appellant the respondents are not willing to absorb the appellant which is share discrimination on the part of the respondent Department.
- G- That husband of the appellant is the permanent bonafide resident of KPK and as such the proprietary demand that the petitioner is to be absorbed in the E&SE Department of KPK.
- H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 3.5.2018

APPELLANT

Lubna

LUBNA SALAHUDDIN

THROUGH:

NK

NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHEWA SERVICE TRIBUNAL
PESHAWAR

C.M NO. _____/2018
IN
IN APPEAL NO. _____/2018

**LUBNA SALAHUDDIN VS GOVT: OF KPK
&
OTHERS**

APPLICATION FOR SUSPENSION OF OPERATION
OF IMPUGNED ORDER/LETTER DATED 23.4.2018
TILL THE DISPOSAL OF THE INSTANT APPEAL

R/SHEWETH:

- 1- That the appellant filed above mentioned appeal before this august service Tribunal in which no date is fixed for hearing.
- 1- That appellant filed the above mentioned appeal against the impugned order/letter dated 23.4.2018 whereby the appellant has been relieved to Education Department of Punjab Government.
- 2- That all the three ingredients necessary for the stay is in favor of the appellant.
- 3- That the impugned order/letter dated 23.4.2018 has been issued by the respondents in utter disregard of law and prevailing Rules.

It is therefore most humbly prayed that on acceptance of this application the operation of the impugned order/letter dated 23.4.2018 may kindly be suspended till the disposal of the above mentioned appeal.

APPELLANT


LUBNA SALAHUDDIN

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

ثانوی و اعلیٰ ثانوی تعلیمی بورڈ بہاولپور



سند نمبر BBS 066050
سند ثانوی امتحان بہاولپور ۱۹۵۶ء
لاعنیت طالب علم — ریگولر / پرائیویٹ

سال نمبر ۹۳۹۰
رجسٹریشن نمبر ۲۸ - آرڈر نمبر ۵ - ۸۴
گروپ سائنس

لبنی صلاح الدین

تصدیق کی جاتی ہے کہ _____
ڈاکٹر صلاح الدین خان
نے ادارہ/مصلحہ _____
گورنمنٹ گریز ہائی اسکول خان پور
مذکورہ امتحان منقذہ _____ بہاولپور
۱۹۵۶ء کی / بالاجوا درجہ _____ میں پاس کیا۔
اس اہلکار کی تاریخ پیدائش _____ (ہندسوں میں) _____
۱۹۴۲ - ۲ - ۳
(نظموں میں) _____ چار _____ ضروری _____ سن ایک ہزار نو سو _____ بہتر _____ عیسوی ہے۔

حاصل کردہ نمبروں کی تفصیل

نمبر شمار	مضامین	کل نمبر	حاصل کردہ نمبر
۱	اُردو	۱۵۰	۱۰۹
۲	انگریزی	۱۵۰	۱۰۵
۳	اسلامیات لازمی	۷۵	۴۹
۴	مطالعہ پاکستان	۷۵	۴۵
۵	ریاضی اختیاری	۱۰۰	۶۲
۶	فزکس	۱۰۰	۶۲
۷	کیمسٹری	۱۰۰	۶۳
۸	بیالوجی	۱۰۰	۶۸
۹	—	—	—
میزان		۸۵۰	۵۶۳

M. Hamid Khan
مستند

پورٹہ ۱۱۹
مقام بہاولپور

نوٹ: یہ سند نمبر کسی نشان تک دستخط کے جاری کی گئی۔

ATTESTED

[Signature]

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

ATTESTED

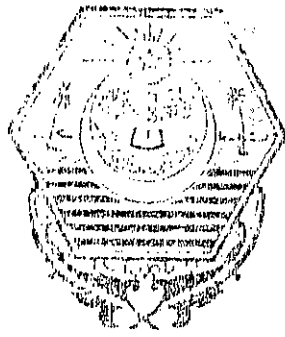
ذاتی واسطی ذالی تعلیمی بورڈ بہاولپور

(20)

A-5

BBS 066050

بہاولپور ایجوکیشن بورڈ
تعمیرت طلبہ تعلیم / پرائیویٹ



بہاولپور ایجوکیشن بورڈ
آئی ایف ایس سی
بہاولپور

ابن سلالہ الدین

تعلیمی بورڈ

ذاتی واسطی ذالی تعلیمی بورڈ

بہاولپور

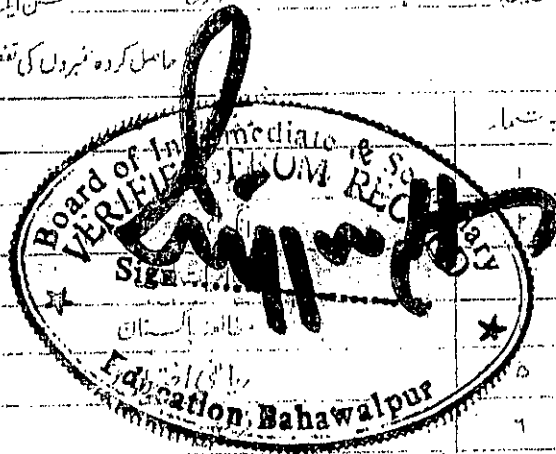
آئی ایف ایس سی بورڈ

بہاولپور

بہاولپور ایجوکیشن بورڈ
آئی ایف ایس سی بورڈ
بہاولپور
1942

مامل کردہ نمبروں کی تفصیل

نمبر	کل	پرکھ	پرکھ
109	100		
108	100		
149	20		
15	20		
22	100		
21	100		
43	100		
48	100		
			9
513	850		پرکھ



M. Kamran

بہاولپور

ATTESTED

Handwritten signature

Better copy - (6)

Certificate.
No. BBH 035763

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Better copy

ROLL NO. 1738

Board of Intermediate and Secondary Education,
Bahawalpur



Intermediate (spring / autumn) Examination, 1989

Group Pre-Medical

Certified that Lubna Salahuddin
son/daughter of Dr. Salahuddin
Religion Islam Enrolment No. 82-RYK-I-2-86
College/ District Rahim Yar Khan
Mark of Identification N.S

has passed in full parts the Intermediate Examination conducted by this Board
as a private/regular/an ex-college candidate.

DETAIL OF MARKS

Sr. No.	SUBJECTS	MARKS	
		Maximum	Obtained
1.	Urdu	200	119
2.	English	200	110
3.	Islamic Education	50	40
4.	Pakistan Studies	50	26
5.	Physics	200	89
6.	Chemistry	200	104
7.	Biology	200	83
TOTAL MARKS (In Figures)		1100	570

(In Words) Five hundred and seventy.

External Grade C

Internal Grade X

Bahawalpur 13 AUG 1991

A. Khan
SECRETARY

Note:- This certificate is issued without alteration or erasure.

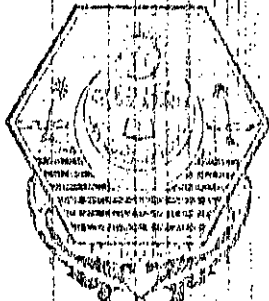
ATTESTED

lg

Certificate No. BBH 035763

ROLL NO. 1111

Board of Intermediate and Secondary Education Bahawalpur



Intermediate (Spring / Autumn) Examination, 1991

Group Pre-Medical

Certified that Labna Saleem son/daughter of Dr. Salehuddin

Religion Muslim

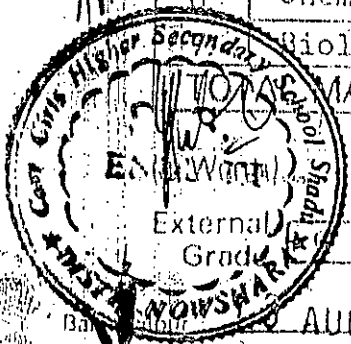
Enrolment No. PK-I-1111

College/District Bahawalpur

Mark of 119 in Urdu has passed with distinction in the Intermediate Examination conducted by this Board as a private candidate.

Handwritten signature and stamp

Sr. No.	SUBJECTS	MARKS	
		Maximum	Obtained
1.	Urdu	200	119
2.	English	200	110
3.	Islamic Education	50	40
4.	Pakistan Studies	50	40
5.	Physics	200	110
6.	Chemistry	200	104
	Biology	200	83
	TOTAL MARKS (In Figures)	1100	576



External Grade Internal Grade

Handwritten signature
SECRETARY

Note:- This certificate is issued without alteration or erasure.

ATTESTED
Handwritten signature

ISLAMIA UNIVERSITY BAHAWALPUR

Result Card for the B.Sc. 1st Annual/2nd Annual Examination of 1991

Serial No. 4318 Roll No. 397 Registered No. BS-WR-205

Name of the Candidate Lubna Salahuddin

Candidate mentioned above is hereby informed that he/she has passed the B. Sc. Examination held in May 1991, obtaining 390 / 800 marks and has been placed in Second Division.

The marks obtained by him/her in the various subjects are given below :-

Subjects :	Marks obtained :
(i) English (Language) Compulsory	<u>35</u> / 100
(ii) Islamiat & Pak. Studies Compulsory	<u>57</u> / 100
(iii) <u>Botany</u>	<u>116</u> / 200
(iv) <u>Zoology</u>	<u>14</u> / 200
(v) <u>Optional Chemistry</u>	<u>81</u> / 200
Total :-	<u>390</u> / 800

Note :- This Result Card is issued, errors and omissions excepted, as a notice only. An entry appearing in it does not in itself confer any right or privilege independently to the grant of a proper Certificate / Degree which will be issued under the regulations in due course.

Dated 26-9-1991

[Signature]
Assistant Controller (Exams.)
Islamia University Bahawalpur.

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

89-WR-205

رجسٹرڈ نمبر
REGISTERED NUMBER

**ISLAMIA UNIVERSITY
BAHAWALPUR**

1991

This is to Certify

that Lubna Salahuddin
son/daughter of Salahuddin Khan
of the Govt: College for Women, Rahim Yar Khan
has obtained the Degree of

Bachelor of Science

in this University at the Examination held
in May, 1991 and was placed in
the Second Division.

The Examination was taken as a whole / ~~in parts~~

Marks Obtained : 390/800

ATTESTED

[Signature]

BAHAWALPUR

299 .94

8

03832
Bs
Serial No.



بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

397

رول نمبر
ROLL NUMBER

اِسْلَامِیہ یونیورسٹی بہاولپور

۱۹۹۱
تصدیق کی جاتی ہے

کہ لبنی صلاح الدین
بن/ بنت صلاح الدین خان

از گورنمنٹ کالج برائے خواتین رحیم یار خان
نے اس یونیورسٹی کے امتحان منعقدہ مئی ۱۹۹۱ کی بنا پر

بی۔ ایس سی

کی ڈگری درجہ دوم میں حاصل کی۔
انہوں نے گلی/ بالاجہ امتحان میں شرکت کی۔
نمبر حاصل کردہ: ۳۹۰/۱۰۰

M. H. H. H. H. H.

CHANCELLOR

چانسلر

بہاولپور

CONTROLLED OF EVALUATIONS

مورخہ

ATTENTION PLEASE
 Respeel Salubzud Hamid sb.
 Ad. Director. S. Education Pzban
 at 9/11/75

REG-19-203 ✓
 REGISTERED NUMBER

ISLAMIA UNIVERSITY

BANAWALPUR

THIS IS TO CERTIFY

that Imam Salubzud
 son/daughter of Salubzud Imam
 of the Department of Education

has obtained the Degree of

Bachelor of Education

in this University at the Examination held

in January, 1974 and was placed in

the Second Division.

The Examination was taken as a whole first part

Special Subjects offer:

- (1) ORISITY (2) ENGLISH

Also passed in ENT. EDU. Optional Subject

Wants Award



CHECKED & VERIFIED

(Signature)
 Assistant Registrar
 Islamia University

Se. 005656
 Serial No.

Handwritten Urdu text: سلامتی کے لئے اور تعلیمی مقاصد کے لئے

Handwritten Urdu notes:
 1- یہی صلاح الدین
 صلاح الدین خان
 شفیعہ ایچی کشن
 2- اس پر مشورہ سے اس کے امتحان منعقد و جوڑی 1974 کی بنا پر

کی ایلی

کی ڈگری درجہ دوم میں حاصل کی۔

انہوں نے کئی/کئی امتحان میں شرکت کی اور

اس امتحان میں ان کے خاص حصوں میں پہلے

(1) کیمسٹری (2) بی ایچ سی

انہوں نے اختیاری حصوں میں درجہ اولیٰ میں بھی

کامیابی حاصل کی۔

تصدیق حاصل کی۔ 1975/1-2

ATTESTED

BANAWALPUR

CHANCELLOR

(Signature)

CONTROLLER OF EXAMINATIONS

(Signature)

ISLAMIA UNIVERSITY
BAHAWALPUR

1993

This is to Certify

that Lubna Salahuddin
son/daughter of Salahuddin Khan
of the Department of Education
has obtained the Degree of

Bachelor of Education

in this University at the Examination held
in January, 1994 and was placed in
the Second Division.

The Examination was taken as a whole ~~in parts~~.

Special Subjects offer :

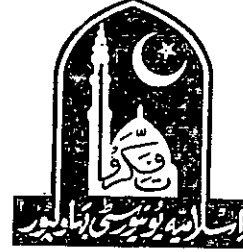
(1) Chemistry (2) Biology

Also passed in Env. Edu: Optional Subject

Marks Obtained 701/1200

Be 005659
Serial No.

10

رول نمبر 201
ROLL NUMBER

اسلامیہ یونیورسٹی بہاولپور

۱۹۹۳
تصدیق کی جاتی ہے
کہ لبنا صلاح الدین
بن/بنت صلاح الدین خان
از شعبہ ایجوکیشن
نے اس یونیورسٹی کے امتحان منعقدہ جنوری ۱۹۹۴ء کی بنا پر

بی۔ ایڈ

کی ڈگری درجہ دوم میں حاصل کی۔

انہوں نے کلی/بلا اجزا امتحان میں شرکت کی اور

اس امتحان میں ان کے خاص مضامین یہ تھے

(۱) کیمسٹری (۲) بیالوجی

انہوں نے اختیاری مضمون ماحولیاتی تعلیم میں بھی

کامیابی حاصل کی۔

نمبر حاصل کردہ :- ۱۲۰۰/۷۰۱

ATTESTED

M. H. H. H. H.

CHANCELLOR

چانسلر

11

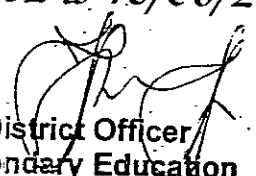
IN-SERVICE TRAINING WORK-SHOP EDU: DEPT.:

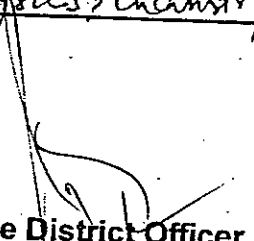


DISTT: SWABI

CERTIFICATE

This certificate is awarded to Ms/Miss LURNA SALAH UD DIN (SET Science)
of Grant Girls High School Jehangira for successful completion of 12-days
In-Service Training Workshop in the Subject of Math, Physics, Chemistry, Biology & English
w.e.f. 05/06/2002 to 18/06/2002 at Distt: Swabi.


District Officer
Secondary Education
Swabi


Executive District Officer
Education & Literacy
Swabi

Arshad Printers Swabi

ATTESTED




SARHAD UNIVERSITY

OF SCIENCE & INFORMATION TECHNOLOGY, PESHAWAR

TRANSCRIPT

Transcript No. SU/ 49035

(12)

Name: Lubna Salnuhuddin

Reg. No: SUIT-11-02-036-0235

Father's Name: Dr. Salnuhuddin Khan

Roll No: 11-SP-06793

Degree: Master of Education

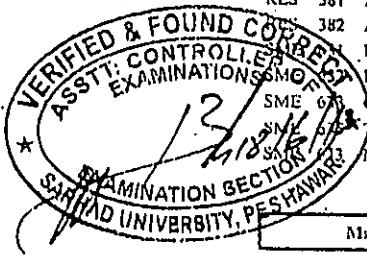
Enrollment Date: 09 Mar, 2011

Faculty: Arts, Social Sciences and Education

Completion Date: 13 Oct, 2012

1st Semester	Cr Hrs	Marks	Grade	GP's	Remarks
SME 626 Comparative Education	3 - 0	75	B	9	Reappeared
SME 627 Computers in Education	3 - 0	60	C	6	
SME 628 Educational Research	3 - 0	70	B	9	
SME 629 Advance Educational Psychology	3 - 0	60	C	6	Reappeared
SME 630 Guidance and Counselling	3 - 0	64	C	6	
Cum Cr: 15.0 GPA: 2.400 Cum GPA: 2.40 Status: PTD					

2nd Semester	Cr Hrs	Marks	Grade	GP's	Remarks
IES 381 Advance Qualitative Research Methods	3 - 0	65	C+	7.5	
IES 382 Advance Quantitative Research Methods	3 - 0	61	C	6	
SME 625 Educational Management and Supervision	3 - 0	61	C	6	
SME 626 Education in Pakistan: Problems Issues & Trends	3 - 0	66	C+	7.5	
SME 627 Curriculum Development and Implementation	3 - 0	83	B+	10.5	
SME 628 Teacher Education in Pakistan	3 - 0	64	C	6	
SME 629 Non-Formal and Distance Education	3 - 0	76	B	9	
Cum Cr: 36.0 GPA: 2.500 Cum GPA: 2.46 Status: QFD					



Marks Obtained : 805 Total Marks : 1200 Overall Percentage : 67.08%

(Errors and omissions are subject to subsequent rectification)
----- END OF TRANSCRIPT -----

[Signature]
Dean

(Degree Completed)

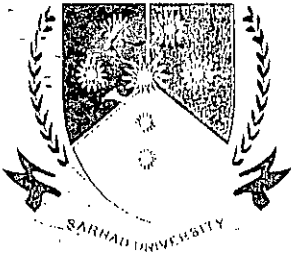
[Signature]
Controller of Examinations

ATTESTED

[Signature]

(Errors and omissions are subject to subsequent rectification)

Attn: Pese
اداره اساتذہ
اداره اساتذہ (اسب)



Sarhad University

15

13

SUIT/Exam/Verification/2013-103

4329

Dated: July 5, 2013

The Headmistress,
GGHS, Jehangira,
Swabi.

Subject: Verification

Please refer to your Letter, addressed to the Controller of Examinations, vide Ref No. 313, dated: 28-05-2011, for the subject cited above.

It is to certify that the following student has successfully passed her program from this University. The details of the student are mentioned below.

Name	F/Name	Registration No.	Roll No.	Program	Verified Transcript No.
Lubna Salahuddin	Dr. Salahuddin Khan	SUIT-11-02-036-0235	11-SP-06793	M.Ed	SU/20035

Regards,

Salman Haiz Solehria
Salman Haiz Solehria
Controller of Examinations

ATTESTED

[Signature]



Sarhad University

UNIVERSITY OF SCIENCE AND INFORMATION TECHNOLOGY, PESHAWAR

Serial Number SUIT-2012-PRO-0437

Date issued: 23-January-2013

Provisional Certificate

This is to certify that Mr. / Ms. Lubna Salahuddin

Son/ daughter of Mr. Dr. Salahuddin Khan

Registration number SUIT-11-02-036-0235

is a regular student of the Sarhad University of Science and Information Technology,
Peshawar .

Mr. / Ms. Lubna Salahuddin has completed all the requirements for the
award of Master of Education degree with a
CGPA of 2.46 on a scale of 4.00. He/ She has already been issued a
transcript and degree will be awarded to him/ her in due course of time on the request of
student.

Mr. / Ms. Lubna Salahuddin bears good moral character and his/ her
conduct during his/ her stay at the University from March, 2011 to October, 2012
has been Very Good.

ATTESTED

Director
Distance Education.

(B) B-15 ~~Attested~~

U B D E R

No. 2/16-97/80 / Admp-II(2)
Dated 5-5-1997

Consequent upon the selection by Punjab Public Service Commission vide No. PPSC-RE-1-97/306-RE, 309/RE and PPSC-RE-1-96/311-RE dated 4-3-1997, the following candidates are hereby appointed/posted as Secondary School Teachers (Science) Women in BS-16 (Rs. 2535-197-3490) (Gazetted) plus usual allowances admissible under the rules on purely temporary basis with effect from the date on which they joins in the institutions noted against their names:-

S.No.	Name with parentage, address.	Place of postings.	Remarks.
1.	Shumaila Mishtaq, M.Sc.B.Ed, D/O Mishtaq Ahmed, H.No. 109/D Block A, New Housing Colony, Yazman.	Govt. Girls Higher Secondary School, Yazman.	Against an existing vacancy.
2.	Might Perveen, M.Sc.B.Ed. D/O Muhammed Yousuf, C.No. 23/INB. Yazman	Govt. Girls High School, Chani Goth.	-do-
3.	Bashra Naheed, B.Sc.B.Ed. D/O Abdul Rashid, 567/B.Vii Gulzar Basti, Bahawalpur.	Govt. Girls High School, Qaimpur	-do-
4.	Shazia Bashir, M.Sc.B.Ed D/O Bashir Ahmed, H.No. 133 Street No. 3 Ward No. 4 Noorpura Chishtian.	Govt. Girls High School, 204/M	-do-
5.	Mansooran Bibi, M.Sc.B.Ed. D/O Allah Bakhsh, H.No. 206 Street No. 6 Gilberg Town Chishtian.	Govt. Girls High School, 10/F.W	-do-
6.	Tahira Hameed, M.Ed. D/O Abdul Hameed, 302/HR Tehsil Fortabbas.	Govt. Girls High School, 319/HR	-do-
7.	Shahnaz Ahmed, M.A.B.Ed, B.Sc D/O Ahmed Din, 58-Advocate Colony, Bahawalnagar	Govt. Girls High School, Fortabbas.	-do-
8.	Shazia Nusrat, M.Sc.B.Ed D/O Ghulam Rasool, H.No. 689 Model Town-B-Khanpur.	Govt. Girls High School, 1/P	-do-
9.	Talat Yasmeen, B.Sc.M.A. Edu D/O Abdul Khaliq, No. 69 Near Jama Abdullah Bin Masood Khanpur.	Govt. Girls High School, Patehpur Kamal	-do-
10.	Farhianda Ghulam Rasool, B.Sc.BED D/O Ghulam Rasool, Al-Farid Corporation, Grain Market, Khanpur	Govt. Girls High School, 45/P	-do-
11.	Lubna Salahuddin, B.Sc.B.Ed D/O Salahuddin 29/A Model Town-A Khanpur.	Govt. Girls High School, Khanpur	Against vacant post of Biology.

Contd...Page..2....

ATTESTED

(Handwritten signatures and marks)

S. No.	Name with parentage	Place of posting	Remarks
12.	Dilna Aziz, M. Sc. B. Ed. D/O Mr. Abdul Aziz, 77-Trust Colony, Bahi mayarkhan.	Govt. Girls High School, Kot Samabad.	Against an existing vacancy.
13.	Shahista Mirdous, B. Sc. M.A. BEd D/O Faqir Muhammed C/O Shabbir Ahmed, 169/Murdd Christian.	Govt. Girls High School, 99/F.	-do-

Note:- The candidates appointed in these orders will be governed by such rules and orders relating to leave, T.A, Medical allowances and pay etc. as may be issued by the Govt. from time to time for the category of the Govt. servants to which they belongs

- Their appointments are purely on temporary basis and their services can be dispensed with/terminated without any notice, and without any reasons being assigned at any time. In case they wish to resign at any time a month's notice/pay will be deposited.
- The appointments are on probation for a initial period of one year. If the work and conduct of any appointee is not found satisfactory her services can be terminated during this period.
- The appointments are for the period either the permanent incumbents of the post resume duty or the tenure of the post expired, their services can be terminated without any notice.
- The candidates appointed in this orders will stay for three year at the place of posting. No application for transfer will be entertained before the completion of 3 years tenure.
- If they wish to accept the posts on these conditions, should take over the charge of her duties after getting herself vaccinated or re-vaccinated if she has not done so, during the last months but not later than 15 days from the date of issued of these orders failing which the appointment will stand automatically cancelled. She should carry with her original certificates/degrees etc to the Headmistresses/Principals of High Schools. They after verifying their qualifications the copies alongwith charge reports will be submitted to this office.
- The Headmistress concerned is required to obtain a certificate from the candidate concerned that she is not married to a foreign national.
- The candidates is required to pass the Medical test on appearing herself before the Medical Board.
- No. T.A/D.A is allowed.

Rafiq
DIRECTOR EDUCATION (SE)
BAHAWALPUR DIV. BAHAWALPUR

81 / Adm-IT (2)

Copy forwarded for information and necessary action to:-

- The District Education Officer (SE) concerned.
- The District Accounts Officers concerned.
- The Principals/Headmistress concerned.
- The candidates concerned.

Rafiq
DIRECTOR OF EDUCATION (SE)
BAHAWALPUR DIV. BAHAWALPUR

ATTESTED

[Signature]

ANSWER-62

18

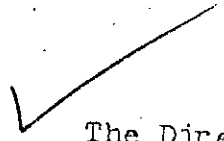
C-18

NO. SO(S-IV)U-56/2000

GOVERNMENT OF THE PUNJAB,
SCHOOL EDUCATION DEPARTMENT.

Dated Lahore, the 20th October, 2000

To



The Director of Education (SE),
Bahawalpur.

Subject:- INTER PROVINCIAL TRANSFER ON DEPUTATION BASIS IN
FAVOUR OF MST. LUBNA SALAH-UD-DIN, SST (SCIENCE)
GGHS KHANPUR, DISTRICT RAHIM KHAN PUNJAB TO NWFP.

Enclosed please find a copy of letter No. SO(S)-
24/92/M.Iqbal, dated 17.10.2000, received from Section
Officer (Schools), Government of NWFP, Education Department,
on the subject noted above.

2. You are requested to relieve the lady teacher
Mst. Lubna Salah-ud-Din, SST (Science), Govt. Girls High
School, Khanpur, District Rahim Yar Khan, to join her new
assignments in the NWFP (Education Department) on deputation
basis for a period of three years.

SECTION OFFICER (S-IV)

NO. & DATE EVEN.

A copy is forwarded for information and necessary
action to the Director Public Instruction (SE),
Punjab, Lahore with reference to her letter No.
12832/Admn.II(II), dated 28.8.2000.

SECTION OFFICER (S-IV).

ATTESTED

(19)

GOVERNMENT OF N.W.F.P.
EDUCATION DEPARTMENT.

NO. SO(S)2-4/92/M.Iqbal.

Dated 17th October, 2000.

To

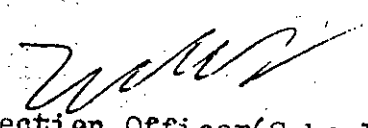
The Secretary to
Government of Punjab
Education Department
Lahore.

SUBJECT:- INTER PROVINCIAL TRANSFER ON DEPUTATION BASIS IN
FAVOUR OF MST: LUBNA SALAHUD DIN SST(SCIENCE)
GGHSS KHANPUR DIST! R.Y.KHAN PUNJAB TO NWFP.

Sir,

I am directed to refer to your letter No. SO(S.IV)
8-56/2000 dated 29.8.2000 that the Government of NWFP, Peshawar
with the concurrence of S&GAD has no objection on the transfer
on deputation of the above named lady teacher for a period of
3-years on the ~~xx~~ usual terms & conditions specified for the
cadre she belongs.

The Lady teacher concerned may be relieved to join
GGHS Jehangira Swabi immediately.


Section Officer(Schools)

Endst: No. & Date even.

Copy forwarded to :-

1. The Section Officer(Reg-I) Govt: of NWFP, ~~Education~~ S&GAD
w/r to his letter No. SOR-I(S&GAD1-14/82(A)(Vol.IV) dated
16.10.2000.

ATTESTED

Section Officer(Schools)



21

~~Attested~~

20

OFFICE OF THE DISTRICT EDUCATION OFFICER (SE) RAHIMYARKHAN.

To
The Headmistress,
GGSS, Khanpur.

Memo.No: _____/E-3, Dated: 23-10-2000.

Subject: INTER PROVINCIAL TRANSFER ON DEPUTATION BASIS IN FAVOUR OF MST.LUBNA SALAH-UD-DIN, SST(SCIENCE) GGSS KHANPUR DISTRICT RAHIMYARKHAN.

Please, ^{and} enclosed ^{herewith} a copy of letter No.2/8-20/20361/Admn-II(2) dated 21.10.2000, and Notification No.SO(S)2-4/92/M.Iqbal, dated 17.10.2000, Govt.of NWFP, Education Department on the subject noted above.

You are requested to ~~relieve~~ relieve the lady teacher Mst.Lubna Salah-ul-Din SST(So) of your school to join her new assignments in the NWFP (Education Department) on deputation basis for a period of three years, and copy of compliance report sent to this office immediatly.

DISTRICT EDUCATION OFFICER(SE)
RAHIM YAR KHAN.

Endst.No: 19691/E-3,

Copy submitted/forwarded for information to:-

1. The Director of Education (SE) Bahawalpur Div.Bahawalpur with refernce to his Endst.No.2/8-20/20361/Admn-II(2) dated 21.10.2000.
2. The Lady teacher concerned.

DISTRICT EDUCATION OFFICER (SE)
RAHIM YARKHAN.

ATTESTED

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23/10
Z. neys

~~ADDED~~ ①

C ① - 21

NO. SO(S-IV)S-56/2000

GOVERNMENT OF THE PUNJAB,
EDUCATION DEPARTMENT,
(SCHOOL WING)

Dated Lahore the, 18th June 2004

TO

The Secretary,
Government of N.W.F.P.,
Education Department,
Peshawar.

NOC
for
absorption
to
K.P.

SUBJECT: -REQUEST FOR NOC ON PERMANENT TRANSFER FROM
PUNJAB EDUCATION DEPARTMENT TO N.W.F.P.

I am directed to enclose a copy of application submitted by Mst, Lubna Salah-ud-Din, SST(Science) Govt. Girls High School, KhanPur District Rahim Yar Khan. Presently working on deputation basis at Govt. Girls High School, Jehangira Swabi.(N.W.F.P) on the subject cited above.


Government of the Punjab, in Education Department has no objection if she is transferred / absorbed on permanent basis in Govt.N.W.F.P. Education Department on the usual terms and conditions.

SECTION OFFICER(S-IV)

NO. & date even.

A copy is forwarded for information and n/a to:-

- 1- The Director Public Instruction (SE) Punjab Lahore.
- 2- The EDO (Equl) R.Y. Khan.
- 3- The Lady Teacher Concerned.


SECTION OFFICER(S-IV)

ATTESTED


The Secretary Education
Government of the Punjab
Education Deptt. (School wing)
Lahore.

(22)

NWFP
(22)

Respected Sir,

Request for the NOC in respect of
Permanent transfer of Mst. Lubna
Salahud Din SET (Science) deputant
Govt Girls H/school Jehangira Distt.
Swabi (NWFP)

Kindly refer to your letter NO. 50(S.IV) 8-56-2000
Dated 20/10/03, I have submitted my application
to the Education Deptt Govt NWFP, for the permanent
transfer to Govt Girls H/school Jehangira, where I am
already working as SET (Science) since 27-10-2000.
Sir, my husband belongs to NWFP and my three
children are getting Education there and we are
permanently settled in NWFP. Beside this the
concerned NWFP Education Deptt. required NOC
for your good office in this regard accordingly.
Therefore I beseech you to kindly issue me
the NOC for the permanent transfer to NWFP
Education Deptt on humanitarian grounds
under the wed lock policy.

Thanking you for the time & consideration.

ATTESTED

With Profound Regards.

Yours faithfully.

Dated 24th May 2004.

(Mst. Lubna Salahud Din)

SET (Science)

مذمت حساب ڈائریکٹر سکول انڈر لبریری صورت سرحد بشپارد

23

مختار : مستقل ترقیاتی لہجور SET سیشن 16-16 BPS
گورنمنٹ گریڈ کی سکول چانڈیوڑ ضلع ہار سے گورنمنٹ
گریڈ کی سکول چانڈیوڑ 14 ہونہ سرحد

F-No. A-17 (SET (F) / 6103 شمارم 21/4/04

(1) - سائل گورنمنٹ گریڈ کی سکول چانڈیوڑ ضلع ہار سے لہجور SET سیشن

گورنمنٹ گریڈ کی سکول چانڈیوڑ ضلع ہار سے لہجور SET سیشن
27/10/2005 سے کام کر رہی ہے۔ میں نے یہ مستقل تبادلہ صورت 14
تعلقہ دیوارمنٹ نے سے مستقل تبادلے کیلئے No. C جاری کر رہی ہے۔

No. 50 (S-IV) 8-56/2005 سوف 18/6/04 سے لہجور
SET (F) / 6103 / F No. A-17 جو کہ درخواست ہذا کے مطابق

حاصل والا گورنمنٹ ہے کہ میں مستقل طور پر اپنے حارڈ کے ساتھ چانڈیوڑ
میں صوبائی میں رہائش نہ کر سکیں اور میرے بچے بھی یہاں رہ رہے ہیں۔
میں نے سکول چانڈیوڑ میں رہنے کے لیے میری مستقل ٹرانزفر کی سفارشات
اور Recommendation کی ہے۔

میں نے گورنمنٹ ہے کہ مجھے (under web lock) کے تحت مستقل طور پر
لہجور SET سیشن گورنمنٹ گریڈ کی سکول چانڈیوڑ ضلع ہار سے صورت سرحد میں
تفصیلات / مستقل کیا جائے۔

میں نے Case کی مکمل نائٹ میں یہ بھی سکول چانڈیوڑ / ڈسٹرکٹ میں
جمع کر رکھی ہوں۔ یہاں پر سے مستقل ٹرانزفر کے افعال جاری
کے مطابق۔

25/6/04

لہجور سرحد سیشن SET سیشن گورنمنٹ گریڈ کی سکول چانڈیوڑ ضلع ہار سے

ATTESTED





23

THROUGH PROPER CHANNEL

To,

The Secretary
School & Literacy Department.
Govt. of N.W.F.P Peshawar.

Date: 16th June 2008

Subject: AS PER PUC: APPLICATION FOR PERMANENT
ABSORPTION IN R/O MST. LUBNA SALAH UH DIN.

Memo: Please refer to Establishment and Administration Department (Regulation wing) Memo No. SOR.I (E&AD) 1-14/82(A) VOL-VII). Dated: 03-12-2004, addressed to your good self with a copy endorsed to the petitioner regarding above cited subject (photocopy of the memo enclosed for the ready reference please).

1. That the applicant initially inducted into Education department, Govt. of Punjab as SET (Science) through Punjab public service commission on 6-5-1997 well before her wedding.
2. That the applicant husband is a native & permanent resident of NWFP Distt. Swabi.
3. That the applicant husband is a permanent employee of National Bank of Pakistan and at present has been serving & posted at Nowshera.
4. That applicant was given deputation to Govt. of NWFP in Education Deptt. In the same cadre in pursuance of wedlock policy by the Education Department Govt. of Punjab and the same concurrence was accepted by the Education Department Govt. of NWFP.
5. That the applicant has been serving in Govt. Girls High School Jehangira Distt Swabi as SET (Science) w.e.f ~~06-05-1997~~ 26.10.2000.
6. That the applicant children are studying in various schools in Distt. Nowshera.
7. That the applicant husband has permanently settled in Distt. Nowshera NWFP.
8. That the applicant seniority as SET (Science) has not been shown in seniority list issued by concerned Deptt. despite eleven year long service causing her to tender this submission to remove her concern and psychological distress because the reflection of her name in seniority list of SET (Science) is her legal and natural right.

ATTESTED

1/2

~~26~~

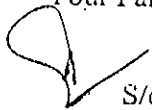
24

9. That the applicant is hard working, devoted and dedicated teacher and has been discharging her duties up to the entire satisfaction of her superiors.
10. That the result of the applicant during her stay in service have ever remained outstanding & excellent.
11. That it has been upheld by Establishment and Administration Deptt. Vide their enclosed memo, that the secretary govt. of NWFP, School & Literacy Department may settle the issue of the applicant to absorb her permanently as SET (Science) in education department.

In view of a forgone continued litany, it is requested that the applicant may please be absorbed as SET (Science) by determining her senior as well in the larger public interest and to enable her to discharge her duties with concentration and devotion.

Thanking you for the time and consideration.

Your Faithfully,



S/d

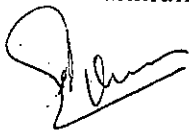
Lubna Salahudin

SET (Science) Govt. Girls High School Jehangir Distt Swabi.

A copy of the above is submitted to EDO Education Distt. Swabi with the request to submit the same to Director School & Literacy for sympathetic recommendation and onward submission to worthy secretary to Govt. of NWFP School & Literacy Peshawar.

(An advance copy has already been submitted to worthy Secretary School & Literacy Govt. of NWFP Peshawar.

Your Faithfully,



Lubna Salahudin

SET (Science) Govt. Girls High School Jehangir Distt Swabi.

Date: 16-06-2008

ATTESTED



From: The Head Mistress,
Government Girls High School,
Jehangira District Swabi.

No. 302
Dated: 13.02.2013

~~28~~
25

To: The DEO,
Elementary & Secondary Education Department
District Swabi.

SUBJECT: APPLICATION FOR UPGRADATION IN BPS-17 SINCE 2007 IN
RESPECT OF MST. LUBNA SALAH UD DIN , SET(SCIENCE) BPS-16
GOVT. GIRLS HIGH SCHOOL JEHangIRA DISTRICT SWABI(KPK).

Enclosed please find herewith self explanatory application in original submitted by above named applicant for your favourable consideration and onward submission to Worthy Secretary, Elementary & Secondary Education Department, Government of Peshawar, and Peshawar through the Director, Elementary & Secondary Education Department, and Peshawar.

In this regard it is confirmed that the applicant is working as SET (Science) in BPS-16 since 06.05.1997 and transferred to this school on 17.10.2000. She is performing her duties up to the entire satisfaction of the under signed without any break i.e. long leave, medical leave, extra ordinary leave etc. It is also confirmed that she is hard working, committed and a devoted science teacher having blot less career and her result is always beyond our expectations.

Therefore, it is strongly recommended that her case for permanent absorption and up-gradation to BPS-17 w.e.f 2007 may kindly be approved for the sake of equity and justice.

Nazir
Head Mistress,
Government Girls High School,
Jehangira District Swabi.

HEAD MISTRESS
G.G.H.S Jehangira
SWABI

ATTESTED

[Signature]

The Secretary,
Government of KPK,
Elementary & Secondary Education
Civil Secretariat,
Peshawar

No: 302-
THROUGH PROPER CHANNEL

26

II REQUEST RESUBMITTED
01-3-2014.

SUBJECT: APPLICATION FOR UPGRADATION IN BPS-17 SINCE 2007 IN RESPECT OF MST. LUBNA SALAH UD DIN , SET(SCIENCE) BPS-16 GOVT. GIRLS HIGH SCHOOL JEHangira DISTRICT SWABI(KPK).

Respected Sir,

It is my belief & faith that meritorious services cannot go un-rewarded. In this context, your kind & immediate attention is invited towards my numerous applications regarding subject issue pertaining to my permanent absorption along with up-gradation to BPS-17 as the matter is long outstanding and I have not received any response from your side.

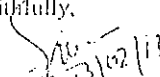
In this regard, it is again submitted that:-

1. The undersigned was inducted as SET(Science) in BPS-16 through Punjab Public Service Commission on 06.05.1997 and presently serving as SET(Science) in KPK, Education Department since 17.10.2000 without any break on the same post and Grade PPS-16 in Govt Girls High School, Jehangira Dist Swabi, Whereas, as per Notification dated 26.02.2008 issued by the Government of NWFP, Finance Department(Regulation Wing)Peshawar, the SETs in BPS-16 having ten years continuous service will be up-graded to BPS-17. But the under signed has neither been up-graded in BPS-17 nor have been absorbed as permanent SET.
2. In the context of Para-1 above, your kind attention is drawn towards Executive District Officer, Schools & Literacy, Swabi letter quoting reference of letter No.2011-34/A-14/SET/B-17/Award Dated 23.02.2008 issued by the Director Schools & Literacy, NWFP, Peshawar through which applications were invited from the eligible SETs for up-gradation from BPS-16 to BPS-17. Accordingly, the under signed applied for the up-gradation from BPS-16 to BPS-17 along with Bio-data and copies of all the ten years ACRs but even then the under signed has been ignored/deprived-off from my due promotion w.e.f 2007 without any justified/cogent and lawful reason.
3. In this regard, an application was submitted to your kind office on 26.10.2004 conveying full details for your consideration but no response has yet been received.(Copy enclosed)
4. The under signed also tendered another application regarding the same issue on 16.06.2008 but again it was neither responded nor any intimation was received till date. (Copy enclosed)
5. Your kind attention is also invited towards an identical case of Mst.Noor Jehan, SET (Transferred from Pindi Bhattian,Punjab and posted at Govt Girls Middle School,Mathra Dagi Distt Sawabi after absorption) vide Education Department(Govt of NWFP),Peshawar Notification No.SO(s)/7-30/98/Mst.Mazhar Bibi dated 05.09.2000 (Copy attached for ready reference) with the request that case of the under signed may kindly be considered in line with the decision taken in the case of Mst.Noor Jehan for the sake of equity and justice.

It is therefore, requested that necessary orders may please be issued so that lawful grievances of the under signed can be redressed. An early action is solicited.

I would further like to submit that if my meritorious case of permanent absorption and up-gradation to BPS-17 from due date of 2007 is not considered, I shall be constrained to have legal remedy through court of law under Basic Rights(Constitution of Government of Pakistan-1973) with all suit charges.

Yours faithfully,


(LUBNA SALAH-UD-DIN)
SET(SCIENCE) GOVERNMENT GIRLS HIGH SCHOOL,
JEHangira DISTT SWABI.

Dated: 11.02.2013.

CC TO,

The DC, Education District Swabi with the request to forward the case to the Director Elementary &

ATTESTED



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**OFFICE OF THE HEAD MISTRESS
GOVT. GIRLS HIGH SCHOOL
JEHANGIRA (DISTT. SWABI)**

NO. 38/A-17/SST(F) Deputation cases
Dated: 27.05.2014

To,

**The District Education Officer
(Female) Swabi.**

**Subject:- APPLICATION FOR UPGRADATION IN BPS-17 SINCE 2007 IN RESPECT OF MST. LUBNA SALAH UD
DIN SET (SCIENCE) BPS-16 GOVT. GIRLS HIGH SCHOOL, JEHANGIRA DISTRICT SWABI (KPK)**

With reference to the above subject, vide Letter No.1741-42/ F.No.38/A-17/SST (F) Deputation cases Dated: 14.05.2014 issued from Director of Elementary and secondary Education (KPK) and copy of the same endorsed to the undersigned. In this regard the comprehensive report regarding her deputation up till now to proceed further in the matter are as under:-

1. It is submitted that Mst.Lubna Salah Ud Din was inducted as SET (Science) BPS-16 through Punjab Public Service Commission on 06.05.1997 and presently serving as SET (Science) in KPK, Education Department since 17.10.2000 on transferred to KPK under wed lock policy initially for three years deputation, later on her deputation was extended for further one year. In this context, the Govt of Punjab education Deptt has already granted NOC for her permanent absorption/ posting in KPK. She continuously performed her duties without any break on the same post and Grade BPS-16 in Govt. Girls High School, Jehangira Distt. Swabi since 17.10.2000 .She has submitted humble submission for her up-gradation in BPS-17 from time to time. Whereas, as per Notification dated:26.02.2008 issued by the Govt. of NWFP, Finance Deptt (Regulation Wing) Peshawar, the SETs in BPS-16 having ten years continues service will be upgraded to BPS-17. But the Mst.Lubna Salah Ud Din has neither been upgraded in BPS-17 nor have been absorbed as permanent SET. She has permanently settled in Nowshera (KPK).
2. In the context of para-1, your kind attention is drawn towards the Executive Distt. Officer, School and Literacy, Swabi Letter quoting reference of letter No.2011-34/A-14/SET/B-17/Award dated: 23.02.2008 issued by the Director School & Literacy, NWFP Peshawar through which applications were invited from the eligible SETs for up- gradation from BPS-16 to 17. Accordingly, Mst.Lubna Salah Ud Din applied for up- gradation from BPS-16 to 17 along with Bio-data and copies of all the ten years ACRs but even then the Mst.Lubna Salah Ud Din has been ignored/deprived-off from her due promotion w.e.f 2007 without any justified/cogent and lawful reason.
3. In this regard, she has also submitted an application to your good office covering all details on 26.10.2004 conveying full details, for your consideration but no response has yet been received (Copy enclosed).
4. Mst.Lubna Salah Ud Din also tendered another application regarding the same issue on 16.06.2008 for the same request (Copy enclosed)..
5. Besides, we confirm that she is performing her services as SET (Science) since 17.10.2000 without any break with full devotion, commitment & to the entire satisfaction of the undersigned. Her results remained 100 %. She is the only SET (Science) Teacher in the School educating the students in the subject of Science.

It is therefore requested & strongly recommended that necessary orders regarding up-gradation in BPS-17 in respect of Mst.Lubna Salah Ud Din, SET (Science) may please be issued from due year 2007 in the best interest of the School.

Yours faithfully,
S/d-

**HEAD MISTRESS
GOVT. GIRLS HIGH SCHOOL
JEHANGIRA (DISTT. SWABI)**

C.C:- An advance copy to PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar vide their Letter No.1741-42/ F.No.38/A-17/SST (F) Deputation cases Dated: 14.05.2014 for kind consideration & action.

**HEAD MISTRESS
GGHS, JEHANGIRA
(DISTT. SWABI)**

ATTESTED



The Director Education (E&SE)
Khyber Pakhtun Khuwa
Peshawar.

Dated: 09-12-2015

28

Subject: APPLICATION FOR PERMENENT ABSORPTION IN RESPECT OF
MST. LUBNA SALAH UD DIN SST(SCIENCE) BPS-16 GOVT GIRLS HIGH SCHOOL
JAHANGIRA (REF: DEO NO. 3166 DATED 18-11-2015)

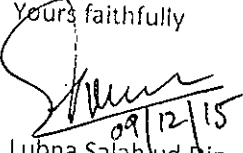
Respected Sir,

Kindly refer to your direction / instruction dated 09-12-2015 from your good office. We are enclosing herewith the 25 documents including Bsc, Med, Fsc & Matric certificate / DMC in addition to DEO swabi recommendation letter, appointment letter of PPSC as SST (Science) and a fundamental letter No:S.R.I(E&AD)I-14/82(A)(VOL-VII) dated 31-12-2004 addressed to secretary Govt of NWFP school and literacy Department and other necessary related documents. Beside permanent transfer/ absorption of similar / identical case of Mst. Noor jehan SET transferred from GGHS Pindi Bhattian Hafizabad (Punjab) to GGMS. Mathra Dongi District Swabi. Vide notification No. SO(S)/7-30/98 Mst. Mazhar bibi Dated 05 September 2000 for ready reference.

Therefore I beseech you to process and recommend my application to the worthy secretary secondary school education Government of Khyber Pakhtun Khawa accordingly.

Thanks & Regards

Yours faithfully


09/12/15
Lubna Salah ud Din
SST(science) GGHS jahangira
District swabi.

ATTESTED



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NO INQUIRY CERTIFICATE.

Certified that Mrs. Lubna Salahuddin
D/O, Dr. Salahuddin working in the
office of Govt. Girls High School Khanpur
as SST. Science in BPS No. 16 w.e.f. 6-5-1997
to upto date. There is no inquiry pending against him/
her as per our office record.

O/S

District Education Officer (SB-1)
Rahim Yar Khan

Chamr
Head
Govt. Girls High School
Khanpur Distt. R. Y. Khan

PENSION LIABILITY CERTIFICATE.

This is to Certify that Govt. of Punjab will bear
the pension liability for the period actually served
by Mrs. Lubna Salahuddin as SST (Science) Government
Girls H/S Khanpur Distt. Rahim Yar Khan (Punjab)
-AND- NO DEMAND CERTIFICATE.

Certified that no Govt. dues are out-standing
or are recoverable from Mr/Miss/Mrs Lubna Salahuddin
D/O, Dr. Salahuddin working as SST. Science
in BPS No. 16 in the office of Govt. Girls High
School Khanpur. Distt. Rahim Yar Khan (Punjab)

O/S

District Education Officer (SB-1)
Rahim Yar Khan

Chamr
Head
Govt. Girls High School
Khanpur Distt. R. Y. Khan

ATTESTED

Handwritten signature

OFFICE OF THE DISTRICT EDUCATION OFFICER (SE), FAHIMYAFKHAN DISTRICT, FAHIMYAFKHAN

To

The Director of Secondary Education,
Bahawalpur Division, Bahawalpur.

MEMO NO. 2956 /G-2.,

Dated: 26/02/1998

SUBJECT:- IN-SERVICE TRAINING COURSE OF SECONDARY SCHOOL TEACHERS IN PHYSICS/CHEMISTRY AND BIOLOGY FROM: 24 03 1998 TO 04 04 1998.

Kindly refer to your Memo No, 2907-9/G-2., dated 21.02.1998 on the subject cited above.

It is submitted that In-Service Training Course for Secondary School Teachers (15) Male and (15) Female to enhance their teaching in Physics, Chemistry and Biology. The said course is going to be held at Govt. In/Pre-Service Teacher Training College, Bahawalpur for S.S.T's (Male) and Govt. College for Elementary Teacher for. (Women), Bahawalpur for S.S.T's (Female) from: 24 03 1998 to 04 04 1998 Positively.

The following Secondary School Teachers are hereby nominated for the above mentioned course.

Sr. No.	Name of SST (Male) With Place of Posting.	Designation	Sr. No.	Name of SST (Female) With Place of Posting.	Designation
1	2	3	1	2	3
1	Yaqoob Khazan, GHS, 173/P, SDK.	SST(S)	1	Lubna Saleh-ud-Din, GHS, Khanpur.	SST(S)
2	Shakoor Anwar, " Ahmadpur Lamma.	"	2	Shehnaz Kousar, " Railway Colony.	"
3	Pehmat Ullah, " Mao Mubraq, FYK.	"	3	Samia Naz, " Senior Muslim, FYK.	"
4	Saadat Manzoor, " Colony, FYK.	"	4	Shehnaz Zohara, " Chak No. 125/P, FYK.	"
5	Mohd. Adrees, " Chak No. 88/P, FYK.	"	5	Fahida Amin, " Liaquatpur.	"
6	Ghulam Murtaza, " Chak No. 109/T.L.	"	6	Lubna Aziz, " Kot Samaba, FYK.	"
7	Shakeel Ahmad, " Colony, Khanpur.	"	7	Fahat Naseem, " Khan Bella, LOF.	"
8	Abdul Fahim, " Habib Abad, LOF.	"	8	Naheed Qamar, " Senior Muslim, FYK.	"
9	Mohd. Asghar Ali, " Chak No. 87/A, LOF.	"	9	Zubaida Akhtar, GHS, Feeroza, LOF.	"
10	Shakeel Ahmad, " Sehja, Khanpur.	"	10	Mignat Ferdous, GGHS M. C. Sadiqabad.	"
11	Mohd. Akhtar, " Basmillahpur, FYK.	"	11	Fahima Yasmeen, " Old, Sadiqabad.	"
12	Azhar Ali, " Chak No. 99/P, FYK.	"	12	Tameem Ferdous, " Chak No. 158/P, SDK.	"
13	Ashiq Naeem, " Comprehensive, FYK.	"	13	Fahana Yasmeen, " Tameer-e-Millat, FYK.	"
14	Ghulam Sarwar, " -----do-----	"	14	Tayyaba Anwar, " Canal Colony, FYK.	"
15	Asghar A. Tabbasum, " Chak No. 114/P, ""	"	15	Fahela Muzaffar, " Petrol Pump, SDK.	"

- NOTE: TA/DA will be paid by the Directorate of Staff Development (Punjab), Lahore. The nominees should also be advised to take with them the following items:-
- A certificate from Head of the Institution that he/she is teaching the above subjects to the Secondary Classes.
 - Pay and distance certificate duly signed by the Head of the Institution.
 - Prescribed Text-Books for Class 9th & 10th in the above subjects.

Encl. No. 2957-90 /G-2.,

DISTRICT EDUCATION OFFICER (SE),
FAHIMYAFKHAN DISTRICT, FAHIMYAFKHAN

Copy submitted for information to the Director Staff Development (Punjab), Lahore w.r. to his letter No. TRG-268/98/369-418., dated 11.02.1998.

2-3 The Director Public Instruction (SE) Punjab, Lahore.

3-4 The Principal's Govt. In/Pre-Service, BWP and Govt. Elementary Teachers Training College for Women, Bahawalpur.

5-35 Copy forwarded for information and Strict Compliance to All the Concerned Institutions (Boys & Girls) Secondary Schools in the District with the remarks that you are requested to relieve the concerned teachers for above course well intine up for intimation to the undersigned. If the concerned teachers do not attend the course the undersigned will be issue

DISTRICT EDUCATION OFFICER (SE),
FAHIMYAFKHAN DISTRICT, FAHIMYAFKHAN

(31)

GOVERNMENT OF PAKISTAN
CABINET SECRETARIAT
ESTABLISHMENT DIVISION

No. 10/30/97-R.H.

Islamabad, the 13th May, 1998.

OFFICE MEMORANDUM

Subject:- POSTING OF SERVING HUSBAND / WIFE AT THE SAME STATION.

The undersigned is directed to state that Government has taken note of the socio-economic problems and hardships faced by husbands and wives in Government service due to posting at different stations of duty, and it has been decided to prescribe the following guidelines to facilitate posting of husband and wife at the same station:

- (i) Where a request is made for posting at a different station in the same department/service/cadre in which an employee is already serving, the request may be accepted subject to availability of a post in the same BPS.
- (ii) If a request involves temporary deputation to another department, it may be processed in consultation with the concerned department, and may be accepted on the prescribed terms of deputation subject to availability of a post in the same BPS.
- (iii) When a request is made for permanent transfer to/absorption in another department/agency, the request may be processed in consultation with the department concerned, subject to the condition that in the event of permanent transfer, seniority shall be determined in accordance with Rule 4 of the Civil Servants (Seniority) Rules, 1993.
- (iv) If there is a tie between two or more Government servants for posting at the same station in the same department/unit of an organization, the Government servant with greater length of service may be preferred.
- (v) Request for posting by a spouse facing serious medical problems may be accorded highest priority.
- (vi) Spouses already posted at one station, including those posted on deputation beyond the prescribed maximum period, may normally not be disturbed without compelling reasons of public interest. Requests for extension of

ATTESTED

[Signature]

MAY 1998
S (ACE)
5 MAY 1998
All members

M (CE)
M (ST)
M (A)
M (CUS)
M (IT)
M (TP)

Circulate to all the field formations and ACE wing.

2505
18/5/98
15-05-98
SECRET
30306
OFFICE
15-05-98

by
18/5/98

GOVERNMENT OF N.W.F.P.
EDUCATION DEPARTMENT

Dated 5th September, 2000.

NOTIFICATION.

NO:SO(S)/7-30/98/Mst. Mazhar Bibi:- The Governor, N.W.F.P. is pleased to transfer Mst. Noor Jehan, S.E.T., GGHS, Faind Bhuttian Hafizabad, Punjab to the Education Department, N.W.F.P. and post her against the vacant post of S.E.T. at GGMS, Mathra Dugl, Swabi, with the following terms & conditions:-

1. Pension liability of the lady teacher will be shared between the Government of the Punjab and NWFP for the period she served in the respective Provinces.
2. No T.A/D.A. will be allowed from the Punjab to the place of posting in N.W.F.P.
3. Her seniority will be placed on the bottom of cadre as required in rule 8(2) of NWFP Civil Servants (AFS) Rules, 1989.

SECRETARY EDUCATION DEPARTMENT
GOVERNMENT OF N.W.F.P.

Indt: No:SO(S)/7-30/98/Mst. Mazhar Bibi. Dated 5.9.2000.

Copy forwarded to:-

1. The Section Officer(S.IV), Govt: of Punjab, Lahore w/r to his letter No:SO(S.IV)8-50/99 dated 19.6.2000.
2. The Section Officer(Rag:I), Govt: of NWFP, SSGAD w/r to his letter No:SOR-I(SSGAD)2-343/00(Noor Jehan dt:8.4.2000).
3. The Director Secondary Education, NWFP, Peshawar.
4. The Distt: Edu: Officer(Secondary)Female, Swabi.
5. The Distt: Accounts Officer, Swabi.
6. The teacher concerned.

[Signature]
SECTION OFFICER(SCHOLS)

ATTESTED

[Signature]

[Handwritten notes and signatures]
Addl. Secy
7/9
151
8/9

BETTER COPY OF PAGE-33

NO.SO (S-IV)8-50/99.
GOVERNMENT OF THE PUNJAB
EDUCATION DEPARTMENT

Dated Lahore the, 19th Jan' 2000

To

The Secretary to Government of (N.W.F.P),
Education Department, Peshawar.

Sub: INTER PROVINCIAL TRANSFER OF MST. NOOR JEHAN, SST GOVT:
GIRLS HIGHER SECONDARY SCHOOL PINDI BHATTIAN HAFIZABAD
(FROM PUNJAB TO N.W.F.P) GOVERNMENT.

Sir,

I am directed to forward for consideration on application of Mst. Noor Jehan SSt, Govt: Girls Higher Secondary School Pindi Bhattian Hafizabad (Punjab), requesting therein for her permanent transfer from Punjab to N.W.F.P on the grounds that she get married and her husband is residing in N.W.F.P alongwith the following documents namely:-

1. Service particulars on the prescribed proforma undertaking that she will not claim TA/DA at the eve of her transfer to the N.W.F.P Government.
 2. Undertaking that she will accept lowest seniority in her cadre at the eve of her transfer to the N.W.F.P Government.
 3. Pensionary liabilities will be shared by respective Government.
 4. Certificate to the effect that there is no Department, Anti-Corruption Enquiry pending against the above named lady teacher.
 5. The Government of the Punjab have no objection to the proposed transfer.
2. It is therefore, requested that concurrence of the Government of N.W.F.P. to the permanent transfer of the said lady teacher from Punjab to N.W.F.P, if acceptable on the above terms and conditions may kindly be conveyed to Provincial Govt: at an early date.

SECTION OFFICER (S-IV)

(38)

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NO. 50 (S-IV) 8450/99.

GOVERNMENT OF THE PUNJAB
EDUCATION DEPARTMENT

Dated Lahore the, Lahore the 19th, Jan 2000

To

The Secretary, to Government of (N.W.F.P.),
Education Department, Peshawar

Sub: INTER-PROVINCIAL TRANSFER OF, Mst. NOOR JEHAN, SST GOVT.
GIRLS HIGHER SECONDARY SCHOOL PINDI BHATTIAN HAFIZABAD
(FROM PUNJAB TO N.W.F.P.) GOVERNMENT.

Sir,

I am directed to forward for consideration on application of Mst. Noor Jehan SST Govt. Girls Higher Secondary School Pindi Bhattian Hafizabad (Punjab), requesting therein for her permanent transfer from Punjab to N.W.F.P. on the grounds that she get married and her husband is residing N.W.F.P., alongwith the following documents, nemely:-

1. Service particulars on the prescribed proforma, undertaking that she will not claim TA/DA at the eve of her transfer to the N.W.F.P. Government.
2. Undertaking that she will accept lowest seniority in her cadre at the eve of her transfer to the N.W.F.P. Government.
3. Pensionary liabilities will be shared by respective Government.
4. Certificate to the effect that there is no Departmental, Anti-Corruption Enquiry pending against above named lady teacher.
5. The Government of the Punjab have no objection to the proposed transfer.

It is, therefore requested that concurrence of the Government of N.W.F.P. to the permanent transfer of the said lady teacher from Punjab to N.W.F.P., if acceptable on the above terms and conditions may kindly be conveyed to Provincial Govt. at an early date.

ATTESTED

[Signature]
SECTION OFFICER (S-IV)

TA/DA above.
NO. & Date of Evn.

A copy is forwarded for information to the Education (SE), Gujranwala Division Gujranwala W/R to DPI (SE), Punjab Lahore Gdtg: No. 20937/Admn-II(2) dated 11-12-1999.

SECTION OFFICER (S-IV)

Additional Secretary
Dy. Secy
26/1/2000
[Handwritten notes and signatures on the left margin]

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PROFORMA FOR INTER/OUT OF PROVINCIAL TRANSFER.

1. Name with Parentage: *Mrs. Lubna Salah-ud-din*
2. Qualifications: *B.Sc. B.ed*
3. Designation: *SST (Science)*
4. Pay Scale No: *BS No. 16 (Rs. 3126/-)*
5. Date of first entry into Government Service: *06.05.1997*
6. Date of appointment to the present Post: *06.05.1997*
7. Satation of Posting: *Govt. Girls H/S Khan Pur. Distt. Rahim Yar Khan.*
8. Date of Posting at present station of posting: *06.05.1997*
9. Permanent Address: *Village & Post office Jahangira Tehsil Lahore Distt. Swabi (NWFP)*
10. Where transfer required: *Govt. Girls H/S Jehangira Tehsil Lahore Distt. Swabi (NWFP)*
11. Reasons of transfer: *Husband is posted in National Bank of Pakistan main Branch Nowshra cant. (NWFP)*

Certified that the above particulars are correct and nothing has been concealed. Further it is to certify/undertake that:-

- (a) No enquiry under E/D Rules is pending against me.
- (b) I am not required by any Court of Law for attendance in any case pertaining to my official duties/service matters.
- (c) I am holding permanent post and was appointed against a substantive post and not in any leave vacancy or any such post against which any other person holds a lien.
- (d) I shall not claim seniority in case of inter divisional/district transfer.

Signature : *Jubna* 21/7/2000

VERIFICATION:

Certified that the above particulars / statement of

Mr./Mrs. *Lubna Salah-ud-din SST (Science)*

Who has been working in this Institution/Office, are correct as per record available in the office and service Book of the application, whose request is hereby forwarded for his/her Inter divisional/Inter District/Province transfer.

COUNTERSIGNED.

Chamra
Head of the Institution/Office

ATTESTED

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DIRECTORATE OF SCHOOLS & LITERACY
NWFP PESHAWAR.

NO. 6103 / F.No. A-17/SET(F)

Deputation/ADDET.

Dated 21/4 /2004.

To

1st: Lubna Salahud Din SET
GGHSS Khanpur (Funjab) now
at GGHS Jehangira Swabi. (NWFP)

SUBJECT: REQUISITION FOR EXTENSION IN DEPUTATION.

Memo:

I am directed to refer to the subject cited above and to ask you to provide N.O.C. from your parent Department for extension of your deputation period in NWFP Education Deptt: as requested by you. You are also directed to provide the following information:-

- a) Exact deputation period.
- b) Extension, if any, already granted in deputation period.
- c) Exact period for which extension is required now.

M. J. Das
ASSTT: DIRECTOR (ESTT: I)
DIRECTORATE OF S&L NWFP

Endst: No. _____

21/4/04

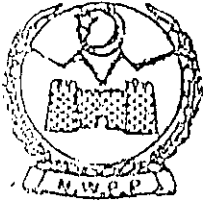
Copy forwarded to the:-

1. Section Officer (Schools) Schools & Literacy Department
Govt: of NWFP, Peshawar w/r to his No. SO(S)4-10/2000/
Muhammad Iqbal dated 29-3-2004.

ASSTT: DIRECTOR (ESTT: I)
DIRECTORATE OF S&L NWFP

ATTESTED

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GOVERNMENT OF N.W.F.P.
ESTABLISHMENT & ADMINISTRATION
DEPARTMENT.
(REGULATION WING)

NO.SOR.I(E&AD)1-14/82(A)(VOL-VII)
Dated Peshawar the 03-12-2004.

To

The Secretary to Govt. of NWFP,
Schools and Literacy Department

Subject: APPLICATION FOR PERMANENT ABSORPTION IN R/O
MST. LUBNA SALAH UD DIN.

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith an appeal addressed to Secretary (Establishment) submitted by Mst. Lubna Salahud Din SET which was thoroughly examined and it has been decided that the solution of the problem lies with Schools and Literacy Department. In order to meet the requirement of rules Secretary Schools and Literacy Department being chairman of Standing Service Rules Committee (SSRC) may amend the relevant service rules by adding a provision for "by Transfer". Subsequently request for permanent absorption would be considered favorably.

Yours faithfully,

(ARIF JAMIL)
SECTION OFFICER(REG.I).

Encl:As above.

Copy forwarded to Mst. Lubna Salahud Din SET (Science)
Government Girls High School Jehangira District (Swabi) with reference to her
application dated 26/10/2004


SECTION OFFICER(REG.I)

ATTESTED



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GOVERNMENT OF N.W.F.P
SCHOOLS & LITERACY DEPTT

Dated Peshawar the 04-12-2004

NOTIFICATION

No. SO(S) 4-10/2000/Muhammad Iqbal

The Competent Authority in consultation with the
Establishment Department has been pleased to approve ex-post facto extension in deputation
period for one year with effect from 28-10-2003 in respect of Mst. Lubna Salahud Din, SST
(Science) Government of the Punjab Education Department to Government of NWFP, Schools
& Literacy Department as SET (Science)

SECRETARY TO GOVT. OF NWFP
SCHOOLS & LITERACY DEPTT

ENDST NO & DATE EVEN

Copy forwarded for information and further necessary action to:

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2-
3-
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- 1- PS to Secretary, Schools & Literacy Department, NWFP.
- 2- The Director, Schools & Literacy Department, NWFP, Peshawar w/c to his letter No. 3138-39 dated 21-7-2004.
- 3- The Executive District Officer, S&L, Swabi.
- 4- The Section Officer (S-IV), Govt. of Punjab, Education Department (School Wing), Lahore.
- 5- Mst. Lubna Salahud Din, SET (Science) GGHS, Jhangira, Swabi with the remarks that her application for permanent description is not covered under the rules.
- 6- P.A. to Additional Secretary, S&L Deptt. NWFP.
- 7- P.A. to Deputy Secretary (Admin) S&L Deptt. NWFP.
- 8- Office order file.

[Signature]
Secretary

[Signature]
(ARBAZ MUSHARAF KHAN)
SCHOOLS & LITERACY DEPTT

ATTESTED

[Signature]

38

(Signature)

D.No 144
27/7/04

DIRECTORATE OF SCHOOLS & LITERACY
NWFP PESHAWAR

No. 313/F.No. /A-17/DS&L/SET(F) Deputation
/AD (Estab-I)

Dated Peshawar the 21/7/2004

To

The Executive District Officer
(Schools & Literacy) Swabi

Inter up to
27/7/04

Subject: REQUEST FOR NOC ON PERMANENT TRANSFER FROM PUNJAB TO NWFP IN RESPECT OF Mst. LUBNA SALAH-UD- DIN SST (SCIENCE)

Memo:

I am directed to ask you to submit the following documents in respect of Mst: Lubna Salah-ud Din SST (Science) Govt: Girls High Schools Khan Pur District Rahim Yar Khan Punjab requesting for inter provincial transfer to Govt: Girls High Schools Jehangira District Swabi N.W.F.P

- 1- Application Form.
- 2- Simple Application
- 3- Service Certificate.
- 4- Non Involvement Certificate.
- 5- N.O.C.
- 6- National Identity Card.
- 7- A Certificate that not claiming any TA/DA/TG.
- 8- A Certificate that not claiming any seniority.
- 9- Nikah Namā
- 10- Appointment order on SET post.
- 11- Domicile of the mistress concerned.
- 12- B.Ed Certificate/Degree.
- 13- Pension Liability Certificate.
- 14- Husband Service Certificate.

(Signature)
Deputy Director (Estab-I)
Directorate of Schools & Literacy
NWFP Peshawar.

Endst: No. _____

Copy forwarded to the:

- 1. Section Officer (Schools) Govt. of NWFP School & Literacy Department with reference to his letter No.SO(S)4-10/2000/M.Iqbal dated 3-7-2004
- 2. PA to Director Schools & Literacy NWFP Peshawar.

Deputy Director (Estab-I)
Directorate of Schools & Literacy
NWFP Peshawar.

ATTESTED

Inter ProvLetter

(Signature)

OFFICE OF THE DIRECTOR ELEM: & SECT:EDU:NWFP, PESHAWAR.
=====

39

NO. 1997 / 17/DEPT(T)/Deputation

TO:-

Dated Pesh: the 20/8/2008.


The Executive District Officer,
(E & S) Education Swabi.

Subject:- APPLICATION FOR PERMANENT ABSORPTION IN
RESPECT OF Mst: LUBNA SALAH-UD-DIN SET.

Memo:-

I am directed to refer to your Memo: No. 131 dated 7-7-2008 on the subject cited above and to state that Mst: Lubna Salahuddin SET GGRSS Jehangira (Swabi) was on deputation since 27-10-2000. Her last deputation was extended for one year upto 27-10-2004 and no further extension was accorded to her, neither your office nor the Principal GGRSS Jehangira (Swabi) have submitted extension in deputation case in respect of the above named Mistress and now she has applied for permanent absorption against SET post.

I am further directed to ask you to submit a detailed comments/views in the subject case and also intimate that why the case was not processed in time.


20/8/08
(Assistant Director (Estt;)
(E & S) Education NWFP,
Peshawar.

ATTESTED



40

43

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECY: EDU: SWABI.

DEPARTMENTAL PERMISSION:

The following mistresses are hereby allowed to appear in the forth coming various examinations as private candidates as noted against each name subject to the following conditions:-

1. they will not leave the E&SE Department after passing the the said Examination at least two years.
2. they will not study for the said Examination during the duty hours.

S.NO.	Name/Designation.	School	Exam. for which perm. is allowed.
1.	Izabj Begum CT	GGHS Panj Pir.	B. Ed. 2011.
2.	Khalida parveen CT	GGHS Jehangira.	M. Ed. 2011.
3.	Parveen Akhtar CT	GGHS Jehangira.	M. Ed. 2011.
4.	Rahsen Akhtar CT	GGHS Jehangira	M. Ed. 2011.
5.	Lubna salahuddin SBT	GGHS Jehangira.	M. Ed. 2011.

(ABDUS SALAM)

EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECY: EDU: SWABI.

End at: NO. 3166-5 / P. Permission/ P.NO. 04/ Dated 31-5 / 2011.

Copy forwarded for information & n/a to the:-

1. Headmistress GGHS Panjpir.
2. Headmistress GGHS Jehangira.
3. Teachers concerned.

DISTRICT OFFICER (E&SE)
ELEMENTARY & SECY: EDU: SWABI.

ATTESTED

[Handwritten signature]

OFFICE OF THE HEAD MISTRESS, GOVERNMENT GIRLS HIGH SCHOOL, JEHANGIRA
DISTRICT SWABI.

No. 367

Dated: 13.02.2013.

SERVICE CERTIFICATE:

It is certified that Mst. Lubna Salah-ud-Din, SET(Science) serving Education Department in BPS-16 at Government Girls High School, Jehangira Distt Swabi since 17.10.2000 though she was appointed in BPS-16 through Public Service Commission on 06.05.1997. She is serving on permanent post as SET(Science) without any break for the last fifteen years up to the entire satisfaction of the under signed.

During my posting at this school, I found her professional, hardworking, loyal, committed and a devoted science teacher. She always showed her remarkable results throughout her 10 year long career.

I wish her all success in her future life and also wish that she may be up graded in BPS 17 w.e.f 2007 as per governing rules of Elementary & Secondary Education Department of KPK.

Noreen

(HEAD MISTRESS)

HEAD MISTRESS
G.C.H.S Jehangira
SWABI

ATTESTED

[Signature]

BETTER COPY OF PAGE-42

OFFICE OF THE DISTRICT OFFICER
FEMAL SWABI
No, _____/Dated 27/2/2013

To,

The Director of E&S Edu:
Khyber Pakhtunkhwa, Peshawar.

Subject:

APPLICATION FOR UP-GRADATION IN BPS-17 SINCE 2007
IN R/O MST: LUBNA SALAHUDDIN SET SINCE BPS-16
GGHS JEHANGIRA DISTRICT SWABI.

Memo:

Enclosed please find herewith self-explanatory of the above named applicant for favorable consideration and onward submission to the quarter concerned please.

Ed- As above.

DISTRICT EDUCATION OFFICER
FEMALE SWABI

Endst, No. 638/-

Copy of the above is forwarded to the:-

42

40

OFFICE OF THE DISTRICT EDUCATION OFFICER
FEMALE SWABI
No. _____ Dated, 27/12/2013

To,

The Director of L.S.S Ldls
Khyber Pakhtoon, Khawa Peshawar

Subject: Application for promotion to EPS-21 since 2007 in t/o
Mrs. Lubna Salim - Mrs. Din SET since EPS-16 GGHS Jhangira
District Swabi.

Enclosed please find herewith self-explanatory application of the above named applicant
For favorable consideration and onward submission to the quarter concerned please.

Encl - As above:-

— Sd / —
DISTRICT EDUCATION OFFICER
FEMALE SWABI

Encl. No. 438

Copy of the above is forwarded to the:-
1) Head Mistress GGHS Jhangira.

(Signature)
DISTRICT EDUCATION OFFICER
FEMALE SWABI

ATTESTED

(Signature)

(43)

DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR

NO. 1746 /F.No.38/A-17/SST (F) Deputation
cases

DATED PESHAWAR THE: 14/5 /2014

The District Education Officer
(Female) Swabi

Subject: APPLICATION FOR UPGRADATION IN BPS-17 SINCE 2007 IN
RESPECT OF MST. LUBNA SALAH UD DIN SET (SCIENCE) BPS-16
GOVT: GIRLS HIGH SCHOOL JEHANGIRA DISTRICT SWABI (KPK)

I am directed to enclose herewith an application in r/o Mst. Lubna Salah-ud-Din
(Sc) GGHS Jehangira District Swabi on the subject cited above and to ask you to submit
a comments/ comprehensive report regarding her deputation up till now to proceed further in
matter.

(Deputy Director (Female)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Copy to the:-

Principal/Headmistress GGHS Jehangira District Swabi.
Mst. Lubna Salah-ud-Din SST (Sc) GGHS Jehangira District Swabi.
PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

(Deputy Director (Female)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

ATTESTED

[Signature]



DISTRICT EDUCATION OFFICE (FEMALE) SWABI

(Office phone Fax No 0938280339, cmisfswabi@yahoo.com)
Swabi No. 3166 Dated 18/11/2015

To,

The Director (E&SE)
Khyber Pakhtunkhwa Peshawar.

Subject: - Application for Permanent Absorption in respect of Mst. Lubna Salah ud Din SST(Science) BPS-16, Govt.Girls High School Jehangira Disst Swabi

Memo:-

Kindly refer to your office Memo NO:978/F.NO.38/A-17/SST/F/Deputation Case Dated,11/11/2015, the comprehensive detail report along with favorable recommendation in the instant case are as under.

Mst.Lubna Salah ud Din SST Science was inducted as SST Science by Punjab Public Service commission vide order NO:2/16-97/80/Admn-11(2) Dated 05-05-1997. She was transferred from Government Girls High School Khanpur Distt Rahim Yar Khan to Govt Girls High School Jehangira Swabi on deputation for 03 year under wed lock policy vide order NO:SO(S)2-4/92/ M-Iqbal Dated 17/11/2000. She was further granted one year deputation vide notification NO: Govt. of NWFP School & Literacy Department Dated 14.12.2004.

The Government of Punjab Education Department (school Wing) had issued NOC for the permanent absorption / transfer in Govt. of NWFP Education Department vide their letter.No. SO (S-IV)8-56/2000 Dated 18-6-2004,(letter enclosed). Her application for permanent absorption after expiry of deputation period was forwarded & then recommend vide letter NO: Dated 30/07/2004 by EDO Swabi School & Literacy under the directive of Director School & Literacy vide letter NO:3137/F-NO/A-17/DS & I/SET (F) Deputation (ESTB-1) Dated 21-7 -2004. later on SO School had recommended the application for permanent absorption & than vide letter NO: SOR-1(E&AD)1-4/82(A)VOL-11 Dated 03-12-2004, a letter had endorsed to Secretary School & Literacy with the favorable remarks that " MST Lubna Salah ud Din SST Science application for permanent absorption it has been decided that the solution of the permanent absorption lies with the Secretary school & literacy Department, subsequently request for permanent absorption be consider favorably".(letter enclosed)

Keeping in view her excellent service as SST Science in Govt Girls High School Jehangira Distt Swabi since 17.10.2000 without break, we strongly recommend that the application of Mst Lubna Salah ud Din SST Science for permanent absorption may be considered favorably in the large interest of Students /Public accordingly.

DISTRICT EDUCATION OFFICER
937 (FEMALE) SWABI

Enc(24)

ATTESTED

(45)

(6)

OFFICE OF THE DIRECTOR ELEMENTARY &
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR

NO. _____
Dated Peshawar the 14/12 2015

To

The Secretary,
Govt. of Khyber Pakhtunkhwa
Elementary & Secondary Education Department.

SUBJECT:- INTER PROVINCIAL TRANSFER

Memo:

I am directed to refer to District Education Officer (Female) Swabi letter No.3166 dated 18-11-2015 on the subject cited above and to state that Mst. Lubna Salahuddin SST Science (Chemistry and Biology) was inducted as SST Science by Punjab Public Service Commission vide order No.2/ 16-97/80/Admn-11(2) dated 05-05-1997. She was transferred from GGHS Khanpur District Rahim Yar Khan to GGHS Jehangira District Swabi, on deputation for 03-year under wed lock policy vide order No.SO(S)2-4/92/ M-Iqbal dated 17-10-2000. She was further granted one year deputation vide Notification No. Govt. of NWFP School & Literacy Depatt: dated 04-12-2004.

The Government of Punjab Education Department (School Wing) had issued NOC for the permanent absorption / transfer to Govt. of NWFP Education Department vide their letter No.SO(S-IV)8-56/2000 dated 18-06-2004. Her application for permanent absorption after expiry of deputation period was forwarded and then recommend vide letter No.Nil dated 30-07-2004 by EDO Swabi, School & Literacy under the directive of Director School & Literacy vide letter No.3137/F.No./A-17/DS &1/SET(F) Deputation (ESTAB-1) dated 21-07-04. Later on Section Officer (Reg-I) had recommended the application and letter had endorsed to Secretary School & Literacy with the favorable remarks that " Mst. Lubna Saiah-ud-Din SST Science (Chemistry & Biology) may be consider for permanent absorption it has been decided that the solution of the permanent absorption lies with the Secretary School & Literacy Department, subsequently request for permanent absorption be consider favorably.

Moreover, the permanent transfer / absorption of the similar / identical case of Mst. Noor Jehan SST GGHS Pand Bhattian Hafiz Abad (Punjab) to GGMS Mathra Dagi District Swabi vide Notification No.SO(S)7-30/98/Mst. Mazhar Bibi dated 05-09-2000 (Copy attached for ready reference).

In the light of recommendation of the DEO(F) Swabi for permanent absorption to the teacher concerned may be consider please.

Encls: As Above

Deputy Director Establishment (F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. 1860-61

Copy forwarded for information to the:-

- 1- District Education Officer(Female) Swabi w/r to her No. cited above
- 2- PA to Director E&SE Local Office.

Deputy Director Establishment (F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

WNSOL/15*

ATTESTED

[Handwritten Signature]

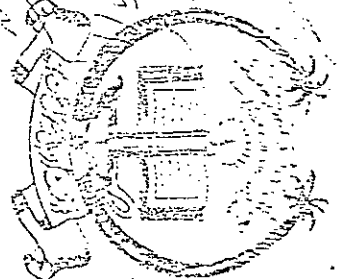
49

46

Govt Grade Secondary School

Ramanpur

Post Box No. 7497



শেখ হাসিনা সরকারি স্কুল

রামপুর - পোস্ট বক্স নং ৭৪৯৭

21.7.2008

23493/PA

কর্তৃপক্ষ - ডায়েরী নং ৫৯৬/১৯৬৩/১৯৬৩

Verification of the above

১০৪৭

E.B
31/7

21/6-97/80

১০৪৭/১৯৬৩/১৯৬৩ - ডায়েরী নং ৫৯৬/১৯৬৩/১৯৬৩
১০৪৭/১৯৬৩/১৯৬৩ - ডায়েরী নং ৫৯৬/১৯৬৩/১৯৬৩
১০৪৭/১৯৬৩/১৯৬৩ - ডায়েরী নং ৫৯৬/১৯৬৩/১৯৬৩
১০৪৭/১৯৬৩/১৯৬৩ - ডায়েরী নং ৫৯৬/১৯৬৩/১৯৬৩
১০৪৭/১৯৬৩/১৯৬৩ - ডায়েরী নং ৫৯৬/১৯৬৩/১৯৬৩
১০৪৭/১৯৬৩/১৯৬৩ - ডায়েরী নং ৫৯৬/১৯৬৩/১৯৬৩
১০৪৭/১৯৬৩/১৯৬৩ - ডায়েরী নং ৫৯৬/১৯৬৩/১৯৬৩
১০৪৭/১৯৬৩/১৯৬৩ - ডায়েরী নং ৫৯৬/১৯৬৩/১৯৬৩
১০৪৭/১৯৬৩/১৯৬৩ - ডায়েরী নং ৫৯৬/১৯৬৩/১৯৬৩
১০৪৭/১৯৬৩/১৯৬৩ - ডায়েরী নং ৫৯৬/১৯৬৩/১৯৬৩

১০৪৭/১৯৬৩/১৯৬৩ - ডায়েরী নং ৫৯৬/১৯৬৩/১৯৬৩

ATTESTED

ATTESTED

Handwritten signature

①

47

No. 864 D 14/10

TO Whome it May Concern

I am pleased to Certify that Miss Lubna Salahuddin w/o Abdul Samad is working as SET (science) ^{BPS-16,} on deputation, since October 27, 2000.

During this period she rendered her service with full devotion in excellent manner.

Therefore we strongly recommend that her services as SET (science) BPS-16, may please be permanently absorbed / transferred in Govt

Girls High School Jehangira Dist Swabi (NWFP) against the said post on which she is

already working and performing her duties, under wedlock policy of Govt, ~~since 27 Oct 2000.~~

~~for deputation period from 27 Oct 2000.~~

Principal
Govt. School
Jehangira (Swabi)

Dated: October, 14, 2004.

HEAD MISTRESS

Govt. Girls H/School
JEHANGIRA (Dist Swabi)
NWFP.

ATTESTED

[Signature]



PAKISTAN National Identity Card



ISLAMIC REPUBLIC OF PAKISTAN

Name: Abdul Samad Khan



Father's Name: Hajji Abdul Aziz Khan



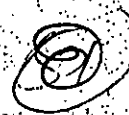
Gender: M Country of Birth: Pakistan

Identity Number: 16201-0737757-5 Date of Birth: 01.06.1964

Date of Issue: 01.09.2014 Date of Expiry: 01.09.2021

Holder's Signature

48



16201-0737757-5

مجموعہ ایس ایس سی ڈی این کے سرکاری سرنامی پاکستان
 5212 ٹاک ڈی روٹ نمبر کسٹ سیکل
 سٹی لاہور

سید ذوالکریم احمد ایم ایم ایس ایس ڈی این کے
 سیکل لاہور سٹی

101981032090
 130-85-324791

Registrar General of Pakistan

تمشمہ کارڈ ملنے پر قریبی لیوی بکس میں ڈال دیں

ATTESTED

[Handwritten signature]

حکومت پاکستان
قومی شناختی کارڈ
16201-8308359-6



49

نام: لیلیٰ بیگم
جنس: عورت
مدیر الصمد خان
شناختی نمبر: 04/02/1972
تاریخ پیدائش

For Inter Provincial Transfer

حکومت پاکستان
قومی شناختی کارڈ
16201-0737757-5

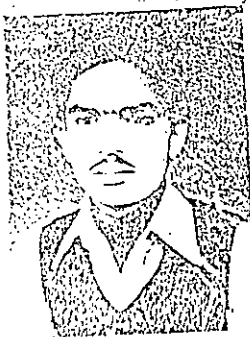


Husband
ID Card

نام: عبدالصمد خان
جنس: مرد
مدیر الصمد خان
شناختی نمبر: 01/06/1984
تاریخ پیدائش

ATTESTED

[Handwritten signature]



(37)

56

HUSBAND DOMICILE

W/10 Mkt. Lubna Salah w/d
SET (Science) Cont Girls
P/S Jehayra.

DOMICILE CERTIFICATE

I declare I was born of parents who are permanently domiciled in North-West Frontier Province having been born in this Province

I was born at Village/Mohalla Mohalla Chacha Kk. Lt. Langsa
Pehsil Surala Distt Mardan

Signature of the Applicant Abdul Samad

Dated 8-9-1981 8/9/81

Pursuance to the declaration dated 8-9-1981
filed by Mr Abdul Samad S/o Abdul Aziz
domiciled in North-west Frontier Province, it is hereby certified that
the said is Abdul Samad born of parents who are resident of
the North-West Frontier Province having been born/settled within it.

I have satisfied myself from personal knowledge/verification that
the above declaration is true and certify accordingly.

This 9th day of Sept 1981

MAGISTRATE 1st CLASS

No. 8417-D/10
COUNTER SIGNED 81

DISTRICT MAGISTRATE

Strike of which ever is not applicable

[Signature]

ATTESTED

[Signature]

5

Gazetted Government servant one of these Certificates filled up and despatched by this same day's post.

before this day _____ noon

and that I _____ received office of SSC (S) GCH at Khambhwal Rly both officers being present with reference to the order of the Government No. S/S/34/9-56/2000 dated 20-10-1990

Signature of Government Servant making over charge: [Signature]

(in case of Government servant whose post is charged while on transit) I received the order of transfer and on despatch

on the 6/11 of 1990 _____ noon

specimen signature attached to Government servant attached here only/

Date of commencement of transfer of charge _____ noon

Date of completion of transfer of charge _____ noon

Signature of Government servant making over charge.

When no actual transfer takes place the inapplicable portion should be struck through and the words left the station of _____ substituted.

The actual date and time of transfer or departure for arrival should be stated.

If a Government servant takes the benefit of Friday or gazetted holiday under Punjab Govt. under Fundamental Rule, 1968.

the date of transfer rules 209 to 211 of the Govt. of India. Supplementaries the actual date of transfer of charges should be reported.

When the charges of an office is not made as its headquarters, or when both the relieving and the relieved Gazetted Govt. Servants or not a reference must be given to the number and date of the Govt.

S.G.P. (Bwp.) 55 G.P. - 30,000 F. - 1-93

A. T. No. 285
(S. T. R. 2)

for use in the Office of Accountant General

Date on which the _____ joining time admissible leave sanctioned ended

In the case of a Government servant returning from leave out of Pakistan state the joining time admissible.

If a Government servant takes benefit of Friday or gazetted holidays under the rules framed by the Punjab Government under fundamental rules, 63 Rules 209 to 211 of the Government of India supplementary rules laid down therein are fulfilled.

conditions laid down therein are:

Certified that both as regards relieving and relieved Government servants the necessary entries have been made in the Audit register and history of service and also in the case of Gazetted Government Servant proceeding on leave out of Pakistan and necessary adjustment of his allowance consequence on the receipt of this certificate has been made and an amount due to or from him has been entered in the "objection column" of the Auditor Register.

Audit Register Volume/Page

Date

The 19 Auditor Auditor History Ser

ATTACHED

Transmitted to the Superintending Regional _____ Circle the
transmission of the Assistant General Punjab Lahore.

No. 4088-25-

Executive Engineer

Divisions

From

Headmistress
G. G. S. Khosla

No. _____ Dated the _____

Transmitted to the Accountant General Punjab, with the remarks that

the time spent the transfer of charge _____ except _____
was not _____

Superintending Engineer

Circle

To

- 1 The Secretary Police
- 2 THE ACCOUNTANT GENERAL
- 3 The D.P.A. (SR) Punjab
- 4 The D.P.A. (SR) Bihar
- 5 For issue of certificate of declaration for

charge of the office of SST G. G. H/s

was transferred from M. T. L. Khosla

to H/M. G. G. H/s Khosla

19

Signature _____

Designation _____

NOTE: The charge certificate may be sent by the Executive Engineer and the Accountant General direct when no time has been sent in the transferred charge.

For B. W. Officers only

No. _____ dated the _____

to the Superintending Regional _____ Circle the transmission of the Assistant General Punjab Lahore.

Executive Engineer

Divisions

Dated the _____

mitted to the Accountant General Punjab, with the remarks that _____ was _____ except _____ was not

Superintending Engineer

Circle

The charge certificate may be sent by the Executive Engineer Accountant General direct when no time has been sent in the _____ d charge.

Accountant-General Register No. _____

D. O.

of 1

No. _____

4088-25-10-2000

From

Headmistress
G. S. S. Khampur

To

1. The Secretary Education (Punjab) Lahore
2. THE ACCOUNTANT GENERAL PUNJAB LAHORE
3. The D.P.G. (SR) Punjab Lahore
4. The D.E. (SR) Bahawalpur
5. The D.A.C. (SR) _____

Forwards a certificate declaration for the charge of the office of S.S. G. S. H/s Khampur

was transferred from Mst. Lubna Gulah ed-Din 881 (Sr) to H.M. G. S. H/s Khampur

on the 25th noon of the October 2000

Signature

Designation

Senior Clerk
Distt. Khampur

(Circular stamp)

(52)

ATTACHED

On all charges among Gazetted Government servants whose Certificates should be at once filled up and despatched by this same day's post.

Certified that MST Lubna S. Lal before noon this day

A. T. No. 285
(S. R. 2)

Made over charges and that I SSA (SR) 934 at Wanpoh (Ry) received charge of the office of SSA (SR) 934 at Wanpoh (Ry) both officers being present with reference to the order of the

Government No. S.P.S. 109 dated 20-10-1968 transferring P. B. (SR) 2051 leave of absence. on deputation to

for use in the Office of Accountant General

Signature of Government Servant making over charge: [Signature]

Date on which the joining time admissible ended leave sanctioned

Certified that (in case of Government servant whose post is charged while he is on leave "or" transit) I received the order of transfer on deputation

In the case of a Government servant returning from leave out state the joining time admissible.

on the 25th of Oct of 1968 before noon after after

Two specimen signature attached to Government servant attached while to Lahore only.

If a Government servant takes benefit of Friday or gazetted by the rules framed by the Punjab Government under fundamental Rules 209 to 211 of the Government of India supplement down therein are fulfilled.

To be filled Officers only | Date of commencement of transfer of charge before noon after after Date of completion of transfer of charge before noon after after

conditions laid down therein are.

Dated: 19 Signature of Government servant taking over charge.

Certified that both as regards relieving and relieved Government the necessary entries have been made in the Audit register of service and also in the case of Gazetted Government Servant on leave out of Pakistan and necessary adjustment of consequence on the receipt of this certificate has been removed due to on from him has been entered in the "object of the Auditor Register.

(a) When no actual transfer take place the inapplicable portion should be scored through and the words left the station of W or arrived at the station of W substituted.

Audit Register Volume/Page V
Date
The 19 Auditor Auditor

(b) The actual date and time of transfer departure for arrival should be entered.
(c) If a Government servant takes the benefit of Friday or gazetted holidays under Punjab Govt. under Fundamental Rules, 1968.

the actual date of transfer rules 209 to 211 of the Govt. of India Supplementary Rules the actual date of transfer of charge should be reported.

(d) When the charges of an office is not made as its headquarters, or when both the relieving and the relieved Government Servants or not present a reference must be given to the number and date of the Govt. order to permitted.

Copies only
6.5.97

Labour
Grade for

Information to :-
Mr Div. Insp.

Mr Khan
Executive Engineer

Division

(Duplicate)
Accountant-General's Regd

of 19
Exdht No. 35931
No. 1779

D.O.T.

86-5-97

From Seniors:

Govt

Kha

THE ACCOUNTANT GENERAL

dated 6

For charge of

was transferred

to Mr

on the

of

Executive Engineer and the Accountant

General

Designated

Administrative

High School

Govt. (R.Y.K)

PUNJAB, LAHORE.

7/19

that the

senior

High School

Government

Division

Executive Engineer

and the Accountant

General

Designated

ATTESTED

[Signature]

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All charges among Gazetted Government Servants one of these Certificates should be once filled up and forwarded by this same day to post

G. P. (Bwp.) 6 S.P. - 30, 1997

Certified that I Mr. Lubna Salaluddin after noon made over charge of that I SSJ (Service Govt. Girls High School) of the office of SSJ (Service Govt. Girls High School) Government No. 2/116-77/S. P. (I) 5/5/87 Proceeding of Govt. Appointment SSJ (Service) Signature of Government Servant making over charge.

A. & P. No. 285
(S. T. R. 2)

For use in the Office of the Accountant General.

Certified that (in case of Government Servant whose post is charged while he is on leave "On" transit) I received the order of transfer at _____ before noon after _____ Two specimen signature's are attached (to Government Servants attached to Lahore only).

Date on which the joining time admissible leave sanctioned ended.

In the case of a Government servant returning from leave out of Pakistan joining time admissible.

to be filled in by P. W. Officer only.

Date of commencement of transfer of charge _____ before noon after _____ Date of Completion of transfer of charge _____ before noon after _____

If a Government servant takes the benefit of Friday or Gazette'd holiday the rules framed by the Punjab Government under Fundamental Rules, 68 transfer rules 209 to 211 of the Government of India Supplementary Rules, see the bill down therein are fulfilled.

Date 06-5-1997 T. Khan Signature of Government Servant SSJ (Service Govt. Girls High School) making over charge.

Note: Govt. Girls High School

- (1) When no actual transfer takes place, the date of departure should be scored through and the words "at the station of" substituted.
- (2) The actual date and time of transfer, or departure for arrival should be entered.
- (3) If a Government Servant take the benefit of Friday or Gazette'd holidays, under the rules framed by the Punjab Government under Fundamental Rules, 68 transfer rules 209 to 211 of the Government of India Supplementary Rules, the actual date of the actual date of transfer of charge should be reported.
- (4) When the charge of an office is not made over at his headquarters, under or when both the relieving and the relieved Gazetted Government Servants are on present, a reference should be given to the number and date of the Government order as required.

Certified that both as regards relieving and relieved Government servants, the records have been made in the Audit Register and History of Services, and also in the case of the Servant proceeding on leave out of the Pakistan, any necessary adjustment of his allowances on the receipt of this Certificate as being made and any amount due to or from him has been in the "Objection columns" of the Audit Register.

Audit Register, Volume _____ Page _____ Volume _____ Dated _____ 19 _____ Auditor. Auditor. History C

Phone No: 80676

No. 624/D.S/1 Exams.

From:

Dated. 25-7-2000

The Controller of Examinations,
Islamia University, Bahawalpur.

To,

Senior Head Mistress
Govt. Girls High School
Khan Purb Distt. Rahimyar Khan

(S) (54)

Subject: VERIFICATION OF RESULT CARD/DEGREE

Please refer to your letter No. 73493

dated 21-7-2000 on the subject cited above.

The Photo Stat Copies of Result Cards/Degrees of the following candidates who have passed their B.A./B.Sc./B.Ed & M.A./M.Ed. from this University are hereby verified/Authenticated and returned herewith:

Sr: No:	Name	Roll No:	Exams Passed	Marks	Division
1-	Lubna Salahuddin H. Salahuddin Khan	397	B.Sc./ 70/91	390/800	Second
2-	do	201	B.Ed. 71/91	701/1200	Second.

نوٹ: درجہ اولیٰ و ثانویہ کے فارغ التحصیل طلبہ کے لیے

Administrative Officer (Exams)
Islamia University
Deputy/Assistant Controller (Exams)
for Controller of (Exams)

Encls: (As above)

ATTESTED

25/7/2000

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پورڈ آف انٹرمیڈیٹ اینڈ سیکنڈری ایجوکیشن بہاول پور

نمبر ۲۵ ریکارڈ

مورخہ 20-7-2007

بجانب
گورنمنٹ سیکرٹری
پورڈ آف انٹرمیڈیٹ اینڈ سیکنڈری ایجوکیشن بہاول پور

عنوان: تصدیقی سرٹیفکیٹ

السلام علیکم!

73493

بحوالہ آپ کی چھٹی / درخواست نمبر مورخہ 20-7-2007 آپ کو اطلاع دی جاتی ہے کہ آپ کی طرف سے آمدہ تصویر / تصاویر / اسناد / رولٹ کارڈز کا دفتری ریکارڈ سے موازنہ کیا گیا اور انہیں درست / غلط پایا گیا جس کی وضاحت متعلقہ سند / اسناد / رولٹ کارڈز کی فوٹو کاپیوں پر کر دی گئی ہے سند / اسناد / رولٹ کارڈز اور تصویر / تصاویر کی ایک ایک کاپی برائے اطلاع ہمراہ چھٹی ہذا واپس ارسال ہے۔

(اسسٹنٹ سیکرٹری ریکارڈ)

برائے سیکرٹری

بورڈ آف انٹرمیڈیٹ اینڈ سیکنڈری ایجوکیشن

بہاول پور

فون نمبر: 885702

ATTESTED

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E - 56

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

W.P.No. _____/2016

Miss Lubna Salahuddin, Senior Science Teacher
Govt, Girls High School, Swabi

.....Petitioner

Versus

1. Govt. of KPK through Secretary School & Elementary Education Department, Peshawar
2. Director Elementary and Secondary Education Department KPK, Peshawar
3. District Officer, Elementary and Secondary Education Department, Swabi
4. Secretary to Govt. of Punjab Education, Department (School wing), Lahore

.....Respondents

**WRIT PETITION UNDER ARTICLE 199
OF THE CONSTITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN, 1973**

Prayer:-

On acceptance of this Writ Petition an appropriate Writ may please be issued directing the respondents to absorb the petitioner in the province of KPK Elementary and Secondary Education department, the petitioner having been transferred from the

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Province of Punjab Education Department to the Elementary and Secondary education Department KPK, Peshawar on deputation w.e.f 26.10.2000 and the respondent No.4 having given NOC for permanent transfer from Punjab Education Department to KPK E&SE Department vide NOC Dated 18.06.2004, the reluctance of the respondents to absorb the petitioner is illegal, unlawful, without authority, discriminatory and thus of no legal effect any other remedy deemed proper also be allowed.

Respectfully Sheweth;

Petitioner's Submits as under:

- 1) That the petitioner while holding the qualification of B.Sc, B.Ed qualified Public Service Commission Punjab on 05.05.1997 and was appointed as SET (Science). She was posted in Gvot. High School Khan Pur on May, 06, 1997. She served there on SET (Science) upto October 26, 2000.

- 2) That the petitioners basically belong to Province of KPK, however her family was settled at Punjab. After her marriage it became difficult for the spouses to live together, as her husband was serving in National Bank of Pakistan at Peshawar. She requested for transfer on the basis of spouse policy. The Province of KPK sent a requisition vide letter dated 29.08.2000 to the Govt. of Punjab, where upon the Govt. of Punjab gave NOC for her transfer vide letter dated 17.10.2000.

ATTESTED



- 3) That the petitioner was thus transferred on deputation for three year w.e.f. 27.10.2000 to the KPK E&SE Department. On completion of the period of deputation, the petitioner was allowed one year further extension in deputation. On completion of her extended period of deputation, the petitioner applied for permanent transfer to the E&SE Department. The Education Department (School wing) Punjab vide letter dated 18.06.2004 also gave NOC for her permanent transfer.
- 4) That through the petitioner is serving in the province of KPK E&SE Department since than albeit she is not allowed permanent transfer/absorption. Numerous representations were submitted, correspondence taken to this effect albeit, the petitioner was not allowed permanent absorption.
- 5) That the petitioner has got no other remedy available in law, as she exhausted at her available remedies by approaching pillar to Post, thus constrained to invoke the Constitutional Jurisdiction of the Hon'ble Court, inter alia, on the following grounds;

GROUND:

- A. That the petitioner has not been treated in accordance with law, her rights secured and guaranteed under the law have been violated.
- B. That the petitioner has been treated discriminately, a similar placed employee namely Noor Jehan was allowed

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permanent transfer and absorption in the Provincial Education Department, but the petitioner is denied.

- C. That where the Govt. of Punjab Education Department granted NOC for the absorption of the petitioner in the Elementary and Secondary Education Department KPK, the reluctance on the part of the respondent department is illegal, unlawful and without lawful authority.
- D. That the petitioner, as well as, her husband are the permanent bonafide residents of KPK, on such the proprietary demand, that the petitioner is to be absorbed in E&SE Department.
- E. That the petitioner served for about 16 years in the E&SE Department KPK, thus is entitled to be absorbed, so that her service career is saved.
- F. That the petitioner, seeks the permission of the Hon'ble Court to rely on additional grounds at the hearing of the petition.

On acceptance of this Writ Petition an appropriate Writ as prayed for may please be issued directing the respondents to absorb the petitioner in the province of KPK Elementary and Secondary Education department, the petitioner having been transferred from the Province of Punjab Education Department to the Elementary and Secondary education Department KPK, Peshawar on deputation w.e.f 26.10.2000 and the respondent No.4 having given NOC for permanent transfer from Punjab

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Education Department to KPK E&SE Department vide NOC Dated 18.06.2004, the reluctance of the respondents to absorb the petitioner is illegal, unlawful, without authority, discriminatory and thus of no legal effect any other remedy deemed proper also be allowed.

INTERIM RELIEF:

May graciously, thus Hon'ble Court may restrain the respondents to desist from taking any action adverse to the service of the petitioner till the decision of the Writ Petition.

Petitioner

Through



Ijaz Anwar
Advocate, High Court
Peshawar

CERTIFICATE:

No such like Writ Petition has earlier been filed by me on the subject matter in this hon'ble Court.

LIST OF BOOKS:

- 1) Constitution of Islamic Republic of Pakistan, 1973.
- 2) Case law.



Advocate

ATTESTED



F-61

The Secretary
Govt. of Khyber Pakhtunkhwa
Elementary & Secondary Education Department
Peshawar

Through Proper Channel
Dated: 16.04.2018

Respected Sir,

Departmental Appeal for Implementation of Interprovincial Transfer in Respect of Mst. Lubna Salahuddin SST Science BPS-16 Govt Girls High School Jahangira Distt Swabi.

The applicant intends to invite your kind attention towards following humble submissions:

1. That the applicant has been rendering service as SST Science in Govt. Girls High School Jahangira Distt Swabi w.e.f 17-10-2000 till Date, regularly.
2. That the applicant was transferred to KPK from Khanpur Distt Rahim Yar Khan, Punjab under wed lock policy on 17-10-2000.
3. That the undersigned has not so far been permanently transferred in spite of NOC given by the secretary education, govt of Punjab, in this regard, which is a clear-cut violation of the constitution of Pakistan-1973.
4. Further, that my application for permanent transfer has been strongly recommended by Director Elementary and Secondary Education, Peshawar, to Secretary, Elementary and Secondary Education, Peshawar, vide Endorsement NO:1860-61 Dated 14-12-2015 based on an identical case of permanent transfer of Mst Noor Jehan, SST from Govt. Girls High School Pandi Bhattian Distt Hafiz Abad (PUNJAB) to Govt Girls Middle School Mathra Dagi Distt Swabi vide Notification NO:SO(S)7-30/98/Mst.Mazhar Bibi Dated 05-09-2000. (Copy enclosed for your kind perusal).
5. That deprivation / discrimination with regard to the applicant's permanent transfer is gross violation of the rules also against fundamental rights as enunciated under constitution of Pakistan which eliminates all sorts of discriminations. Because it is lawful right of the applicant that she may be permanently transferred / on similar parameter as implemented in the case of Mst Noor Jehan reference regarding which has already been cited in para No:4 above.
6. That the applicant has tendered numerous applications to the Departmental Heads, praying therein for the permanent transfer despite the fact that all these applications were submitted through proper channel and were dully recommended but no cogent result has been received so for. (copies enclosed)

Hence the instant appeal / petition is submitted for your kind & sympathetic consideration in fever of the applicant accordingly.

Yours obediently


16/04/2018

Mst. Lubna Sajahud Din.
SST Science,
Govt. Girls High School,
Jehangira Distt. Swabi.
Enc(11)06

ATTESTED



Judgment Sheet

IN THE PESHAWAR HIGH COURT, PESHAWAR.
JUDICIAL DEPARTMENT

G-62

W.P. No. 1866-P/2016.

JUDGMENT

Date of hearings 13.02.2018.

Miss Lubna Salahuddin versus Government of Khyber
Pakhtunkhwa through Secretary School & Elementary
Education, Department, Peshawar and others.
Petitioners by Mr. Mr. Zartaj Anwar, advocate.

WAQAR AHMAD SETH J:- Through the instant Constitution
petition filed under Article 199 of the Constitution of Islamic
Republic of Pakistan, 1973 petitioner prayed that :-

“On acceptance of this writ petition an appropriate writ as prayed for may please be issued directing the respondents to absorb the petitioner in the province of Khyber Pakhtunkhwa Elementary and Secondary Education Department, the petitioner having been transferred from the Province of Punjab Education Department to the Elementary and Secondary Education, Department Khyber Pakhtunkhwa, Peshawar on deputation w.e.f. 26.10.2000 and the respondent No 4 having given NOC for permanent transfer from Punjab Education Department to Khyber Pakhtunkhwa E&SE Department vide NOC dated 18.06.2004, the reluctance of the respondents to absorb the petitioner is illegal, unlawful, without authority, discriminatory and thus of no legal effect any other remedy deemed proper also be allowed.”

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Azmir Bashir Awan, Court Secretary. (DB). Mr. Justice Yahya Afridi, HCJ & Mr. Justice Waqar Ahmad Seth, Senior Puisne Judge

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Peshawar High Court

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2. In essence the grievance of the petitioner is that she basically belong to Khyber Pakhtunkhwa, but her family was settled at Punjab. That petitioner duly qualified was appointed as SET (Science) on 06.05.1997, by the competent authority and was posted in Government High School, Khan Pur (Punjab). That since her induction in service petitioner performed her duties till 26.10.2000. That after her marriage it was difficult for the spouses to live together, as petitioner's husband was serving in National Bank of Pakistan at Peshawar. She requested for her transfer on the basis of "Spouse Policy", whereupon Government of Khyber Pakhtunkhwa has sent a requisition letter dated 29.08.2000 to the Government of Punjab; whereupon, "No Objection Certificate" vide letter No. SO(S)2-4/92/M.Iqbal dated 17.10.2000 was issued by Section Officer, (Schools) Government of N-W.F.P, Education Department and in continuation thereof, Section Officer (S-IV) Government of Punjab School Education Department vide its letter No. SO(S-IV)8-56/2000 dated 20.10.2000 issued direction to Director of Education (SE), Bahawalpur to relieve the petitioner for joining her new assignments in the Khyber Pakhtunkhwa, (Education Department) on deputation basis for a period of three years. Later on, after the expiry of deputation period, it was extended for further one year. Likewise, on further completion of extension period, petitioner against applied for her permanent transfer to the E&SE Department. In this regard Education Department (School Wing) Punjab vide letter No.

Aamir Bashir Awan, Court Secretary. (DB). Mr. Justice Yahya Afridi, HCJ & Mr. Justice Waqar Ahmad Seth, Senior Puisne Judge

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 Peshawar High Court
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SO(S-IV) 8-56/2000 dated 18.06.2004, issued "N.O.C" for her permanent transfer. With the passage of time petitioner approached the quarter concerned for her permanent absorption in Khyber Pakhtunkhwa E&SE Department, but, failed to get any premium. Hence the petitioner knocked the door of this Court under constitutional jurisdiction.

3. Respondents were put to notice, whereupon the answering respondent No. 2 contested the petition by filing his written comments/reply.
4. Arguments heard and record perused with the able assistance of learned counsel for the parties.
5. Admittedly, petitioner is a deputationist and the question is as to whether a deputationist can ask for his / her retention / absorption in the department. This question of law has already been settled in number of judgments by the apex Court of the country. In the case titled Punjab Small Industries Corporation (PSIC) versus Sh. Abdus Salam and others reported in SCMR-2008 583 (a), which reads as under:-

“---S. 9---Constitution of Pakistan (1973), Arts. 199 & 212(3)--Transfer of deputationist...Order of deputation reserved right to Government to withdraw / transfer deputationist at any time without assigning any reasons---High Court admitted constitutional petition and suspended transfer order---Supreme Court granted leave to appeal to consider contentions of authority that High Court had no jurisdiction to entertain constitutional petition for enquiring as to why, without assigning any reasons, deputationist had been transferred; that such matter fell within exclusive jurisdiction of Service Tribunal; and that High Court could not assume jurisdiction for granting relief to an individual employee.

Aamir Bashir Awan, Court Secretary. (00). Mr. Justice Yahya Afridi, HCJ & Mr. Justice Waqar Ahmad Seth, Senior Puisne Judge

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Likewise in the case reported in 2010 SCMR-378 (b) Dr. Shafiqur Rehman Afridi versus CDA Islamabad through Chairman and others, has held as under:-

“--Art. 199--Constitutional petition--Scope--Vested right--aggrieved person--Deputation of civil servant--Scope--Civil servant has no vested right to complete deputation period and matter relating to terms and conditions of service--Constitutional jurisdiction as conferred upon High Court under Art. 199 of the Constitution cannot be invoked--Deputationist cannot be treated as aggrieved person provided he was placed in the same grade and status in borrowing cadre which he was enjoying before his status of deputationist--Such civil servant has no vested right to remain on a post as deputationist forever or for a stipulated period as mentioned in notification and can be repatriated at any time.

Similarly in the case of reported in 2010 SCMR-618 titled Hamida Begum versus Government of Pakistan Ministry of Education through Secretary and others, has held as under:-

“--S. 10.--Constitution of Pakistan 1973, Arts., 185(3)--Deputation--Repatriation to parent department--Civil servant was employee of Provincial Government and was on deputation in Education Department, Government of Pakistan--Authorities issued order for repatriation of civil servant to her parent department but she wanted to be absorbed permanently--Validity--Civil servant held lien in her parent department of the Province and could not be absorbed permanently for want of concurrence of Provincial Government, but such concurrence was not conveyed to Federal Government--Civil servant was repatriated to her parent department but no response was shown by her parent department nor concurrence of Provincial Government for permanent absorption of civil servant was conveyed in absence whereof, service of civil servant could not be absorbed in the concerned department of Federal Government even if she held requisite qualification and eligibility for such absorption--Civil servant also did not approach to Provincial Government for the purpose of grant of NOC and consequently in

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Amir Bashir Awan, Court Secretary.

(DB) Mr. Justice Yahya Ahsini, HCJ & Mr. Justice Waqar Ahmad Seth, Senior Puisne Judge

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Peshawar High Court

20 FEB 2018

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terms of an earlier order passed by Supreme Court the office order issued by Federal Government for repatriation of civil servant held the field—Judgment passed by High Court was not open to any exception and Supreme Court declined to interfere in the same—leave to appeal was refused.

6. While deriving wisdom from the above cited judgments of the apex Court, petitioner is not an aggrieved person and a deputationist would continue to hold the post in officiating / temporary capacity till his/her confirmation thereon or reversion to his / her substantive post. Deputationist could be returned by borrowing department or recalled back by lending department at any time. If at all borrowing department seeks absorption of deputationist, would be required to initiate proposal, obtained his / her consent and request for approval of lending department. In the instant case petitioner is a deputationist from Punjab to the Khyber Pakhtunkhwa, Elementary and Secondary Department and she is interested in her absorption over here. She is also claiming to have obtained NOC from the Government of Punjab / parent department but there is no consent of the borrowing department to this effect.

7. In the comments the borrowing department / respondents No.1 to 3 had contended as under:-

"That para-4 is correct that the petitioner is not allowed for permanent transfer / absorption in the Elementary & Secondary Education Khyber Pakhtunkhwa. It is submitted with great respect that the petitioner wants permanent absorption in E&SE Department Khyber Pakhtunkhwa against SST BIO/Chemistry post but the rules dated 24.7.2014 in field for SST post in E&SE Department Khyber Pakhtunkhwa does not allow. As per rules dated 24.7.2014 twenty five percent SST posts have been reserved for initial

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[Signature]

Aamir Bashir Awan, Court Secretary. (DB) Mr. Justice Yahya Afridi, HCJ & Mr. Justice Waqar Ahmad Seth, Senior Puisne Judge

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recruitment whereas 75% SST Posts have been reserved for promotion from amongst the District Cadre posts i.e Senior CT /CT primary school head teacher PHST Senior Primary School Teacher SPST Primary School Teacher PST Senior Drawing Master SDM Drawing Master DM Senior Arabic Teacher SAT Arabic Teachers AT Senior Theology Teacher STT Theology teachers and Senior Qarl."

8. In nutshell it is the departmental authority, the borrowing department to decide as to whether they are requiring the services of the deputationist, live long and the deputationist cannot insist for her completion or absorption, in this respect.

9. Since the domain of the departmental authority is there for the purpose of absorption of any deputationist, in view of the given circumstances and the structure of the department the court cannot impose or compel a department to hire or absorbed someone, therefore, better would be to give the authority of the competent forum to decide the matter, at its own end.

10. In view of the above this writ petition is dismissed as non maintainable however the departmental competent authority is directed to decide the issue within a period of 30 days, positively.

No. 10505
Date of Presentation of Application 14/2/18
No of Pages 13
Copy
Urgency
Total 50
Date of Disposal 20/2/18
Date of Delivery of Order 20/2/18
Received By

CHIEF JUSTICE

CERTIFIED TO BE TRUE COPY
JUDGE

Announced
13.02.2018

Examined
Peshawar High Court, Peshawar
Authorised Under Article 8.7 of
The Qanun-e-Shahadat Order 1984

20 FEB 2018

ATTESTED



**DIRECTORATE OF ELEMENARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

NO. _____ /W.P.No.1866-O/2016

Dated Peshawar the 23/4/2018

H-68

To

The District Education Officer
(Female) Swabi

SUBJECT:- RELIEVING FROM OFFICIAL DUTY

Memo:-

I am directed to refer to the subject noted above and to enclose herewith a copy of the decision of the Honourable Peshawar High Court Peshawar in the case of Mst.Lubna Salahuddin SST GGHS Jehangira Swabi and to ask you to relieve the SST concerned immediately from her duty and direct her to report to her parent department under intimation to all concerned please.

Deputy Director Establishment(F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst.No. 4815-17

Copy forwarded for information and necessary action to the:-

- 1- Deputy Director Litigation Directorate of E&SE Khyber Pakhtunkhwa local office.
- 2- Mst.Lubna Salahuddin SST GGHS Jehangira Swabi
- 3- PA-to Director E&SE Local Office.

Deputy Director Establishment(F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

/Noor/

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