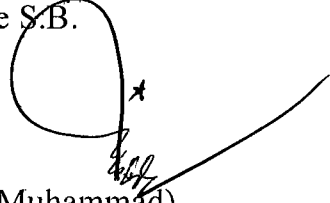


20.09.2022


Learned counsel for the appellant present and requested for adjournment on the ground that he has not gone through the record. Adjourned. To come up for preliminary hearing 02.11.2022 before the S.B.


(Mian Muhammad)
Member (E)

02.11.2022

Junior to counsel for appellant present.

He made a request for adjournment as senior counsel for appellant is busy before the Hon'ble Peshawar High Court. Adjourned by way of last chance. To come up for preliminary hearing on 12.12.2022 before S.B.


(Rozina Rehman)
Member (J)

07.06.2022 Junior to counsel for the appellant present.

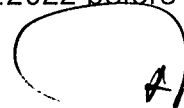
Lawyers are on general strike, therefore, case is adjourned to 28.07.2022 for preliminary hearing before S.B.



(Rozina Rehman)
Member(J)

28.07.2022 Junior to counsel for appellant present.

He made a request for adjournment as senior counsel is busy before Hon'ble Peshawar High Court. To come up for preliminary hearing on 20.09.2022 before S.B.



(Rozina Rehman)
Member (J)



SCANNED
KPST
Peshawar



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. _____ 72/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	21/01/2022	<p>The present appellant initially went in Writ Petition before the Hon'ble Peshawar High Court Peshawar and the Hon'ble High Court vide its order dated 17.01.2022 while treating the Writ Petition into an appeal and has sent the same to this Tribunal for decision in accordance with law. The same 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> <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>06.05.22</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p><i>On account of public holiday to come up for the same as before on 7-6-22</i></p> <p style="text-align: right;"><i>On</i> <i>Reader</i></p>
2-	6-5-22	



②

**The
PESHAWAR HIGH COURT
Peshawar**

Ph: No. 091-9210149-58

SCANNED
KPS
Peshawar

No. 45692 (1)/640/2022/WP-MN

Dated. 19-January-2022

From

**Deputy Registrar (J),
Peshawar High Court,
Peshawar.**

To

The Khyber Pakhtunkhwa Service Tribunal, Peshawar.



Subject:

Writ Petitions W.P 124/2022 Title: Ambar Nosheen VS Federation of Pakistan etc

SCANNED
KPS
Peshawar

Memo,

I am directed to send herewith the titled case in original alongwith all annexures and copy of judgment of this Honble Court dated 17.01.2022 for compliance.

Deputy Registrar (J)

20/01/22

Encl: As above.

①

JUDGMENT SHEET
PESHAWAR HIGH COURT, PESHAWAR
JUDICIAL DEPARTMENT

W.P. No.124-P/2022

Amber Nosheen and others

Vs.

**Federation of Pakistan through Secretary M/O Education
(Defunct CAAD), Pak Secretariat, Islamabad and others**

Date of hearing **17.01.2022**

Petitioner(s) by: **Muhammad Farooq Malik, Advocate.**

Respondent(s) by: **Nemo (Motion case).**

JUDGMENT

IJAZ ANWAR, J. This writ petition has been filed under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, with the following prayer:-

“It is, therefore, respectfully prayed that by accepting the instant writ petition, the respondents may graciously be directed to:-

- i. Issue formal absorption orders of petitioners in the light of the Federal Government letter dated 16 March 2013 as issued to other similarly placed employees.*
- ii. Declare the impugned letters of repatriation as illegal and void ab-initio and ineffective upon the rights of the petitioners.*
- iii. Direction to official respondents to issue NOCs for extension in deputation period till absorption of their services in Federal Government.*
- iv. Any other relief, which this Hon'ble Court deems fit and appropriate, may also be awarded”.*


2

2. In essence, initially petitioners were appointed as PST/PTC/CT Teachers in the respondent-E&SED on different dates, however, as their husbands are working in the Federal Government; as such, under the spouse policy, their services were transferred to Islamabad on deputation basis. Later, the Federal Government through different letters requested for the absorption of the petitioners, however, petitioners were issued repatriation orders which were challenged before this Court in different Writ Petitions and vide consolidated judgment dated 07.10.2021, this Court converted the same into representation of the petitioners with directions to the respondents that if the case of the petitioners falls at par with those School Teachers, they may also be extended similar relief. In compliance of the order of this Court, vide the impugned orders dated 23.11.2021 and 24.11.2021, their representation was declined. Hence, this writ petition.

3. Preliminary arguments heard and record perused.

4. Perusal of the record reveals that earlier, petitioners have approached this Court by filing Writ Petition bearing No.5301-P/2019 which was disposed of vide judgment dated 07.10.2021 by directing the respondent (Secretary, Elementary & Secondary Education Department) to decide the representation of the petitioners. In compliance of the order of this Court, the request of the

petitioners for grant of NOCs for permanent absorption was declined. Letters were duly communicated vide dated 23.11.2021 and 24.11.2021.

5. We when put a question to the learned counsel for the petitioners regarding maintainability of this writ petition, his only ground is that the matter pertains to deputation of the petitioners, as such, in terms of Section 2 of the Khyber Pakhtunkhwa Civil Servants Act, 1973, they cannot be termed as "civil servants". We have perused the relevant provisions of the Act *ibid* and find that there is no such exclusion regarding the status of the petitioners from the definition of 'civil servant', even where they remained on deputation with the Federal Government, their status as 'civil servant' shall be that of 'civil servant' of the Province. Even otherwise, petitioners are seeking permanent absorption in the Federal Government where they are serving on deputation and as such, the main grievance is against the Provincial Government when they were regretted NOCs for permanent absorption.

6. Learned counsel for the petitioners, after arguing the case at some length, requested that instead of dismissing the petition in hand, let it be treated as 'service appeal' and be sent to the Khyber Pakhtunkhwa Service Tribunal.

7. We have noted that since this Court has earlier directed for disposal of the departmental appeal/

representation of the petitioners and on its decision vide the impugned orders, the matter squarely falls within the jurisdiction of the Khyber Pakhtunkhwa Service Tribunal. We, thus, instead of dismissing the instant petition, treat it Service Appeal and send it to the Khyber Pakhtunkhwa Service Tribunal for its decision in accordance with law. Petitioners are also directed to file separate Service Appeals in the Khyber Pakhtunkhwa Service Tribunal in accordance with law and to appear before the said Tribunal on 27.01.2022 for further proceedings.

Announced
Dt:17.01.2022



JUDGE


JUDGE

(DB) Hon'ble Mr. Justice Ijaz Anwar and Hon'ble Mr. Justice Syed Arshad Ali

Muhammadullah

IN THE PESHAWAR HIGH COURT PESHAWAR

Inst # 1466

Civil Miscellaneous No. 91 -P/2022

In in wp124/22

Ambar Nosheen V /s Federation of Pakistan

Presented by Muhammad Farooq Malik
on behalf of appellant/petitioner.

Entered in the relevant register.

Put up again along with main case file

15 JAN 2022

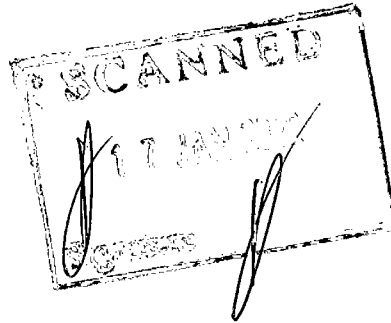
Reader

15 JAN 2022

Countersigned

15 JAN 2022

Deputy Registrar



BEFORE PESHAWAR HIGH COURT PESHAWAR

CM No. 91-P /2022

In

W.P No. 124-P /2022

Ambar Nosheen..... Petitioner

Versus

FEDERATION OF PAKISTAN etc..... Respondents

INDEX

S.No.	Description of documents	Annex	Pages
1.	Application with Affidavit		1 - 2
2.	Copy of Office Order dated 28-12-2021 with Better Copy	A	3 - 4

Petitioners

Through

Muhammad Farooq Malik,
Advocate Supreme Court, Pakistan

FILED TODAY

Deputy Registrar

15 JAN 2022

BEFORE PESHAWAR HIGH COURT PESHAWAR

CM No. 91-P /2022

in

W.P No. 124-P /2022

Ambar Nosheen..... Petitioner

Versus

FEDERATION OF PAKISTAN etc..... Respondents

APPLICATION FOR PLACING ON RECORD ADDITIONAL DOCUMENTS

Respectfully Sheweth

1. That above titled Case is pending adjudication and not it is fixed before this Hon'able Court for 17-01-2022.
2. That the attached documents are necessary for the due appreciation of the issue involved in the above referred Writ Petition. (Copies of documents are attached as Annexure "A " 3-4)

It is therefore, prayed that on acceptance of this application additional documents may kindly be placed on file.

FILED TODAY
 Deputy Registrar
 15 JAN 2022 Through

Petitioners

Muhammad Farooq Malik,
 Advocate,
 Supreme Court of Pakistan

BEFORE PESHAWAR HIGH COURT PESHAWAR

CM No. 917 /2022

in

W.P No. 124 /2022

Ambar Nosheen..... Petitioner

Versus

FEDERATION OF PAKISTAN etc..... Respondents

AFFIDAVIT

I, Muhammad Farooq Malik Advocate, Supreme Court of Pakistan do hereby solemnly declare that the accompanying **Application** is true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

M. Farooq Malik
DEPONENT

No: 875

Certified that the above was verified on solemn affirmation before me in office, this 15 day of Jan 2022 at Dist. Jhelum by M. Farooq Malik who is Adv who is Self

M. Farooq Malik

15/01/2022

FILED TODAY
[Signature]
Deputy Registrar
15 JAN 2022

Islamabad: December 28, 2021

OFFICE ORDER

In pursuance of the Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Peshawar's letter dated 08.07.2009, the services of Ms. Nishat Begum, PST, Government Girls Primary School No. 1, Bannu were taken on deputation basis against the post of Matric Trained Teacher (BPS-09) in her own pay & grade vide Federal Directorate of Education, Islamabad's office order dated 06-08-2009.

2. This Directorate has received letter from Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa vide letter No. SO (PE)/E&SED/7-1/Age Relaxation/2021 dated Peshawar 23-11-2021, wherein the directions for Ms. Nishat Begum are reproduced as under:-

".....that your request for grant of NOC for extension in the period of deputation till absorption in FDE cannot be acceded to being not covered under the relevant policy. Moreover, you have already been repatriated to your Parent Department vide this department order No. SO (PE) 5-2/03/PT/Bannu dated 21.10.2019, therefore, you are directed to report for duty to your parent office i.e. office of the District Education Office (F), Bannu. In case of failure disciplinary action shall be initiated against you under rules-9 of Efficiency & Disciplinary Rules-2011."

3. Therefore, pursuant to the above directions, Ms. Nishat Begum, PST, Government Girls Primary School No. 1, Bannu, Khyber Pakhtunkhwa presently working as Elementary School Teacher (BPS-14), Islamabad Model School (I-V) No.1, I-9/4, Islamabad is advised, in her own interest, to immediately report back to her Parent Department in compliance with the direction of her Parent Department i.e. Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa.

4. This issues with the approval of Competent Authority.

(ALI AZHAR)

Assistant Director (Schools/Female)

Distribution:

- i. AGPR, Islamabad
- ii. APS to Director General, FDE.
- iii. Secretary to Govt. of Khyber Pakhtunkhwa, Establishment & Admin. Department, Peshawar.
- iv. Director, Elementary & Secondary Education Department, Govt of Khyber Pakhtunkhwa, Peshawar
- v. District Education Officer (Female), District Bannu.
- vi. Director (Schools), FDE, Islamabad.
- vii. Area Education Officer (Urban-II), Islamabad.
- viii. Principal/ DDO, Islamabad Model School (I-V) No.1, I-9/4, Islamabad.
- ix. District Account Officer, District Bannu.
- x. Section Officer (PE), Elementary & Secondary Education Department, Govt of Khyber Pakhtunkhwa, Peshawar with reference to his office letter No. SO (PE)/E&SED/7-1/Age Relaxation/2021 dated Peshawar 23-11-2021.
- xi. Ms. Nishat Begum, EST (BPS-14), Islamabad Model School (I-V) No. 1, I-9/4, Islamabad.
- xii. Master File.



(ALI AZHAR)

Assistant Director (Schools/Female)

(4)

By Registered

No.F.I-9/134-EST (D) FDE
 Government of Pakistan
 Federal Directorate of Education
 * * * * *

Islamabad, December 28, 2021

OFFICE ORDER

In pursuance of the Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Peshawar's letter dated 08.07.2009, the services of Ms. Nishat Begum, PST, Government Girls Primary School No.1, Bannu were taken on deputation basis against the post of Matric Trained Teacher (BPS-09) in her own pay & grade vide Federal Directorate of Education, Islamabad's office order dated 06-08-2009.

2. This Directorate has received letter from Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa vide letter No.SO(PE)/E&SED/7-1/Age Relaxation/2021 dated Peshawar 23-11-2021, wherein the directions for M.s Nishat Begum are reproduced as under:-

".....that your for grant of NOC for extension in the period of deputation till absorption in FDE cannot be acceded to being not covered under the relevant policy. Moreover, you have already been repatriated to your Parent Department vide this department order No. SO (PE) 5-2/03/IPT/Bannu dated 21.10.2019, therefore, you are directed to report for duty to your parent office i.e office of the District Education Office (F), Bannu. In case of failure disciplinary action shall be initiated against you under rules-9 of Efficiency & Disciplinary Rules-2011."

3. Therefore, pursuant to the above directions, Ms. Nishat Begum, PST, Government Girls Primary School No.1, Bannu, Khyber Pakhtunkhwa presently working as Elementary School Teacher (BPS-14), Islamabad Model School (I-V) No.1, I-9/4, Islamabad is advised, in her own interest, to immediately report back to her Parent Department in compliance with the direction of her Parent Department i.e. Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa.

4. This issues with the approval of Competent Authority.

(ALI AZHAR)

Assistant Director (Schools/Female)

Distribution:

- i. AGPR, Islamabad
- ii. APS to Director General, FDE.
- iii. Secretary to Govt. of Khyber Pakhtunkhwa, Establishment & Admin. Department, Peshawar.
- iv. Director, Elementary & Secondary Education Department, Govt. of Khyber Pakhtunkhwa, Peshawar.
- v. District Education Officer (Female), District Bannu.
- vi. Director (Schools), FDE, Islamabad.
- vii. Area Education Officer (Urban-II), Islamabad.
- viii. Principal/DD, Islamabad Model School (I-V) No.1.I-9/4, Islamabad.
- ix. District Account Officer, District Bannu.
- x. Section Officer (PE), Elementary & Secondary Education Department, Govt. of Khyber Pakhtunkhwa, Peshawar with reference to his office letter No. SO (PE)/E&SED/7-1/Age Relaxation/2021 dated 23-11-2021.
- xi. Ms. Nishat Begum, EST (BPS-14), Islamabad Model School (I-V) No. I. I-9/4, Islamabad.
- xii. Master File.



Sd/-

(ALI AZHAR)

Assistant Director (Schools/Female)

IN THE PESHAWAR HIGH COURT PESHAWAR

Inst # 965

Writ Petitions No. 124-P/2022 with IR

In


Ambar Nosheen V /s Federation of Pakistan etc

Presented by Muhammad Farooq Malik
on behalf of appellant/petitioner.

Entered in the relevant register.

Be laid Before DB for orders on 17-01-2022

12 JAN 2022


Reader

12 JAN 2022

Countersigned

12 JAN 2022


Deputy Registrar

URGENT FORM

BEFORE PESHAWAR HIGH COURT PESHAWAR

W.P No. _____/2022

Ambar Nosheen.....Petitioner

VERSUS

Federation of Pakistan & others.....Respondents

Will you kindly treat the accompanying Writ Petition as urgent and in accordance with the Provisions of Rules,9 Chapter 3-A Rules orders of the High Court, Lahore Volume V.

The grounds of urgency are:-

That Respondents are bent upon to Repatriate / Relive petitioners vide different impugned Letters, which is against rules and spouse policy, hence instant Writ Petition needs to be fixed at an earliest date otherwise purpose of Writ Petition would become infructuous

and properly before 17th January as meeting has been called by the respondents for the same purpose -

Petitioners

Dated: 11.01.2022

Through



Mohammad Farooq M.lik,
Advocate
High Court Peshawar.



IN THE PESHAWAR HIGH COURT, PESHAWAR.
OPENING SHEET FOR WRIT BRANCH

Date of Filing:- 11/01/2022
 District:- Peshawar

Case Type: Writ Petition Nature of Original Proceedings: _____

Category Code

0	5	4	6		
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Review/Contempt of Court in respect of _____

Writ of:

Heabus Corpus	Prohibition	Mandamus	Qua Warranto	Certiorari
------------------	-------------	----------	-----------------	------------

Form	Date	interlocutory/ Final Order

Case pertains to
 SB
DB

Petitioner(s) Name	<u>Amber Nosheen</u>
Mobile No	<u>0333-5438260</u>
Addresses	<u>National Police Foundation O-9 House No. 1492 Street No. 17/2 Block C, Islamabad</u>
CNIC No	<u>17301-1222637-0</u>
Email Address	

Counsel for Petitioner(s)	<u>Muhammad Farooq Malik Advocate</u>
Mobile No	<u>0314-9008308</u>
Addresses	<u>Flat No 8, First Floor, Cantonment Plaza, Peshawar Saddar</u>
CNIC No	<u>17301-9123462-7</u>
Email Address	<u>mfarooq@yahoo.com</u>

Respondents	<u>Federation of Pakistan & others</u>
Addresses	<u>Pak Secretariat, Islamabad</u>

Original Order/ Action/ Inaction
 Complained of _____

Prayer Issue formal absorption orders of petitioners in the light of Federal Government Letter dated 16th March 2013 as issued to other similarly placed employees.
Declare the impugned letters of repatriation as illegal and void ab initio and ineffective upon the rights of petitioner.
Direction to official respondents to issue NOCs for extension in deputation period till absorption of their services in Federal Government.

Law/Rules/governing the original proceedings/ action/Inaction Constitution of Islamic Republic of Pakistan, 1973

Signature:

FILED TODAY
Deputy Registrar
12 JAN 2022

Service Appeal No: 72/2022

BEFORE PESHAWAR HIGH COURT PESHAWAR

W.P No. 124P/2022

Ambar Nosheen..... Petitioner

Versus

FEDERATION OF PAKISTAN etc..... Respondents

INDEX

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4	Copies of Spouse Policy of Both Federal and Provincial Governments	C to C-1	28 - 31
5	Copies of Deputations Orders and NOCs	D to D-1	32 - 37
6	Copies of Extension Orders	E	38 - 44
7	Copies of Letters Dated 18-07-2019, 12-07-2019 & 19-07-2019	F to F-2	45 - 49
8	Copies of Repatriation Order dated 6-11-2019	G	50 - 53
9	Copies of writ petitions along with consolidated judgment and orders dated 07.11.2021 of this Hon'able court	H	54 - 73
10	Copies of Order <i>Order of this Honorable court. 7-11-2021</i>	H/1	74 - 77
11	Copies of orders dated .11.2021, 23.11.2021 and 24.11.2021	I	78 - 80
12	Copy of Letter dated 22-10-2019	J	81 - 102
13	Copies of impugned letter dated 28.12.2021	K	103 - 107
14	Copy of Letter dated 16-03-2013	L	108 - 116
12	Copies of Gazette Notification alongwith Summary for Prime Minister	M	117 - 22
13	Documents of petitioner No.6	N	123 - 134
14	Notice / <i>Court Fee</i>		135 - 136
15	Wakalatnama		137

FILED
Deputy Registrar
12 JAN 2022

Scanned USB Received
12 JAN 2022
Signature

Through:

PETITIONERS

Mohammad Farooq Malik,
Advocate, Supreme Court Pakistan

①

BEFORE PESHAWAR HIGH COURT PESHAWAR

W.P No. 124P/2022

1. Amber Nosheen W/o Tahir Hafeez R/o National Police Foundation O-9 House No. 1492 Street # 17/2 Block C, Islamabad Permanently r/o Sarwar Abad near Hashtnagir Phatak Peshawar City
2. Farhat Yasmeen W/o Muhammad Ishfaq R/o House # 69 / 10-C Sector G-10/3 Islamabad , permanent resident of K.P.K Peshawar
3. Naila Bashir Abbasi W/o Muhammad Naveed Abbasi R/o Gulberg Town House # B-1/8 Street No.1 Islamabad, permanent resident of K.P.K Peshawar
4. Nishat Begum W/o Muhammad Rafiq R/o Muhammadi Town Street No.3 House # 13 Islamabad, permanent resident of K.P.K Peshawar
5. Ishrat Ara W/o Shoakat Ali R/o Nor PorShahan Post Office KhasDistrict and Tehsil Islamabad
6. Shahana Begum wife of Amjid Naeem resident of Block 89/A, Flat No.4, G-10-3, Islamabad permanent resident of Mohallah Meena khel, Lakki Marwat Petitioners

FILED TODAY
Deputy Registrar
12 JAN 2022

Versus

1. Federation of Pakistan through Secretary M/O Education (defunct CAAD), Pak-Secretariat, Islamabad.
2. Director General Federal Directorate of Education (FDE), G-9/4 Islamabad.
3. Secretary, Primary Elementary & Secondary Education Department, Government of KPK, Peshawar
4. Director Primary Elementary & Secondary Education Government of KPK, Peshawar
5. Government of KPK through Advocate General Peshawar
6. Assistant Director School ,Government of Pakistan , federal directorate of Education Islamabad Respondents

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

Respectfully Sheweth:

1. That the petitioners are employee of Elementary and Secondary Education Department Govt of KPK Peshawar, who were initially appointed as PST/PTC (**Copies of initial appointment Orders are attached as Annexure-A at Page 10-20)**
2. That as a matter of fact the husbands of the petitioner are permanent resident of Islamabad and also employees of Federal Government who are working at different department of Federal Government of Islamabad. (**Copies of Service Record of Petitioners' Husbands are attached as Annexure-B to at Page 21-27)**
3. That to facilitate posting of serving of spouses at one station Federal Government as well as Government of Khyber Pakhtunkhwa promulgated wedlock policy with a view to address problem and hardship of families due to posting at different stations of duties. (**Copies of spouse polices of the both the Governments i.e Federal as well as Provincial are attached as Annexure-C to ~~E-1~~ at Page 28-31)**
4. That by taking benefit of spouse policy petitioners were transferred from their home district to Islamabad on deputation through their respective orders by taking NOC from their respective departments. (**Copies of Deputations Order and NOC are attached as Annexure-D to ~~D-1~~ at Page 32-37)**
5. That the deputation orders of the petitioner were time and again extended in their favour by the competent authority. (**Copies of Extension Orders of Petitioner are attached as Annexure- E at Page 38-44)**

FILED TODAY

Deputy Registrar

12 JAN 2022

3

6. That thereafter Federal Government through different letters dated 30-10-2013 & 19-07-2019, 12-07-2019, 18-07-20219, 19.07.20219 in respect of petitioner of Elementary and Secondary Education Department requested Government of KPK for issuance of NOC for extension/absorption in the deputation period of petitioner. (Copies of Letter dated 19-07-2019 are attached as Annexure-F at Page 45-49)
7. That respondent No.3 by adopting a novel procedure issued repatriation orders of petitioners vides different Orders. (Copies of Repatriation Orders are attached as Annexure-G at Page 50-53)
8. That the above mentioned deputation orders were challenged by petitioners through deferent writ petitions before this Hon'able court and the this Hon'able Court vide consolidated judgment and order dated 07.10.2021, converted all the writ petitions as representation with directed to respondent No.03 that if the case of the petitioners are at par with all those school teacher who had already be given NOCs for permanent absorption , the same relief may also be extended to Writ petitions. (Copies of writ petitions along with consolidated judgment and orders dated 07.11.2021 of this Hon'able court are attached as Annexure- H^{1/1} at Page 54-77)
9. That respondent No.03 without adhering the true import and direction of this Hon'able Court in slip shod manner declined to issue NOCs to the petitioners vide impugned orders dated , 23.1.2021 and 24.12.2021. (copies of orders dated 23.11.2021, 23.11.2021 and 24.11.2021 are attached as annexure- I at page 78-80).
10. That the respondent No .3 in order to accommodate their blue eyed issued NOC for extension of some of the deputationist, despite of the fact that they have completed 5 years deputation period and in some of the cases respondents issued NOCs for

FILED TODAY
Deputy Registrar
12 JAN 2022

permanent absorption of its employees in federal government but they are reluctant for the reason best know to them to issue NOC in favour of the petitioner. (Copies of latter dated 22.10.2019, 30.10.2017, are attached as annexure J at Page 81 - 102.)

11. That despite the fact respondent No.03 have already issued NOCs for permanent absorption to different similarly placed teachers but with mala fide intention and ulterior motive, despite clear cut directions of this Hon'able court with held the same relief to the petitioners without any cogent and plausible reasons.

12. That in pursuance of the above mentioned orders of respondent No.03 federal Government (respondent No.06) issued letters of repatriation to some of the petitioners. (copies of impugned letter dated 28.12.2021 are attached as annexure-K at page 103 - 107).

13. That petitioner having no other speedy and efficacious remedy invoke the Constitutional Jurisdiction of this Hon'able Court inter-alia on the following grounds;

FILED TODAY
Deputy Registrar
12 JAN 2022

GROUND:

- a. That the act of respondents by issuing impugned letters of repatriation and not issuance of formal absorption order pursuant to approval of Prime Minister Summary dated March 2013 communicated through letter dated 11.11.2014, is illegal, unlawful, void ab-initio and against the principles of natural justice.
- b. That the act of respondents is against the law and is in violation of Fundamental Rights contained in Constitution and violative to O.M. No.8/10/83-R.I, dated 06-03-1983 of the Federal Government, hence the same is void ab-initio and is liable to be declared illegal.
- c. That the act of respondents is discriminatory which is in clear violation of Article 25 & 27 of the Constitution, 1973 as in some of the cases approval for permanent absorption and as well as extension in

the deputation has been issued by official respondents but they are reluctant to accommodate the petitioners.


- d. That moreover KPK Government also adopted Spouse Policy of the Federal Government vide Circular Letter No. SORI (S & GAD) 1-1/85 dated 11/7/1998. Hence there is no ambiguity and clash of interest between federal and provincial Government on this issue.
- e. That the impugned repatriations orders are based on malafide and ulterior motives and against spouse policy adopted by both the Provincial and Federal Governments. Moreover petitioners were on deputation for a period of more than five years so they are entitled for permanent absorption.
- f. That the Federal Government issued Letter Dated 16-03-2013 under title of "Absorption of Staff Working Under Federal Directorate of Education Department Islamabad working on deputation basis" wherein summary submitted to PM Secretariat Islamabad for absorption of Teachers who were working on deputation bases. **(Copy of Letter Dated 16-03-2013 are attached as Annexure-L at Page 108-116)**
- g. That similarly Federal Government also relaxed the time period of 5 years for deputationists who are working on deputation under wedlock policy and that corresponding amended was made in Rule 20-A of Appointment, Promotion and Transfer Rules 1973, so petitioners are also entitled for that benefit of the same policy. **(Copy of Gazetted Notification dated 17-04-2012 alongwith summary for PM dated 10-02-2012 are attached as annexure - M at page 117-122)**

PRAYER

FILED TODAY
Deputy Registrar
12 JAN 2022

It is, therefore, respectfully prayed that by accepting instant writ petition the respondents may graciously be directed to:-


- ⑥
- i. Issue formal absorption orders of petitioners in the light of Federal Government letter dated 16 March 2013 as issued to other similarly placed employees.
 - ii. Declare the impugned Letters of Repatriation as illegal and void ab initio and ineffective upon the rights of petitioner.
 - iii. Direction to official respondents to issue NOCs for extension in deputation period till absorption of their services in Federal Government.
 - iv. Any other relief, which this Hon'ble Court deems fit and appropriate, may also be awarded.

Petitioners
Through

Mohammad Farooq Malik,
Advocate High Court Peshawar

INTERIM RELIEF

May it please your lordship?

By way of Interim Relief, pending final decision on Writ Petition the impugned Letters dated 28-12-2021, 23-11-2021, 24-11-2021 of repatriation may graciously be suspended and give direction to Respondent No. 6 not to issue further repatriation order to the petitioners and maintain status quo.

FILED TODAY

Deputy Registrar
12 JAN 2022

Petitioners
Through

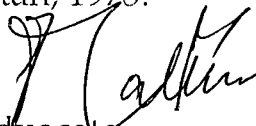
Mohammad Farooq Malik,
Advocate High Court Peshawar

CERTIFICATE

Certified that no such Writ Petition has earlier been filed in this Hon'ble Court on behalf of the petitioner.

LIST OF BOOKS

- 1 Constitution of Islamic Republic Of Pakistan, 1973.
- 2 Any other law as per need.


Advocate

7

BEFORE THE HON'BLE PESHAWAR HIGH COURT, PESHAWAR

W.P. No. 124 P / 2022

Amber Nosheen

.....PETITIONER

VERSUS

Federation of Pakistan & others

.....RESPONDENTS

AFFIDAVIT

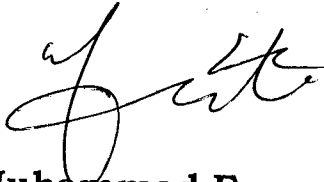
I, Amber Nosheen W/o Tahir Hafeez R/o National political Foundation O-9 House No. 1492 Street No. 17/2 Block C, Islamabad Permanently R/o Sarwar Abad Near Hashtangri, Phatak Peshawar, do hereby solemnly affirm and declare that the contents of the accompanying **Writ Petition** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT

Identified by:


CNIC: 17301-1222637-0 ✓

0333-5438260



Muhammad Farooq Malik
Advocate High Court,
Peshawar.

FILED TODAY
Deputy Registrar
12 JAN 2022

425
I, Amber Nosheen W/o Tahir Hafeez R/o National political Foundation O-9 House No. 1492 Street No. 17/2 Block C, Islamabad Permanently R/o Sarwar Abad Near Hashtangri, Phatak Peshawar, do hereby solemnly affirm and declare that the contents of the accompanying **Writ Petition** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.
I, Tahir Hafeez
on behalf of Amber Nosheen
Peshawar
M. Farooq Malik

10/01/2022

Nadra verified

8

BEFORE PESHAWAR HIGH COURT PESHAWAR

W.P No. 1248/2022

MS. ISHRAT ARA..... Petitioners

Versus

FEDERATION OF PAKISTAN etc..... Respondents

ADDRESSES OF PARTIES.

PETITIONER

1. Amber Nosheen W/o Tahir Hafeez R/o National Police Foundation O-9 House No. 1492 Street # 17/2 Block C, Islamabad Permanently r/o Sarwar Abad near Hashtnagir Phatak Peshawar City
2. Farhat Yasmeen W/o Muhammad Ishfaq R/o House # 69 / 10- C Sector G-10/3 Islamabad , permanent resident of K.P.K Peshawar
3. Naila Bashir Abbasi W/o Muhammad Naveed Abbasi R/o Gulberg Town House # B-1/8 Street No.1 Islamabad, permanent resident of K.P.K Peshawar
4. Nishat Begum W/o Muhammad Rafiq R/o Muhammadi Town Street No.3 House # 13 Islamabad, permanent resident of K.P.K Peshawar
5. Ishrat Ara W/o Shoakat Ali R/o Nor PorShahan Post Office KhasDistrict and Tehsil Islamabad
6. Shahana Begum wife of Amjid Naeem resident of Block 89/A, Flat No.4, G-10-3, Islamabad permanent resident of Mohallah Meena khel, Lakki Marwat

FILED TODAY

Deputy Registrar

12 JAN 2022

9

RESPONDENTS

1. Federation of Pakistan through Secretary M/O Education (defunct CAAD), Pak-Secretariat, Islamabad.
2. Director General Federal Directorate of Education (FDE), G-9/4 Islamabad.
3. Secretary, Primary Elementary & Secondary Education Department, Government of KPK, Peshawar
4. Director Primary Elementary & Secondary Education Government of KPK, Peshawar

Through

Petitioner


Mohammad Farooq Malik,
Advocate
High Court Peshawar.

FILED TODAY
Deputy Registrar
12 JAN 2022

(913)

ANNEXURE "A"

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PRIMARY PESHAWAR.

APPOINTMENT.

Consequent upon the selection by Departmental selection committee the appointment of the following PTC, trained candidates are hereby ordered in the P.T.S. of Rs. 1480-81-2695 (Rs. 1480/- P.M. plus usual allowances admissible under the rules in the schools noted against each their names w.e. from the date of taking their over charge subject to the following existing terms and conditions:-

S.No.	Name, Father's Name and address.	D/O Birth.	No. in Int: / M. Dist.	Open.	Batch wise.	Score.	school.	Remarks.
1.	Nazia D/O Abdul Manan BA/PTC/99 H/No. T-868, Moh: Islam abad Nishtarabad Pesh:	22/12/79	1/256	Open	-	59.55	GGPS Gulbahar No.4.	ANCP.
2.	Samina Begum D/O Badrud Din BA/PTC/99, Village & PO Nasirpur.	1/4/77	2/142	-d-	-	55.01	GGPS Kamba.	AVP.
3.	Ghazala Bibi D/O Khalil ur Rehman BA/PTC/99. Shaheen Muslim Town H.No.31/A Akhoo Abad No.1.	4/3/75	3/247	-do-	-	55.01	GGPS Gulbahar No.2.	AVP.
4.	Asis Parveen D/O Mohammad Iqbal BA/PTC/99. V & P.O. Chamakni Moh: Zareen Abad Pesh:	16/3/76	4/145	-do-	-	54.06	GGPS Gulo Zai.	ANCP.
5.	Saeed Khalil D/O Khalil ur Rehman BA/PTC/99 Gulabad PO Landi Arbab.	3/7/76	5/07	-do-	-	53.70	GGPS Kakshal Psh;	-do-
6.	Saima Riaz D/O Mohammad Riaz, BA/PTC/99 Railway Quarter near Masjid Washing Line Pesh: Cantt:	3/5/77	6/21	-do-	-	52.91	GGPS Hazarkhawani No.1.	-do-
7.	Salma Usman D/O Mohammad Usman, BA/PTC/99 Vill: Karim Dad Nahaqi Daud Zai Peshawar	16/3/78	7/138	-do-	-	52.19	GGPS Ghari Dad.	ANCP
8.	Ambir Nosheen D/O Mohammad Saddiq, BA/PTC/99 H/No. 102, Sarwar Abad near Hashtanagri Pattak Pesh:	19/8/75	8/233	-do-	-	52.03	GGPS Ghari Abdul Samad.	AVP
9.	Farzana Bibi D/O Saleem ur Rehman, BA/PTC/99 Q.No.8/A Civil Quarters Pesh:	11/4/78	9/155	-do-	-	52.03	GGPS Tahkal Lala No.3.	ANCP
10.	Zaib un Nisa D/O Abdul Malik, BA/PTC/99 H/No. 500, Kucha Tyans Khan, Moh: Hamid abad Pesh:	22/2/77	10/316	-do-	-	51.70	GGPS Kohati Gate.	ANCP
11.	Naseem Hafiz D/O Hafiz Mohammad Din, BA/PTC/99. H/No. 4405, Moh: Afridi Khan Dabgari Peshawar.	7/7/79	11/275	-do-	-	51.33	GGPS Palosi Talarzai.	A.V.P.
12.	Noureen D/O Mosam Khan, BA/PTC/99 Qr: No. 104, Civil Quarters Kohat Road Pesh:	20/2/73	12/108	-do-	-	51.03	GGPS Azakhel Pesh:	AVP.

Attested

to be true copy

11

8. Service books of the teachers must be prepared complete in all respect after their taking over charge.
9. They/She are required to produced Health and age certificate from the authority concerned before taking over charge.
10. They/She should not apply for transfer from their Union Council where they/she are appointed upto seven years in any case.
11. No TA/DA is allowed being 1st: Apptt:
12. If they /She should not join the post with in fifteen days from the receipt of this orders/notification. The offer of appointment shall stand Cancelled automatically.
13. If their certificates/Degrees were found bogus/fak they/She will be handedover to the Police and their service will also be terminated/Dismised.
14. The above selection has been made on the following criteria:-

Marks Obtained Multiplied by the marks allocations to the certificates/Degrees and Divided by the total marks i.e.

$$\frac{630 \times 30}{870} = 22.23$$

ALLOCATION MARKS.

SSC	30
PTC	25
P.A.	20
B.A.	10
M.A.	10

NOTE :-

It is once again stressed that the original certificates/Degrees of the candidates concerned should be checked/verified before handing over charge by the S.D.E.O.(F) Peshawar being a DDO and she will be personally held responsible for any mishap/irregularity were found at later stage.

(MRS. RASHID AKHTAR)
 District Education Officer,
 (Female) Primary Peshawar.

Encl: No. 317-575 / F.No. 1/APPT. / P.T.C. / F. No. 1/2000
 Copy of the above is forwarded to the :-

- 1:- Director Primary Education, N.W.F.P. Peshawar.
- 2:- P.S Secretary to Govt: of NWFP, Education Deptt: Peshawar.
- 3:- Accountant General, N.W.F.P. Peshawar.
- 4:- Sub: Divisional Education Officer (F) Peshawar.
- 5-116 Candidates concerneds.
- 117:- KKKXX Supdt: Local Office.
- 118 229. Personal File.
- 230:- Master file.

Attested

Dy: District Education Officer,
 (Female) Primary Peshawar.

to be true copy

ATTESTED

(12)

OFFICE OF THE DISTT: EDUCATION OFFICER (FEMALE) PRY: DERA ISMAIL KHAN.

APPOINTMENT:-

Consequent upon the approval of Selection of PTC (Trained) candidates on merit (Session-wise) by the Distt: Selection Committee the following appointments are hereby ordered in BFS 7 and those who possess the qualification of FA/FSc 2nd Division in BFS-9 plus usual allowances in the interest of public service with effect from their taking over charge.

S.No	Name/F.Name & Address	Marks	Session	Name of School where appointed	R ^E T ^A R ^K S
1.	Farhat Yasmin D/O H.Din Muhammad Rana Street-DIKhan	853	5/91-92	GGPS Khokhar Sharqi	V/Post. v/Fehmida transferred
2.	Abida Perveen D/O Abdur Wahim, Madni Town-DIKhan	846	6/91-92	" Kot Tagga	V/P vice Nadia Trans

TERMS AND CONDITIONS:-

1. Charge reports should be sent to all concerned.
2. TA/TA etc is not allowed on eve of 1st appointment.
3. Appointments are made purely on temporary basis and liable to termination at any time without assigning any notice/reason.
4. Health and Age certificate should produce from Supdt: Distt: H/Q Hospital, DIKhan, and E/E Card from E/E Office.
5. Original documents should be checked by the SDEO(F) DIKhan and would not be handed over charge if age is less are above than 18/40 yrs or if any bogus certificate/document.
6. The above appointees should report for duty with fortnight after the issue of this order, if failed, appointment order will be considered as cancelled.

Sd/ Miss Sakina Bibi Malik,
Distt: Edu: Officer (F)
(Pry: D.I. Khan.)

Endst No. 585-594/AE-II / Dated DIKhan 25/4 / 1996.

- Forwarded for information and n/action to the :-
1. Sub Divl: Edu: Officer (F) DIKhan
 2. Distt: Accounts Officer - DIKhan.
 3. MPAs concerned
 5. ADEO (Acctt) Local.
 6. Above named candidates.
 8. P.H/Teachers concerned.
 10. P.A to Director Pry: Education NWFP., Peshawar.

Attested

Sakina
Distt: Edu: Officer,
(F) Pry: D.I. Khan.

to be true copy

ATTESTED

(13)

13/11/93

OFFICE OF THE DIVL: DIRECTOR OF EDU: (S) HAZARA DIVISION, ABBOTTABAD.

OFFICE ORDER NO. 32 / AE-VIII/
CT(F).

DATED A/ABAD THE 29.6 /93.

ADJUSTMENT/APPOINTMENT: -

The following adjustment/appointment of the trained C.T. candidates (Long Course) are hereby ordered against CT/SV post as noted against each in BPS-9 (fs.1185-72-2265) and BPS-14 (fs.1530-119-3315) in case of BA/B.Sc. (2nd Divn:) plus usual allowances as admissible under the rules with effect from the date of their taking-over charge on the following terms and conditions in the interest of public service: -

S.No.	Name of mistresses/ candidate with qualification and address.	School where adjusted/ posted.	Remarks.
1.	Mst: Rafia Bashir, CT trd: work: ag: SV post at GGMS, Pind Kargo, Atd:	GGMS, Rearen.	ag: newly created vacant CT post.
2.	Mst: Zakia Begum, CT trd: work: ag: SV post at GGHS, Darband, Mansehra.	GGHS, Giddarpur.	-do-
3.	Mst: Shahnaz Bibi, CT trd: working ag: SV post at GGMS, Talhata, Mansehra.	GGMS, Shohal Mazullah.	-do-
4.	Mst: Asmat Shireen, BA/CT trd: D/O Chanzeb Khan, C/O Muhammad Miskeen, Vill: & PO Khakhi, Mansehra.	GGMS, Lissan Nawab.	ag: vacant SV post.
5.	Mst: Zahida Bibi, FA/CT trd: D/O Ghulam Rabbani, Moh: Khawaja Kheli, Balakot, Mansehra.	GGMS, Mohandri.	-do-
6.	Mst: Naheed Bano, BA/CT trd: D/O Badar Zaman, H.No.62, Koh-e-Sahr, Loharbanda, Mansehra.	GGMS, Kaghan.	-do-
7.	Mst: Naila Bashir, FA/CT trd: D/O Muhammad Bashir Abbasi, Vill: Balakot, Mansehra.	GGMS, Malkot.	-do-
8.	Bibi Shahnaz, FA/CT trd: D/O Pir Khan, Vill: & PO Bherkund, Mansehra.	GGMS, Thathi Khurd.	-do-
9.	Mst: Rukhsana Begum, FA/CT trd: D/O Syed Afsar Shah, C/O Zulfiqar Ali Shah, Iaz Manzil, Kutchary Rd: A/Abad.	GGMS, Riala.	vice Mst: Mah Jabeen, not joined.
10.	Mst: Fakhra Shamia FA/CT trd: w/ Zabeen. Mansehra.	GGHS, Darband.	ag: SV post vice Mst: Jabeen.

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(14)

....P/2.....

11. Mst: Lubna Waheed, FA/CT trd: GGMS, Talhata. ag: SV post
wife of Abdul Waheed, vice S.No.3
Vill: & PO Salhad, A/Abad. above.

Note:- 1. No TA/DA & TG is allowed.
2. Charge reports should be sent to all concerned.

CONDITION:-

1. The appointment is purely on temporary basis and subject to the termination at any time without notice or assigning any reason.
2. They should produce their age & health certificate from the Medical Superintendent concerned.
3. The Head of institution/office are required to check all original educational qualification certificates before handing over charge to them.
4. In case they wish to resign from service they will have to give one month's prior notice or forfeit one month's pay in lieu of short notice.
5. The appointment shall stand automatically cancelled if they fail to join the post within 15 days of the issue of this ~~letter~~ order.
6. The newly appointee are required to get verify their academic certificates from Board/University concerned.
7. The candidates should not be handed over charge if their age exceed 40 years or below 18 years.

(HAJI SARFRAZ KHAN)
DIVL: DIRECTOR OF EDU: (SCHOOLS)
HAZARA DIVISION, ABBOTTABAD.

Endst: No. 14119-50 /AE-VIII/CT(F) Dated A/Abad the 29.6. /93.
Copy to the:-

1. Director of Education (S) Hazara Divn: Abbottabad.
- 2-3. District Education Officer (F) Secy: A/Abad & Mansehra.
- 4-5. Headmistresses GGMSs Giddarpur & Darband.
- 6-7. Sub: Divl: Edu: Officer (F) A/Abad & Mansehra.
- 8-16. Headmistresses G.G.M.Ss concerned.
- 17-18. District Accounts Officer, A/Abad & Mansehra.
- 19-26. All the candidates concerned.
27. ADEO (E) Local Directorate.
28. Superintendent Estb: Br: Local Directorate.
29. AE - V, ESCOL DT.
30. Personal files.
31. Office order file.

For/Divl: Director of Edu: (S)
Hazara Division, Abbottabad.

M. Rafique/##

ATTESTED
ATTESTED

(15)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PRIMARY BANNU.

APPOINTMENT.

The appointment of the following untrained PTC Candidates of constituency No. PF(11) from the approved merit list ^{are} hereby ordered in LPS-7 fixed plus usual allowances as due and admissible under the rules against the vacant PTC post in the interest of public service with effect from the date of their taking over charge.

S.No	Name with Father's Name.	Posted at.	Remarks.
1.	Shahana Begum D/O Ghani Khan Lakki Minna Khel.	GOPT W/Jander.	Against V/ Post.
2.	Shada Maroon D/O Gul Nawaz Lakki Minna Khel.	GOPT W/Jander.	"
3.	Kameer Begum D/O Abdur Rehman V; P.O. Natera Lakki.	GOPT Mir Khan Panyalla "	
4.	Kaleem Akhter D/O Abdul Karim V; Iakk Khel Lakki.	GOPT Landiwah Nabi Khan "	
5.	Kakhsana Begum D/O Ghulam Nabi-ud-Din V; Shari Khel Lakki.	GOPT Landiwah Dan Khel "	
6.	Ashida Farveez D/O Saib Asad V; Saad Khel Lakki.	GOPT Sarfati Michan Khel "	
7.	Irshad Begum D/O Mir Jaleem Khan Lakki Michan Khel.	GOPT Dan Khel Landiwah "	
8.	Nisbat Begum D/O Anamullah Khan V; P.O. Saib Khel.	GOPT Mir Asam Michan Khel "	
9.	Dil Jona Bibi D/O Abdul Karim V; Iakk Khel Lakki Marwat.	GOPT Nabi Khan Landiwah "	
10.	Robina Shabeen D/O Abdul Sajid V; Landiwah.	GOPT Sarat Khel Landiwah. "	
11.	Behnaz Firdus D/O Haq Nawaz Lakki Minna Khel.	GOPT Sarat Khel Landiwah.	

Handwritten signature: Sheraz Khan
Principal
G.H.S.S. Bannu

TERMS AND CONDITIONS.

- Charge report should be submitted to all concerned.
- No TA/DA is allowed to any one.
- They will produce their health and age certificate from the medical superintendent District Headquarter hospital Bannu.
- Their ages should be between 18 and 25 years.
- Their appointments are made purely on temporary basis and are liable to termination at any time without assigning any notice/reason.
- Their original certificates/documents may be got verified before handing over charge.
- They will be governed by such rules and orders relating to leave TA medical & pay etc as may be issued by the Government from time to time for the category of Govt. servants to which they belong.
- The candidates must take over charge within 15 days.

Handwritten: Attached

(HUSSAN JANA) to be true copy

DISTRICT EDUCATION OFFICER,
(FEMALE) PRIMARY BANNU.

Endst: No. 3/113-3127 A-6/Vol: V Dated 18/11/1992.

Copy to the:-

- The Director Primary Education G.H.S. Hayatabad Peshawar.
- P.A to Director Primary Edu: G.H.S. Hayatabad Peshawar.
- Distt; Accounts Officer, Bannu.
- Sub Divisional Education Officer, (Female) Bannu & Lakki Marwat.
- Candidates Concerned

Handwritten signature: [Signature]

16

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR BANNU

APPOINTMENT

The appointment of the following untrained PTC candidates of constituency No PF() from the approved merit list are hereby ordered in BPS-7 fixed plus usual allowances as due to admissible under the rules against the vacant PTC post in the interest of public service with effect from the date of their taking over charge.

S.No	Name with father Name	Posted at	Remarks
1.	Shahbana Rehman d/o Ghani Rehman Lakki Mine KHel	GGPS N/Jander	Against V/ Post
2.	Shada Nasreen D/o Gul Nawaz Lakki Mina Khel	GGPS N/Jander	Against V/ Post
3.	Kausar Kamina D/o Abdur Rehman V; PO Matra Lakki	GGPS N/Jander	Against V/ Post
4.	Kaleem AKhtar D/o Abdul Karim V; Lakki Khel Lakki	GGPS Mir Alam Panyalla	Against V/ Post
5.	Rukhsana Begum D/o Ghulam Mohy ud Din Moh Shari Khel Lakki	GGPS Landwah nabi Khan	Against V/ Post
6.	Khalila perveen D/o Said Moh Saeed Khel	GGPS Landwah Dau Khel	Against V/ Post
7.	Irshad begum D/o Mir Aslam Lakki Mishan Khel	GGPS Michen Khel	Against V/ Post
8.	Nishat Begum D/o Amanullah Khan V: P.O Abbat Khel	GGPS Dau Khel Landiwah	Against V/ Post
9.	Dil Jana Bibi D/o Abdul Karim V: Lakki Khel Larkki marwwat	GGPS Mir Aghan Michan Khel	Against V/ Post
10.	Rotina Shaheen D/o Abdul Maryum V: Landiwah	GGPS Rabi Shah Landiwah	Against V/ Post
11.	Techns Pirdus D/o Haq Nawaz Lakki Mina KHel	GGPS Khel Landiwah	Against V/ Post

Terms and conditions:

1. charge report should be submitted to all concerned.
2. No TA/DA is allowed to any one.
3. They will produce their health and certificate from the medical superintendent district headquarter hospital bannu.
4. Their ages should be between 18 and 25 years.
5. Their appointments are made purely on temporary basis and are liable to termination at any time without assigning any notice/reason.
6. their original certificates may be got verified before handing over charge.
7. they will be governed by such rules and orders relating to leave TA medical & Pay etc as may be issued by the Government from time to time for the category of Govt. servants to which they belong.
8. The candidates must take over charge within 15 days.

HUSSAIN JANA
DISTRICT EDUCATION OFFICER
(FEMALE) PRIMARY BANNU

Endst No. 3113-3127/A-6/Vol:V Dated 18/11/1992

Copy to the:

1. The Director Primary Education NWFP Hayatabad Peshawar
2. P.A to Director Primary Education NWFP Hayatabad Peshawar
3. District Accounts Officer, bannu
4. Sub Divisional Education Officer, (female) bannu & Lakki Marwat
5. Candidates concerned.

ATTESTED

to be true copy
Advocate

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PRIMARY PESHAWAR
APPOINTMENT.

Consent upon the selection by departmental and action committee the appointment of following PTC, trained candidates are hereby ordered in the BTS of Rs. 1480-81-2695 & Rs. 1480/- PM Plus usual allowances admissible under the rules in the schools noted against each their names w.e. from the date of taking their over charge subject to the following existing terms and conditions:

S.No.	Name, Father's name and address	D/o Birth	No. Int./M.Idst	In Open	Batch wise	Score	School	Remarks
1.	Nazia D/o Abdul manna BA/PTC/99 H/No. T-868, Moh: Islam Abad Nishtarabad Peshawar	22/12/79	1/256	Open		50.55	GGPS Gulbahar No. 4	ANCP
2.	Samina Begum D/o Badrud Din BA/PTC/99, Village & PO Nasirpur	01/04/77	2/142	-do-		55.54	GGPS. Kambo	AVP
3.	Ghazala Bibi D/o Khalil ur Rehman BA/PTC/99 Shaheen Muslim Town H. No. 31/A Akhoon Abad No. 1	04/03/75	3/247	-do-		55.01	GGPS Gulabaha No. 2,	AVP
4.	Asis Parveen D/o Mohammad Iqbal BA/PTC/99 V & P.O Chamakani Moh: Zareen Abad Pesh	16/03/76	4/145	-do-		54.06	GGPS ANCP Gulo Zai	ANCP
5.	Saeed Khalil D/o Khalil ur Rehman BA/PTC/99 Gulabad PO Landi Arbab	02/07/76	5/01	-do-		53.79	GGPS Kakshal Pesh	ANCP
6.	Saima Riaz D/o Mohammad Riaz BA/PTC/Railway Quarter near Madni Masjid Washing Line Pesh	06/05/77	6/21	-do-		52.91	GGPS Hazarakhwani No. 1	ANCP
7.	Salma Usman D/o Mohammad Usman, BA/PTC/99 Village: Karim Dad Nahaqi Daud zai Peshawar	16/03/78	7/138	-do-		52.19	GGPS ANCP Ghari Karim Dad	ANCP
8.	Ambar Nosheen D/o Mohammad sadiq, BA/PTC/99 H/No. 102, Sarwar Abad Near Hashanagri Pattak Pesh	19/08/75	8/233	-do-		52.03	GGPS Ghari Abdul Samad	ANCP
9.	Farzana Bibi D/o Saleem ur Rehman FA/PTC/99 Q. No. 8/A Civil Quarters Pesh:	11/04/78	9/155	-do-		52.03	GGPS Takhal Lala No. 3	ANCP
10.	Zaib un Nisr. D/o Abdul malik BA/PTC/99 H/No. 500, Kucha Tyaas Khan, Moh: Hamid Abad Pesh:	22/02/71	10/316	-do-		51.70	GGPS Kohati Gate	ANCP
11.	Naseem Hafiz D/o Hafiz Mohammad Din, FA/PTC/99 H/No. 4465, Moh: Afridi Khan Dabgari Pesh	7/7/79	11/275	-do-		51.33	GGPS Palosi Talarzai	ANCP
12.	Noureen D/o Mosam Khan, BA/PTC/99 Qr: No 104, Civil Quarters Kohat Road Pesh	20/8/73	13/108	-do-		51.03	GGPS Azaakhel No. 3 Pesh	ANCP

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8. Service books of the teachers must be prepared complete in all respect after their taking over charge.
9. They/she are required to produced health and age certicficates from the authiorty concerned before taking over charge.
10. They/She should not apply for transfer from them ununio council where they/she are appointed upto seven years on any case.
11. No TA/DA is allowed being Ist: Apptt:
12. If they/she should not joint the post with in fifteen days from the receipt of this orders/notificaiotn. The offer of appointment shall stand cancelled automatically.
13. If their certificates/degrees were found bogus fake they/she will be handedover to the police and their service shall also be terminated/dismissed.
14. The above selection has been made on the following criteria:

Marks obtained multiplied by the marks allocations to the certificates/degrees and divided by the total marks i.e. $630 \times 30 / 850 = 22.23$

ALLOCATION MARKS.

SSC	30
PTC	25
F.A	20
B.A	10
M.A	10

Note:

It is once again stressed that the original certificates/degrees of the candidates concerned should be checked/verified before handing over charge by the S.D.E.O (F) Peshawar being a DDO and she will be personally held reasonable for any dept/irregularity were found at stage.

MRS. RASHID AKHTAR
DISTRICT EDUCATION OFFICERS,
(FEMALE) PRIMARY PESHAWAR

Attested

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19

RECORDED



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Dated Peshawar the 11-04-2013.

ORDER.

No.SO(PE)E&SED/5-2/IPT/Mardan/Ishrat Ara/CT/2011 In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR.I (E&AD)1-14/82/Vol.27 dated 10-04-2013, the services of Mst. Ishrat Ara Bibi CT (BS-15) GGHS Ikram Pur District Mardan (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on deputation basis for initial period of one (01) year on usual terms & conditions.

2. The borrowing department/deputationist will deposit Pension Contribution, Leave salary, GP Fund, Group Insurance etc with Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar under the relevant head and will regularly deposit challans to the Director Elementary & Secondary Education Khyber Pakhtunkhwa as per deputation policy of this Provincial Govt.

SECRETARY

Encl. No. & Date as above.

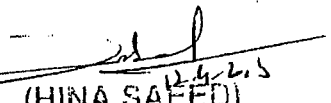
Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Education Officer (FDE) Ministry Of Capital Administration & Development Islamabad w/r to his letter No. F. 21-41/2013-FDE(S) dated 09-04-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer Elementary & Secondary Education Mardan.
5. The District Accounts Officer, Mardan.
6. Mst. Ishrat Ara Bibi CT (BS-15) GGHS Ikram Pur District Mardan

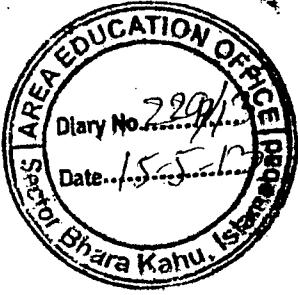
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(HINA SAEED)
SECTION OFFICER (PRIMARY)

Islamabad, the 08th May, 2013.



OFFICE ORDER

Consequents upon her relieving on the basis of deputation from Education Department, Government of KPK to FDE vide their letter No. SO(PE)E&SED/5-2/IPT/MARDAN/ISHRAT ARA/CT/2011 dated 11.04.2013, Mrs. Ishrat Ara, CT (B-15) GGHS, Ikram Pur, Mardan taken on deputation on her own pay / grade & scale for a period of 01-year w.e.f. 30.04.2013 to 29.04.2014 is hereby posted in Islamabad Model School for Girls (I-X), University Colony G-5, against a vacant post of TGT (B-16).


2. She has allowed to join her duty w.e.f. 02.05.2013 (i.e. the date of joining under FDE).
3. No TA/DA will be paid in this connection.
4. She stand relieved to her parent department on 29.04.2014.
5. These orders are subject to revision/ modification or cancellation as and when found necessary.
6. This is issued with the approval of Director Schools (Female).


(MUHAMMAD ASLAM ANSARI)
ADMN OFFICER (FEMALE)

Copy to:-

- ❖ AGPR, Islamabad.
- ❖ Heads concerned, IMSG, U.C G-5, Islamabad.
- ❖ Section Officer (Primary), School Education Department, Government of KPK w.r.t. letter No. SO(PE)E&SED/5-2/IPT/MARDAN/ISHRAT ARA/CT/2011 dated 11.04.2013.
- ❖ Person Concerned.
- ❖ Personal File.

(MUHAMMAD ASLAM ANSARI)
ADMN OFFICER (FEMALE)

Attested

10 May 2013

21

Annex: B

GOVERNMENT OF PAKISTAN
 M/o Information, Broadcasting and National Heritage
 Quaid-e-Azam Academy (Sub-office)
 Block (N) Pak Secretariat Islamabad

Name Tahir Hafeez
 Designation Assistant (BS-14)
 Address H.No. 1492, St. 17/2, Block-C
N.P. Foundation Islamabad
 Tele(Off) 051-9246478 Mob 0333-5438260

Employee's Signature _____ Signature of Issuing Authority _____

OTHER DETAILS

NIC No. 6 1 1 0 1 1 9 3 7 5 3 0 - 1

Date of Birth 24-08-1971


Mark of Identification Mole below Right Eye

Blood Group B+

INSTRUCTIONS

1. This card is not transferable and is the Property of the Govt. of Pakistan.
2. This card is to be surrendered on leaving this department.
3. The loss of this card must be reported to issuing authority and nearest Police Station.

ATTACHED



22


GOVERNMENT OF PAKISTAN
National History & Literary Heritage Division
QUAID-I-AZAM ACADEMY (Sub-Office)
N-Block, Pak. Secretariat
<<>>

No. F.II (21)/2005-QAA

Islamabad, the 04th December, 2019

TO WHOM IT MAY CONCERN

This is to certify that Mr. Tahir Hafeez S/o (Late) Muhammad Hafeez, is working as Assistant in Quaid-i-Azam Academy (Sub-office), National History & Literary Heritage Division, Islamabad, since 17th June, 2005. He is currently working as Assistant in BPS-16.


(Zahid Hussain Abro)
Research Officer

ZAHID HUSSAIN ABRO
Research Officer
Quaid -I-Azam Academy (Sub-Office)
M/o Information Broadcasting and
National Heritage Islamabad

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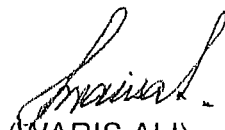
No. Admn-IV/1183-P.
Government of Pakistan
Ministry of Railways
(Railway Board)
Islamabad

Dated 07-11-2019.


TO WHOM IT MAY CONCERN

It is certified that Mr. Muhammad Ishfaq S/O Muhammad Siddique bearing National Identity Card No. 61101-1941303-3 is a permanent employee of Ministry of Railways and working as Private Secretary (BS-17) in the Ministry of Railways, Islamabad since 1985.


(MUMTAZ AHMAD)
Director Establishment
Ministry of Railways
Islamabad

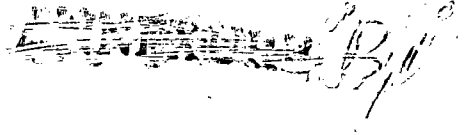

(WARIS ALI)
Director/Administration

(WARIS ALI)
DIRECTOR / ADMINISTRATION
MINISTRY OF RAILWAYS
ISLAMABAD

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P R E M I E R
 SECURITY SERVICES
 ISO 9001 - 2015 CERTIFIED


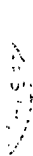

Dated: November 6, 2019

Employee's Reference letter

This is to confirm that Muhammad Naveed Abbasi S/o Muhammad Nazir Abbasi is working for Premier Security Services (Pvt) Ltd a company incorporated in Pakistan under company act and operating in Pakistan. He is member of permanent cadre and enjoying the status of a Manager Finance since September 2015.


Chief Executive
 Maj (R) Muhammad Zulfiqar Kayani

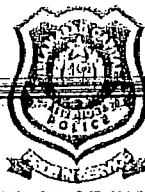
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APPROVED B/20



OFFICE OF THE
SENIOR SUPERINTENDENT OF POLICE,
(LOGISTICS), HEADQUARTERS,
ISLAMABAD.

No. 423 /A(HQ)/AFC(Misc):

Dated 07/04 /2018

Subject: SERVICE CERTIFICATE.

It is certified that Mr. Muhammad Rafique bearing CNIC No. 11201-0378367-3 is permanent employee of ICT Police, Islamabad against the post of Constable BPS-07 (Buckle # 7738) since 20.10.2004. Till date the official has 13 years, 05 months and 08 days service qualifying for pension purpose to his credit.

2. This certificate is being issued on the personal request of the above named official, please.

(ZIA ULLAH NIAZI),
Audit & Accounts Officer / DDO,
Capital Territory Police,
Islamabad.

Attested

to be true copy



26

OFFICE OF THE
SUPERINTENDENT OF POLICE, HEADQUARTERS,
ISLAMABAD.

CERTIFICATE.

It is certified that Constable Shoukat Ali, No.4058, of Capital Territory Police Islamabad, was recruited as such in Capital Territory Police Islamabad on 10-05-1990. He has 18 years, 05 months and 18 days service at his credit till the issuance of this letter. During the period he remained posted in different formations of Capital Territory Police.

Superintendent of Police,
Headquarters, Islamabad.

No. 5158

/Admin.

Dated: 29-10-12008.

Official Concerned.

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تصدیقی سرٹیفکیٹ (27)

تصدیق کی جاتی ہے کہ
نحوالہ آرڈر بک نمبر 42
بعدہ کنفرم ہو چکا ہے
نمبر 4058
مورخہ 18-1-95
کراچی

7
اویس آئی بی پی آر آرڈرز
OSI/HQ
Islamabad
28-3-17

*** محمد سلیم ***

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ANNEXURE C

II. Postings/Transfers to Pakistan Missions Abroad (Other Than Posts Administered by Ministry of Foreign Affairs)

- (i) Posts in foreign missions abroad should be filled on the basis of detailed job descriptions to be prepared by the controlling Ministry;
- (ii) The controlling Ministry should prepare a panel of suitable officers for the post;
- (iii) The panel of suitable officers should be considered by a Committee of the controlling Ministry including a representative of the Establishment Division;
- (iv) The recommendations of the Committee should be considered by the Special Selection Board; and
- (v) The recommendations of the Special Selection Board should be submitted to the competent authority for approval.

2. Ministries/Divisions are requested to proceed further in the matter of postings/transfers as above and bring these instructions to the notice of all departments, offices, autonomous/semi-autonomous bodies and corporations under their control for strict compliance.

[Authority.— Estt. Division O.M. No.10/10/94-R.2, dated 22-3-1994].

Sl. No. 4

Posting of Serving Husband/Wife at the Same Station

The government has taken note of the socio-economic problems and hardship 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 department concerned, 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 the

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Civil Servants (Seniority) Rules, 1993*

- 11
- (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 not normally be disturbed without compelling reasons of public interest. Requests for extension of deputation period beyond the permissible limit may be considered with compassion if interests of public service would permit.
- 11

2. The above guidelines are subject to the following conditions:-

- (i) Posting of husband and wife at the same station should not be made by dislocation of any government servant already serving at a particular station unless his transfer is necessitated by compelling reasons of public interest or within the framework of general policy of postings and transfers.
- (ii) The prescribed selection authority should be consulted in each case.

3. All government servants whose spouses are in government service may be asked to furnish, at the end of every calendar year, the particulars of their spouses to their controlling Ministries/Divisions so as to facilitate maintenance of ICP Charts and up-to-date monitoring of the situation.

4. The above guidelines may be circulated to the autonomous bodies under the charge of Ministries/Divisions for adoption, with such modifications, as may be considered necessary.

[Authority.- Estt. Division O.M.No. 10/30/97-R.II, dated 13-5-1998].

Sl. No. 5

Posting of Unmarried Female Government Servants at the Place of Residence of Parents/Family

It has been brought to the notice of government that unmarried female

* Chapter 2, Sl.No.147.

** Individual Career Planning.

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(iii) The process should be completely transparent and in the best public interest.

3. I am further, directed to request that all concerned should ensure that:
(a) All postings/transfers are made strictly in accordance with this posting/transfer policy and any one violating the said policy shall be held accountable under the E&D Rules.

(b) If an exemption is required to be made in exigency of service aiming at serving public interest, that shall be allowed only by the Chief Secretary.

(c) Each department, without violating the posting/transfer policy, may add further yardsticks, keeping in view their own requirement, which shall be got approved, from the Chief Secretary.

3. The receipt of this letter may kindly be acknowledged.

(Authority: S&GAD letter No.SOR-I(S&GAD)1-1/85(Vol.I), dated 22.12.99)

Policy of posting of serving Husband/Wife in the same station.

Sl.No:9

The following policy of the Federal Government with regard to the posting of husband and wife at one station of duty, has been adopted by the Provincial Government of NWFP in respect of its employees working in Government Departments, Autonomous and Semi-Autonomous Bodies in the NWFP:-

(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 Section-8 of the NWFP Civil Servants Act, 1973 read with Rule-17 of the NWFP Civil Servants (Appointment, Promotion and Transfer) Rules 1989.

(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) Husband 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 deputation period beyond the permissible limit may be considered with compassion if interests of public service would permit.

2. The above guidelines are subject to the following conditions:-

(i) Posting of husband and wife at the same station should not be made if it results in the dislocation of any Government servant already serving at a particular station unless his transfer is necessitated by compelling reasons of public interest within the frame work of general policy of postings and transfer.

(ii) The prescribed selection authority should be consulted in each case.

3. It is requested to follow the above policy strictly in letter and spirit.

(Authority:- Circular letter No.SORI(S&GAD)1-1/85(V.I), dt: 11.7.98)

Decision of the Provincial Cabinet meeting held on 8.7.99

S.No. 10

Decision
"DEOs & SDEOs (female) may be posted in their own district of domicile in the Education Department if considered necessary & unavoidable"

(Authority:-Circular letter No.SOC(S&GAD)27/89/99, dated 15.07.99)

Placement Scrutiny Committee

S.No.11

Notification:
No.SOI(S&GAD)1-1/98. The competent authority is pleased to constitute a Placement Scrutiny Committee comprising of the following:-

- | | |
|-----------------------------------|------------------|
| a. Additional Chief Secretary | Co-ordinator |
| b. Senior Member Board of Revenue | Member |
| c. Secretary Home & TA Department | Member |
| d. Secretary S&GAD | Member/Secretary |

2. Functions of the Committee are as under:-

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interest or within the framework of general policy of postings and transfer.

- (ii) The prescribed selection authority should be consulted in each case.

3. It has also been decided that the above guidelines shall also be followed by autonomous/semi-autonomous bodies/ corporations etc. under the control of the Federal Government.

[Authority:- Estt. Division O.M. No.10/30/97-R-2, dated 17-12-1999].

Sl. No. 5-A

Posting of Married Female Government Servants at the Place of Residence/Posting of Their Husbands Who are Not in Government Employment

Keeping in view the socio-economic problems and hardships faced by husbands and wives in government service due to posting at different stations of duty, the Establishment Division issued instructions/guidelines *vide* its OM No. 10/39/97-R-2, dated 13.5.1998 (Sl. No. 4) and 17.12.1999 (Sl.No. 5) to facilitate posting of husbands and wives at the same station and the posting of the unmarried female civil servants at the place of residence of their parents/families. With a view to facilitating those female government servants whose spouses are not in government service or employed in the private sector or unemployed, it has been decided to extend the facility to this class of government servants also to the above to serve at the place of residence of their spouses irrespective of whether such spouses are employed with the government, private sector, or even unemployed.

[Authority:- Estt. Div.'s OM No. 10/30/97-R-2, dated 21-4-2006].

Sl. No. 6

Normal Tenure for an Officer on the Same Job/Post

It has been observed that a number of officers remain at the same desk for considerable period of time. This arrangement is not administratively desirable as the officers holding the same post for a long time tend to develop rigidity in the outlook and ideas and do not view the problems with the same objectivity as they normally should. It is, therefore, essential that officers should not be allowed to remain on the same job for any length of time. Normal tenure for an officer on the same post should be three years and should not exceed five years in any case.

2. The above orders apply not only to the Ministries and Divisions but also to all kinds of organizations, including the Attached Departments and Subordinate Offices as well as autonomous bodies and corporations under the administrative control of the various Federal Ministries/Divisions.

3. As regards the technical officers/experts, if they have been recruited for the same post in which they are working, the orders referred to above will not apply. However, if it is possible to rotate such officers, this may be done.

Attested

37

ANNEXURE 'D'

**GOVERNMENT OF NWFP
SCHOOL & LITERACY DEPARTMENT.**

ORDER.

NO. SO(PE)5-2/174/07/Ms. Ambar Nosheen PTC In pursuance of the Establishment Department Government of NWFP NOC contained in letter No. SORI. (E&AD) 1-14/82 (Vol-XI) dated 16-8-2007, the services of Ms. Ambar Nosheen PTC Govt. Girls Primary School Gahri Abdul Samad District Peshawar (NWFP) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on deputation basis for initial period of 03 years, on the terms & conditions contained in the letter No. F.4-9/2007/ (W) FDE dated 26-07-2007.

**SECRETARY TO GOVT. OF NWFP
SCHOOL & LITERACY DEPARTMENT.**

Endst.No.SO(PE)5-2/174/07/Ambar Nosheen PTC Dated Pesh: the, 18-09-07.

Copy forwarded to:-

1. The Secretary to Govt. of NWFP Establishment Department w/r to his letter quoted above.
2. The Director General Federal Directorate of Education Islamabad w/r to his letter quoted above.
3. The Director School & Literacy NWFP Peshawar w/r to his letter No.7538/ F.No.1/208/IPT dated 13-2-2007.
4. The Distt: Accounts Officer Peshawar O/O the Accountant General NWFP.
5. The Executive District Officer School & Literacy Peshawar with the request to relieve and direct the lady teacher concerned to report to the Director General Federal Directorate of Education Islamabad for further posting.
6. Ms. Ambar Nosheen PTC Govt. Girls Primary School Gahri Abdul Samad Peshawar.

SECTION OFFICER (PRIMARY)

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No. F.4-9/2007-Dep (W) FDE
Government of Pakistan
Federal Directorate of Education

Islamabad, the 1st Oct

OFFICE ORDER

Consequent upon her relieving from the parent department i.e. Education Department, Government of NWFP, Ms. Amber Nosheen, PTC, Teacher, Government Girls Primary School, Gahri Abdul Samad, District Peshawar (NWFP), taken on deputation as Matric Trained Teacher (in her own pay and grade) for a period of three years vide this Directorate's letter of even number dated 26.07.2007 is hereby posted to F.G. Girls Primary School Nilore (FA) Islamabad vice Farhana Akhtar transferred.

2. She is allowed to join her duty w.e.f. 12.09.2007 (Forenoon).
3. This is Issued with the approval of Director General.

(ASIF IQBAL KHAN)
DEPUTY DIRECTOR (F)

Copy to:-

- The A.G.P.R, Islamabad.
- The Section officer (Primary), Education Department, Government of NWFP, w.r.t. their letter No. SO(PE)5-2/174/07/Amber Nosheen PTC, dated 18.09.2007.
- Head concerned.
- Personal file. *Concerned ed.*
- Office order file.

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(ASIF IQBAL KHAN)
DEPUTY DIRECTOR (F)

NO.F.4-9/2000(W)FDE
Government of Pakistan
Federal Directorate of Education

Islamabad, the 22nd Mar. 2004

From : Mrs. Rizwana Waqar
Deputy Directress(W)
To : The Section Officer (Primary)
Schools & Literacy Department
Govt. of N.W.F.P.
Peshawar.

Subject: TRANSFER ON DEPUTATION UNDER THE FEDERAL DIRECTORATE OF EDUCATION, ISLAMABAD.

The competent authority has been pleased to borrow the services of Mrs. Parbat Wasim, Teacher, Govt. Girls Pri. School, Chaman Chowk No.1, Distt. D.T. Khan under the Government of N.W.F.P. on deputation as Matric Trained Teacher under the Federal Directorate of Education, Islamabad on the following terms and conditions: -

- a) She will be on deputation initially for a period of three(03) years or till the joining of a regular selectee, whichever is earlier.
- b) The Federal Government has the right to revert her to her parent department at any time without prior notice.
- c) She shall draw her own pay in her own scale/grade.
- d) She shall be entitled to draw allowances and other fringe benefits as admissible to other Federal Govt. employees.
- e) No T.A/D.A will be admissible on her joining in this Department or repatriation to her parent department.
- f) She will not be paid any deputation allowance.
- g) The parent department will retain her lien for the said deputation period as admissible under the rules and is bound to accept her as and when she is repatriated from this Directorate.
- h) There will be no possibility of her transfer within a period of deputation after joining.
- i) In case of her promotion in parent department, she will be reverted before completion of her deputation period.
- j) She will be posted in Rural Area of Islamabad.

2. Since Mrs. Parbat Wasim is working under the administrative control of your department, it is requested that she may be relieved off and directed to report to the undersigned within 30 days from the date of issuance of this letter alongwith "N.O.C & Lien retention certificate" from the parent department, if the above terms and conditions are acceptable to her and the Department.

3. This is issued with the approval of Director General (Education).

(MRS. RIZWANA WAQAR)
DEPUTY DIRECTRESS(W)

Copy to:

1. The A.G.P.R. Islamabad.
2. Mrs. Parbat Wasim O/o. Muhammad Ishtaq, Ministry of Communication & Railway (Railway Division) Room No.429, Block, Pak Sectt. Islamabad.
2. Mrs. Parbat Wasim Govt. Teacher, Chaman Chowk No.1, Distt. D.T. Khan.
3. Head concerned.
4. Personal file.
5. Office order file.

Attested

(ZULFIQAR ALI)
ADMINISTRATIVE OFFICER(W)

OFFER-DEPUT/20

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Islamabad, the 16th October, 2008

OFFICE ORDER

Consequent upon her relieving by her parent department, i.e; Elementary and Secondary Education Department, Government of N.W.F.P vide order No.SO(PE)5-2/251/08/Mst. Naila Bashir C.T dated 17-09-2008 Mst. Naila Bashir is hereby taken on deputation for a period of (03)-years with effect from 27-09-2008 (in her own pay and scale/ grade) at F.G. Girls Middle School, Bain Nala (F.A), Islamabad against a vacant post of T.U.G.T on the following terms and conditions:-

- a) She will be on deputation initially for a period of three (03) years or till the joining of a regular selectee, whichever is earlier.
- b) On the completion of deputation period, she will stand repatriated to her parent department without any notice. Prior to her joining under this directorate, she will also submit an undertaking on stamp paper duly attested by the magistrate class-1 to the effect that she will neither file an appeal/ writ petition in the court for permanent absorption.
- c) The Federal Government has the right to revert her to her parent department at any time without prior notice.
- d) She shall draw her pay in her own pay/ grade.
- e) She shall be entitled to draw allowances and other fringe benefits as admissible to other Federal Government employees.
- f) No. T.A/ D.A will be admissible on her joining in this Department.
- g) She will be paid the deputation allowance as per rules.

02. This is issued with the approval of Director General, (Education).

(MRS. FARZANA ASHRAF GONDAL)
DEPUTY DIRECTOR (FEMALE)

Copy forwarded to :

- 1). A.G.P.R, Islamabad
- ✓ 2). Section Officer (Primary), Elementary & Secondary Education, Peshawar Govt. of N-W-F-P w/r to your letter No. SO. (PE)5-2/251/08 Mst. Naila Bashir C.T.
- ✓ 3). Mst. Naila Bashir, C.T, Govt. Girls High School, Bakote Abbottabadi, N.W.F.P, with the remarks that if the above terms and conditions are accepted to her and her parent department then join the above mentioned school immediately.
- 4). The Headmistress, F.G. Girls Middle School, Bain Nala (F.A), Ibd with the remarks that in case of her joining in the same school, her joining report may be submitted to FDE at an early date.

Attested

to be true conv

(M. AFZAALQADIR)
ADMIN. OFFICER (F)

37

No. F.1-9/2009-MTT(W)FDE
Government of Pakistan
Federal Directorate of Education.

Islamabad May 13, 2009

The Section Officer (Primary),
Elementary & Sec, Education Department,
Government of N.W.F.P, Peshawar.

Subject:- TRANSFER ON DEPUTATION UNDER FDE

The competent authority has been pleased to borrow the services of Mrs. Nishat Begum, PST, GGPS, No.1, Bannu city under FDE as MTT on the following terms & conditions:-

- She will be on deputation initially for a period of 3 years or till joining of regular incumbent of post whichever is earlier.
- On completion of deputation, she will stand repatriated to her parent department.
- FDE has right to revert her services at any stage.
- She will draw pay in own scale.
- She will be entitled fringe benefits as admissible to other F.G. employees.
- NO TA / DA will be paid for joining.
- Deputation allowance will be admissible as per rules.

2. If the above mentioned terms and conditions are acceptable to department & teacher concerned, then she may be relieved to join under FDE within 30 days positively.

3. This is issued with the approval of Competent authority.

(MRS. FARZANA ASHRAR GONDAL)
DEPUTY DIRECTOR (F)

Copy to:-

- Nishat Begum, PST, GGPS No.1,
Bannu City, NWFP.
- Office file.

(MUHAMMAD AFZAAL QADIR)
ADMA. OFFICER (F)

Attended

to be true copy

38

Annex: "E"

Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.
No. 5839 / F.No.23/IPT/PST(F) Peshawar.
Dated Peshawar the 27-9- /2010.

To

The Secretary to Govt: of Khyber Pakhtunkhwa,
(E&SE) Department, Peshawar.

Subject:

REQUEST FOR EXTENSION IN DEPUTATION PERIOD.

Memo

I am directed to refer to the letter No. SO(PE)5-2/02/IPT/Peshawar/Vol-V dated 31-05-2010 on the subject cited above and to enclose herewith NOC and Lien retention certificate in respect of Mst. Amber Nowsheen PST GGPS Garhi Abdul Samad District Peshawar under deputation to Federal Directorate of Education Islamabad regarding extension in deputation for a further period of two years for favour of further process with the request that this Directorate has no objection on extension in her deputation period for further two years period under the rules as desired please.

[Signature]
Deputy Directress (Estab)
Directorate of Elementary & Secy Education
Khyber Pakhtunkhwa, Peshawar.

Enstd: No.

Copy of the above is forwarded to the E.D.O. (E&SE) Peshawar w/r to his letter No.7679 dated 17-09-2010 for information and with the remarks, send a copy of explanation called from the Mistress concerned for her direct correspondence with the high ups.

Deputy Directress (Estab)
Directorate of Elementary & Secy Education
Khyber Pakhtunkhwa, Peshawar

Govt: of Khyber Pakhtunkhwa
Elementary & Secondary
Education Department
S.E. Diary No. 530
Date, 28/7
Ambar Nowsheen PST

[Signature]
SO (PE)

Attested

Elementary & Secondary
Education Department
D.S. No. 4177
Date 28/7

Attested
to be true copy

to be true copy

39

En

N.C.C

Certified that the under signed have No objection for further Extension in Deputation period for two years in respect of Mrs: Amber Nowsheen Ex PST Govt: Girls Primary School Garhi Abdul Samad Peshawar.

C/Signed

Deputy District Officer,
(Female) Peshawar.

Executive Distt. Officer
Elementary & Secondary Education
Peshawar.

LIEN RETENTION CERTIFICATE.

Certified that to the effect that the lien of Mrs: Amber Nowsheen PST Govt: Girls Primary School Ghari Abadul Samad Peshawar will be retained till the completion of her deputation period in her parent Department i.e (ECS) Education Peshawar.

C/Signed

Deputy District Officer,
(Female) Peshawar.

Executive Distt. Officer
Elementary & Secondary Education
Peshawar.

Attested

Attested

to be true copy

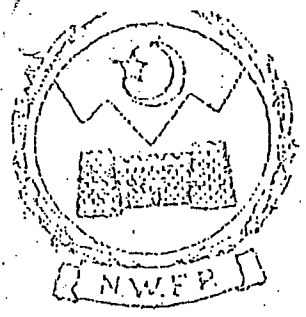
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40

RECEIVED
11/4/2007

GOVERNMENT OF NWFP
ESTABLISHMENT & ADMIN. DEPARTMENT
(REGULATION WING)

No.SOR-I(E&AD) 1-14/82(Vol-XI)
Dated Peshawar the 11-4-2007



To,

The Secretary to Govt. of NWFP,
School & Literacy Department.

Subject:-

INTER PROVINCIAL TRANSFER OF MST. FARHAT YASMEEN, PTC, GGPS CHAMAN NO. 1 DISTRICT D.I.KHAN (NWFP) TO FEDERAL DIRECTORATE OF EDUCATION ISLAMABAD.

Dear Sir,

I am directed to refer to your letter No. SO(PE)5-2/64-100 dated 29.3.2007 on the subject noted above and to convey the NOC of the Establishment and Administration Department to the proposed extension in deputation for a further period of two (2) years w.e.f 29.04.2007 to 28.04.2009 in respect of Mst. Farhat Yasmeen, PST GGPS Chaman Chowk No. 1 District D.I.Khan NWFP Schools and Literacy Department to Federal Directorate of Education Islamabad (Total period of deputation including the instant period comes to (05) five years).

Yours faithfully,

(ARIF JAMIL)
SECTION OFFICER (REG-1)

Attested

to be true copy
Secretary (E&A)
Dated 11/4/2007

Attested

to be true copy

Handwritten notes and signatures in the bottom left corner, including the number '454'.



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Dated Peshawar the 19-4-2012.

ORDER.

No.SO(PE)5-2/IPT/02/A-Abad/Vol.VII . In pursuance of the NOC conveyed by the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, to the Elementary & Secondary Education Department Khyber Pakhtunkhwa vide letter No. SOR.I (E&AD)1-14/82/Vol.XXIII dated 16-04-2012, the period of deputation service in respect of Ms. Naila Bashir CT GGHS Bakote Abbottabad to Federal Directorate of Education Islamabad is hereby extended for one (01) year wef; 11-9-2011 to 10-9-2012. Total period including the instant period comes to four (04) years.

2. The borrowing department/deputationist will deposit Pension Contribution, Leave salary GP Fund, Group Insurance etc with Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar under the relevant head and will regularly provide deposit challans to the Director Elementary & Secondary Education Khyber Pakhtunkhwa as per deputation policy of this Provincial Govt.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Admn. Officer (Female) Govt. of Pakistan Federal Directorate of Education Islamabad w/r to his letter NO.F.9-14/1424-D(W)FDE Dated 26-12-2011.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to his letter No. 4292/F.No.01/IPT(F)Hazara Div. dated 22-3-2012.
4. The Executive District Officer Elementary & Secondary Education Abbottabad w/r to his letter No. 6279 dated 8-3-2012.
5. Ms. Naila Bashir CT Govt. Girls High School Bakote Abbottabad.

(MUHAMMAD AYUB KHAN)
SECTION OFFICER (PRIMARY)

RZI 1906
25-4-12

25/4/12

Attested
to be true copy



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Dated Peshawar the 24-09-2013**

ORDER.

No.S0(PE)5-2/E&SED/Abbottabad/2013/Naila Bashir CT. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa NOC conveyed to this Department vide letter No. SOR.I(E&AD)1-14/82/Vol.27 dated 18-09-2013, the deputation period in r/o Ms. Naila Bashir CT GGHS Bakote District Abbottabad (Now on deputation to Federal Directorate of Education, Islamabad) is hereby extended for further period of one (1) year w.e.f. 11-9-2012 to 10-9-2013. Total period of deputation including the instant extension comes to five (5) years on usual terms & conditions.

2. The borrowing department/deputationist will deposit Pension Contribution, Leave salary, GP Fund, Group Insurance etc with Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar under the relevant head and will regularly deposit challans to the Director Elementary & Secondary Education Khyber Pakhtunkhwa as per deputation policy of this Provincial Govt.

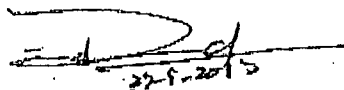
3. As the deputationist has already completed her 5 years deputation period therefore she is directed to report back to her parent department immediately.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary to Govt. of Khyber Pakhtunkhwa Establishment Department w/r to his letter quoted above.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer Elementary & Secondary Education Abbottabad.
4. District Accounts Officer Abbottabad.
5. The Deputy Director Schools (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No. F.9-14/1424-D(W) FDE dated 11-02-2013.
6. Ms. Naila Bashir CT GGHS Bakote District Abbottabad.


 (HINA SAEED)
 SECTION OFFICER (PRIMARY)

Attested

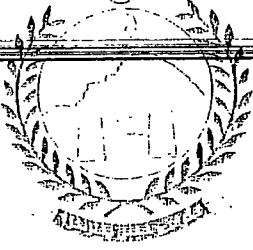
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43

ANNEXURE

2/3

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Dated Peshawar the 18-7-2012



ORDER.

No.SO(PE)5-2/03/IPT/Bannu/Vol-IV. In pursuance of the NOC conveyed by the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, vide letter No. SOR.I (E&AD)I-14/82/Vol.XXIV dated 06-07-2012, the deputation period in respect of Mst. Nishat Begum PST(BS-7) Govt. Girls Primary School NO.1 Bannu City Khyber Pakhtunkhwa (on deputation under Federal Directorate of Education Islamabad) is hereby extended for a further period of two (02) years w.e.f. 23-7-2012 to 22-7-2014. Total period of the deputation including the existing period comes to Five(05) years.

2. The borrowing department/deputationist will deposit Pension Contribution, Leave salary GP Fund, Group Insurance etc with Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar under the relevant head and will regularly provide deposit challans to the Director Elementary & Secondary Education Khyber Pakhtunkhwa as per deputation policy of this Provincial Govt.

SECRETARY


Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Assistant Director School (Female) Govt. of Pakistan Federal Directorate of Education Islamabad w/r to her letter No.F. 1-9/134/Deo/MTT(W)FDE dated 21-5-2012.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to his letter No. 1840/F.No.A-30/IPT(F)D.I.Division dated 18-6-2012.
4. The Executive District Officer Elementary & Secondary Education Bannu.
5. The District Accounts Officer Bannu.
6. Mst. Nishat Begum PST(BS-7) Govt. Girls Primary School NO.1 Bannu City.
7. The Headmistress GGPS NO.1 Bannu City.

Attested

to be true copy


(MUHAMMAD AYUB KHAN)
SECTION OFFICER (PRIMARY)

44

No. F-9-14/1761-D(W) FDE
Government of Pakistan
Federal Directorate of Education

Islamabad, the 22nd August, 2016

To,

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

Subject: **EXTENSION IN DEPUTATION PERIOD IN RESPECT OF
MRS. ISHRAT ARA BIBI, (DEPUTATIONIST), BS-15 .**

I am directed to refer to the subject noted above and to say that Mrs. Ishrat Ara Bibi, CT, GGHS, Ikrampur District Mardan was taken on deputation under FDE for a period of 01-year w.e.f. 30.04.2013.

2. Now her deputation period has been expired on 29.04.2014 therefore, she is requesting to FDE for further extension in deputation period of 03-years w.e.f. 30.04.2014 to 29.04.2017.

3. Above in view, you are again requested to furnish the consent / NOC of your department in respect of Mst. Ishrat Ara Bibi, TUGT to this Directorate immediately within 15-days for further necessary action in the matter, please.

4. This is issued with the approval of Director Schools.

(RANA MUHAMMAD NAZIR)
Dy. Director Schools (Female)

Copy to:

- Mst. Ishrat Ara Bibi, TUGT (Dep), IMCG, Quaid-e-Azam University Colony, Islamabad.
- Head concerned.

Attested
to be true copy


(RANA MUHAMMAD NAZIR)
Dy. Director Schools (Female)

No.F.1-9/127-MTT (D) FDE
Government of Pakistan
Federal Directorate of Education

REGISTERED A/D

Annex F

Islamabad, the 19th July, 2019

45

From: **Agha Nadeem Khan,**
Admn Officer Schools (Female),
Federal Directorate of Education,
Rohtas Road, Sector G-9/4, Islamabad.

To: **Section Officer (Primary),**
Elementary & Secondary Education Department,
Govt. of Khyber Pakhtunkhwa,
Peshawar.

Subject: **NOC FOR EXTENSION IN THE DEPUTATION PERIOD.**

Dear Sir,

I am directed to refer to the subject noted above and to state that the services of Ms. Ambar Nosheen, PTC Teacher, Govt. Girls Primary School, Gahri Abdul Samad District Peshawar were borrowed by Federal Directorate of Education (FDE), Islamabad on deputation basis initially for a period of 03-years i.e. from 12.09.2007 to 11.09.2010 to facilitate the posting of serving husband/wife at the same station as laid down in the Establishment Division, Islamabad's guidelines circulated vide O.M No.10/30/97-R.II, dated 13.05.1998 (**Annex-I**). The initial period of deputation of the incumbent was further extended for 02-years and on 11.09.2012 she has completed her maximum period of deputation i.e. 05-years (**Annex-II**).

2. FDE had earlier requested the Elementary & Secondary Education Department, Govt. of Khyber Pakhtunkhwa for provision of NOC to consider her case for permanent absorption, however, it is a matter of fact that her case, along with other similar incumbents, has remained under consideration for a policy decision at different times in FDE, but the same could not be materialized so far. Further to clarify that FDE has been retaining the services of Ms. Ambar Nosheen on deputation basis beyond the permissible limit of 05-years in terms rule 20-A of the Civil Servants (Appointment, Promotion, Transfer) Rules, 1973 for facilitating serving husband/wife on the same station.

3. Therefore, the Elementary & Secondary Education Department, Govt. of KPK is requested to furnish FDE with NOC for regularization of deputation period of Ms. Ambar Nosheen beyond 11.09.2012 till date and further extension for a period of two years till 18.07.2021. In case her services are required by the Elementary & Secondary Education Department, Govt. of KPK being the lending department, this may be clearly communicated to FDE so that she may be repatriated accordingly.

4. A prompt response in this regard is awaited, please.

Encl: As above

(Agha Nadeem Khan)
Admn. Officer Schools (Female)

Copy to:

- Director Elementary & Secondary Education Department, Govt. of Khyber Pakhtunkhwa, Peshawar.
- District Education Officer (Female), Peshawar.
- APS to Director General (FDE), Islamabad.
- Area Education Officer, Sector Sihala, FDE, Islamabad.
- Principal Islamabad

Attested

to be true copy

48

F. No.9-14/48-D(W) FDE
Government of Pakistan
Federal Directorate of Education

Islamabad, the 12th July, 2019.

The Secretary,
Elementary and Secondary Education Department,
Government of KPK,
Peshawar

Subject: **NOC FOR EXTENSION IN THE DEPUTATION PERIOD.**

I am directed to refer on the subject noted above and to say that the service of **Mrs. Naila Bashir**, CT was borrowed by Federal Directorate of Education (FDE), Islamabad on deputation basis from 01-11-2008 to facilitate the posting of serving wife at the same station as laid down in the Establishment Division, Islamabad's guidelines circulated vide O.M. No. 10/30/97-R.II, dated 13-05-1998. The initial period of deputation of the incumbent was further extended upto 10-09-2013 and her maximum period of deputation i.e. 05-years has been expired on 10-09-2013.

2. However, Mrs. Naila Bashir is still working under FDE on deputation basis beyond the maximum period of 05-years which for Civil Servants, in case of serving wife may be allowed in terms rule 20-A of the Civil Servants (Appointment, Promotion Transfer) Rules, 1973. However, the state allowance is subject to willingness / NOC from the parent department which in the instant case is the Education Department, Govt. of KPK.

3. FDE had earlier requested the Education Department, Government of KPK for provision of NOC to consider his case for permanent absorption, however, it is a matter of fact that her case, along with other similar incumbents, has remained under consideration for a policy decision at different times in FDE, but the same could not be materialized so far.

4. Therefore, the Education Department, Government of KPK is requested to furnish FDE with the necessary NOC enabling this Directorate to process the case of Mrs. Mrs. Naila Bashir for extension in the deputation period for beyond 5-years w.e.f. 11-09-2013 to 10-09-2019. In case her services are required by the Government of KPK being the lending department, this may be clearly communicated to FDE so that she may be repatriated accordingly.

5. A prompt response in this regard is awaited please

(Agha Nadeem Khan)
Admin Officer Schools (Female)

Copy to:

- Section Officer (Primary), Elementary and Secondary Education Department, with the reference to your letter No.SO(PE)5-2/E&SED/Abbottabad/2013/Naila Bashir dated 24-09-2013
- District Education Officer (F), Abbottabad, KPK.
- Principal Concerned.
- Teacher concerned.

Attested

to be true copy

(Agha Nadeem Khan)
Admin Officer Schools (Female)

Attested

to be true copy

4/6

REGISTERED MAIL
MOST IMMEDIATE

No. F.2013/P.A-Dep/14-16-17/(W) FDE
Government of Pakistan
Federal Directorate of Education

Islamabad the 30th October, 2013.

To, ✓
The Section Officer (Primary),
Elementary & Secondary Education Department,
Government of KPK,
Peshawar.

Subject: NO OBJECTION CERTIFICATE FOR PERMANENT ABSORPTION

I am directed to refer to the subject noted above and to say that, Mrs. Amber Nosheen D.O.B 19.08.1975 D/O Muhammad Sadique was taken on deputation under FDE on 03.10.2007 in her own pay/grade & scale i.e MTT (B-09).

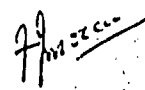
2. In the light of approval of the Prime Minister of Pakistan, FDE is preparing the case for permanent absorption of the deputationist for onward transmission to CA&D Division for DPC/DSC. In this regard, the NOCs of parent department for permanent absorption of the deputationists are required.

3. You are requested that, the NOC / consent of your department for permanent absorption in respect of Mrs. Amber Nosheen may be furnished to this Directorate upto 05.11.2013 for further process please.

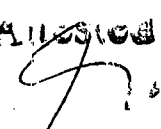
Attention: The name of above teacher will be considered for permanent absorption in the light of recruitment rule subject to approval by the Departmental Selection Committee / CA&D Division Islamabad on the condition that, completion of 05-years deputation period, meet the wedlock policy, fulfillment of codal & procedural formalities, availability of posts: If the services of above name teacher not absorbed on permanent basis by DSC / CA&DD due to lack of academic / professional qualification OR not fall in the recruitment rule OR any other deficiencies then FDE will not be bound to absorb her services on permanent basis under FDE on the basis of this letter.

4. This letter does not confer any right or claim of permanent absorption.

5. This is issued with the approval of Director General (Edu).


(HASAN IMRAN BAIG)
Dy. Director Schools (FEMALE)

Copy to:
↓ E.D.O concerned.
↓ D.E.O concerned.
↓ Person concerned. IMSG (I-V). Nilore, IBD with the direction to provide the original NOC before 1-10-2013.

Attested

to be the copy

(HASAN IMRAN BAIG)
Dy. Director Schools (FEMALE)

Islamabad, the 19th July, 2019

From: Agha Nadeem Khan,
Admn. Officer Schools (Female),
Federal Directorate of Education,
Rohtas Road, Sector G-9/4, Islamabad.

To: Section Officer (Primary),
Elementary & Secondary Education Department,
Govt. of Khyber Pakhtunkhwa,
Peshawar.

Subject: NOC FOR EXTENSION IN THE DEPUTATION PERIOD.

Dear Sir,

I am directed to refer to the subject noted above and to state that the services of Ms. Nishat Begum, Primary School Teacher (PST), Govt. Girls Primary School No.1, Bannu City were borrowed by Federal Directorate of Education (FDE), Islamabad on deputation basis initially for a period of 03-years i.e. from 09.07.2009 to 08.07.2012 to facilitate the posting of serving husband/wife at the same station as laid down in the Establishment Division, Islamabad's guidelines circulated vide O.M No.10/30/97-R.II, dated 13.05.1998 (Annex-I). The initial period of deputation of the incumbent was further extended for 02-years and on 08.07.2014 she has completed her maximum period of deputation i.e. 05-years (Annex-II).

2. FDE had earlier requested the Elementary & Secondary Education Department, Govt. of Khyber Pakhtunkhwa for provision of NOC to consider her case for permanent absorption, however, it is a matter of fact that her case, along with other similar incumbents, has remained under consideration for a policy decision at different times in FDE, but the same could not be materialized so far. Further to clarify that FDE has been retaining the services of Ms. Nishat Begum on deputation basis beyond the permissible limit of 05-years in terms rule 20-A of the Civil Servants (Appointment, Promotion, Transfer) Rules, 1973 for facilitating serving husband/wife on the same station.

3. Therefore, the Elementary & Secondary Education Department, Govt. of KPK is requested to furnish FDE with NOC for regularization of deputation period of Ms. Nishat Begum beyond 08.07.2014 till date and further extension for a period of two years till 18.07.2021. In case her services are required by the Elementary & Secondary Education Department, Govt. of KPK being the lending department, this may be clearly communicated to FDE so that she may be repatriated accordingly.

4. A prompt response in this regard is awaited, please.

Encl: As above

(Agha Nadeem Khan)
Admn. Officer Schools (Female)

Copy to:

- Director, Elementary & Secondary Education Department, Govt. of Khyber Pakhtunkhwa, Peshawar.
- District Education Officer (Female), Peshawar.
- APS to Director General (FDE), Islamabad.
- Area Education Officer, Sector Sihala, FDE, Islamabad.
- Headmistress, Islamabad Model School (I-V) No.1, I-9/4, Islamabad.
- Lady teacher concerned.

Attested

to be true copy

No.F.1-9/60-MTT (D) FDE
Government of Pakistan
Federal Directorate of Education

Islamabad, the 18th July, 2019

From: **Agha Nadeem Khan,**
Admn Officer Schools (Female),
Federal Directorate of Education,
Rohtas Road, Sector G-9/4, Islamabad.

47

To: **Section Officer (Primary),**
Elementary & Secondary Education Department,
Govt. of Khyber Pakhtunkhwa,
Peshawar.

Subject: **NOC FOR EXTENSION IN THE DEPUTATION PERIOD.**

Dear Sir,

I am directed to refer to the subject noted above and to state that the services of Ms. Farhat Yasmeen, PTC Teacher, Govt. Girls Primary School, Chaman Chowk No.1, D.I Khan were borrowed by Federal Directorate of Education (FDE), Islamabad on deputation basis initially for a period of 03-years i.e. from 29.04.2004 to 28.04.2007 to facilitate the posting of serving husband/wife at the same station as laid down in the Establishment Division, Islamabad's guidelines circulated vide O.M No.10/30/97-R.II, dated 13.05.1998 (Annex-I). The initial period of deputation of the incumbent was further extended for 02-years and on 28.04.2009 she has completed her maximum period of deputation i.e. 05-years (Annex-II).

2. FDE had earlier requested the Elementary & Secondary Education Department, Govt. of Khyber Pakhtunkhwa for provision of NOC to consider her case for permanent absorption, however, it is a matter of fact that her case, along with other similar incumbents, has remained under consideration for a policy decision at different times in FDE, but the same could not be materialized so far. Further to clarify that FDE has been retaining the services of Ms. Farhat Yasmeen on deputation basis beyond the permissible limit of 05-years in terms rule 20-A of the Civil Servants (Appointment, Promotion, Transfer) Rules, 1973 for facilitating serving husband/wife on the same station.

3. Therefore, the Elementary & Secondary Education Department, Govt. of KPK is requested to furnish FDE with NOC for regularization of deputation period of Ms. Farhat Yasmeen beyond 28.04.2009 till date and further extension for a period of two years till 17.07.2021. In case her services are required by the Elementary & Secondary Education Department, Govt. of KPK being the lending department, this may be clearly communicated to FDE so that she may be repatriated accordingly.

4. A prompt response in this regard is awaited, please.

Encl: As above

(Agha Nadeem Khan)
Admn. Officer Schools (Female)

Copy to:

Attested
to be true copy



56

Annex:- G

G

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 06.11.2019

G

ORDER

No. SO(PE)5-2/IPT/D.I Khan/Mst. Ambar Nosheen PST/Peshawar:- The Competent Authority has been pleased to repatriate Mst. Ambar Nosheen, PST, Govt. Girls Primary School Garhi Abdul Samad, District Peshawar, Khyber Pakhtunkhwa (working in Federal Directorate of Education, Government of Pakistan on deputation basis) to her parent Department i.e Elementary & Secondary Education Department Khyber Pakhtunkhwa, District Peshawar, after completion of 5-years deputation period, with immediate effect.

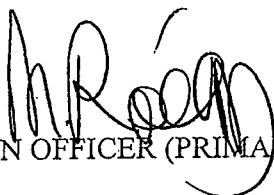
SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, Peshawar.
2. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar, for further necessary action.
3. The Admn. Officer Schools (Female), Federal Directorate of Education, Government of Pakistan, Islamabad w/r to his letter No. F. 1-9/127-MTT (D) FDE dated 19.07.2019 with the request to repatriate the lady teacher immediately.
4. The District Education Officer (F), Peshawar, with the direction to initiate proceedings against the above mistress for overstay as absence from duty.
5. The District Accounts Officer, Peshawar.
6. The Principal, Islamabad Model College for Girls, Lohi Bher (Federal Area), Islamabad.
7. PS to Secretary, Elementary & Secondary Education Department, Peshawar.
8. Mst. Ambar Nosheen, Islamabad Model College for Girls, Lohi Bher (Federal Area), Islamabad, with the direction to report back to her parent department, immediately.

Attested
to be true copy


SECTION OFFICER (PRIMARY)

Attested
to be true copy



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 14 10 2019

ORDER

No. SO(PE)5-2/PT/D.I Khan/Mst. Farhat Yasmeen PST/2013 - The Competent Authority has been pleased to repatriate Mst. Farhat Yasmeen, PST, Govt. Girls Primary School Chaman Chowk, No 1, D.I Khan, Khyber Pakhtunkhwa (working in Federal Directorate of Education, Government of Pakistan on deputation basis) after completion of 5-years deputation period to her parent department i.e. Elementary & Secondary Education Department Khyber Pakhtunkhwa, District D.I Khan, with immediate effect.

SECRETARY

Encls. No. & Date as above.

Copy forwarded to -

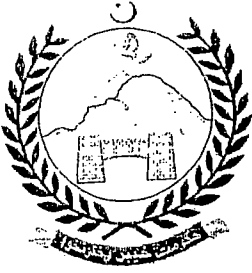
1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, Peshawar
2. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar, for further necessary action
3. The Admn. Officer Schools (Female), Federal Directorate of Education, Government of Pakistan, Islamabad w/r to his letter No F-1-9/60-MTT (D) FDE dated 18 07 2019 with the request to repatriate the lady teacher immediately
4. The District Education Officer (F), D.I Khan, with the request to adjust the above mistress against vacant post in District D.I Khan.
5. The District Accounts Officer, D.I Khan
6. PS to Secretary Elementary & Secondary Education Department, Peshawar
7. Mst. Farhat Yasmeen, Islamabad Model School (IV), G-9/A, Islamabad with the direction to report back to her parent department, immediately

SECTION OFFICER (PRIMARY)

Attested

To be true copy

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 19.09.2019

ORDER

No. SO(PE)5-2/012/IPT/Abbottabad/Vol-VII:- The Competent Authority has been pleased to repatriate Mst. Naila Bashir, CT, GGHS Bakote, District Abbottabad, Khyber Pakhtunkhwa (working in Federal Directorate of Education, Government of Pakistan on deputation basis) to her parent Department i.e Elementary & Secondary Education Department Khyber Pakhtunkhwa, District Abbottabad, with immediate effect.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, Peshawar.
2. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar, for further necessary action.
3. The Admn. Officer Schools (Female), Federal Directorate of Education, Government of Pakistan, Islamabad w/r to his letter No. 9-14/48-D(W) FDE dated 12.07.2019 with the request to repatriate the lady teacher immediately.
4. The District Education Officer (F), Abbottabad, with the request to adjust the above mistress against vacant post in District Abbottabad.
5. The District Accounts Officer, District Abbottabad.
6. PS to Secretary, Elementary & Secondary Education Department, Peshawar.
7. The teacher concerned.

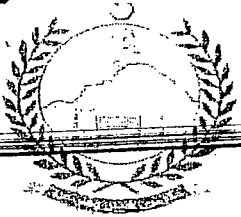
SECTION OFFICER (PRIMARY)

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(3)

21/10/2019



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 21.10.2019

ORDER

No. SO(PE)5-2/03/IPT/Bannu/Vol-IV:- The Competent Authority has been pleased to repatriate Mst. Nishat Begum, PST, Govt. Girls Primary School No.1, Bannu City, Khyber Pakhtunkhwa (working in Federal Directorate of Education, Government of Pakistan on deputation basis) to her parent Department i.e Elementary & Secondary Education Department Khyber Pakhtunkhwa. District Bannu, after completion of 5-years deputation period, with immediate effect.

SECRETARY

Enst. No. & Date as above.

Copy forwarded to:

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, Peshawar.
2. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar for further necessary action.
3. The Admn. Officer Schools (Female), Federal Directorate of Education, Government of Pakistan, Islamabad w/r to his letter No. F. 1-9/134-MTT (D) FDE dated 19.07.2019 with the request to repatriate the lady teacher immediately.
4. The District Education Officer (F), Bannu, with the request to adjust the above mistress against vacant post in District Bannu.
5. The District Accounts Officer, Bannu.
6. The Headmistress, Islamabad Model School (IV) No.1, I-9/A, Islamabad
7. PS to Secretary, Elementary & Secondary Education Department, Peshawar.
8. Mst. Nishat Begum, Islamabad Model School (I-V) No.1, I-9/A, Islamabad with the direction to report back to her parent department, immediately.

M. A. Khan

SECTION OFFICER (PRIMARY)

Attested

to be true copy

ATTESTED
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(54)

Annex: "H"

BEFORE PESHAWAR HIGH COURT PESHAWAR

W.P No. 6989-P /2019

U1 Amber Nosheen W/o Tahir Hafeez R/o National Police Foundation O-9 House No. 1492 Street # 17/2 Block C, Islamabad Permanently r/o Sarwar Abad near Hashtnagir Phatak Peshawar City..... Petitioner

Versus

1. Federation of Pakistan through Secretary M/O Education (defunct CAAD), Pak-Secretariat, Islamabad.
2. Director General Federal Directorate of Education (FDE), G-9/4 Islamabad.
3. Secretary, Primary Elementary & Secondary Education Department, Government of KPK, Peshawar
4. Director Primary Elementary & Secondary Education Government of KPK, Peshawar
5. Government of KPK through Advocate General Peshawar..... Respondents

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

Respectfully Sheweth:

1. That the petitioner ^{AMR} is employee of Elementary and Secondary Education Department Govt of KPK Peshawar, who was initially appointed as PST/PTC (Copies of initial appointment Order ^{AMR} is attached as Annexure-A at Page 8-10)
2. That as a matter of fact the husbands of the petitioner is permanent resident of Islamabad and also employees of Federal Government who ^{AMR} is working as Assistant in National History and Literary Heritage Division Quaid -i-Azam Academy (Sub

(SS) (2)

Office) at Islamabad. (Copies of Service Record of Petitioners' ^{are} Husbands is attached as Annexure-B to at Page 11-12)

3. That to facilitate posting of serving of spouses at one station Federal Government as well as Government of Khyber Pakhtunkhwa promulgated wedlock policy with a view to address problem and hardship of families due to posting at different stations of duties. (Copies of spouse polices of the both the Governments i.e Federal as well as Provincial are attached as Annexure-C to C-1 at Page 13-16)

4. That by ^{was} taking benefit of spouse policy petitioner ^{was} transferred from ^{her} home district to Islamabad on deputation through her order by taking NOC from ^{her} respective department. (Copy of Deputations Order and NOC are attached as Annexure-D to D-1 at Page 17-18)

5. That the deputation orders of the petitioner ^{was} time and again extended in ^{her} favour by the competent authority. (Copies of Extension Orders of Petitioner are attached as Annexure- E at Page 19-20)

6. That thereafter Federal Government through different letters dated 30-10-2013 & 19-07-2019, in respect of petitioner of Elementary and Secondary Education Department requested Government of KPK for issuance of NOC for extension/absorption in the deputation period of petitioner. (Copy of Letter dated 19-07-2019 are attached as Annexure-F at Page 21-22)

7. That respondent No.3 by adopting a novel procedure issued ^{an} impugned repatriation order of petitioners vide Order dated 6-11-2019. (Copy of Repatriation Order is attached as Annexure-G at Page 23)

8. That after receiving above mentioned repatriation order, petitioner through her representation approached the competent

56

authority for withdrawal of repatriation order and issuance of NOC for further extension in her deputation period at Islamabad but that was not decided till date (Copy of Representation is attached as Annexure- H at Page 24-25)

9. That the respondent No .3 in order to accommodate their blue eyed issued NOC for extension of some of the deputationist, despite of the fact that they have completed 5 years deputation period and in some of the cases respondents issued NOCs for permanent absorption of its employees in federal government but they are reluctant for the reason best know to them to issue NOC in favour of the petitioner. (Copies of letters I to I-8 are attached as annexure I at Page 26-37.)

10. That petitioner, having no other speedy and efficacious remedy invoke the Constitutional Jurisdiction of this Hon'able Court inter-alia on the following grounds;

GROUND:

- a. That the act of respondents by issuing impugned letter of repatriation and not issuance of formal absorption order pursuant to approval of Prime Minister Summary dated March 2013 communicated through letter dated 11.11.2014, is illegal, unlawful, void ab-initio and against the principles of natural justice.
- b. That the act of respondents is against the law and is in violation of Fundamental Rights contained in Constitution and violative to O.M. No.8/10/83-R.I, dated 06-03-1983 of the Federal Government, hence the same is void ab-initio and is liable to be declared illegal.
- c. That the act of respondents is discriminatory which is in clear violation of Article 25 & 27 of the Constitution, 1973 as in some of the cases approval for permanent absorption and as well as extension in the deputation has been issued by official respondents but they are reluctant to accommodate the petitioners.
- d. That moreover KPK Government also adopted Spouse Policy of the Federal Government vide Circular Letter No. SORI (S & GAD) 1-

to be true copy

(57) (4)

1/85 dated 11/7/1998. Hence there is no ambiguity and clash of interest between federal and provincial Government on this issue.

✓ e. That the impugned repatriation order is based on malafide and ulterior motives and against spouse policy adopted by both the Provincial and Federal Governments. Moreover petitioner, ~~was~~ ^{she is} on deputation for a period of more than five years so ~~she~~ ^{she is} ~~is~~ ^{are} entitled for permanent absorption. (B)

✓ f. That the Federal Government issued Letter Dated 16-03-2013 under title of "Absorption of Staff Working Under Federal Directorate of Education Department Islamabad working on deputation basis" wherein summary submitted to PM Secretariat Islamabad for absorption of Teachers who were working on deputation bases. (Copy of Letter Dated 16-03-2013 are attached as Annexure-J at Page 38)

✓ g. That similarly Federal Government also relaxed the time period of 5 years for deputationists who are working on deputation under wedlock policy and that corresponding amended was made in Rule 20-A of Appointment, Promotion and Transfer Rules 1973, so petitioner ^{is} also entitled for that benefit of the same policy. (Copy of Gazetted Notification dated 17-04-2012 alongwith summary for PM dated 10-02-2012) 39-64 .

PRAYER

It is, therefore, respectfully prayed that by accepting instant writ petition the respondents may graciously be directed to:-

i. Issue formal absorption orders of petitioner in the light of Federal Government letter dated 16 March 2013 as issued to other similarly placed employees.

ii. Declare the impugned Letters of Repatriation as illegal and void ab initio and ineffective upon the rights of petitioner.

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(58) (5)

iii. Direction to official respondents to issue NOCs for extension in deputation period till absorption of ^{her} services in Federal Government.

iv. Any other relief, which this Hon'ble Court deems fit and appropriate, may also be awarded.

Petitioner

Through

Mohammad Farooq Malik,
Advocate High Court Peshawar

INTERIM RELIEF

May it please your lordship?

By way of Interim Relief, pending final decision on Writ Petition the impugned Letter dated 06-11-2019 of repartition may graciously be suspended.

Petitioner

Through

Mohammad Farooq Malik,
Advocate High Court Peshawar

CERTIFICATE

Certified that no such Writ Petition has earlier been filed in this Hon'ble Court on behalf of the petitioner.

LIST OF BOOKS

- 1 Constitution of Islamic Republic Of Pakistan, 1973.
- 2 Any other law as per need.

Advocate

Attested
to be true copy

59

IN THE PESHAWAR HIGH COURT, PESHAWAR

Writ Petition No. _____/2019

Ambar Nosheen **Petitioner**

VERSUS

Govt of Khyber Pakhtunkhwa through its Chief Secretary and others

..... **Respondents**

AFFIDAVIT

I, Ambar Nosheen W/o Tahir Hafeez R/o National Police Foundation O-9, House No. 1492, Street No. 17/2, Block C, Islamabad., do hereby solemnly affirm and declare on oath that the contents of the accompanying **Writ Petition** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT

CNIC No. 17301-1222637-0

Cell # 0333-5438260

Identified by,



Muhammad Farooq Malik
Advocate, High Court.

15922
Certified that I have read the above affidavit and I certify that the contents of the affidavit are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.
day of Dec in Ambar Nosheen
at Tahir Hafeez Islamabad
who is Farooq Malik
Who is
09/12/19

Attested
to be true copy

ndm verified

(69)

BEFORE PESHAWAR HIGH COURT PESHAWAR

W.P No. **6084-P**/2019

1. Farhat Yasmeen W/o Muhammad Ishfaq R/o House # 69 / 10-C Sector G-10/3 Islamabad , permanent resident of K.P.K Peshawar
2. Naila Bashir Abbasi W/o Muhammad Naveed Abbasi R/o Gulberg Town House # B-1/8 Street No.1 Islamabad, permanent resident of K.P.K Peshawar
3. Nishat Begum W/o Muhammad Rafiq R/o Muhammadi Town Street No.3 House # 13 Islamabad, permanent resident of K.P.K Peshawar..... Petitioners

Versus

1. Federation of Pakistan through Secretary M/O Education (defunct CAAD), Pak-Secretariat, Islamabad.
2. Director General Federal Directorate of Education (FDE), G-9/4 Islamabad.
3. Secretary, Primary Elementary & Secondary Education Department, Government of KPK, Peshawar
4. Director Primary Elementary & Secondary Education Government of KPK, Peshawar
5. Government of KPK through Advocate General Peshawar..... Respondents

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

Respectfully Sheweth:

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to be true copy

1. That the petitioners are employees of Elementary and Secondary Education Department Govt of KPK Peshawar, who were initially appointed as under:-
 - i. Petitioner No.1 PST Government Girls Primary School Chaman Chowk D.I.Khan
 - ii. Petitioner No. 2 Teacher Government Girls High School Mir

(69)

iii. Petitioner No.3 PST Government Girls Primary School No.1
Bannu City
(Copies of initial appointment Orders are attached as Annexure-
A to A-2 at Page 8-11)

2. That as a matter of fact the husbands of all the petitioners are permanent resident of Islamabad and also employees of Federal Government who are working in different Department at Islamabad. (Copies of Service Record of Petitioners' Husbands are attached as Annexure-B to at Page 12-14)

3. That to facilitate posting of serving of spouses at one station Federal Government as well as Government of Khyber Pakhtunkhwa promulgated wedlock policy with a view to address problems and hardship of families due to posting at different stations of duties. (Copies of spouse polices of the both the Governments i.e Federal as well as Provincial are attached as Annexure-C to C-2 at Page 15-18)

4. That by taking benefit of spouse policy petitioners were transferred from their home districts to Islamabad on deputation through their respective orders by taking NOCs from their respective departments. (Copies of Deputations Orders and NOCs are attached as Annexure-D to D-1 at Page 19-21)

5. That the deputation orders of the petitioners were time and again extended in their favour by the competent authority. (Copies of Extension Orders of Petitioners are attached as Annexure- E-1 to E-2 = P. 22-25)

6. That thereafter Federal Government through different letters dated 18-07-2019, 12-07-2019 & 19-07-2019 in respect of petitioners, *addressed*
to ~~to~~ Elementary and Secondary Education Department requested Government of KPK for issuance of NOCs for extension in the deputation period of petitioners (Copies of Letters are attached as Annexure-E *to E-2 = P. 26-28*)

Attested
to be true copy

(62)

7. That respondent No.3 by adopting a novel procedure issued impugned respective repatriation orders of petitioners in different dates. (Copies of Repatriation Orders are attached as Annexure-G^{to G2} at Page 29-31)

8. That after receiving ^{the} above mentioned repatriation orders, petitioners through their respective representation approached the competent authority for withdrawal of repatriation orders and issuance of NOCs for further extension in their deputation period at Islamabad but that was not decided till date (Copies of Representation are attached as Annexure- H^{H2} at Page 32-38).

9. That the respondent No .3 in order to accommodate their blue eyed issued NOCs for extension of some of the deputationist, despite of the fact that they have completed 5 years deputation period and in some of the cases respondents issued NOCs for permanent absorption of its employees in federal government but they are reluctant for the reason best know to them to issue NOCs in favour of the petitioners. (Copies of latter dated 22.10.2019, 30.10.2017, are attached as annexure I at Page 39-40.)

10. That petitioners having no other speedy and efficacious remedy invoke the Constitutional Jurisdiction of this Hon'able Court inter-alia on the following grounds;

GROUND:

a. That the act of respondents by issuing impugned letters of repatriation and not issuance of formal absorption orders pursuant to approval of Prime Minister Summary dated March 2013 communicated through letter dated 11.11.2014, is illegal, unlawful, void ab-initio and against the principles of natural justice.

b. That the act of respondents is against the law and is in violation of Fundamental Rights contained in Constitution and violative to O.M.

No.8/19/83-P.T.P. 6.03.1983, of the P. & C. Commission hence

c. That the act of respondents is discriminatory which is in clear violation of Article 25 & 27 of the Constitution, 1973 as in some of the cases approval for permanent absorption and as well as extension in the deputation has been issued by official respondents but they are reluctant to accommodate the petitioners.

d. That moreover KPK Government also adopted Spouse Policy of the Federal Government vide Circular Letter No. SORI (S & GAD) 1-1/85 dated 11/7/1998. Hence there is no ambiguity and clash of interest between federal and provincial Government on this issue.

e. That the impugned repatriation order is based on malafide and ulterior motives and against spouse policy adopted by both the Provincial and Federal Governments. Moreover petitioners were on deputation for a period of more than five years so they are entitled for permanent absorption.

f. That the Federal Government issued Letter Dated 16-03-2013 under title of "Absorption of Staff Working Under Federal Directorate of Education Department Islamabad working on deputation basis" wherein summary submitted to PM Secretariat Islamabad for absorption of Teachers who were working on deputation bases.

11 (Copy of Letter Dated 16-03-2013 alongwith absorption orders of some the teachers are attached as Annexure-J at Page 41-49) 4

g. That similarly Federal Government also relaxed the time period of 5 years for deputationist who are working on deputation under wedlock policy and that corresponding amended was made in Rule 20-A of Appointment, Promotion and Transfer Rules 1973, so petitioners are also entitled for that benefit of the same policy. (Copy of Gazetted Notification dated 17-04-2012 alongwith summary for PM dated 10-02-2012) K to K-S = P. - 50 - 56

Attested
to be true copy

PRAYER

It is, therefore, respectfully prayed that by accepting instant writ petition the respondents may graciously be directed to:-

(69)

- i. Issue formal absorption orders of petitioners in the light of Federal Government letter dated 16 March 2013 as issued to other similarly placed employees.
- ii. Declare the impugned Letters of Repatriation as illegal and void abinitio and ineffective upon the rights of petitioners.
- iii. Direction to official respondents to issue NOCs for extension in deputation period till absorption of their services in Federal Government.
- iv. Any other relief, which this Hon'ble Court deems fit and appropriate, may also be awarded.

afant yman
Petitioners

Through

J. Farooq Malik
Mohammad Farooq Malik,
Advocate High Court Peshawar

INTERIM RELIEF

May it please your lordship?

By way of Interim Relief, pending final decision on Writ Petition the impugned Letters dated 14-10-2019, 19-09-2019 and 21-10-2019 of repartitions may graciously be suspended.

afant yman
Petitioners

Through

J. Farooq Malik
Mohammad Farooq Malik,
Advocate High Court Peshawar

CERTIFICATE

Certified that no such Writ Petition has earlier been filed in this Hon'ble Court on behalf of the petitioner.

LIST OF BOOKS

- 1 Constitution of Islamic Republic Of Pakistan, 1973.
- 2 Any other law as per need.

J. Farooq Malik
Advocate
ALISTED
No be true copy

65

BEFORE PESHAWAR HIGH COURT PESHAWAR

W.P No. _____/2019

Farhat Yasmeen & Others..... Petitioners

Versus

FEDERATION OF PAKISTAN etc..... Respondents

AFFIDAVIT

I, Farhat Yasmin W/o Muhammad Ishfaq R/o House # 69 / 10-C Sector G-10/3 Islamabad , do hereby solemnly declare that the accompanying writ petition is true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Farhat Yasmin

DEPONENT

61101-1869853-6

0333-5483014

Identified by

Muhammad Farooq Malik

Muhammad Farooq Malik,
Advocate, Peshawar

Attested
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to be true copy

No.	13005
Certified that the above was verified on solemnly affirmation of	
day of	Nov 09
at	Muhammad Ishfaq
who is	Farhat Yasmin
who is	M. Farooq Malik
<p style="text-align: right;"><i>M</i> 5/11/2019</p>	

BEFORE PESHAWAR HIGH COURT PESHAWAR

W.P No. **5301-P**/2019

66

Ishrat Ara W/o Shoakat Ali R/o Nor Por Shahan Post Office
Khas District and Tehsil Islamabad **Petitioner**

Versus

1. Federation of Pakistan through Secretary M/O Education (defunct CAAD), Pak-Secretariat, Islamabad.
2. Director General Federal Directorate of Education (FDE), G-9/4 Islamabad.
3. Secretary, Primary Elementary & Secondary Education Department, Government of KPK, Peshawar
4. Director Primary Elementary & Secondary Education Government of KPK, Peshawar..... **Respondents**

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

Respectfully Sheweth:

1. That the petitioner is a married female Government Servant and was appointed in Respondent no.3 Department in the year 29/09/2007 as CT Teacher BPS-09.
2. That the husband of the petitioner is resident of Islamabad and also a Government Servant and is serving as constable in the Department of Islamabad Police. Therefore, on basis of Wedlock Policy the petitioner applied for permanent transfer from Govt of KP to Federal Government in pursuance of clause (iii) of the following Policy of Federal Government i.e. Estt.Division's O.M. No.10/30/97-R-II, dated 13-5-1998, published in Estacode-2015, Chapter-3, Serial No. (1.3), which reads as under;

ATTESTED


②

"Posting of serving husband/wife at the same station.- The

Government has taken note of the socio-economic problems and hardship 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:

67

- 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 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 deputation period beyond

N

N

ATTESTED

[Handwritten signature]

the permissible limit may be considered with compassion if interests of public service would permit.

68

2. The above guidelines are subject to the following conditions:-

- i) Posting of husband and wife at the same station should not be made by dislocation of any Government servant already serving at a particular station unless his transfer is necessitated by compelling reasons of public interest or within the framework of general policy of postings and transfers.
- ii) The prescribed selection authority should be consulted in each case.

3. All Government servants whose spouses are in Government service may be asked to furnish at the end of every calendar year the particulars of their spouses to their controlling Ministries/Divisions so as to facilitate maintenance of ICP Charts and up-to-date monitoring of the situation. 4. The above guidelines may be circulated to the autonomous bodies under the charge of Ministries/Divisions for adoption, with such modifications, as may be considered necessary."

3. That the Respondent no 3 issued transfer orders dated 30/04/2013 of the petitioner on deputation for a period of 3 years to IMCG Quid Azam university colony Islamabad, which was extended from time to time. (Copy of Transfer Order dated 11-04-2013, Deputation Order dated 22-03-2013, & Extension in Deputation Period Letter Dated 22-08-2016 are attached as Annexure-A, B & C at Page _____)

4. That thereafter, above Wedlock Policy was permanently adopted by the Federal Government through making amendment in Rule 20-A of Civil Servants (Appointment, Promotion and Transfer) Rules, 1973, vide Notification SRO No.968(I)/82, dated 21-09-2012, contained in Estacode-2015. Chapter 2. Serial No.1. Page No.61. in

ATTESTED

(Sands)

(17)

M "Provided that posting of serving husband and wife at the same station, unmarried female government servants at the place of residence of their parents/family and that of married female government servants at the place of residence/posting of their husbands who are not in government employment **shall be exempted from the said rule.**"

(69)

Meaning thereby, the deputationists have to be reverted back to their parent departments under Rule 20-A *ibid*, but the addition of proviso exempted the petitioner from applicability 'reversion clause' of Rule 20-A.

5. That the Federal Government has also issued an Office Memorandum No.1(28)/75-D.II, dated 06-03-1975, contained in Estacode-2015, Chapter 3, Serial No.10.2, Page No.436-7, wherein the deputationists have been categorized into two different categories;

(17-1)

i. Deputationists who have not yet completed five years deputation period and the Borrowing department has no intention to absorb them;

M ii. **Deputationists who have completed five years deputation period and the borrowing department has not reverted them and has intion to absorb them.**

(17)

Particularly in the Second category, the deputationists would be deemed to be automatically absorbed from the date of expiry of period of five years, and the petitioner fell within the second category, hence in light of both of these Notifications, the petitioner became an absorbed employee of respondent no.2 and her lien was terminated with respondent no.3 after passage of first three years of deputation.

ATTEST

✓ 6. That in the year 2014, the respondent no.1 formally processed the cases of absorption of different deputationists through letter No.F.1-6/2014-Secy(CA&DD), dated 11.11.2014, which reads as under;

79

"It is intimated that approximately 11 female teachers (BS-07 to BS-14) are working in different schools of ICT. Their services were requisitioned by CA&D Division from KPK on deputation under wedlock policy since 2007. These teachers have already completed their 05 years deputation period and have requested for permanent absorption under wedlock policy. Their case for permanent absorption was taken up with the Prime Minister in March 2013 along with other cases and the Prime Minister was pleased to approve their absorption under wedlock policy as per recruitment rules.

The cases of these teachers alongwith other cases are also under consideration for permanent absorption in consultation with Establishment Division. Till such time their cases are not decided, they are allowed to continue working under CA&D Division. List of these teachers is enclosed for information."

7. That since, the formal approval of Prime Minister dated March 2013, the respondent No.2 has yet not issued formal orders of absorption of the petitioner.
8. That on dated 19/09/2019 the respondent no 3 vide office order passed the order of the repatriation of the petitioner to her parent department i.e Elementary and Secondary Education Department Khyber Pakhtunkhwa District Mardan, which act of the respondent is in clear violation of the wedlock policy and rules mentioned above. **(Copy of Impugned Order dated 19-09-2019 is attached as Annexure-D at Page_____)**
9. That aggrieved from above said order of repatriation of official respondent petitioner file a representation before Competent Authority but that Representation was not decided as yet. **(Copy of representation order dated 27-09-2019 is attached as Annexure- E at Page_____)**

10. That petitioner having no other speedy and efficacious remedy is filing instant Constitution Petition under Article 199 of the Constitution of Pakistan, 1973 inter-alia on the following grounds:

71

GROUND:

- a. That the act of respondents of issuing letter dated 19/09/2019 and of not issuance of formal absorption orders pursuant to approval of Prime Minister dated March 2013 communicated through letter dated 11.11.2014, is illegal, unlawful, void ab-initio and against the principles of natural justice.
- b. That the act of respondents is against the law and is violation of Fundamental Rights contained in Constitution 1973 and violative to O.M. No.8/10/83-R.I, dated 06-03-1983 of the Federal Government, hence the same is void ab-initio and is liable to be declared illegal.
- c. That the act of respondents is discriminatory which is in clear violation of Article 25 & 27 of the Constitution, 1973.
- d. That moreover KPK Government also adopted Spouse Policy of the Federal Government vide Circular Letter No. SORI (S & GAD) 1-1/85 dated 11/7/1998. Hence there is no ambiguity and clash of interest ^{with} but federal and provincial Government.
- e. That this Hon'able Court in famous Case "Shoukat Ali Yousafzai Vs Govt of KPK & Others " had also accepted Writ Petition of Petitioner and absorbed the petitioner of that Writ Petition in PMS Cadre and order of this Hon'able Court was also upheld by the Hon'able Supreme Court of Pakistan (Copy of Order dated 19-08-2014 passed in Writ Petition No. 2942-P/2013 alongwith CPLA No. 636-P/2014 alongwith Order dated 22-11-2017 of Supreme Court of Pakistan are attached as Annexure F & G at Page _____)
- f. That the impugned repatriation order is based on malafide and ulterior motives and against spouse policy adopted by both the Provincial and Federal Governments. Moreover petitioner was on

ATTEST

(72)

deputation for a period of more than five years so she is entitled for permanent absorption.


PRAYER

In view of the foregoing circumstances, it is respectfully prayed that by accepting instant writ petition the respondents may kindly be directed to act in accordance with above referred law for and may also be directed to;

- i. Issue formal absorption orders of petitioner w.e.f. 30/04/2013, in Federal Government in the light of above referred amended Rule 20-A of Civil Servants (Appointment, Promotion and Transfer) Rules, 1973
- ii. Declare the impugned Letter dated 19/09/2019 as illegal and void abinitio and ineffective upon the right of petitioner.
- iii. Any other relief, which this Hon'ble Court deems fit and appropriate, may also be awarded.


Petitioner

Through



Mohammad Farooq Malik,
Advocate High Court Peshawar

INTERIM RELIEF

May it please your lordship,
By way of Interim Relief, pending final decision on Writ Petition the impugned Letter dated 19-09-2019 may graciously be suspended.


Petitioner

Through


Mohammad Farooq Malik,
Advocate High Court Peshawar

CERTIFICATE

Certified that no such Writ Petition has earlier been filed in this Hon'ble Court on behalf of the petitioner.

LIST OF BOOKS

- 1 Constitution of Islamic Republic Of Pakistan, 1973.
- 2 Any other law as per need.


Advocate

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73

BEFORE THE PESHAWAR HIGH COURT
PESHAWAR

W.P. No. _____/2019

In the matter of:

MS. ISHRAT ARA

Versus

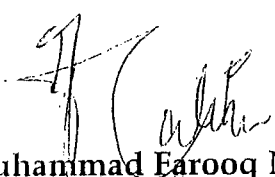
FEDERATION OF PAKISTAN etc

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION, 1973

AFFIDAVIT

I, Ishrat Ara W/o Shoakat Ali R/o Nor Por Shahan Post Office Khas District and Tehsil Islamabad, do hereby solemnly swear and affirm that the contents of accompanied Writ Petition are true and correct according to the best of my knowledge and belief and that nothing had been concealed from this Honorable Court.

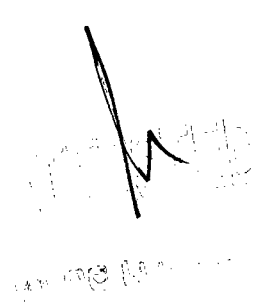
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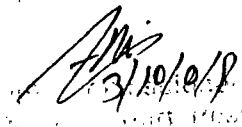

Muhammad Farooq Malik
Advocate High Court


Deponent

CNIC 61101-1103119-6

Cell No. 0347-5372625



9411
Identified this _____
OCT 19 19 _____
Shoakat Ali
Ishrat Ara
Islamabad
m. Farooq

13/10/19

74

Annex: H/1

Judgment Sheet

IN THE PESHAWAR HIGH COURT, PESHAWAR
JUDICIAL DEPARTMENT

W.P.No.5301-P of 2019



Date of hearing... 07.10.2021

Petitioner (s) by Mr. Muhammad Farooq Malik, Advocate.

Respondent (s) by Mr. Muhammad Taufique Qureshi, Deputy Attorney General and Ms. Sophia Noreen, AAG.

JUDGMENT

SHAKEEL AHMAD, J.- This judgment shall decide writ petitions Nos.97-P of 2016, 6084-P/2019, 5301-P/2019, and 6989-P of 2019 as common questions of law and facts are involved therein.

2. All these petitions have been filed to seek an order in terms of Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 directing the respondents to issue formal orders of petitioners in the light of Federal Government letter dated 16th March, 2013 as issued to other similarly placed employees, to issue NOCs for extension in deputation period till absorption, and declaration to the effect that the impugned repatriation letter of the petitioner is illegal.

3. Brief facts of the case are that, initially, petitioners were appointed as PST/PTC/CT (teachers) and were posted at different places of the respondents

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Peshawar High Court

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'department; that the petitioners seek their posting to the places mentioned in their writ petitions, to facilitate the life of spouses at one station in view of the Federal Government as well as Government of Khyber Pakhtunkhwa wedlock policy; that by taking benefit of spouses policy petitioners were transferred from their home districts to different places on deputation through their respective orders by obtaining NOCs from their respective departments and their deputation orders were extended from time to time by the competent authority, however, respondent No.3 issued impugned repatriation orders of petitioners on different dates; that petitioner feeling aggrieved from the aforesaid orders, approached the competent authority for withdrawal of repatriation orders and issuance of NOCS for further extension in their deputation period; that respondent No.3 issued NOCs to some of their blue eyed persons but the petitioners were ignored despite the fact that they have completed 05 years deputation period, hence this petition.

4. We have heard the learned counsel for the parties at great length and scanned the record appended the writ petitions with their valuable assistance.

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Peshawar High Court

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5. It appears from the record that the petitioners were serving on deputation as Teachers under the supervision of Federal Directorate of Education, Islamabad. After expiry of their period of deputation, they applied for issuance of NOCs for the permanent absorption as Teachers in the Federal Directorate of Education at Islamabad. We noted that under similar circumstances a number of Teachers were given NOCs by the Secretary Education, Government of Khyber Pakhtunkhwa, Peshawar through separate office orders, proof whereof were enclosed at page-30 to 37 of the writ petition No.6989-P of 2021.

6. In view of the above, we instead of deciding the fate of these petitions on merit, deem it appropriate to convert all the petitions into representation and send the same to the Secretary, Primary Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa, Peshawar to examine the case of each petitioner in the light of newly added proviso in rule 20-A, after sub-rule (3) of the Civil Servants (Appointment, Promotion & Transfer) Rules, 1973 and earlier office order passed by him, and if, the case of the petitioners falls at par with those School Teachers, they may also be extended similar relief. The Secretary, Primary Elementary & Secondary Education Department,

M. J.
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Peshawar High Court

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Government of Khyber Pakhtunkhwa, Peshawar is directed to decide the representation within a period of one month positively. The writ petition is disposed of in the above terms.



Announced.
07.10.2021
(Ayub)

CHIEF JUSTICE

JUDGE

Self

(DB) Hon'ble Mr. Justice Qaiser Rashid Khan (HCJ)
Hon'ble Mr. Justice Shakeel Ahmad

[Signature]
CERTIFIED TO BE TRUE COPY

EXAMINER
Peshawar High Court
Authorized Under Section 10 of
The Oath-taking Act, 1974

18 OCT 2021

- 10656 -

No.

Date of Presentation of Application 19-10-2021

No of Pages 6 Pages

Copying fee.....

Total 24.00

Date of Preparation of Copy 19-10-2021

Date of Delivery of Copy 19-10-2021

Received By Ambar Nosheen
petitioner

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[Signature]
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78

ANNEXURE:- I

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223587

No. SO(PE)5-2/IPT/02/Peshawar/Mst. Amber Nosheen/Vol-VI/2002-21.
Dated Peshawar the 25-11-2021

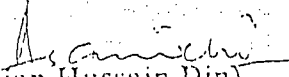
To

Mst. Amber Nosheen (MTT)
Islamabad Model College for Girls,
Lohi Bher, (Federal Area), Islamabad
Under Federal Directorate of Education Islamabad.

Subject: - NOC FOR PERMANENT ABSORPTION.

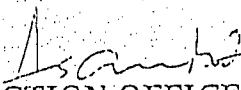
I am directed to refer to your application 21.11.2019 and judgment of the Peshawar High Court Peshawar dated 07.10.2021 passed in writ petition No. 97-P of 2016, on the subject noted above and to state that your request for grant of NOC for extension in the period of deputation till absorption in the Federal Directorate of Education cannot be acceded to being not covered under the relevant policy.

Moreover, you have already been repatriated to your parent department vide this department order No.SO (PE)5-2/IPT/D.I Khan/Mst. Ambar Nosheen PST/Peshawar dated 06.11.2019, therefore, you are directed to report for duty to your parent office i.e office of the District Education Office (F) Peshawar. In case of failure, disciplinary action shall be initiated against you under Rule-9 of E&D rules 2011.


(Mian Hussain Din)
SECTION OFFICER (PE)

Copy forwarded to:-

1. The Secretary Establishment Department, Khyber Pakhtunkhwa w/r to letter No. SOR-1 (E&AD)/1-14/82(Vol-XI) dated 16.08.2007.
2. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar for further necessary action.
3. DEO (F), District Peshawar.
4. District Accounts Officer, District Peshawar.
5. The Admin Officer Schools (F) Government of Pakistan, Federal Directorate of Education Islamabad w/r to his letter No.F.1-9/127-MTT(D)FDE dated 19.07.2019.
6. PS to Secretary E&SE, Khyber Pakhtunkhwa.
7. Master File.


SECTION OFFICER (PE)



79

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223587

No. SO (PE)/E&SED/7-1/Age Relaxation/2021
Dated Peshawar the 23-11-2021

To

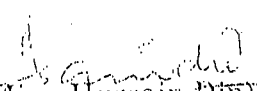
- Mst. Nishat Begum (MTT),
- i. IMSG (I-V) No 1-1-9/4, Islamabad.
 - ii. Muhammadi Town Street No.3 House # 12 Islamabad.

Subject: - NOC FOR EXTENSION IN DEPUTATION PERIOD TILL ABSORPTION.

Dear Sir,

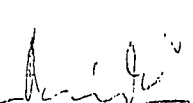
I am directed to refer to your application and judgment of the Peshawar High Court Peshawar dated 07.10.2021 passed in writ petition No. 5301 of 2019, on the subject noted above and to state that your request for grant of NOC for extension in the period of deputation till absorption in the Federal Directorate of Education cannot be acceded to being not covered under the relevant policy.

Moreover, you have already been repatriated to your parent department vide this department order No.SO (PE)5-2/03/IPT/Bannu/Vol-IV dated 21.10.2019, therefore, you are directed to report for duty to your parent office i.e office of the District Education Office (F) Bannu. In case of failure, disciplinary action shall be initiated against you under Rule-9 of E&D rules 2011.


(Mian Hussain Dini)
SECTION OFFICER (PE)

Copy forwarded to:-

1. The Secretary Establishment Department, Khyber Pakhtunkhwa w/r to letter No. SOR-I E&AD/I-14/82/Vol. XXIV dated 06.07.2012.
2. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to his letter No. 1840/F.No.A-30/IPT(F)D.I Division dated 18.06.2012.
3. The Admn Officer Schools (F) Govt. of Pakistan, Federal Directorate of Education, Islamabad w/r to letter No. F.1-9/134-MMT(D)FDE dated 19.07.2019 with the request to relieve the teacher concerned immediately.
4. DEO (F), District Bannu.
5. District Account Officer, District Bannu.
6. PS to Secretary E&SE, Khyber Pakhtunkhwa.
7. Master File.


SECTION OFFICER (PE)



(82) Annex 1

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223587

No. SO(PE)5-2/IPT/02/Mardan/Mst. Ishrat Ara Bibi /CT/2011-21.
Dated Peshawar the 24-11-2021

To

Mst. Ishrat Ara Bibi (CT),
GGHS Ikram Pur District Mardan,
presently posted TGT (BS-16) at Islamabad Model College for Girls QAU
Colony, Islamabad.

Subject: - NOC FOR PERMANENT ABSORPTION.

I am directed to refer to your application 27.09.2019 and judgment of the Peshawar High Court Peshawar dated 07.10.2021 passed in writ petition No. 5301-P of 2019, on the subject noted above and to state that your request for grant of NOC for extension in the period of deputation till absorption in the Federal Directorate of Education cannot be acceded to being not covered under the relevant policy.

Moreover, you have already been repatriated to your parent department vide this department order No. SO(PE)5-2/IPT/02/Mardan/Mst. Ishrat Ara Bibi /CT/2011 dated 19.09.2019, therefore, you are directed to report for duty to your parent office i.e office of the District Education Office (F) Mardan. In case of failure, disciplinary action shall be initiated against you under Rule-9 of E&D rules 2011.

(Mian Hussain Din)
SECTION OFFICER (PE)

Copy forwarded to:-

1. The Secretary Establishment Department, Khyber Pakhtunkhwa w/r to letter No. SOR-1 (E&AD)/1-14/2015 dated 02.03.2017.
2. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to letter No. 933/P.File Ihsrat Ara CT/IPT dated 03.02.2017.
3. DEO (F), District Mardan.
4. District Accounts Officer, District Mardan.
5. The Assistant Director Schools (F) Government of Pakistan, Federal Directorate of Education Islamabad w/r to his letter No.F.9-14/1761-D/(W)FDE dated 23.02.2016.
6. PS to Secretary E&SE, Khyber Pakhtunkhwa.
7. Master File.

SECTION OFFICER (PE)

ATTESTED

ATTESTED

DM
4-11-2021



The Admin Officer Schools (Female)
Federal Directorate of Education,
Government of Pakistan,
Islamabad.

REQUEST FOR ISSUANCE OF NOC FOR DEPUTATION PERIOD

I am directed to refer to the subject noted and to enclose herewith a copy of an

application bearing No. 381 dated 21.10.2019 in respect of Mrs. Rashida Hina, PST (BS-12),
CGPS No.1, Sabir Abad, District Karak, Khyber Pakhtunkhwa, presently working in Federal
Directorate of Education, Government of Pakistan, Islamabad and to state that the lady teacher
concerned has already completed her five years deputation period and there is no provision to
further extend her deputation period as per deputation policy of this province.

You are, therefore, requested to accept her services on permanent basis in Federal

Directorate of Education, Islamabad as per policy/rules of the Federal Government, please.

Your faithfully,

SECTION OFFICER (PRIMARY)

[Signature]

Ends of even number & date:

- 1. The Director, Elementary & Secondary Education, KPK, Peshawar.
- 2. The District Education Officer (Female), Karak.
- 3. PS to Secretary, E&SE Department, Peshawar.
- 4. Mst. Rashida Hina, IMCO, Maira Begwal, F/A, Islamabad.

Attested

to be true copy

SECTION OFFICER (PRIMARY)

[Signature]

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
NO. SO (PE)/5-2 IPT/KARAK/MST. RASHIDA HINA PST2014
DATED PESHAWAR THE 22.10.2019

To,

The Admin Officer Schools (Female)
Federal Directorate of Education
Government of Pakistan
Islamabad

Subject:- **REQUEST FOR ISSUANCE OF NOC FOR DEPUTATIONIST**

Dear Sir,

I am directed to refer to the subject noted and to enclose herewith a copy of an application bearing no. 381 dated 21-10-2019 in respect of Mst. Rashida Hina PST (BS-12) , GGPS No. 1 Sabir Abad, District Karak , Khyber Pakhtunkhwa, presently working in Federal Directorate of Education, Government of Pakistan Islamabad and to state that they lady teacher concerned has already completed her five years deputation period and there is no provision to further extend her deputation period as per deputation policy of this province.

You are, therefore, requested to accept her services on permanent basis in Federal Directorate of Education, Islamabad as per policy / rules of the Federal Government, please.

Yours faithfully

SECTION OFFICER (PRIMARY)

Encl: As above

Ends of Even Number and Date:

Copy for information to

1. The Director Elementary and Secondary Education KPK Peshawar
2. The District Education Officer (Female) Karak
3. PS to Secretary E & SE Department Peshawar
4. Mst. Rashid Hina , IMCG, Maira, Begwal, F/A Islamabad

10/22/19

SECTION OFFICER (PRIMARY)

REGISTERED



GOVERNMENT OF
- KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the 30.10.2017

NOTIFICATION.

No.S.O(PE)E&SED/5-2/06/IPT/Swat/Mst. Farkhanda Nazli (Deputationist): In pursuance of the NOC/sanction issued by the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, vide letter No.SOR-I/E&AD/1-14/2006 dated 26.02.2009, the services of Mst.Farkhanda Nazli SST GGMS Sumbat District Swat, is hereby extended for a period of further two years w.e.f 16.10.2016 to 15.10.2018, total period of deputation including the instant extension come out to be seven(07) years.

2. Consequent upon the above, the SST concerned is allowed to carry out her duties already placed at the disposal of Federal Directorate of Education Govt. of Pakistan Islamabad.
3. No TA/DA is allowed

SECRETARY

Indst: of even No. & date:

Copy forwarded to the: -

- 1- Accountant General Khyber Pakhtunkhwa Peshawar
- 2- Director E&SE Khyber Pakhtunkhwa Peshawar
- 3- Director Schools (Female) Govt. of Pakistan Federal Directorate of Education Islamabad.
- 4- Section Officer (R-1) Establishment Department.
- 5- PS to Chief Secretary Khyber Pakhtunkhwa
- 6- PS to Secretary E&SE Department.
- 7- Incharge EMIS E&SE Department
- 8- Ms.Farkhanda Nazli SST GGMS Sumbat District Swat (Deputationist).
- 9- Office order file
- 10-Master file

(NAIK MUHAMMAD)
SECTION OFFICER (PRIMARY)

Attested

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85

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 19-09-2013.

ORDER


No. SO(PE)5-2/Kohat/Siraj Begum PST. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR-1 (E&AD)1-14/82/Vol:27 dated 18-09-2013, the services of Mrs. Siraj Begum PST GCPS Togh Bala NO.1 District Kohat (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis without retaining her lien in the E&SE Department.

SECRETARY

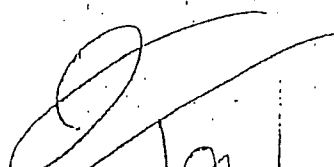
Enclst. No. & Date as above.


Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female), Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No.F.2013/P.A.-Dep/14-16-17(W) FDE dated 19-08-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer (F) Elementary & Secondary Education Kohat.
5. The District Accounts Officer Kohat.
6. Mrs. Siraj Begum PST GCPS Togh Bala NO.1 District Kohat.


20.9.2013
(HINA SAEED)

SECTION OFFICER (PRIMARY)


23/9

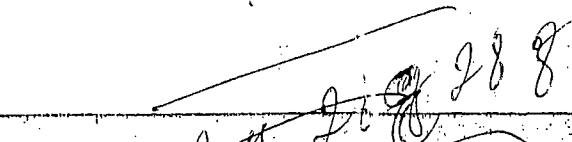

Mrs. Za Iba Mansoor
Assistant Professor Physics
Fazaia Inter College Kohat

Attested

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Attested

to be true copy


28/9

Attested

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IMMEDIATE
By S.M

No.F.4-57/2011 (Education)
Government of Pakistan
Ministr, of Capital Administration and Development

Islamabad: the March 16, 2013

Subject: ABSORPTION OF STAFF UNDER FEDERAL DIRECTORATE OF EDUCATION (FDE), ISLAMABAD WORKING ON DEPUTATION BASIS

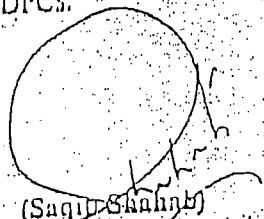
I am directed to state that in response to a summary submitted to the Prime Minister's Secretariat, Islamabad seeking approval of the Prime Minister for absorption of staff working in the educational institutions under Federal Directorate of Education (FDE), Islamabad the Prime Minister has been pleased to approve absorption of all deputationists (teaching & non-teaching) working under FDE, Islamabad on deputation basis under Wedlock Policy and completed their 05 years of deputation subject to provision in the Recruitment Rules and after fulfillment / completion of all codal / procedural formalities as contained under Civil Servants Act, 1973.

FDE is, therefore, requested that the below given information may be submitted to this Ministry immediately so that process for absorption of the deputationists may be initiated / completed, accordingly:

- a. Institution-wise list of all the deputationists (male & female) (teaching non-teaching) as per enclosed Performa (Annex-1).
- b. Copies of the Recruitment Rules for each cadre posts where a deputationist is likely to be absorbed.
- c. MOC from the respective parent departments for each deputationist regarding permanent absorption under FDE, Islamabad.
- d. ACRs / PERs grading for the last 05 years.

After completion of the necessary documentation procedure of the deputationists, their cases will be placed before the respective DPCs.

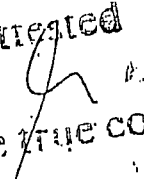
This may please be treated on PRIORITY.

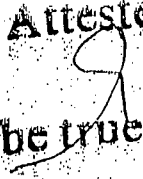

(Saqib Shahab)
Assistant Educational Advisor

The Director General
Federal Directorate of Education (FDE),
Islamabad.

Copy to:

- i) P.S to the Secretary, M/o CA&D, Islamabad.
- ii) P.A to J.E.A (Education), M/o CA&D, Islamabad.

Attested

to be true copy

Attested

to be true copy

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of u.s?

Attested


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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Dated Peshawar the 11-10-2013

ORDER.

No.SO(PE)5-2//IPT/Swabi/Hafsa Bibi PST/2013. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR-I (E&AD)1-14/82/Vol.27 dated 11-10-2013, the services of Mrs. Hafsa Bibi PST GGPS Gabai (Gadoon) District Swabi (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis without retaining her lien in the E&SE Department.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No.F:2013/P.A.-Dep/14-16-17(W) FDE dated 12-09-2013,
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer (F) Elementary & Secondary Education Swabi.
5. The District Accounts Officer Swabi.
6. Mrs. Hafsa Bibi PST GGPS Gabai (Gadoon) District Swabi

(Signature)
(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

Attested
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ANNEXURE-5/5



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Dated Peshawar the 26-11-2013

ORDER

No. SO(PE)5-P/PT/Zarqa Ishaq DM/Abbottabad. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR-1 (E&AD)1-14/82 dated 13-11-2013, the services of Mrs.Zarqa Ishaq DM CGMS Baran Gali Abbottabad (Khyber Pakhtunkhwa) is hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis on the condition that no right of lien will be retained by her in E&SE Department Khyber Pakhtunkhwa.

SECRETARY

Ends: No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Primary) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter NO.F.2013/P.A.Dop/14-16-17(W)/PDE dated 29-10-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer (F) Elementary & Secondary Education Abbottabad.
5. The District Accounts Officer Abbottabad.
6. Mrs.Zarqa Ishaq DM CGMS Baran Gali Abbottabad.

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

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ANNEXURE

FROM: LTEL PESHAWAR BRANCH

FILE NO. 1091 2262279

SEP. 24 2013 09:35AM (P)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 19-09-2013.

ORDER

No.SO(PE)5-2/IPT/Rubina Bibi PST/Abbottabad. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR-1 (E&AD)1-14/82/Vol.27 dated 18-09-2013, the services of Mrs. Rubina Bibi PST GGPS District Abbottabad (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad (FDE) on permanent basis without retaining her lien in the E&SE Department.

SECRETARY

Encl. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No.F.2013/P.A.-Dep/14-16-17(W) FDE dated 26-08-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer (F) Elementary & Secondary Education Chitral.
5. The District Accounts Officer Chitral.
6. Mrs. Rubina Bibi PST GGPS District Abbottabad.

(HINA SAEED)

SECTION OFFICER (PRIMARY)

Attested

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Dated Peshawar the 11-10-2013

ORDER.

No. SO(PE)5-2/IPT/Shahida Malik PST/Abbottabad. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR-I (E&AD)1-14/82/Vol.27 dated 24-09-2013, the services of Mrs. Shahida Malik PST GGPS Kokal Tehsil and District Abbottabad (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis on the condition that no right of lien will be retained by her in E&SE Department Khyber Pakhtunkhwa.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No.F.2013/P.A.-Dep/14-16-17(W) FDE dated 12-09-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer (F) Elementary & Secondary Education Abbottabad.
5. The District Accounts Officer Abbottabad.
6. Mrs. Shahida Malik PST GGPS Kokal Tehsil and District Abbottabad.

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SECTION OFFICER (PRIMARY)

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 17-08-2016

Notification

No. SO(PE)5-2/IPT/Abbottabad/Mst. Farhat Bibi & Parveen Abbasi PST/08: The services of Mst. Farhat Bibi PST, GGPS Romatti, District Abbottabad (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis on the condition that no right of lien will be retained by her in E&SE Department Khyber Pakhtunkhwa.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter No. SOR-1 (E&AD)1-14/82 dated 07/03/2016.
2. The Deputy Director School (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No. F.2015./P.A/14-15/(W)FDE dated 16/12/2015
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer (F), District Abbottabad.
5. The District Accounts Officer District Abbottabad.
6. Mst. Farhat Bibi PST, GGPS Romatti, District Abbottabad.

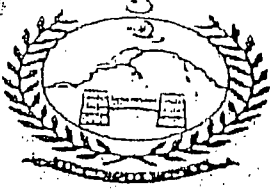
(Signature)
 (MUHAMMAD NASIR KHAN)
 SECTION OFFICER (PRIMARY)

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 17-08-2016

Notification

No. SO(PE)S-2/IPT/08/Battagram: The services of Mst. Ruqia Shafi AT, GGHS Tickari Khareri, District Battagram, (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis on the condition that no right of lien will be retained by her in E&SE Department Khyber Pakhtunkhwa.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter No. SOR-I (E&AE) 1-14/82 dated 04/03/2016.
2. The Deputy Director School (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No. F.2015./P.A/14-15/(W)FDE dated 29/06/2015
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer (F), District Battagram.
5. The District Accounts Officer District Battagram.
6. Mst. Ruqia Shafi AT, GGHS Tickari Khareri, District Battagram.

(MUHAMMAD NASIR KHAN)
SECTION OFFICER (PRIMARY)

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 19-09-2013.

ORDER

No SO(PE)5-2/IPT/Farhat Sultana PST/Abbottabad. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR-I (E&AD)1-14/82/Vol.27 dated 18-09-2013, the services of Mrs. Farhat Sultana CT GGHS Mirpur District Abbottabad (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis without retaining her lien in the E&SE Department.

SECRETARY

Endst. No. & Date as above

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No.F.2013/P.A.-Dep/14-16-17(W) FDE dated 20-08-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer(F) Elementary & Secondary Education Chitral.
5. The District Accounts Officer Chitral.
6. Mrs. Farhat Sultana CT GGHS Mirpur District Abbottabad.

(HINA SAEED)

SECTION OFFICER (PRIMARY)

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~~ATTENTION~~



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the 30.10.2017

NOTIFICATION.

No.S.O(PE)E&SED/5-2/06/IPT/Swat/Mst. Farkhanda Nazli (Deputationist): In pursuance of the NOC/sanction issued by the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa. vide letter No.SOR-I/E&AD/1-14/2006 dated 26.02.2009, the services of Mst.Farkhanda Nazli SST GGMS Sumbat District Swat, is hereby extended for a period of further two years w.e.f 16.10.2016 to 15.10.2018, total period of deputation including the instant extension come out to be seven(07) years.

2. Consequent upon the above, the SST concerned is allowed to carry out her duties already placed at the disposal of Federal Directorate of Education Govt. of Pakistan Islamabad.
3. No TA/DA is allowed

SECRETARY

Endst: of even No. & date:

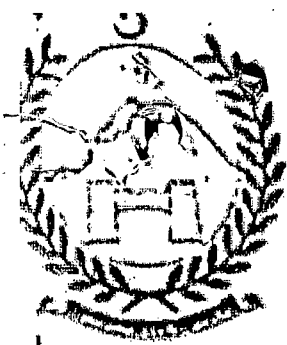
Copy forwarded to the: -

- 1- Accountant General Khyber Pakhtunkhwa Peshawar
- 2- Director E&SE Khyber Pakhtunkhwa Peshawar
- 3- Director Schools (Female) Govt. of Pakistan Federal Directorate of Education Islamabad.
- 4- Section Officer (R-I) Establishment Department.
- 5- PS to Chief Secretary Khyber Pakhtunkhwa
- 6- PS to Secretary E&SE Department.
- 7- Incharge EMIS. E&SE Department
- 8- Ms.Farkhanda Nazli SST GGMS Sumbat District Swat (Deputationist).
- 9- Office order file
- 10-Master file


(NAIK MUHAMMAD)
SECTION OFFICER (PRIMARY)

Attested

10/10/2017



194

better copy

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
No. SO(PE)/5-2/IPT/Karak/Mst. Rashida Hina PST/2014
Dated Peshawar the 22.10.2019

The Admin Officer Schools (Female)
Federal Directorate of Education,
Government of Pakistan,
Islamabad.

Subject: - REQUEST FOR ISSUANCE OF NOC FOR DEPUTATION PERIOD

Dear Sir,

I am directed to refer to the subject noted and to enclose herewith a copy of an application bearing No. 381 dated 21.10.2019 in respect of Mst. Mst. Rashida Hina, PST (BS-12), GGPS No.1, Sabir Abad, District Karak, Khyber Pakhtunkhwa, presently working in Federal Directorate of Education, Government of Pakistan, Islamabad and to state that the lady teacher concerned has already completed her five years deputation period and there is no provision to further extend her deputation period as per deputation policy of this province.

You are, therefore, requested to accept her services on permanent basis in Federal Directorate of Education, Islamabad as per policy/rules of the Federal Government, please.

Yours faithfully,

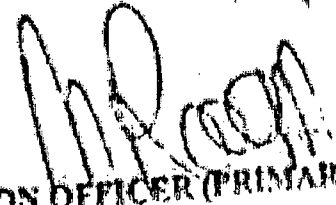
Encl: As above.


SECTION OFFICER (PRIMARY)

End: of even number & date:

Copy for information to:

1. The Director, Elementary & Secondary Education, KPK, Peshawar.
2. The District Education Officer (Female), Karak.
3. PS to Secretary, E&SE Department, Peshawar.
4. Mst. Rashida Hina, IMCG, Maira Begwal, F/A, Islamabad.


SECTION OFFICER (PRIMARY)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 19-09-2013.

95

ORDER

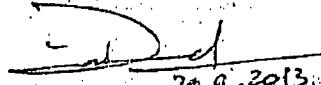
No. SO(PE)5-2/Kohat/Siraj Begum PST. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR-I (E&AD)1-14/82/Vol.27 dated 18-09-2013, the services of Mrs. Siraj Begum PST GGPS Togh Bala NO.1 District Kohat (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis without retaining her lien in the E&SE Department.

SECRETARY


Enclst. No. & Date as above.

Copy forwarded to:-


1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No.F.2013/P.A.-Dep/14-16-17(W) FDE dated 19-08-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer(F) Elementary & Secondary Education Kohat.
5. The District Accounts Officer Kohat.
6. Mrs. Siraj Begum PST GGPS Togh Bala NO.1 District Kohat.


20-9-2013
(HINA SAEED)

SECTION OFFICER (PRIMARY)


Mrs. Za Iqa Mansoor
Assistant Professor Physics
Fazala Inter College Kohat


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96



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Dated Peshawar the 11-10-2013

ORDER.

No.SO(PE)5-2//IPT/Swabi/Hafsa Bibi PST/2013. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR-I (E&AD)1-14/82/Vol.27 dated 11-10-2013, the services of Mrs. Hafsa Bibi PST GGPS Gabai (Gadoon) District Swabi (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis without retaining her lien in the E&SE Department.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No.F.2013/P.A.-Dep/14-16-17(W) FDE dated 12-09-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer (F) Elementary & Secondary Education Swabi.
5. The District Accounts Officer Swabi.
6. Mrs. Hafsa Bibi PST GGPS Gabai (Gadoon) District Swabi

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(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

RECEIVED
11-10-2013



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Dated Peshawar the 26-11-2013

97

ORDER.

No. 50(PE)S-2/IPT/Zarqa IshaqDM/Abbottabad. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR-I (E&AD)1-14/82 dated 13-11-2013, the services of Mrs.Zarqa Ishaq DM GGMS Baran Gali Abbottabad (Khyber Pakhtunkhwa) is hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis on the condition that no right of lien will be retained by her in E&SE Department Khyber Pakhtunkhwa.

SECRETARY.

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter NO.P.2013/P.A.Dep/14-16-17(W)FDE dated 29-10-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer (F) Elementary & Secondary Education Abbottabad.
5. The District Accounts Officer Abbottabad.
6. Mrs.Zarqa Ishaq DM GGMS Baran Gali Abbottabad.

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

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to be true copy

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 19-09-2013.

ORDER

No.SO(PE)5-2/IPT/Rubina Bibi PST/Abbottabad. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter.No.S&R-1 (E&AD)1-14/82/Vol.27 dated 18-09-2013, the services of Mrs. Rubina Bibi PST GGPS District Abbottabad (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis without retaining her lien in the E&SE Department.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No.F.2013/P.A.-Dep/14-16-17(W) FDE dated 26-08-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer(F) Elementary & Secondary Education Chitral.
5. The District Accounts Officer Chitral.
6. Mrs. Rubina Bibi PST GGPS District Abbottabad.

(HINA SAEED) 20-9-2013

SECTION OFFICER (PRIMARY)

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ATTESTED

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Dated Peshawar the 11-10-2013

ORDER.

No. SO(PE)5-2/IPT/Shahida Malik PST/Abbottabad. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR-I (E&AD)1-14/82/Vol.27 dated 24-09-2013, the services of Mrs. Shahida Malik PST GGPS Kokal Tehsil and District Abbottabad (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis on the condition that no right of lien will be retained by her in E&SE Department Khyber Pakhtunkhwa.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No.F.2013/P.A.-Dep/14-16-17(W) FDE dated 12-09-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer(F) Elementary & Secondary Education Abbottabad.
5. The District Accounts Officer Abbottabad.
6. Mrs. Shahida Malik PST GGPS Kokal Tehsil and District Abbottabad.

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SECTION OFFICER (PRIMARY)

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 17-08-2016

Notification

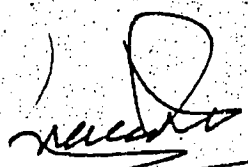
No. SO(PE)5-2/IPT/Abbottabad/Mst. Farhat Bibi & Parveen Abbasi PST/98: The services of Mst. Farhat Bibi PST, GGPS Romatti, District Abbottabad (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis on the condition that no right of lien will be retained by her in E&SE Department Khyber Pakhtunkhwa.

SECRETARY


Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter No. SOR-I (E&AD)1-14/82 dated 07/03/2016.
2. The Deputy Director School (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No. F.2015./P.A/14-15/(W)FDE dated 16/12/2015
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer (F), District Abbottabad.
5. The District Accounts Officer District Abbottabad.
6. Mst. Farhat Bibi PST, GGPS Romatti, District Abbottabad.


 (MUHAMMAD NASIR KHAN)
 SECTION OFFICER (PRIMARY)


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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 17-08-2016

Notification

No. SO(PE)5-2/IPT/08/Battagram: The services of Mst. Ruqia Shafi AT, GGHS Tickari Khareri, District Battagram, (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis on the condition that no right of lien will be retained by her in E&SE Department Khyber Pakhtunkhwa.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter No. SOR-I (E&AD)1-14/82 dated 04/03/2016.
2. The Deputy Director School (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No. F.2015./P.A/14-15/(WFDE) dated 29/06/2015
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer (F). District Battagram.
5. The District Accounts Officer District Battagram.
6. Mst. Ruqia Shafi AT, GGHS Tickari Khareri, District Battagram.

(MUHAMMAD NASIR KHAN)
SECTION OFFICER (PRIMARY)

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ATTENDED

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 19-09-2013.

ORDER

No SO(PE)5-2/IPT/Farhat Sultana PST/Abbottabad. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR-I (E&AD)1-14/82/Vol.27 dated 18-09-2013, the services of Mrs. Farhat Sultana CT GGHS Mirpur District Abbottabad (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis without retaining her lien in the E&SE Department.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No.F.2013/P.A.-Dep/14-16-17(W) FDE dated 20-08-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer(F) Elementary & Secondary Education Chitral.
5. The District Accounts Officer Chitral.
6. Mrs. Farhat Sultana CT GGHS Mirpur District Abbottabad.

(HINA SAEED)

SECTION OFFICER (PRIMARY)

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23/09/13

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No. F.1-9/127-EST (D) FDE
Government of Pakistan
Federal Directorate of Education

Amber, "K"
By Registered

Islamabad: December 28, 2021

OFFICE ORDER

In pursuance of the Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Peshawar's letter dated 18.09.2007, the services of Ms. Amber Nosheen, PTC, Government Girls Primary School Ghari Abdul Samad District Peshawar were taken on deputation basis against the post of Matric Trained Teacher (BPS-09) in her own pay & grade vide Federal Directorate of Education, Islamabad's office order dated 01-10-2007.

2. This Directorate has received letter from Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa vide letter No. SO (PE) 5-2/IPT/02/Peshawar/Mst.AmberNosheen/Vol-VI/2002-21 dated 23-11-2021 wherein the directions for Ms. Amber Nosheen are reproduced as under:-

".....that your request for grant of NOC for extension in the period of deputation till absorption in FDE cannot be acceded to being not covered under the relevant policy. Moreover, you have already been repatriated to your Parent Department vide this department order No. SO (PE) 5-2/IPT/D.I.Khan/Mst. Amber Nosheen PST/Peshawar dated 06.11.2019, therefore, you are directed to report for duty to your parent office i.e office of the District Education Office (F), Peshawar. In case of failure disciplinary action shall be initiated against you under rules-9 of Efficiency & Disciplinary Rules-2011."

3. Therefore, pursuant to the above directions, Ms. Amber Nosheen, PTC, Government Girls Primary School Ghari Abdul Samad District Peshawar presently working as Elementary School Teacher (BPS-14), Islamabad Model College for Girls, Lohi Bheer, Islamabad is advised, in her own interest, to immediately report back to her parent department in compliance with the direction of her parent department i.e Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa.

4. This issues with the approval of Competent Authority.

(ALI AZHAR)

Assistant Director (Schools/Female)

Distribution:

- i. AGPR, Islamabad
- ii. APS to Director General, FDE.
- iii. Secretary to Govt. of Khyber Pakhtunkhwa, Establishment & Admin. Department, Peshawar
- iv. Director, Elementary & Secondary Education Department, Govt of Khyber Pakhtunkhwa, Peshawar
- v. District Education Officer (Female), District Peshawar.
- vi. Director (Schools), FDE, Islamabad.
- vii. Area Education Officer (Urban-II), Islamabad.
- viii. Principal/ DDO, Islamabad Model College for Girls, Lohi Bheer, Islamabad.
- ix. District Account Officer, District Peshawar.
- x. Section Officer (PE), Elementary & Secondary Education Department, Govt of Khyber Pakhtunkhwa, Peshawar with reference to his office letter No. SO (PE) 5-2/IPT/02/Peshawar/Mst.AmberNosheen/Vol-VI/2002-21 dated 23-11-2021
- xi. Ms. Amber Nosheen, EST (BPS-14), Islamabad Model College for Girls, Lohi Bheer, Islamabad
- xii. Master File.

(ALI AZHAR)

Assistant Director (Schools/Female)

104

By Registered

No. F.1-9/60-EST (D) FDE
Government of Pakistan
Federal Directorate of Education

Islamabad: December 28, 2021

OFFICE ORDER

In pursuance of the Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Peshawar's letter dated 27-04-2004, the services of Ms. Farhat Yasmeen, PST, Government Girls Primary School No.1 Chann Chowk, Dera Ismail Khan were taken on deputation basis against the post of Elementary School Teacher (BPS-14) in her own pay & grade vide Federal Directorate of Education, Islamabad's office order dated 26-05-2004.

2. This Directorate has received letter from Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa vide letter No. SO (PE) 5-2/IPT/02/D.I.Khan/Mst. Farhat Yasmeen/PST/2013-21 dated 24-11-2021 wherein the directions for Ms. Farhat Yasmeen are reproduced as under:-

".....that your request for grant of NOC for extension in the period of deputation till absorption in FDE cannot be acceded to being not covered under the relevant policy. Moreover, you have already been repatriated to your Parent Department vide this department order No. SO (PE) 5-2/IPT/02/D.I.Khan/Mst. Farhat Yasmeen/PST/2013 dated 14-10-2019, therefore, you are directed to report for duty to your parent office i.e office of the District Education Office (F), D.I.Khan. In case of failure disciplinary action shall be initiated against you under rules-9 of Khyber Pakhtunkhwa Efficiency & Disciplinary Rule-2011."

3. Therefore, pursuant to the above directions, Ms. Farhat Yasmeen, PST, Government Girls Primary School No.1, Chaman Chowk, Dera Ismail Khan presently working as Elementary School Teacher (BPS-14), Islamabad Model School (I-V), G-9/1, Islamabad is advised, in her own interest, to immediately report back to her parent department in compliance with the direction of her parent department i.e Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa

4. This issues with the approval of Competent Authority.


(ALI AZHAR)
Assistant Director (Schools/Female)

Distribution:

- i. AGPR, Islamabad.
- ii. APS to Director General, FDE.
- iii. Secretary to Govt. of Khyber Pakhtunkhwa, Establishment & Admin. Department, Peshawar
- iv. Director, Elementary & Secondary Education Department, Govt. of Khyber Pakhtunkhwa, Peshawar
- v. District Education Officer (Female), District D.I. Khan.
- vi. Director (Schools), FDE, Islamabad.
- vii. Area Education Officer (Urban-II), Islamabad.
- viii. Principal/ DDO, Islamabad Model School (I-V), G-9/1, Islamabad.
- ix. District Account Officer, District D. I. Khan.
- x. Section Officer (PE), Elementary & Secondary Education Department, Govt of Khyber Pakhtunkhwa, Peshawar with reference to his office letter No. SO (PE) 5-2/IPT/02/D.I.Khan/Mst. Farhat Yasmeen/PST/2013-21 dated Peshawar 24-11-2021.
- xi. Ms. Farhat Yasmeen, EST (BPS-14), Islamabad Model School (I-V), G-9/1, Islamabad.
- xii. Master File.

ATTESTED
ATTESTED

(ALI AZHAR)
Assistant Director (Schools/Female)



(105)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223587

No. SO(PE)5-2/IPT/02/Mardan/Mst. Ishrat Ara Bibi /CT/2011-21.
Dated Peshawar the 24-11-2021

To

Mst. Ishrat Ara Bibi (CT),
GGHS Ikram Pur District Mardan,
presently posted TGT (BS-16) at Islamabad Model College for Girls QAU
Colony, Islamabad.

Subject: - NOC FOR PERMANENT ABSORPTION.

I am directed to refer to your application 27.09.2019 and judgment of the Peshawar High Court Peshawar dated 07.10.2021 passed in writ petition No. 5301-P of 2019, on the subject noted above and to state that your request for grant of NOC for extension in the period of deputation till absorption in the Federal Directorate of Education cannot be acceded to being not covered under the relevant policy.

Moreover, you have already been repatriated to your parent department vide this department order No. SO(PE)5-2/IPT/02/Mardan/Mst. Ishrat Ara Bibi /CT/2011 dated 19.09.2019, therefore, you are directed to report for duty to your parent office i.e office of the District Education Office (F) Mardan. In case of failure, disciplinary action shall be initiated against you under Rule-9 of E&D rules 2011.

(Mian Hussain Din)
SECTION OFFICER (PE)

Copy forwarded to:-

1. The Secretary Establishment Department, Khyber Pakhtunkhwa w/r to letter No. SOR-1 (E&AD)/1-14/2015 dated 02.03.2017.
2. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to letter No. 933/P.File Ihsrat Ara CT/IPT dated 03.02.2017.
3. DEO (F), District Mardan.
4. District Accounts Officer, District Mardan.
5. The Assistant Director Schools (F) Government of Pakistan, Federal Directorate of Education Islamabad w/r to his letter No.F.9-14/1761-D/(W)FDE dated 23.02.2016.
6. PS to Secretary E&SE, Khyber Pakhtunkhwa.
7. Master File.

SECTION OFFICER (PE)

ATTESTED

ATTESTED

DM
4-11-2021



(pob)

ANNEX - 1

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223587

No. SO (PE)/E&SED/7-1/Age Relaxation/2021
Dated Peshawar the 23-11-2021

To

Mst. Nishat Begum (MTT),

i. IMSG (I-V) No 11-9/4, Islamabad.

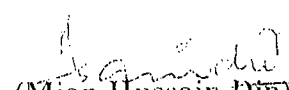
ii. Muhammadi Town Street No.3 House # 12 Islamabad.

Subject: - **NOC FOR EXTENSION IN DEPUTATION PERIOD TILL ABSORPTION.**

Dear Sir,


I am directed to refer to your application and judgment of the Peshawar High Court Peshawar dated 07.10.2021 passed in writ petition No. 5301 of 2019, on the subject noted above and to state that your request for grant of NOC for extension in the period of deputation till absorption in the Federal Directorate of Education cannot be acceded to being not covered under the relevant policy.

Moreover, you have already been repatriated to your parent department vide this department order No.SO (PE)5-2/03/IPT/Bannu/Vol-IV dated 21.10.2019, therefore, you are directed to report for duty to your parent office i.e office of the District Education Office (F) Bannu. In case of failure, disciplinary action shall be initiated against you under Rule-9 of E&D rules 2011.


(Mian Hussain Dini)
SECTION OFFICER (PE)

Copy forwarded to:-

1. The Secretary Establishment Department, Khyber Pakhtunkhwa w/r to letter No. SOR-I E&AD/T-14/82/Vof.XXIV dated 06.07.2012.
2. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to his letter No. 1840/F.No.A-30/IPT(F)D.I Division dated 18.06.2012.
3. The Admn Officer Schools (F) Govt. of Pakistan, Federal Directorate of Education, Islamabad w/r to letter No. F.1-9/134-MMT(D)FDE dated 19.07.2019 with the request to relieve the teacher concerned immediately.
4. DEO (F), District Bannu.
5. District Account Officer, District Bannu.
6. PS to Secretary E&SE, Khyber Pakhtunkhwa.
7. Master File.


SECTION OFFICER (PE)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223587

No. SO(PE)5-2/IPT/04/Lakki Marwat/Mst.Shahana Begum/Vol-II/2002-21.

Dated Peshawar the 23-11-2021

To

107

Mst. Shahana Begum (PST),
MTT, Islamabad Model School (I-V) G-10/4, Islamabad,
Under Federal Directorate of Education, Islamabad,

Subject: - **NOC FOR PERMANENT ABSORPTION.**

I am directed to refer to your application dated 14.11.2019 and judgment of the Peshawar High Court Peshawar dated 07.10.2021 passed in writ petition No. 97-P of 2019, on the subject noted above and to state that your request for grant of NOC for extension in the period of deputation till absorption in the Federal Directorate of Education cannot be acceded to being not covered under the relevant policy.

Moreover, you have already been repatriated to your parent department vide this department order No.SO (PE)5-2/04/IPT/Lakki Marwat/Vol-II dated 23.10.2019, therefore, you are directed to report for duty to your parent office i.e office of the District Education Office (F) Lakki Marwat. In case of failure, disciplinary action shall be initiated against you under Rule-9 of Khyber Pakhtunkhwa Efficiency & Disciplinary Rules-2011.


(Mian Hussain Din)
SECTION OFFICER (PE)

Copy forwarded to:-

1. The Secretary Establishment Department, Khyber Pakhtunkhwa w/r to letter No. SOR-I (E&AD)/1-14/2018/Shahana Bgm dated: 30.05.2012.
2. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to his letter No.8330/F.No.28/PST(F)/IPT/Bannu dated: 11.03.2009.
3. Admin Officer Schools (Female), Federal Directorate of Education, Rohtas Road, Sector G-9/4, Islamabad No: F.1-9/149-MTT(D) FDE dated: 19.07.2019.
4. DEO (F), District Lakki Marwat.
5. District Accounts Officer, District Lakki Marwat.
6. PS to Secretary E&SE, Khyber Pakhtunkhwa.
7. Master File.


SECTION OFFICER (PE)

IMMEDIATE
By S.M.

ANNEXURE L

No.F.4-57/2011 (Education)
Government of Pakistan
Ministry of Capital Administration and Development

Islamabad: the March 16, 2013

Subject: ABSORPTION OF STAFF UNDER FEDERAL DIRECTORATE OF
EDUCATION (FDE), ISLAMABAD WORKING ON DEPUTATION
BASIS

I am directed to state that in response to a summary submitted to the Prime Ministers Secretariat, Islamabad seeking approval of the Prime Minister for absorption of staff working in the educational institutions under Federal Directorate of Education (FDE), Islamabad the Prime Minister has been pleased to approve absorption of all deputationists (teaching & non-teaching) working under FDE, Islamabad on deputation basis under Wedlock Policy and completed their 05 years of deputation subject to provision in the Recruitment Rules and after fulfillment / completion of all codal / procedural formalities as contained under Civil Servants Act, 1973.

FDE is, therefore, requested that the below given information may be submitted to this Ministry immediately so that process for absorption of the deputationists may be initiated / completed, accordingly:

- Institution-wise list of all the deputationists (male & female) (teaching non-teaching) as per enclosed Performa (Annex-1).
- Copies of the Recruitment Rules for each cadre posts where a deputationist is likely to be absorbed.
- NOC from the respective parent departments for each deputationist regarding permanent absorption under FDE, Islamabad.
- ACRs / PERs grading for the last 05 years.

After completion of the necessary documentation procedure of the deputationists, their cases will be placed before the respective DPCs.

This may please be treated on PRIORITY.

(Saqib Shahab)
Assistant Educational Advisor

The Director General
Federal Directorate of Education (FDE),
Islamabad.

Copy to:

- P.S to the Secretary, M/o CA&D, Islamabad.
- P.A to J.E.A (Education), M/o CA&D, Islamabad.

Attested
to be true copy

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to be true copy

109

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 19-09-2013.

ORDER


No. SO(PE)5-2/Kohat/Siraj Begum PST. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR-I (E&AD)1-14/82/Vol.27 dated 18-09-2013, the services of Mrs. Siraj Begum PST GGPS Togh Bala NO.1 District Kohat (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis without retaining her lien in the E&SE Department.

SECRETARY

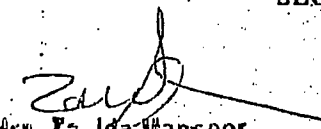
Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female), Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No.F.2013/P.A.-Dep/14-16-17(W) FDE dated 19-08-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer(F) Elementary & Secondary Education Kohat.
5. The District Accounts Officer Kohat.
6. Mrs. Siraj Begum PST GGPS Togh Bala NO.1 District Kohat.


20.9.2013
(HINA SAEED)

SECTION OFFICER (PRIMARY)

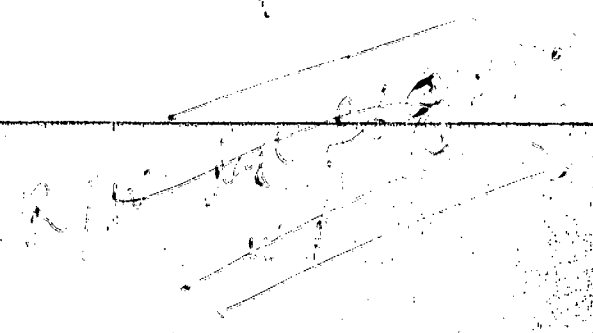

Mrs. Zaid Mansoor
Assistant Professor Physics
Fazaia Inter College Kohat

Attested

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110

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Dated Peshawar the 11-10-2013

ORDER.

No.SO(PE)5-2/IPT/Swabi/Hafsa Bibi PST/2013. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR-I (E&AD)1-14/82/Vol.27 dated 11-10-2013, the services of Mrs. Hafsa Bibi PST GGPS Gabai (Gadoon) District Swabi (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis without retaining her lien in the E&SE Department.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No.F:2013/P.A.-Dep/14-16-17(W) FDE dated 12-09-2013,
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer (F) Elementary & Secondary Education Swabi.
5. The District Accounts Officer Swabi.
6. Mrs. Hafsa Bibi PST GGPS Gabai (Gadoon) District Swabi

Attested
to be true copy

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

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to be true copy



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Dated Peshawar the 26-11-2013

ORDER

No. SO(PE)S-2/IPT/Zarqa Ishaq DM/Abbottabad. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR-1 (E&AD)1-14/82 dated 13-11-2013, the services of Mrs.Zarqa Ishaq DM GGMS Baran Gali Abbottabad (Khyber Pakhtunkhwa) is hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis on the condition that no right of lien will be retained by her in E&SE Department Khyber Pakhtunkhwa.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter NO.P.2013/P.A.Dep/14-16-17(W)PDE dated 29-10-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer (F) Elementary & Secondary Education Abbottabad.
5. The District Accounts Officer Abbottabad.
6. Mrs.Zarqa Ishaq DM GGMS Baran Gali Abbottabad.

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 19-09-2013.

ORDER

No.SO(PE)5-2/IPT/Rubina Bibi PST/Abbottabad. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter.No.SOR-I (E&AD)1-14/82/Vol.27 dated 18-09-2013, the services of Mrs. Rubina Bibi PST GGPS District Abbottabad (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis without retaining her lien in the E&SE Department.

SECRETARY

Exdt. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No.F.2013/P.A.-Dep/14-16-17(W) FDE dated 26-08-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer(F) Elementary & Secondary Education Chitral.
5. The District Accounts Officer Chitral.
6. Mrs. Rubina Bibi PST GGPS District Abbottabad.

(HINA SAIED)
SECTION OFFICER (PRIMARY)

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23/9/13



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Dated Peshawar the 11-10-2013

ORDER.

No. SO(PE)5-2/IPT/Shahida Malik PST/Abbottabad. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR-I (E&AD)1-14/82/Vol.27 dated 24-09-2013, the services of Mrs. Shahida Malik PST GGPS Kokal Tehsil and District Abbottabad (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis on the condition that no right of lien will be retained by her in E&SE Department Khyber Pakhtunkhwa.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No.F.2013/P.A.-Dep/14-16-17(W) FDE dated 12-09-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer(F) Elementary & Secondary Education Abbottabad.
5. The District Accounts Officer Abbottabad.
6. Mrs. Shahida Malik-PST GGPS Kokal Tehsil and District Abbottabad.

Attested
to be true copy

SECTION OFFICER (PRIMARY)

Attested
to be true copy



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 17-08-2016

Notification

No. SO(PE)5-2/IPT/Abbottabad/Mst. Farhat Bibi & Parveen Abbasi PST/08: The services of Mst. Farhat Bibi PST, GGPS Romatti, District Abbottabad (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis on the condition that no right of lien will be retained by her in E&SE Department Khyber Pakhtunkhwa.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter No. SOR-I (E&AD)1-14/82 dated 07/03/2016.
2. The Deputy Director School (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No. F.2015./P.A/14-15/(W)FDE dated 16/12/2015
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer (F), District Abbottabad.
5. The District Accounts Officer District Abbottabad.
6. Mst. Farhat Bibi PST, GGPS Romatti, District Abbottabad.

(MUHAMMAD NASIR KHAN)
SECTION OFFICER (PRIMARY)

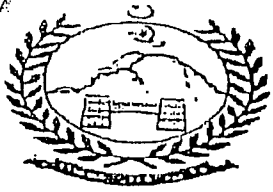
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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 17-08-2016

Notification

No. SO(PE)S-2/IPT/08/Battagram: The services of Mst. Ruqia Shafi AT, GGHS Tickari Khareri, District Battagram, (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis on the condition that no right of lien will be retained by her in E&SE Department Khyber Pakhtunkhwa.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter No. SOR-I (E&AD)1-14/82 dated 04/03/2016.
2. The Deputy Director School (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No. F.2015./P.A/14-15/(W)/FDE dated 29/06/2015
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer (F). District Battagram.
5. The District Accounts Officer District Battagram.
6. Mst. Ruqia Shafi AT, GGHS Tickari Khareri, District Battagram.

(MUHAMMAD NASIR KHAN)
SECTION OFFICER (PRIMARY)

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to be true copy

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to be true copy

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 19-09-2013.

ORDER

No SO(PE)5-2/IPT/Farhat Sultana PST/Abbottabad. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR-I (E&AD)1-14/82/Vol.27 dated 18-09-2013, the services of Mrs. Farhat Sultana CT GGHS Mirpur District Abbottabad (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on permanent basis without retaining her lien in the E&SE Department.

SECRETARY

Endst. No. & Date as above.

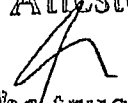
Copy forwarded to:-

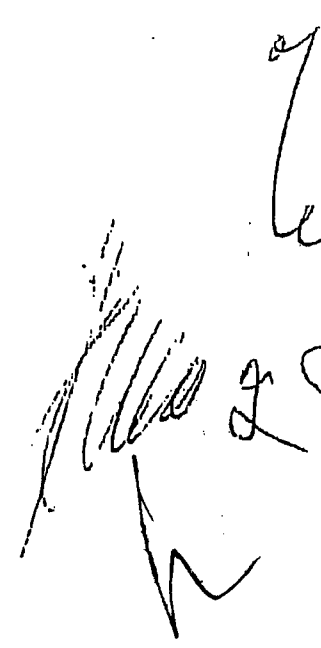
1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No.F.2013/P.A.-Dep/14-16-17(W) FDE dated 20-08-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer(F) Elementary & Secondary Education Chitral.
5. The District Accounts Officer Chitral.
6. Mrs. Farhat Sultana CT GGHS Mirpur District Abbottabad.

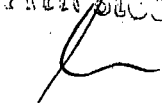


(HINA SAEED)

SECTION OFFICER (PRIMARY)

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ANNEXURE

M

REGISTERED No. M - 302
L-7646

The Gazette of Pakistan

EXTRAORDINARY
PUBLISHED BY AUTHORITY

ISLAMABAD, TUESDAY, APRIL 17, 2012

PART II

Statutory Notifications (S. R. O.)

GOVERNMENT OF PAKISTAN

CABINET SECRETARIAT

(Establishment Division)

NOTIFICATION

Islamabad, the 16th April, 2012

S. R. O. 375(I)/2012.—In exercise of the powers conferred by sub-section (1) of section 25 of the Civil Servants Act, 1973 (LXXI of 1973), read with Notification No.SRO 129(1)/98, dated the 27th February, 1998, the Prime Minister is pleased to direct that the following further amendment shall be made in the Civil Servants (Appointment, Promotion and Transfer) Rules, 1973, namely:—

In the aforesaid Rules, in rule 20 A, after sub-rule (3) the following proviso shall be inserted and shall seem to have always been so inserted, namely:—

“Provided that posting of serving husband and wife at the same station, unmarried female government servants at the place of residence of their parents/family and that of married female

(1497)

[2422 (2012)/Ex. Gaz.]

Price: Rs. 2.00

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government servants at the place of residence/posting of their husbands who are not in government employment shall be exempted from the said rule?

[F. No. 10/30/97-R-2]

ANJUM BASHIR SHAIKH,
Deputy Secretary.

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SECRET

Secret

GOVERNMENT OF PAKISTAN
CABINET SECRETARIAT
CAPITAL ADMINISTRATION & DEVELOPMENT DIVISION

SUMMARY FOR THE PRIME MINISTER

Subject: - RELAXATION OF TIME PERIOD BEYOND 05 YEARS FOR DEPUTATION UNDER WEDLOCK POLICY.

The Federal Directorate of Education (FDE) has hired the services of a number of teachers on deputation basis under the Wedlock Policy of the Government keeping in view the socio economic problems faced by husbands and wives in government service due to posting at different stations.

2. A problem arose when the quota reserved for deputation was saturated and repatriation orders were issued to some of the deputationists after completion of 05 years of deputation. The purpose was to accommodate the requests of teachers waiting for deputation. Consequently, the affected teachers filed Writ Petitions in the Islamabad High Court, Islamabad. The Islamabad High Court, while disposing off 64 similar petitions, pronounced a single judgment dated 24-11-2011, wherein working of some of the petitioners / deputationists in the borrowing department despite expiry of deputation period was declared as contrary to law, settled rules, against the principle of good governance. It was also observed that this reflected the indifferent approach of both the borrowing as well as parent departments. (Annex-I).

3. The rationale of Wedlock Policy is to facilitate posting of husbands & wives at one station for obvious reasons. The Wedlock Policy also provides consideration of requests for extension in deputation period beyond the permissible limit with compassion if interests of public service would permit.

4. In the present situation more than 90% teachers working on deputation have been borrowed in FDE under wedlock policy. All of these are skilled, qualified and experienced. Their stay in the educational institutions under FDE will contribute to improvement of educational standards.

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5. Therefore, the existing Wedlock Policy may reviewed by providing clear provisions that the normal period of deputation i.e. 05 years will not be applicable in cases where an incumbent is borrowed under Wedlock Policy. Moreover, with reference to Establishment Division, Islamabad's O.M No. 10/30/97-RII, dated 13-05-1998, extension in deputation for a period of 02 years may also be granted to all the incumbents working in FDE under Wedlock Policy.

6. Para-5/N above is submitted for approval of the Honourable Prime Minister, please.

M. Ijaz
(Muzaffar Ijaz) Secretary

Through:
Secretary, Establishment Division, Islamabad.

P.M.'s Sectt. (Mr. Khushnood Akhtar Lashari, Principal Secretary to the Prime Minister)
CA&D Division U.O.No.F.4-57/2011 (Education), dated 10 February, 2012.

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ESTABLISHMENT DIVISION

Subject: RELAXATION OF TIME PERIOD BEYOND 05 YEARS FOR DEPUTATION UNDER WEDLOCK POLICY.

7. In order to accommodate female government servants both married and unmarried, Establishment Division, with the approval of Prime Minister issued instructions/guidelines vide its O.M No. 10.30.97.R.2 dated 13.5.1998 as amended on 17 December, 1999 and 21. April, 2006(Annex-II) regarding posting of serving husband and wife at the same station, unmarried female government servants at the residence of their parents/family and that of married female government servants at the place of residence/posting of their husbands who are not in government employment.

8. Posting of such employees were treated as on deputation and were regulated under administrative instructions contained in OM dated 18.2.1987, dated 11.4.2000 and dated 4.5.2005(Annex-III) which provided for extension in the deputation period beyond five years with the approval of Establishment Division. On 3.5.2007 a new rule 20-A was added in Civil Servants(Appointment, Promotion & Transfer) Rules, 1973(Annex-IV) according to which from the date of the insertion of the said rule, the provincial civil servants cannot be retained on deputation in the Federal Government beyond the maximum period of five years.

9. Since the policy of posting of female government servants is being hit by the existing provisions of the said rules, it is, therefore, proposed that rule 20-A of the Civil Servants(Appointment, Promotion & Transfer) Rules, 1973 may be suitably amended to allow exemption in respect of female provincial government servants who are posted under the policy of the Federal Government regarding posting of serving husband and wife at the same station, unmarried female government servants at the residence of their parents/family and that of married female government servants at the place of residence/posting of their husbands who are not in government employment as under in bold:-

Existing provision of rule 20-A of the Civil Servants(Appointment, Promotion & Transfer) Rules, 1973	Proposed Amendment
<p>20A Appointment on deputation.-</p> <p>(1) A person in the service of a Provincial Government or an autonomous, semi-autonomous body or corporation or any other organization set-up, established, owned, managed or controlled by the Federal Government who possesses the minimum educational qualifications, experience or comparable length of service prescribed for a post shall be eligible for appointment to the said post on deputation for a period not exceeding three years which may be extended for another period of two years on such terms and conditions as may be sanctioned by Federal Government in</p>	<p>20A Appointment on deputation.-</p> <p>(1) A person in the service of a Provincial Government or an autonomous, semi-autonomous body or corporation or any other organization set-up, established, owned, managed or controlled by the Federal Government who possesses the minimum educational qualifications, experience or comparable length of service prescribed for a post shall be eligible for appointment to the said post on deputation for a period not exceeding three years which may be extended for another period of two years on such terms and conditions as may be sanctioned by Federal Government in</p>

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<p>consultation with the lending Organization.</p> <p>(2) Subject to any rule or orders on the subject issued by the Federal Government, a civil servant who fulfills the conditions and is considered suitable may be sent on deputation to an autonomous, semi-autonomous body or corporation established by law or to the Provincial Government on such terms and conditions as may be decided by the lending and borrowing organizations.</p> <p>(3) In case of appointment under sub-rule (1) or sub-rule (2) pension contribution shall invariably be made by the borrowing organization."</p>	<p>consultation with the lending Organization.</p> <p>(2) Subject to any rule or orders on the subject issued by the Federal Government, a civil servant who fulfills the conditions and is considered suitable may be sent on deputation to an autonomous, semi-autonomous body or corporation established by law or to the Provincial Government on such terms and conditions as may be decided by the lending and borrowing organizations.</p> <p>(3) In case of appointment under sub-rule (1) or sub-rule (2) pension contribution shall invariably be made by the borrowing organization.</p> <p>Provided that posting of serving husband and wife at the same station, unmarried female government servants at the place of residence of their parents/family and that of married female government servants at the place of residence/posting of their husbands who are not in government employment shall be exempted from the said rule.</p>
--	--

Law & Justice Division
(Law Section-1)
No. 147/2012
Dated 28/2-2012

10. Section 25 of Civil Servants Act, 1973 provides that President or any person authorized by the President in that behalf may make rules as appear to him to be necessary or expedient. Prime Minister is the competent authority to approve amendments in Rules under the Civil Servants Act, 1973 in terms of Rule 5-A of Schedule V-A of the Rules of Business, 1973(Annex-V) read with SRO No. 120(1)/1998 dated 27.2.1998(Annex-VI).

11. Draft SRO is added at Annex-VII.

12. Approval of the Prime Minister is solicited to the proposal contained in para 9 above.

Khushnood Akhtar Lashari
(Khushnood Akhtar Lashari)
Establishment Secretary

Prime Minister's Secretariat,
(Principal Secretary to the Prime Minister), Islamabad.
Estab. Divn.U.O.No. 10/30/97-R-II dated 27.02.2012

Through
Secretary,
Law, Justice & Parliamentary Affairs Division

Muhammad Masood Chishti
Muhammad Masood Chishti
Secretary
Law, Justice & Parliamentary Affairs
Government of Pakistan
Islamabad Tele: 9202712

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By No.
Date:

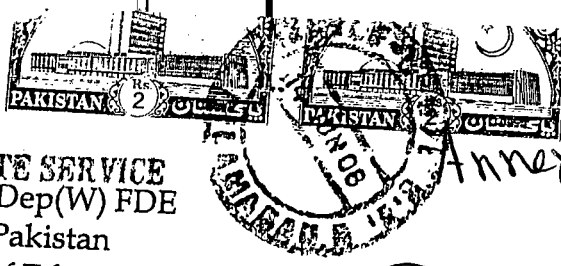
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U.P.C



ON PAKISTAN STATE SERVICE
F.9-14/MTT-TUGT/Dep(W) FDE
Government of Pakistan
Federal Directorate of Education

Reg. No. 17

Islamabad the 13 June, 2008.

(123)

To,

Shahana Begum P.F.C
Teacher Govt. Girls.
Primary school Bulwahi.
Abul. Laki Marwat

14/6
DESPATCHER
Federal Directorate of Education
R Itas Road, G-2/4, Islamabad

Subject: DEPUTATION TO THE POST OF MTT (B-09) / TUGT (B-14)

Reference your application for transfer on deputation to the post of MTT / TUGT in the Federal Government Education institutions under this Directorate, you are requested to appear for test / interview to be conducted on open merit basis for final selection. The schedule is as under:-

S#	Description	Venue	Date	Time
1	Written Test	F.G. Boys Model School No. 14, G-9/1, Islamabad	21.06.2008 (Saturday)	09:00 a.m. sharp.
2	Interview	F.G. Boys Model School No. 14, G-9/1, Islamabad	22.06.2008 (Sunday)	09:00 a.m. sharp.

2. You must bring the following documents in original / attested photocopies

- Academic and Professional Certificate(s)/Degree(s) with marks sheet.
- Domicile Certificate.
- NOC and lien retention certificate from parent department.
- National Identity Card.
- Service certificate of the spouse alongwith the status of his department i.e. Government, Semi Government or Corporation or Autonomous Body or Private Organization.

3. No TA / DA will be paid in this connection.

(ASIF IQBAL KHAN)
DEPUTY DIRECTOR (F)

Islamabad May 13, 2009

To,

The Section Officer (Primary),
Elementary & Sec, Education Department,
Government of N.W.F.P, Peshawar.

Subject:- **TRANSFER ON DEPUTATION UNDER FDE**

The competent authority has been pleased to borrow the services of Mrs. Shahana Begum, PST, GGPS, Wanda Painsa Khan, Lakki Marwat under FDE as MTT on the following terms & conditions:-

- She will be on deputation initially for a period of 3 years or till joining of regular incumbent of post whichever is earlier.
- On completion of deputation, she will stand repatriated to her parent department.
- FDE has right to revert her services at any stage.
- She will draw pay in own scale.
- She will be entitled fringe benefits as admissible to other F.G. employees.
- NO TA / DA will be paid for joining.
- Deputation allowance will be admissible as per rules.

2. If the above mentioned terms and conditions are acceptable to department & teacher concerned, then she may be relieved to join under FDE within 30 days positively.

3. This is issued with the approval of Competent authority.

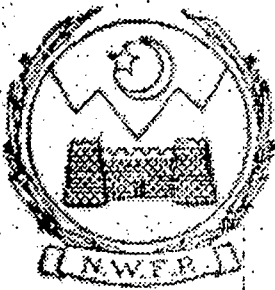
(MRS. FARZANA ASHRAR GONDAL)
DEPUTY DIRECTOR (F)

Copy to:-

- Shahana Begum, PST, GGPS, Wanda Painsa Khan, Lakki Marwat, NWFP.
- Office file.

(MUHAMMAD AFZAAL QADIR)
ADMA. OFFICER (F)

ATTESTED
ATTESTED



125

GOVERNMENT OF NWFP
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the 5-5-2009.

ORDER.

NC SO(PE)5-2/04/IPT/LAKKI MARWAT/VOL.II.

In pursuance of the Establishment and Administration Department Govt. of NWFP NOC contained in letter No. SOR-I(E&AD)1-14/82(Vol.XV) dated 2-5-2009, the services of Ms. Shahana Begum PST GGPS Wanda Pinda Khan Lakki Marwat (NWFP) are hereby placed at the disposal of the Federal Directorate of Education Islamabad on deputation basis for initial period of 03 years w/e 2-5-2009 to 1-5-2012 on the terms & conditions contained in their letter No. F-1-9/2008/(W)FDE dated 15-4-2009.

SECRETARY TO GOVT. OF NWFP
ELEMENTARY AND SECONDARY
EDUCATION DEPARTMENT.

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary to Govt. of NWFP Establishment Department w/r to his letter No. quoted above.
2. The Director, Federal Directorate of Education Islamabad w/r to his letter No. quoted above.
3. The Director Elementary & Secondary Education NWFP, Peshawar w/r to his letter No. 8330/F.NO. 28/PST(F)/IPT/Bannu dated 11-3-2009.
4. The Distt. Accounts Officer Lakki Marwat.
5. The Executive Distt. Officer Elementary & Secondary Education Lakki Marwat with the request to relieve the lady teacher and direct her to report for duty to the Federal Directorate of Education Islamabad.
6. Ms. Shahana Begum PST GGPS Wanda Pinda Khan Lakki Marwat.

(ARIF JAMIL)

SECTION OFFICER (PRIMARY)

Personal No. 307955

Islamabad, the May 19, 2009

OFFICE ORDER


Consequent upon relieving of Mrs. Shahana Begum, PST, GGPS, Wanda Painda Khan, Lakki Marwat, from her parent department on posting on deputation basis and joining under FDE, she is hereby posted/ transferred to F.G. Junior Model School No.29, I-9/4, Islamabad against a vacant post until further orders. She is allowed to join her duty at school w.e.f 15-05-2009 i.e. the date on which she reported for duty at FDE. Terms and conditions of her deputation will remain the same as contained in offer letter. She will stand repatriated to her parent department on expiry of the deputation period.

2. She directed to immediately join her place of posting without any delay.
3. No TA/DA will be paid in this connection.

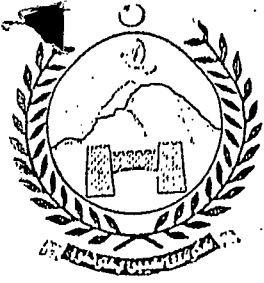

MRS. FARZANA ASHRAF GONDAL
DEPUTY DIRECTOR FEMALE

Copy forwarded to:

- ❖ The A.G.P.R., Islamabad..
- ❖ Head Concerned.
- ❖ Person concerned.
- ❖ Personal file.


(MUHAMMAD AFZAAL QADIR)
ADMN. OFFICER (F)

~~ATTESTED~~
~~ATTESTED~~



128

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Dated Peshawar the 07-5-2012.

ORDER.

No.SO(PE)5-2/IPT/04/Lakki/Vol-II. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No. SOR.I (E&AD)1-14/82/Shahana Begum dated 30-05-2012, the deputation period of Ms. Shahana Begum PST (BS-07) GGPS Wanda Painda Khan Lakki Marwat, Khyber Pakhtunkhwa to Federal Directorate of Education Islamabad is hereby extended for further 02 years w.e.f. 2-5-2012 to 1-5-2014. Total period of the deputation including the existing period comes to Five (05) years.

2. The borrowing department/deputationist will deposit Pension Contribution, Leave salary GP Fund, Group Insurance, etc with Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar under the relevant head and will regularly provide deposit challans to the Director Elementary & Secondary Education Khyber Pakhtunkhwa as per deputation policy of this Provincial Govt.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Admn. Officer (Female), Federal Directorate of Education Islamabad w/r to his letter NO.F.1-9/149(Dep)/MTT(W)FDE Dated 11-4-2011.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The Executive District Officer Elementary & Secondary Education Lakki Marwat w/r to his letter No. 219 dated 14-4-2012.
5. The District Accounts Officer Lakki Marwat.
6. Ms. Shahana Begum MTT Islamabad Model School No. I, 1-9/4 Islamabad.

Attested

[Signature]
Administrative Officer
Islamabad Model College
For Boys, G-10/4
Islamabad

(Annex I)

[Signature]
(MUHAMMAD AYUB KHAN)
SECTION OFFICER (PRIMARY)

ATTESTED
[Signature]

GOVERNMENT OF PAKISTAN
MINISTRY OF CAPITAL ADMINISTRATION & DEVELOPMENT


NO.F.12-19/2012-FDE(S)

129

Islamabad, the January 3, 2013

Subject:- EXTENSION IN DEPUTATION PERIOD IN RESPECT OF MRS. SHAHNA BEGUM, MTT (BS-09), ISLAMABAD MODEL SCHOOL NO.01 (I-V), I-9/4, ISLAMABAD.

In pursuance of Establishment Division's O.M. No.8/3/2010-R-4 dated 31-12-2012, the deputation period of Mrs. Shahna Begum, PST (BS-07), Elementary & Secondary Education Department, Govt. of Khyber Pakhtunkhwa, presently working as MTT (BS-09) on deputation basis in Islamabad Model School No. (I-V), I-9/4, Islamabad under the Federal Directorate of Education, Islamabad is hereby extended for a period of two years with effect from 02-05-2012 to 01-05-2014.


(MAHMOOD KHAN LAKHO)
EDUCATION OFFICER (FDE)
TELE:9204306

1. The AGPR, Islamabad.
2. The Director General, Federal Directorate of Education, Islamabad.
3. The Director Schools (Female), Federal Directorate of Education, Islamabad (W.r.t their FDE's U.O. No.F.1-9/134-MTT(W)/FDE dated 01-11-2012.
4. Mrs. Shahna Begum, MTT (BS-09), Islamabad Model School No. (I-V), I-9/4, Islamabad
5. Office file.

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BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

Writ Petition No. 97-P/2016

Mst. Shahana Begum W/o Amjad Naeem,
PST / MTT, Islamabad Model School No. (I-V),
G-10/4, Federal Directorate of Education,
Islamabad. Petitioner

Versus

1. District Education Officer/Sub Divisional Education Officer (Female), Lakki Marwat.
2. Director General, Federal Directorate of Education, G-9/4, Islamabad.
3. Secretary, Govt. of Pakistan, Ministry of Capital Administration & Development Division, Islamabad.
4. Secretary, Govt. of KP, Elementary & Secondary Education Department, Peshawar. . . . Respondents



⇔<=>⇔<=>⇔<=>⇔<=>⇔

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

⇔<=>⇔<=>⇔<=>⇔<=>⇔

**ALLSIGNED
to be true copy**

Respectfully Sheweth:

1. That petitioner was appointed as PST in prescribed manner vide order dated 22.11.1994. (Copy as annex "A")
2. That on 05.05.2009, R. No. 3 placed services of petitioner at the disposal of Federal Directorate of Education (FDE), Islamabad on deputation basis for initial period of 3 years with effect from 02.05.2009 to 01.05.2012 on some terms and conditions. (Copy as annex "B")

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Deputy Registrar

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3. That petitioner was relieved of her duty by R. No. 1 as she was deputed to Federal Directorate of Education on 05.05.2009 and was further directed to report to the said Directorate at Islamabad. (Copy as annex "C")
4. That on 19.05.2009, petitioner was posted to FG Junior Model School, No. 29, 1-9/4, Islamabad against a vacant post till further orders and made arrival report for duty at the school with effect from 15.05.2009. (Copy as annex "D")
5. That after the expiry of the said period, R. No. 1 wrote letter to Director of Education, KP, Peshawar on 14.04.2012 that petitioner has applied through FDE for further extension of 02 years as her Husband namely, Amjad Nacem was permanent Govt. Servant in the same department and as per policy the spouse, both shall be adjusted in one station. This department has got no objection, if the high ups of the department grant extension of 02 years more with effect from 02.05.2012 to 01.05.2014 as requested. (Copy as annex "E")
6. That on 07.05.2012, further extension for 02 years with effect from 02.05.2012 to 01.05.2014 was accorded by R. No. 1 (Secretary KP). (Copy as annex "F")
7. That on 03.01.2013, extension for a period of 02 years with effect from 02.05.2012 to 01.05.2014 was allowed. (Copy as annex "G")
8. That not only petitioner but numerous others were also under deputation to FDE, Islamabad, so to permanently absorbed them in the respective assignments, the Prime Minister was pleased to approve absorption of all deputationists (Teaching and none teaching) on the basis of Wed Lock Policy who have completed their 05 years of deputation. Some information were also sought vide letter dated 16.03.2013 of the Govt. of Pakistan Ministry of Capital Administration & Development Division, Islamabad. (Copy as annex "H")
9. That on 22.09.2014, SO Primary called for explanation regarding expiry of deputation period of petitioner with further direction to report back to the parent department of KP within 10 days, otherwise, proceeding will be initiated under Efficiency & Disciplinary Rules. (Copy as annex "I")

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Deputy Registrar

31 DEC 2015

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10. That on 11.11.2014, the Section Officer wrote letter to R. No. 3 with copy to Secretary Education, KP regarding permanent absorption of female teachers working on deputation under Wed Lock Policy in capital Administration & Development Division that permanent absorption was approved by the Prime Minister in March, 2013 under Wed Lock Policy as per recruitment rules, so the cases are under consideration for permanent absorption in consultation with the Establishment Division unless and until their cases are not decided, they be allowed to continue working under CA&D Division. (Copy as annex "J")
11. That Senior Research Officer wrote letter to R. No. 2 that the competent authority, R. No. 3 has been pleased to approve the following proposal:-
- i. No Objection Certificate (NOC) for permanent absorption.
 - ii. Certificate of their substantive pay scales.
- Please submit progress report to this division. (Copy as annex "K")
12. That on 01.07.2015, petitioner submitted reply to explanation letter dated 22.09.2014, stating therein that deputation cases for permanent absorption in FDE as per Wed Lock Policy and orders of the Prime Minister of Pakistan will be settled shortly, so NOC for the purpose be forwarded to Education Department for further necessary action. (Copy as annex "L")
13. That on 03.08.2015, Senior Research Officer, Islamabad wrote letter to R. No. 3 that petitioner along with others be allowed to continue work on deputation basis under FDE till final decision for permanent absorption. (Copy as annex "M")
14. That on 06.08.2015, Sub Divisional Officer wrote letter to DEO (Female), Lakki Marwat to terminate services of petitioner. (Copy as annex "N")
15. That on 31.08.2015, petitioner submitted representation before R. No. 1 that under Wed Lock Policy, NOC be issued to petitioner to continue her service at Islamabad. (Copy as annex "O")

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approval of the Prime Minister of Pakistan and permanent absorption. (Copies as annex "P" & "Q")

17. That Head Mistress, Islamabad Model School (I-V), G-10/4, issued certificate in favour of petitioner performing her duties in the Model School since 15.05.2009. (Copy as annex "R")

Hence this Writ Petition, inter alia, on the following grounds:-

GROUND S:

- a. That since 02.05.2009, petitioner is performing her duties at Federal Directorate of Education, Islamabad on deputation basis which was allowed by the Provincial Education Department i.e District Executive Officer (Female), Lakki Marwat.
- b. That permanent absorption in FDE of petitioner was approved by the Prime Minister of Pakistan as well as Establishment Department, Islamabad, yet final process is on Board, so R. No. 1 shall wait till the final outcome of the case.
- c. That monthly salaries are paid to the petitioner by the Federal Govt. and not by the Provincial Ex-Checker.
- d. That as per Spouse Policy, Husband and Wife shall remain in serve at one and the same station.
- e. That in the circumstances, R. No. 1, after allowing her to serve at FDE, Islamabad is not liable to take any adverse action against petitioner. The same will be based on malafide.

It is, therefore, most humbly prayed that on acceptance of the Writ Petition, in exercise of the extraordinary constitutional jurisdiction, this hon'ble Court may graciously be pleased to:-

- a. Direct R. No. 1 or as the case may be, to issue petitioner fresh NOC, if needed, for permanent absorption in the Federal Directorate of Education, Islamabad;
- b. Direct further R. No 1 to wait for till the final settlement of the issue of absorption at FDE, Islamabad; and/or

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Deputy Registrar

31 DEC 2015

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c. Any other writ/order/direction deemed proper and just in the circumstances of the case, be also issued/ordered/given.

INTERIM RELIEF:

By keeping in view the aforesaid facts and circumstances of the case, respondents be directed not to take any adverse action against petitioner till the final outcome of permanent absorption at Islamabad.

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27/11/15
Examiner
Peshawar High Court Peshawar
Authorised Under Article 87 of
The Qanun-e-Shahadat Order 1987.
Dated: 29.12.2015

Through

Petitioner
[Signature]
Saadullah Khan Marwat
[Signature]
Arbab Saif-ul-Kamal
[Signature]
Miss. Rubina Naz
Advocates,

LIST OF BOOKS:

- 1. Constitution.

CERTIFICATE:

As per instructions of my client, certified that no such like Writ Petition has earlier been filed by the petitioner before this Hon'ble Court on the subject matter.

[Signature]
Advocate

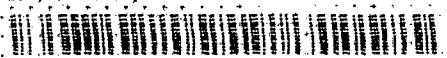
AFFIDAVIT

I, Saadullah Khan Marwat Advocate, Peshawar High Court, Peshawar, do hereby solemnly affirm and declare that the contents of the **Writ Petition** as per information conveyed by the petitioner are true and correct.

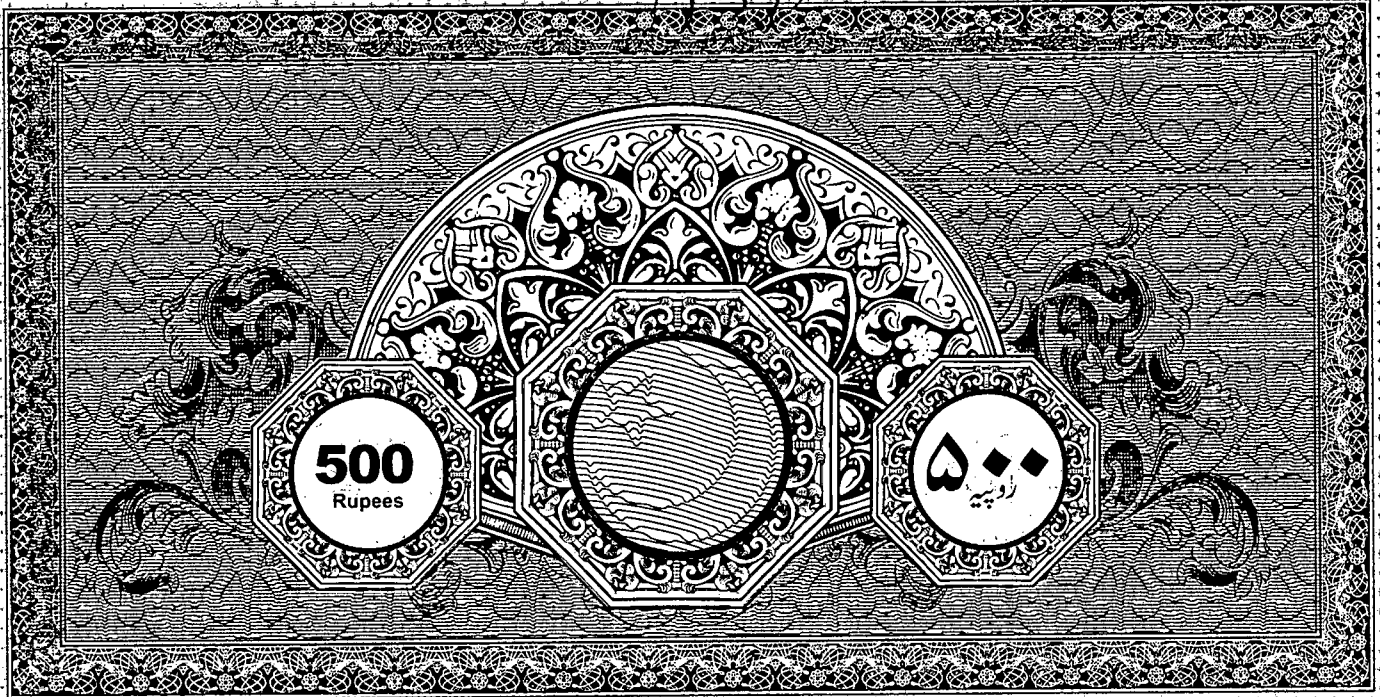
[Signature]
DEPONENT

No: 97-B-1-
Certified that the above was verified on *[Signature]*
affirmation before me in office, this *29/12/15*
day of *Dec* - 2015 by *Saadullah Khan Adv*
s/o *[Signature]*
who was identified by *[Signature]*
Who is personally known to me: *[Signature]*

FILED TODAY
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District Registrar
31 DEC 2015



135



PAKISTAN COURT FEE

Reshawes High court Peshawar
up. 12020

Amber Nosheen etc

CANCELLATION

12 JAN 2022

US

Fe Chaudhary

FILED TODAY
Deputy Registrar
12 JAN 2022

BEFORE PESHAWAR HIGH COURT PESHAWAR

135

W.P No. _____/2022

Ambar Nosheen & Others..... Petitioners

Versus

FEDERATION OF PAKISTAN etc..... Respondents

NOTICE

To,

1. Federation of Pakistan through Secretary M/O Education (defunct CAAD), Pak-Secretariat, Islamabad.
2. Director General Federal Directorate of Education (FDE), G-9/4 Islamabad.
3. Secretary, Primary Elementary & Secondary Education Department, Government of KPK, Peshawar
4. Director Primary Elementary & Secondary Education Government of KPK, Peshawar

Please take notice that I am filing writ petition in the Hon'ble Peshawar High Court Peshawar on behalf of Petitioners.

Petitioners

Through

Muhammad Farooq Malik,
Advocate Supreme Court, of Pakistan

