


FORM OF ORDER SHEET

Court of _____

Case No. - 727/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	31/03/2023	<p>The appeal of Dr. Javeria Haroon received today by registered Post be entered in the Institution register and fixed for preliminary hearing before touring Single Bench at A.Abad on _____. Notice be issued to appellant for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR.</p>

To,

The Respected Registrar,

Khyber Pakhtoonkhwa Service Tribunal,

Peshawar.

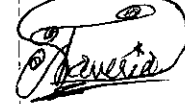
Sub: Submission of Appeal for Expunge and Up-Gradation of ACRs/PERs (2017, 2020, 2021, 2022)

Respected Sir,

Kindly find here with this appeal for Appeal for Expunge and Up-gradation of ACRs/PERs (2017, 2020, 2021, 2022) in complete form along with 2 copies in separate files for A.G./D.A.G. and member and 8 copies for each respondent in separate envelopes.

Thanking you in anticipation of acknowledgment at your gracious self,

Your's Sincerely,



Dr. Javeria Haroon,

Assistant Prof. of Chemistry,

Govt. Girls Post Graduate College,

Haripur.

Dated: 27-03-2023.

BEFORE THE HONOURABLE KHYBER PAKHTOONKHWASERVICE TRIBUNAL

PESHAWAR

Appeal no. 727/2023

Dr. Javeria Haroon (Ph.D.), Assistant Professor of Chemistry (BPS-18), Govt. Girls Post Graduate College (GGPGC) No. 1, Haripur.

.....**Appellant**

VERSUS

1-Honourable Prof. Dawood Khan, Secretary Higher Education, Khyber Pakhtoonkhwa, Civil Secretariat, Peshawar.

2- Honourable Prof. Faridullah Shah, Director of Higher Education and Controlling officer of ACRs/PERs, Department of Higher Education (Colleges), Khyber Pakhtoonkhwa, Peshawar.

3-Respected Prof. Khurshid Ahmed, x-Director of Higher Education and x-Controlling officer of ACRs/PERs, Department of Higher Education (Colleges), Khyber Pakhtoonkhwa, Peshawar.

4-Respected Additional Director (ACRs/PERs), Department of Higher Education (Colleges), Khyber Pakhtoonkhwa, Peshawar.

5- Respected Prof. (retd.) Subhan Ullah, x-Director of Higher Education, Department of Higher Education (Colleges), Peshawar.

6-Respected Prof. (retd.) Zahoor Ul Haq, x-Director of Higher Education, Department of Higher Education (Colleges), Peshawar.

7-Respected Prof. (retd.) Nasira Bano, x-Principal Govt. Girls Post Graduate College (GGPGC) No. 1, Haripur, Department of Higher Education (Colleges), Khyber Pakhtoonkhwa.

8-Respected Prof. Nighat Shaheen, Principal Govt. Girls Post Graduate College (GGPGC) No. 1, Haripur, Department of Higher Education (Colleges), Khyber Pakhtoonkhwa.

INDEX

S#	Description of Documents	Annex	Pages
1.	Grounds of Appeal		1-5
2.	Affidavit		6
3.	Addresses of Parties		7
4.	Copy of Appointment Order	"A"	8 (24, 24, 24, 24)
5.	Copy of the Departmental Letters	"B"	9, 10, 11
6.	Copy of Departmental Appeals	"C"	12-17

Appellant (by self)

Javeria

**Dr. Javeria Haroon (Ph.D.),
Assistant Prof. of Chemistry (BPS-18),
Govt. Girls Post Graduate College,
Haripur.**

Dated: 27-03-2023

**BEFORE THE HONOURABLE KHYBER PAKHTOONKHWAS SERVICE TRIBUNAL
PESHAWAR**

Service Appeal No. _____/2023

Dr. Javeria Haroon, Assistant Professor of Chemistry (BPS-18), Govt. Girls Post Graduate College (GGPGC) No. 1, Haripur.

.....Appellant

VERSUS

1-Honourable Prof. Dawood Khan, Secretary Higher Education, Khyber Pakhtoonkhwa, Civil Secretariat, Peshawar.

2-Honourable Prof. Faridullah Shah, Director of Higher Education and Controlling officer of ACRs/PERs, Department of Higher Education (Colleges), Khyber Pakhtoonkhwa, Peshawar.

3-Respected Prof. Khurshid Ahmed, x-Director of Higher Education and x-Controlling officer of ACRs/PERs, Department of Higher Education (Colleges), Khyber Pakhtoonkhwa, Peshawar.

4-Respected Additional Director (ACRs/PERs), Department of Higher Education (Colleges), Khyber Pakhtoonkhwa, Peshawar.

5- Respected Prof. (retd.) Subhanullah, x-Director of Higher Education, Department of Higher Education (Colleges), Peshawar.

6-Respected Prof. (retd.) Zahoor Ul Haq, x-Director of Higher Education, Department of Higher Education (Colleges), Peshawar.

7-Respected Prof. (retd.) Nasira Bano, x-Principal Govt. Girls Post Graduate College (GGPGC) No. 1, Haripur, Department of Higher Education (Colleges), Khyber Pakhtoonkhwa.

8-Respected Prof. Nighat Shaheen, Principal Govt. Girls Post Graduate College (GGPGC) No. 1, Haripur, Department of Higher Education (Colleges), Khyber Pakhtoonkhwa.

.....Respondents

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTOONKHWAS SERVICE TRIBUNAL ACT 1974, AGAINST THE IMPUGNED ACTION OF THE RESPONDENTS BY ILLEGAL AND UNLAWFUL ADVERSE REMARKS RECORDED IN THE ACRS/PERS OF THE APPELLANT FOR THE YEAR 2017, 2020, 2021 AND AGAINST NO ACTION TAKEN AFTER 120 DAYS ON THE DEPARTMENTAL APPEALS OF APPELLANT UPTO THE EXTENT OF UPGRADATION AND EXPUNCTION OF ADVERSE REMARKS RECORDED IN THE ACRS/PERS OF THE APPELLANT FOR THE YEAR 2017, 2020, 2021 AND 2022

PRAYER

Being aggrieved and dissatisfied with non-compliance of rules and regulations and no response of Appellant's all departmental appeals after passing 120 days except verbal assertion related to up gradation and expunction of ACRs/PERs (2017, 2020, 2021 and 2022), the Appellant prefers her appeal with most humble prayer that this Honourable Khyber Pakhtoonkhwa Service Tribunal may be pleased to;

1-Set aside and declare all related impugned actions including impugned decisions and notifications as illegal, mala fide as "malice in law" as well as "malice in mind", unconstitutional, devoid of merit, and against the verdict of legal, therefore, ineffective upon right of Appellant's promotion in BPS-19 among peers.

2-Direct the respondents (1 and 2) not to consider no-communicated ACRs/PERs (belated, missing, average, below average and adverse (devoid of related prior counseling by reporting officers and related prior personal hearing by countersigning officers)) in prescribed time period based on mala fide, not done on part of Appellant, and against the guidelines as provided by the relevant ACRs/PERs rules, therefore, cannot be utilized for her prejudice, instead prone to expunge and upgrade with all consequential and back benefits..

3-Grant compensation for all grievances, unfairness and mishandling Appellant's all departmental appeals as Appellant's suffering by hands of senior peers with no written response on sympathetic basis opened a gate for unauthorized continuous sufferings of juniors by hands of seniors whereas all impugned notifications are to be set aside following rules and regulations in the best interest of justice.

5-Grant any other equitable remedy as well as relief in which Appellant may deem fit and proper under the described facts and grounds.

9-Set all factual evidences as open proof to be accepted during proceedings, if needed.

10-Direct the respondents (1 and 2) to provide related departmental notifications, if needed.

Dated: 27-03-2023

MAY IT PLEASE YOUR HONOUR,

ON FACTS:

1-That abridgely, the facts giving rise in the instant appeal/petition are that the Appellant is highly qualified, a law abiding and taxpaying citizen of Pakistan and has a good antecedents in her credit.

2-That after getting onto the rolls of prestigious Higher Education Department (HED, KPK) in the year 2009, the Appellant has pulled day and night to render his best in the service of the department with utmost zest and professional gusto initially as Lecturer (BPS-17) dated 13-04-2009 and then, as Assistant Professor on her promotion dated 14-07-2017 after PSB meeting dated 24-03-2017, which is crystal evident from the Appellant's long-stretched service period with unblemished service record (copy of Appointment order here as Annexure "A").

3-That the Appellant has always upheld the professional confidence by her believe in serving and commitment with the vision of home department while reverence from the people of interaction and general public along with marvelous record and successful evaluation for more than decade, by not only performing duties consigned at start of each session, but, also duties assigned during whole year from time to time either verbally or in written.

4- That in the given circumstances whereby adverse remarks were introduced in Appellant's missing and later relegated ACRs/PERs for the year (2017, 2020, 2021) with belated communication to Appellant (Copy of impugned adverse remarks in related departmental letters here as Annexure "B"), while, Appellant got verbal assurance with no written communication about pending decisions from departmental side after her timely written requests (Copy of related departmental expunge appeals here as Annexure "C") for expunge of adverse remarks

and up gradation for which neither the Appellant's prior appearance was sought for related prior explanation and prior counseling with written order at specific date and time by reporting officers (Prof. (retd.) Nasira Bano and Prof. Nighat Shaheen), prior personal hearing with written order at specific date and time by countersigning officers (Prof. (retd.) Subhanullah and Prof. (retd.) Zahoor Ul Haq), nor any findings or material evidence in support of related adverse remarks were recorded in the belated communicated ACRs/PERs (2017, 2020, 2021) from which the Appellant could have drawn his analogies of what went wrong on her part. But, presumptions were named as conclusions in the Appellant's said ACRs/PERs.

5-That if any order or notification regarding any of Appellant's departmental appeal had issued in written, it was never served to Appellant till now and all notifications with no compliance with rules and regulations, may deem struck off and set aside.

6-That feeling aggrieved from the acts of the Respondents having no other efficacious remedy available elsewhere and forum to be addressed at, the Appellant approaches this Honourable Tribunals Inter alia upon the following grounds.

GROUNDS

1-That it is settled proposition of law that subject to its power and authority, the preparation, process, communication, and presentation of Appellant's ACRs/PERs (2017, 2020, 2021) in prescribed time following rules and regulations as confidential document is the function of concerned reporting officer and department, and not the civil servant, and department has to provide the complete set of ACRs/PERs of the concerned officer to the PSB well in advance with no impugned and pending decisions regarding up gradation and expunge of said ACRs/PERs following ACR/PER rules to be placed in Appellant's character dossier in prescribed time for completion of whole process.

2-That it is settled rule of law that whilst any "adverse remarks" are being added or holds the chance of being added to the one's ACR/PER, the person shall be intimated mandatorily with a Warning Letter or Counseling on the subject in prescribed time as per settled dictum on the subject, but, in the case of Appellant, unbothered from the situation, the department did not communicate the same to the Appellant even her ACRs/PERs (2017 (graded below average by reporting officer (Prof. (retd.) Nasira Bano)), 2020 (graded average by reporting officer (Prof. Nighat Shaheen)), 2021 (graded average by countersigning officer (Prof. (retd.) Zahoor Ul Haq)) were recorded after preparation by reporting officers without related prior counseling with written order and related explanations with written order in prescribed time as well as countersigned by countersigning officers after their retirement without related prior personal hearing with written order in prescribed time, and consigned to record room for character dossier by Additional Director (ACR/PER), which is clear violation of article 19A of constitution of Pakistan.

3- That after furnishing above bench mark ACRs/PERs prior in 2013,2014, 2015, 2016 practical sessions with resultant previous promotion in 2017 in BPS-18, the pre-missing below average ACR/PER (2017) with intensive personal adverse remarks was furnished belated after retirement during COVID-19 online session (2020) with non compliance of rules for prior counseling by same reporting officer (Prof. (retd.) Nasira Bano) as well as real x-mother in law (mumani saas) as revenge after Civil suit by in laws stating false claim of divorce (2019) and settled legal separation via Union Council by their side in 2020 and family suit by Appellant.

4-That after furnishing "Very Good" ACR/PER prior in 2019 practical session, the pre-missing average ACR/PER (2020) and ACR/PER (2021) with intensive personal adverse remarks during

COVID-19 online session, were furnished with non compliance of ACR/PER rules related to prior counseling by same reporting officer (Prof. Nighat Shaheen) after her departmental explanation about timely furnishing missing ACRs/PERs (2017, 2020) as personal grudge to Appellant despite her continuous request for processing during COVID-19 online session.

5-That one reporting officer (Prof. (retd.) Nasira Bano) was retired at the time of furnishing adverse remarks in pre-missing below average ACR/PER (2017) after appellant got referred by on-chair respected principal (Prof. Nighat Shaheen; 2020) with non cooperation while rejecting request of appellant to furnish same ACR/PER (2017) on humanity basis on back ground of two court cases with in laws. Additionally, two countersigning officers were also retired at the time of introducing intensive personal adverse remarks in both ACRs/PERs (2017 (below average), and 2021 (average)) without prior counseling with written order in prescribed time.

6-That Appellant got immediate clearance by respected acting director (Prof. Muhammad Rose) as inquiry officer in departmental facts-finding inquiry held in July, 2017 soon after her promotion in BPS-18 (14-07-2017) at the end of her maternity leave as a result of false accusations based on malice in mind by reporting officer (Prof. (retd.) Nasira Bano; x-mother in law) of non-performance of non-communicated one day BS examination duty as well as timely informed and non-continuous five casual leaves in the month of January, 2017 due to unavoidable circumstances (continuous physical beating by in laws in expectant condition with already one minor kid (1 and half year) at that time resultant non-cooperation of reporting officer for hospital visits even in recess along with previous related medical leave of 15 days in December, 2016. Moreover, availed casual leaves by Appellant did not exceed than allowed in 2017.

7-That Appellant faced biasness and malice by both reporting officers (Prof. (retd.) Nasira Bano and Prof. Nighat Shaheen) from time to time regarding internal selection for further external processing for awards such as "Best Teacher" and open departmental training opportunities while setting aside her applications and discouraging as head of institution in addition to set false grounds against appellant from time to time such as their attempts of negative encoding of students from time to time.

8-That the affliction to appellant was conducted by countersigning officers (Prof. (retd.) Subhanullah and Prof. (retd.) Zahoor Ul Haq) even after their retirement with non-compliance of prior counseling rules as close friends of x-in laws with common interest of destruction of appellant's career under influential revenge of Appellant's x-in laws as background which could not be ignored. Moreover, respective Controlling officer of ACRs/PERs (Prof. Khurshid Ahmed) had not properly conducted official roles in time. Therefore, mala fide as 'malice in mind' as well as 'malice in law' along with unfairness and biasness are strong elements in mishandling Appellant's case with no written response towards all Appellant's departmental appeals despite verbal positive responses, leading destruction of dignity and career with resultant grievance of Appellant and related social impact.


9-That clear violation of Section 24A of the General Clauses Act 1897 has been made by not responding to all the applications of Appellant which is not sustainable in the eye of law that authorities having statutory powers must exercise the same in fair, just and reasonable manner. The impugned decisions of the Respondents are unfair, unjust, and therefore, not maintainable.

10-That under the mandate of Article 4 of the Constitution, no one should be treated otherwise than in accordance with law, but, here the case is *volta facie* and a totally different yardstick has been used to treat the Appellant.

11-That the long-continued service of the Appellant, which depends on length of her service and equity, justifiably desires, and requires that having render her prime youth, career and life in the services of the Respondents while working in Higher Education Department, Khyber Pakhtoonkhwa, the Appellant may not be exploited or hung in dark with infringement of fundamental rights as in Article 4, 10A, 25, and 27 of Constitution of Pakistan.

12-That the law and honourable courts of law have always preferred and appreciated that rules are to be followed, and have always discouraged, deplored, and depreciated any variation from rules or its violation.

13-That any other grounds will be raised at the time of arguments with kind permission of Honourable Khyber Pakhtoonkhwa Service Tribunal.



Appellant (by self)
Dr. Javeria Haroon (Ph.D.),
Assistant Prof. of Chemistry (BPS-18),
Govt. Girls Post Graduate College,
Haripur.

Dated: 27-03-2023

CERTIFICATE

Certified as per instructions that after getting no response for her departmental appeals, this is the first appeal in this Honourable Provincial Service Tribunal, Khyber Pakhtoonkhwa against all related impugned actions including notifications and decisions by respondents for directions to respondents (1 and 2) of Higher Education Department, Khyber Pakhtoonkhwa, for expeditious processing of rectification and expunge of adverse remarks along with upgradation of ACRs/PERs (2017, 2020, 2021, 2022). Nothing is pending related to subject above in any other court of law.

REFERENCE BOOK

ESTACODE (2021). Pakistan Public Administration Research Centre, Establishment Division, Cabinet Secretariat, Islamabad: 1-1044.

6

BEFORE THE HONOURABLE COURT OF WORTHY CHAIRMAN
KHYBER PAKHTOONKHWASERVICE TRIBUNAL PESHAWAR

Service Appeal No: _____/2023

Dr. Javeria Haroon-----Appellant

VERSUS

Honourable Secretary of Higher Education, KPK and others-----Respondents

AFFIDAVIT

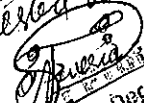
I, Dr. Javeria Haroon, Assistant Professor of Chemistry, Higher Education Department (Colleges), Khyber Pakhtoonkhwa, do hereby solemnly affirm and declare on oath that the contents of accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this honourable Tribunal.




DEPONENT

CNIC# 13101-6504896-4

Cell# +92316-1899064

attested true copy

Govt Girls Degree College
Haripur

ADDRESSES OF PARTIES

- 1) Honourable Prof. Dawood Khan, Secretary Higher Education, Khyber Pakhtoonkhwa; Civil Secretariat, Peshawar.
- 2) Honourable Prof. Faridullah Shah, Director of Higher Education, Directorate of Higher Education (Colleges), Near Northern By Pass, Rano Garhi, Peshawar.
- 3) Respected Additional Director (ACRs/PERs), Directorate of Higher Education (Colleges), Near Northern By Pass, Rano Garhi, Peshawar.
- 4) Respected Prof. Khurshid Ahmed, x-Director of Higher Education, Principal GDC, Hayatabad, Directorate of Higher Education (Colleges), Near Northern By Pass, Rano Garhi, Peshawar.
- 5) Respected Prof. (retd.) Subhan Ullah, x-Director of Higher Education, Department of Higher Education (Colleges), Peshawar.
- 6) Respected Prof. (retd.) Zahoor Ul Haq, x-Director of Higher Education, Directorate of Higher Education (Colleges), Near Northern By Pass, Rano Garhi, Peshawar.
- 7) Respected Prof. (retd.) Nasira Bano, x-Principal GGPGC, Haripur, Directorate of Higher Education (Colleges), Near Northern By Pass, Rano Garhi, Peshawar.
- 8) Respected Prof. Nighat Shaheen, Principal GGPGC, Haripur, Directorate of Higher Education (Colleges), Near Northern By Pass, Rano Garhi, Peshawar.



Annex
A-8 1/4

**GOVERNMENT OF NWFP
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT**

Dated Peshawar: the 13th April, 2009.

NOTIFICATION

No. SO(FC)HE/1-2/08(Vol-IV)/Recruitment: Consequent upon the recommendation of NWFP Public Service Commission, the Competent Authority is pleased to appoint the following recommendees as female Lecturers (BPS-17) in various subject of College Cadre in Higher Education Department with immediate effect and to post them in the colleges noted against each with the following adjustment:-

	Name / Father Name / Address	Subject	Posted at & Remarks.
	Shenila Mehwish Orakzai D/O Saddullah Orakzai Postal Address: House No:75, Street No:9, Colony No:2, Gulbahar Peshawar City Permanent Address: As Above	Computer Science	GGC, Pir Pai, against vacant post
2.	Naheed Khan D/O Hidayat Ullah Khan Postal Address: House No:B-92, Ph-II, Gulshan-e-Hadeed Karachi. Permanent Address: As Above	Computer Science	GGC, Miran Shah (NWA), against vacant post
3.	Zaib-un-Nisa D/O Jhangi Khan Postal Address: Bagh Gali Sahib Jan Colony Al-Noor, Street H#69, D.I.Khan. Permanent Address: As Above	Computer Science	GGC, Tank, against vacant post
4.	Salma D/O Fida Nek Ahmad Postal Address: Farhad C/O Fazal Shoes Company Chowk Mian Sultan Baba Bakhela District Malakand. Permanent Address: As Above	Computer Science	GGC, Lund Khwar (Mardan), against vacant post
5.	Saima D/O Fazal Qayyum Postal Address: Village Jewad F/O Box Hathian The: Takht Bhai, District: Mardan Permanent Address: As Above	Maths	GGC, Lund Khwar, against vacant post
6.	Razia Begum D/O Haji Sarwar Jan Postal Address: Village: Nasrin Sher Dil P/O Pak Ismail Khel Surani Tehsil & District: Bannu Permanent Address: As Above	Maths	GGC, Surrani Bannu, against vacant post
7.	Sumera Anjum D/O Muhammad Amir Khan Postal Address: Hussain Steel Traders, Tehsil Paharpur, District D.I.Khan Permanent Address: As Above	Maths	GGC, Tank, against vacant post vacant post
8.	Rahela Arif D/O Syed Arif Shah Postal Address: House # 427, Sector #4, Peshawar Road KDA Kohat Permanent Address: As Above	Maths	GGC, Thall, against vacant post
9.	Sadaf Umar D/O Hazrat Umar Postal Address: Mohallah Haidarabad Baricham Shamsi Road Mardan Permanent Address: As Above	Maths	GGC, Mardan, against vacant post

Three copy
of
Annex
A-8

Asstt Prof.
Govt Girls Degree College
Paharpur

Amir
A-8 3/4

22.	Ghazanfar Ghias Malik D/O Malik Muhammad Postal Address: Village Diwala G.P.O Dera Ismail Khan Permanent Address: As Above	Pak-Study	GGC, No.2, D.I.Khan, against vacant post
23.	Yasmeen D/O Ahdul Majeed Postal Address: C/O Mohammad Ayaz, Near Masjid-e-Ansar, Sarhad Street, Latif-Abad, P/O Ashrafia Colony, Peshawar Permanent Address:	Pak-Study	GGC, Hayatabad, against vacant post
24.	Safeena Jan D/O Muhammad Ajmal Postal Address: Shalimar Mobiles & PCO Abid Khan Markeet Shinkiari Road Mansehra Permanent Address: Mohallah Upper Channai Near Kohisar Flour Mill Abbottabad Road Mansehra	Pak-Study	GGC, Kanju (Swat), against vacant post
25.	Nazia Ali Rehman D/O Ali Rehman Postal Address: Rehman's House Mohallah Chakrali, Near Areeba Children Academy Mansehra Permanent Address: As Above	Maths	GGC, Chetti Dheri (Mansehra), against vacant post
26.	Abida Begum D/O Bahadur Khan Postal Address: C/O Saleem Khan A.D. Bureau of Statistics Benovelent Fund Building Cantt: Peshawar Permanent Address: Haji Rahim Shah Banda, Village & P.O. Tor Dher, Tehsil Takht Bhai District: Mardan	History	GFC (W), Peshawar, against vacant post
27.	Nabila Kousar D/O Ghulam Mustafa Postal Address: House No.1005, New Housing Colony TIP Haripur. Permanent Address: As Above	Computer Science	GGC, Serai Saleh (Haripur), against vacant post
28.	Saima Yousaf D/O Syed Yousaf Shah Postal Address: House NO. 147-D, Street NO: 55, G-6/4, Islamabad, Permanent Address: Village Maidan P.O and District Battagram Hazara	Home Economics	GGC, No.2 Abbottabad, against vacant post.
29.	Salma Zahoor D/O Zahoor-ul-Islam Postal Address: Salam Zahoor C/O Zahid-ul-Islam, House # 3, Sector # 4, KDA Kohat. Permanent Address: As Above	Psychology	GGC, Karak, against vacant post
30.	Sadia Kiran D/O Abdul Hakeem Postal Address: House T-1230/333/4, Street No.2, Afghan Colony Block B. Peshawar City. Permanent Address: As Above	Psychology	GCGC, Peshawar, against vacant post
31.	Ifat Gulab D/O Gulab Hussain Postal Address: Govt: Degree College for Girls Parachinar Kurram Agency, Peermanent Address: Imamia Colony Parachinar upper Kuram Agency	Psychology	GGC, Parachinar (Kuram Agency), against vacant post
32.	Rubina Gul D/O Muhammad Gulzar Postal Address: M.Gulzar House No: 1418/5 Gulberg Colony Majid Shaheed Road Near Women Medical Colege Nawanshehr A.T.D Permanent Address: As Above	Urdu	GGC, Haripur, against vacant post
33.	Zahida Akhtar D/O Ghulam Mustafa Postal Address: H.No: 1005, New Housing Colony TIP Haripur Permanent Address: As above	Geography	GGC, Haripur against vacant post
34.	Fatima Bibi D/O Gul Din Postal Address: Nathia Jadeed Charkhara Road Gulabad NO.2, H.No:2, Peshawar Cantt: Permanent Address: As Above	Law	GFC(W), against the vacant post
35.	Sadaf Syed D/O Said Ahmad Shah Postal Address: Ghazi Abad, Dalazak Road Peshawar City. Permanent Address: As Above	Philosophy	GFC(W) Peshawar against vacant post

© Office Work with permission of Government through NWFP PSC/Examination/Apply only in various subjects, 8 March 2010, DPA, Govt of FATA

attached true copy
[Signature]
Asstt Prof.
Govt Girls Degree College
Haripur

Amendment
A-8
4/4

36.	Sauam Saleem D/O Muhammad Saleem Awan Rathi Darahi, Pangran, Post Officer Jangraha, Tehsil & District Abbottabd, Permanent Address: MOH, Sadiq Akbar Depot Road Havelian Tehsil & District Abbottabad	Mathematics	GGC, Ghazi (Haripur), against vacant post
37.	Sufia Afsar D/O Afsar Ali Postal Address: House No: 233, Street 64, Sector D-I, Phase-I, Hayat abad Peshawar, Permanent Address: Village & P/O Booni Tehsil Mustuj, District: Chitral	Mathematics	GGC Chitral, against vacant post

TERMS AND CONDITIONS.

- i. They shall, for all intents and purposes be Civil Servants, except for the purpose of Pension and Gratuity. In lieu of the same, they shall be entitled to receive Contributory Provident Fund. For the said fund 10% contribution will be made by the Provincial Government and 10% by the Civil Servant concerned in the prescribed manner. Provided further that, in the event of death of the civil servant, whether before or after retirement, her family shall be entitled to receive the said amount, if it has already not been received by concerned deceased civil servant.
- ii. They will have all rights / privileges contained in NWFP Civil Servants Act, 1973 with all amendments made therein including NWFP, Civil Servants (Amendment) Act.2005 and Rules made there under.
- iii. In case of resignation, the officer will have to give one month prior notice. In absence of such notice her one month's pay / allowances shall be forfeited to Government.
- iv. The selectee should join her post within 30-days of the issue of this notification. The Director Higher Education NWFP, Peshawar should furnish a certificate to the effect that the selectee has joined the post or otherwise, after one month of the issue of this notification.
- v. In case of disciplinary matters, NWFP, Civil Servants Act.1973 and NWFP, Civil Servants Removal from Service (Special Powers) Ordinance 2000 shall be applicable.
- vi. They will get pay i.e. initial pay of BPS-17 including usual allowances as admissible under the rules. They will be entitled to annual increment like other Civil Servants.
- vii. They will be equally considered for appointment against higher post if found eligible on the basis of competence, expertise and experience.

SECRETARY TO GOVT; OF NWFP,
HIGHER EDUCATION DEPARTMENT

Endst: No. & Date Even.

Copy to the:-

1. Secretary, Public Service Commission, Peshawar.
2. Accountant General NWFP Peshawar.
3. Secretary to Govt. of NWFP, Establishment Department, Peshawar.
4. Director, Higher Education NWFP, Peshawar.
5. Director Education FATA NWFP.
6. District/Agency Accounts Officers concerned.
7. Principals, of the College concerned.
8. P.S. to Minister for Education, NWFP.
9. P.S. to Secretary, Higher Education Department, NWFP Peshawar.
10. Officers concerned.

Attested true copy
Asstt Prof.
Govt Girls Degree College
Haripur

(Signature)

(Asifa Sarwar)
SECTION OFFICER (FC)



DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA
Rand Garhi, Chamanani Stop, Near Govt. Poly Technical Institute
PESHAWAR

Ammin
B-9

No. 8540

/AD/ACR

Tel #: 091-2650018

Dated: 9/4/2021

Ms. Javeria Haroon

I am directed to convey to you the following adverse remarks recorded in your Performance Evaluation Report for the period from 01.01.2017 to 31.12.2017

PART-IV (REPORTING OFFICER EVALUATION)

3. Pen-Picture.

• She lacked the flexibility in her attitude, and also she was not good at her communication, and interpersonal skills.

1. Special aptitude.

• Poor

6. Overall Grading.

Below Average.

7. Fitness for promotion.

Not yet fit for promotion

I hope you will try your best to remove these defects. One spare copy of this D.O. letter is enclosed. This may be signed and returned to this office for placement in your Character Roll. Please note that nothing is to be written on it except merely putting your signature and dates in token of having received this letter. In case the acknowledgement is not received in this office within a week, it will be presumed that you have accepted the remarks and no appeal will be entertained after the specified time.

Javeria
19/04/2021

Ms. Javeria Haroon,
Assistant Professor of chemistry,
GGCW, Haripur.

*Received via whatsapp app of clerk
from GPGCW, Haripur on
19-04-2021 (09:51am)
while on HEART (MTPB)
mandatory training]*

[Signature]
ASSISTANT DIRECTRESS (ACR)

Encls: No. _____

Copy of the above is forwarded for information and necessary action to:

1. The Principal GPGCW, Haripur.
2. DD(F) Local Directorate.

Attested True copy
[Signature]
ASST. PRINC.
Govt Girls Degree College
Haripur

ASSISTANT DIRECTRESS (ACR)

Amna
B-10



**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA
RANO GARHI, CHAMKANI STOP, NEAR GOVT. POLY TECHNICAL
INSTITUTE, PESHAWAR**

E-mail: - dhokpkpesh@gmail.com Facebook.com/dhokppeshawar Twitter.com/dhokppeshawar
Tel # 091-2650016

No 15959 IADI/ACR

Dated Peshawar the 01/07/2021

To:

Ms. Javeria Haroon,
Assistant Professor of chemistry,
GPCC(W), Haripur.

SUBJECT: PERFORMANCE EVALUATION REPORT (PER'S) FOR THE YEAR 2020.

I am directed to refer to the subject cited above and to inform you that your PER's for the year 2020 is graded as "Average".

Therefore, you are directed to improve your performance, otherwise, you will face difficulties in future promotions.

attested true copy
Javeria
Asstt Prof.
Govt Girls Degree College
Haripur

[Signature]
ASSISTANT DIRECTRESS (ACR)



Scanned with CamScanner



**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA**



Annex
2
B-11

NEAR NORTHERN BY PASS, RANO GARHI PESHAWAR

Tell: 0919330496 Phone: 091-2650016

E-mail:- dhekpkpesh@gmail.com ACR Section E-mail:- dheacrsection@gmail.com

No. 19501 / AD (ACR)

Dated: 14/10/2022

To

Registered

Mrs. Javeria Haroon, Assistant Professor of chemistry,
Govt; Postgraduate College For Women, Haripur.

Subject: ADVERSE REMARKS RECORDED BY THE REPORTING OFFICER AND COUNTERSIGNED OFFICER IN THE PER (PERIOD 01.01.2021 TO 31.12.2021).

I am directed to convey you that following adverse remarks recorded in your Performance Evaluation Report for the period 01.01.2021 to 31.12.2021 by the Reporting Officer/Principal and Countersigned Officer Mr. Zahoor Ul Haq, the then Director Higher Education.

PART-IV (REPORTING OFFICER EVALUATION)

No.1 **Please comment on the officer's performance on the job given in part II (2) with special reference to knowledge of work, quality and quality of output. How far was the officer able to achieve targets? Do you what has been stated in part II (2)**
"Agreed with the data provided Part II for academic results but list of job description is exaggerated & performance was not up to the desired satisfaction of the undersigned".

No.3. **Pen Picture.**
"Emotionally unstable, tries to perform her duties but due to same attitude problems other members of the team feel uncomfortable".

No.6. **Overall Grading (Countersigning Officer).**
"Average".

No.7 **Fitness for promotion (Countersigning Officer).**
"Not yet fit for promotion".

PART-V (REMARKS OF THE COUNTERSIGNING OFFICER)

No.1. **How well do you know the officer? If you disagree with the assessment of the reporting officer, please give reason.**
"Agreed with R.O. Needs to improve her attitude with colleagues & superiors".

I hope you will try your best to remove these defects. One spare copy of this D.O. letter is enclosed. This may be signed and returned to this office for placement in your Character Roll. In case the acknowledgement is not received in this office within a week time, it will be presumed that you have accepted the remarks and no appeal will be entertained after the specified time. (Please note that nothing is to be written on it except merely putting your signature and dates in token of having received this letter).

(AFRASEYAB)

For Assistant Director
(Academics/ACR)

Endst; No. _____ /

Copy of the above is forwarded to the:

1. Deputy Director (Female), Local Directorate with the remarks to place the same in her personal file.
2. Superintendent, Promotion Cell, Local Directorate.
3. C.R Dossier/Office Copy.

attested true copy
Javeria Haroon
Govt. Girls Degree College
Haripur

**Assistant Director
(Academics/ACR)**

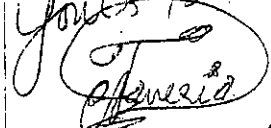
To,
The Director
Higher Education Department,
Khyber Pakhtunkhwa, Peshawar.


Through Proper Channel

Sub: Appeal for Expunge of Adverse Remarks on PER/ACK

Respected Sir,
With due respects w.r.t. kind letter No. 8540/AD/ACK dated 09-04-2021 (received via what's app, GPGCW, Haripur on 19-4-2021 (9:51 am) during HEART training (MTP-34), regarding adverse remarks under Part IV (Reporting Officer) on my Performance Evaluation Report (PER) from period 01-01-2017 to 31-12-2017, it is stated that I remained flexible and cooperative in my behaviour during dealings with students, academic staff, administration, ministerial staff as well as parents of students while serving in various college committees (cleanliness, BS Chemistry Examination Coordination, FA/FSc admissions, students' grievances, Gas, Electricity, Tub well etc) which may be proved during my both trainings (HEITA and HEART) services tasks as well as soft skills and communication skills. I am determined to prove outstanding performance with improvement in future, please with great academics skill

Kindly, expunge these adverse remarks which are introduced in PER/ACK without proof of prior counselings, explanations and warnings regarding my non-flexible attitude, bad communication and bad interpersonal skills as per rule, please
Thanking you in anticipation;

Yours Sincerely,

Dr. Tanveer Hassan,
Assistant Prof. of Chemistry
GPGCW, Haripur

attested true copy Date of - 19th April, 2021.

Govt Girls Degree College
Haripur

To, The Honorable Director,
Higher Education Department (Colleges),
Khyber Pakhtunkhwa, Peshawar
through Proper Channel:

Sub: Appeal for Expunge of Adverse Remarks on PER/ACH.

Respected Sir,

With due respect, w.r.t. kind letter No. 1950/AD(ACR) dated 14-10-2022 received via dispatched on 19-10-2022 regarding adverse remarks under Part-IV (Reporting Officer Evaluation) and Part-V (Remarks of the Countersigning Officer) on my Performance Evaluation Report (PER) submitted on 21-12-2021 (approx 10 months ago) from period 01-01-2021 to 31-12-2021, it is stated that I always remained emotionally stable, well-behaved, flexible, caring and cooperative in my dealings towards students and their guardians as well as all working staff at institution including administrative, academic and ministerial colleagues while teaching and serving via various duties assigned with dignity and peacefully, whether assigned to me verbally or in written through proper channels, as Area Incharge in association with different working functional teams and committees at College and even worked after duty hours.

Furthermore, Area Incharge at our institution is concerned with all affairs of assigned area including cleanliness, furniture, water, gas, electricity, water supplies, sanitary, laboratories and even related staff tea. Additionally, being member of Chemistry Department, various tasks are assigned including arrangement of research and industrial visits, projects, making science models, exhibitions, posters, presentations, competitions, workshops, SAR, PTM related to CEC reports.

Additionally, I always remained comfortable in respectful manner in direct verbal or written communication related to any problem and negligence on part of any sub-officer in an amicable way and always acted upon the directions of respected head of institution.

Kindly, expunge these adverse remarks which are introduced in my PER/ACH without initial proof of prior counselings, explaining, internal and external inquiries, disciplinary actions in a stepwise manner regarding my dissatisfied performance, any incomplete tasks, attitude problems, unavailability for team members and emotional stability issue (Proof attached 1-20) thanking you in anticipation,
Yours sincerely,
Dr. Jamia Sheron
Assistant Prof. of Chem.
G.D.C. U, Peshawar

Dated - 19th October, 2022 -

attested by copy
ASST P.
Govt Girls Degree
Haripur

1-ACR

13/10

Amended
C-14



**OFFICE OF THE PRINCIPAL: GOVT. POSTGRADUATE COLLEGE
FOR WOMEN HARIPUR.**



Phone No. 0995-628781 Gmail: ggcw1haripur@gmail.com

No. 56 /

Dated. 07 / 02 / 2023

To

The Director, Higher Education
Khyber Pakhtunkhwa, Peshawar.

Subject:

REDRESSAL APPEAL.

Memo:

Enclosed please find the self-explanatory application of Mrs. Javeria Haroon, Asstt Professor of Chemistry of this college is hereby submitted for further necessary action.

Principal

**Govt. Postgraduate College for Women
Haripur**

attested & true copy

ASSTT PROF.
Govt Girls Degree College
Haripur

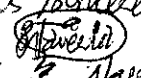
To,
The Respected Director,
Higher Education Department,
Khyber Pakhtunkhwa, Peshawar.
Through Proper Channel.

Subject: Redressal Appeal for Sympathetic Review of Deferred Promotion Decision and Upgradation with Expunge of ACRs/PERs and Seniority (2017, 2020, 2021)

Respected Sir,
With due respect, it is an honour to state that
w.r.t. my previous appeals dated 20th December, 2022 and 9th January, 2023
with covering letter No. 16 dated 11-01-2023 and Tentative Seniority
BPS-19 with covering letter No. 2670 dated 16-01-2023 as well as
my previous appeals for expunge of ACRs/PERs dated
19th April, 2022 (2017 ACR/PER), 19th October, 2022 (2021 ACR/PER)
after introduction of adverse remarks without related any type
of counseling (advice/warning/explanations/other directions on prior basis,
according to Rule 3.6 (a), (b), (c) of instructions regarding PERs/ACRs (DHE
Letter No. 22957 dated 25-11-2022) (DHE letter No. 23922 dated 7-12-2022),
it is hereby humbly requested to consider me for Promotion in BPS-19
with seniority fixation at correct serial No. from the date of vacant/
available seat after PSB dated 18-11-2022 as all cases including
mine got clearance on said date as displayed by KPPLA association.


My all appeals are still non-responsive with no
further communication from departmental side and any notification
letter with non-compliance of rules may lead to struck off by law,
please, along with upgradation of my ACRs/PERs for the years 2017,
2020 and 2021 on prior basis, please for redressal of my grievance.

It is again requested to send me PSB meeting
dated 18-11-2022 minutes with solid reasons for deferred promotion
later on after clearance of all cases as my ACRs/PERs were
also not missing for said PSB. (DHE letter 18148 dated 5-12-2022)
(females 18-19 (228) cases) and one countersigning officer recommended
"Not fit for promotion" in my ACRs/PERs also and my juniors got promoted.
Thanking you in anticipation,

Yours sincerely,

Dr. Javed Anwar,
Assistant Prof. of Chemistry
PGC, U.P. Hazrat.

Date: 7th February, 2023.

M/O

attested true copy

Dr. Javed Anwar
Assistant Prof. of Chemistry
PGC, U.P. Hazrat



FOR WOMEN HARIPUR.



Amen
C-16

Phone No. 0995-628781 Gmail: pgcwHaripur@gmail.com

No. 117

Dated. 27 / 02 / 2023

To

The Director, Higher Education
Khyber Pakhtunkhwa, Peshawar.

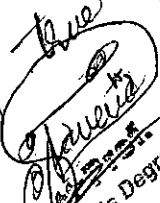
Subject:

REQUEST FOR EXPUNGE OF ACK/PER FOR THE YEAR 2022.

Memo:

Enclosed please find the self-explanatory application of Mrs. Javeria Haroon, Asstt Professor of Chemistry of this college is hereby submitted for further necessary action.

Principal
Govt. Postgraduate College for Women
Haripur

attested true copy

Javeria Haroon
Asstt Professor
Govt Girls Degree College
Haripur

Date - 27-02-2023

Govt. PG. CW, Haripur

To,
The Respected Director,
Khyber Pakhtoonkhwa,
Peshawar.

Sub: Request for Expunge of ACR/PER for the year 2022

Respected Sir,

With due respect, it is an honour to state that after earning "Very Good" ACR/PER for the year 2019 from the same reporting officer, now, as apprehension of singul of impugned adverse remarks and average gradation for the continuous last two years 2020 and 2021 without prior counselling as per rule, it is most humbly requested to expunge my ACR/PER for the year 2022 upto the extent of upgradation alongwith suspension of adverse judgement, if any, as authorized controlling officer of ACRs.

In addition, as per rule, to avoid personal likes and dislikes, may place under another reporting officer most preferably JMC Coordinator i.e., Respected Principal of Government Post Graduate College, Panipat.
Hijazif needed, please -

Thanking you in anticipation of acknowledgement by your gracious self,

Yours Sincerely,
Javeed

Dr. Javeed Haqoom,
Assistant Prof. of Chemi
G.P.G.C.W, Haripur

Date - 27-02-2023

attested true copy
Javeed
Asst. Prof.
Govt Girls Degree College
Haripur