

**BEFORE THE KPK SERVICE TRIBUNAL CAMP COURT**  
**ABBOTTABAD**

Service Appeal No. 251/2023

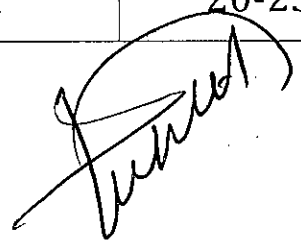
**Muhammad Azmat.....Appellant**

**VERSUS**

**Govt. of Khyber Pakhtunkhwa  
Through Secretary  
and Director, Higher Education Peshawar.....Respondents**

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**Deponent**

**Dated: 20-06-2023**

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**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**CAMP COURT ABBOTTABAD.**

S.A # 251/23

M. Muhammad Azmat.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa  
Through Secretary  
and Director, Higher Education Peshawar..... Respondents

**PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1 & 2**

Respectfully Sheweth: - That the respondents submits as under:

**Preliminary Objections:-**

1. That the appellant has got neither cause of action nor locus standi to file the instant Service Appeal.
2. That the appellant has not come to this Tribunal with clean hands.
3. That the appellant is estopped by his own conduct to file the instant appeal.
4. That the instant service appeal is bad for misjoinder & non joinder as the countersigning officer is not made party in the instant case.
5. That the appeal is barred by law and limitation.

**Facts:-**

- 1) Correct to the extent that the appellant is the employee of Higher Education Department, rest of the Para Pertain to record
- 2) Pertains to record.
- 3) Correct to the extent that the adverse PER for the year 2020 & 2021 was communicated to the appellant vide letter dated 20.09.2022 (Annex-A)
- 4) Correct to the extent that Departmental appeal was received (Annex-B) which was processed but in the meanwhile the appellant submitted another application for changing his countersigning officer in addition to the prayer mentioned in his departmental appeal (Annex-C) which was processed and fact finding inquiry was initiated on the complaint of the appellant (Annex-D) but the appellant submitted his statement before the inquiry officer that the matter is subjudice (Annex-E) and the inquiry officer concluded his inquiry being subjudice (Annex-F)
- 5) As already explained in Para 4
- 6) Incorrect. As already explained in preceding paras.

**Grounds:-**

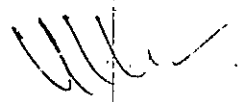
- 1) Incorrect. The appellant was always in trouble with his colleague due to which his PER was recorded as adverse.
- 2) The PER of the year 2020 & 2021 was reported by the reporting officer on 13/01/2022, the same was sent to the countersigning authority on 12/09/2022

and vide letter dated 22/09/2022 Adverse PER were communicated to the appellant.

- 3) It is pertinent to mention here that the appellant was performing his duties with the utter dissatisfaction of his highups as he has violated the conduct rules by defaming the Department through Social Media (Annex-G) on complaint in this regard an explanation was also called from him (Annex-H). Moreover, an inquiry was also conducted wherein inquiry officer recommended that the appellant maybe warned to reform his attitude & avoid misuse of Social Media & Print Media for negative propaganda & defamation of the department (Annex-I) but the appellant did not mend his ways.
- 4) As already explained in Para 3.
- 5) As already explained in preceding Paras.
- 6) Incorrect. As already explained in preceding Paras.
- 7) It is pertained to mention here that on the request of the appellant a fact finding inquiry was initiated (Annex-D) wherein the appellant submitted his statement that the matter is subjudice (Annex-E) due to which the inquiry officer concluded his inquiry being subjudice. (Annex-F).
- 8) As already explained preceding paras
- 9) Incorrect. As already explained in preceding Paras.
- 10) Pertains to record.
- 11) Pertains to record.
- 12) Incorrect. As already explained in preceding Paras.
- 13) That the respondents may be allowed to raise additional grounds at the time of arguments.

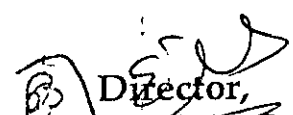
**Prayer:-**

It is, therefore, humbly prayed that the instant Service Appeal is based on misconception/nisstatements hence may graciously be dismissed.



**Secretary,**

Higher Department Education, Khyber Pakhtunkhwa  
Respondent No 1



**Director,**

Higher Education Khyber Pakhtunkhwa,  
Respondent No. 2.

Annet - A

DIRECTORATE OF HIGHER EDUCATION

KHYBER PAKHTUNKHWA

NEAR NORTHERN BY PASS, RANO GARHI PESHAWAR

Tel: 0919330496 Phone: 0912650016

E-mail: [dhekpesh@gmail.com](mailto:dhekpesh@gmail.com) ACR Section E-mail: [dheacrsection@gmail.com](mailto:dheacrsection@gmail.com)

No. 17342 /AD (ACR)/M.Azmat

Dated: 20/19/2022

Registry

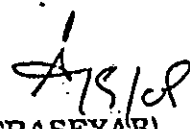
Muhammad Azmat

I am directed to convey to you the following adverse remarks recorded in your Performance Evaluation Report for the period from 01.01.2020 to 31.12.2020 and 1.1.2021 to 31.12.2021.

PART-IV (REMARKS OF COUNTERSIGNING OFFICER)

2. How well do you know the officer? If you disagree with the assessment of the reporting officer, please give reasons.  
"Not Agreed with R.O. The officer is always in trouble with colleagues" (2020)  
"Not Agreed with R.O. Direct complaints from students and staff" (2021)
3. Overall Grading.  
"Average"
4. Recommendation for promotion.  
"Not Yet"
5. Evaluation of the quality of assessment made by the reporting officer.  
"Exaggerated"

I hope you will try your best to remove these defects. One spare copy of this D.O. letter is enclosed. This should 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.


  
(AFRASEYAB)  
Assistant Director  
(Academics/ACR)

Muhammad Azmat  
Associate Professor of English,  
Govt. Postgraduate College, Haripur.

Endst; No. 17343-14/

Copy of the above is forwarded to the:

1. Deputy Director (Estt), Local Directorate.
2. Superintendent Promotion Cell, Local Directorate.
3. Master File.

  
(AFRASEYAB)  
Assistant Director  
(Academics/ACR)

Annex-B

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The Director,  
Higher Education Department,  
Khyber Pakhtunkhwa.

Through: Proper Channel

Subject: Request for Expunction of Adverse Remarks of Countersigning Officer from My Performance Evaluation Reports of 2020 & 2021

Sir,

In compliance to your Letter No. 17342/AD (ACR)/M.Azmat, dated 21/9/2022, as received on Saturday, 24<sup>th</sup> Sep, 2022 (Afternoon) from my Principal, the following responses are hereby submitted on 27<sup>th</sup> Sep, 2022 to your honour for the favour of expunction of adverse remarks from my PERs of 2020 & 2021:

2. (i) "Not Agreed with R.O. The officer is always in trouble with colleagues" (2020)

**RESPONSE:** It is humbly stated that, as per requirements of justice, my behavior may please be considered, assessed and represented in an overall, concrete, and factual manner. In fact, I have worked as a subordinate under five Principals so far in GPGC Haripur and that is the total period of my service in Higher Education Department. All of those Principals have been my Reporting Officers too in their respective tenures. With the grace of Allah, all of them always appreciated my behavior and performance. They trusted me and assigned me very important responsibilities of the college (e.g., Chairman BS Amount Disbursement Committee, Resource Person, Editor English Section as well as Chief Editor of the college magazine, Inspector BS Exams, and Chairman Research Seminar Committee), which all demanded a high level of proactive job behavior on the one hand and a candidly courteous interpersonal relationship with the colleagues or/and the students on the other. To my pleasure, I accomplished all those assignments successfully. In recognition, my performance and behaviour have always been acknowledged by the Principals as reflected from the PERs they wrote for me. Besides, I was rather honoured by them with even prizes, oral words of appreciation and certificates as well.

Secondly, I rendered my services as a highly honoured Resource Person of Directorate of Higher Education Khyber Pakhtunkhwa in recognition of which a shield was presented to my humble self from the Director Higher Education in March 2019.

Thirdly, it is humbly requested that the assessment of my respected immediate supervisor upon me behavior and performance in my 2020 and 2021 PERs, should not be ignored any way, as it is only he who is the best position to analyze my performance and character more closely, directly and comprehensively. Besides, the credibility of his remarks about me and my other colleagues is also evident from his highly dignified stature, a track-record of honesty, dignity, and selflessness. In fact, he is undoubtedly the one among the most senior educational leaders of the whole province and commands immense respect from almost all of his colleagues of the whole department.

Fourthly, to put with all humble assurance, I have never caused any damage or trouble to any of my colleagues, nor I have ever usurped the right of any of them. Also, no inquiry has ever been carried out against me. Likewise, nothing has ever been conveyed to me by my



(6)

Reporting Officer or Countersigning Officer about my behavior with the colleagues. Overall, I have passed my life as an exponent of devotion, merit and justice.

Fifthly, I always earned a good name for my college, colleagues and the department as a whole by my outstanding performance in various capacities, the most recent example being the convincing and domineering victory of our college magazine in the annual provincial magazine contest first-time ever in the history of our college. Undoubtedly, all this became possible mainly due to my contributions in diverse leadership capacities, that is, the Chief Editor, Editor of English Section and the highest contributing author over which I received immense appreciation not only from within the country as well as from abroad. At the same time, this success speaks aloud about my team leadership and participative leadership behavior.

Lastly, my behavior has altogether been rejected by the use of the high frequency marker "always", while to assert humbly, nothing in this regard was conveyed to me or my Reporting Officer at all for immediate and effective redressal.

**2. (ii) "Not Agreed with R.O. Direct complaints from students and staff"  
(2021)**

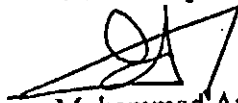
**RESPONSE:** No complaint against me has been received by my Reporting Officer. Nor I was at all communicated about it. My immediate supervisor and I were kept totally aloof from all such correspondence. It clearly shows some misperception, communication gap, or breach of trust somewhere due to which not a single complaint against me was conveyed to my Reporting Officer. Then appearing as a sequel to this, the assessment of the Reporting Officer about me was not considered either. On the other hand, it happened so that, in Oct, 2021, I received a souvenir from the hands of the Additional Director Academics as well as a rich applause from all around over my successful accomplishment of the assigned duties as the Chairman Research Seminar Committee.

**3. Overall Grading: AVERAGE**

**RESPONSE:** It lacks due recognition and reflection of my outstanding performance, high level of integrity and proactive overall behavior alongwith its various dimensions, and my track-record of a number of outstanding accomplishments obviously based on a progressive and proactive life style and behaviour.

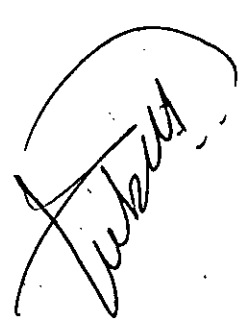
In light of the above-stated supporting points and responses, it is earnestly requested to your gracious self to revisit and expunge the adverse remarks recorded against me by the Countersigning Officer.

Yours Respectfully,



Muhammad Azmat,  
Associate Professor of English,  
GPGC, Haripur.

Dated: 27<sup>th</sup> Sep, 2022.



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

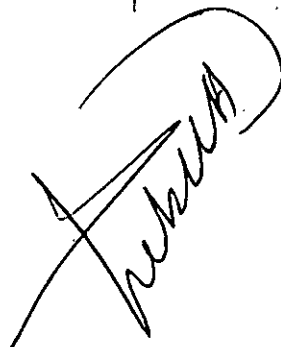
Subject: Request / Reminder for (a) Changing Countersigning Officer for My PER of Year 2022, (b) Expunging Adverse Remarks from my PERs of Years 2020 & 2021, (c) Taking a Legal Action against Harassing Acts of High Officials of Directorate against Me, and (d) Granting Me Due Recognition over Historic Win of Our Magazine in Provincial Contest

Sir,

Consequent upon a severe damage done to my career and honour by high officials of the Directorate (as already conveyed to your kind self through my Appeal of 3<sup>rd</sup> Oct. and Complaint of 21<sup>st</sup> Oct, 2022) with more threats still hovering around me regarding my PER of 2022 and confidential record (which are unfortunately at the disposal of the same Officials) on the one hand while no response or redressal by your kind self so far in this regard on the other hand, I once again make a highly earnest and humble request to your gracious self to grant me justice and provision of my due rights and honours as stated in the Subject Line above. The supporting details for each prayer are presented as under:

1. The Countersigning Officer for My PER of the Year 2022 may please be replaced with some other one of true professional, honest, balanced and fair approach on the following main grounds:

- The default Countersigning Officer for my PER of 2022 is the present Director Mr. Khurshid Ahmad who has already expressed his strong personal grudge against me through sponsoring and partaking in the organized blatant criminal campaign against me, comprising the abuse of power, negative use of social media, cyber-bullying, and public defamation, thereby causing me mental torture and harassment; rather, he is still issuing threats to me through indirect means and channels in connection to my PER of 2022. In this backdrop, it is impossible for the said officer to get objective towards me in compliance to Rule 11 from "GUIDELINES FOR FILLING UP THE PER" which says that "The Reporting and Countersigning Officers should be clear, direct, OBJECTIVE, and unambiguous in their remarks."
- It is noticeable that Mr. Khurshid has conveyed to me the adverse remarks in my PERs of 2020 & 2021 so late in a willful manner, in fact just at a time when my promotion is due, obviously to harm my career, while he hoarded the adverse remarks/ observations (if any really existed then) of the concerned countersigning officer against me earlier on, while sharing with me no counseling, warning, or explanation etc. for mending my behavior if he really found that improper. Thus, he has himself committed the violation of his own directives in the recent letter no. 22957, dated 25/11/2022, on the title "ADVERSE REMARKS / GRADING", wherein he has otherwise directed the Principals with reference to Rule 3.6 (a, b, & c) related to Filling up PER "to strictly follow the guidelines/ instructions issued for reporting the PERs of the officers/ Officials and record adverse remarks (if any) only in those cases in which prerequisites have been completed and applied as per rule / instruction."
- It is so regretful that, rather than appreciating me over my historic contributions for the provincial annual contest winning magazine of my college as the Chief-Editor, Editor




(English) and prominent Author [while as per past tradition, the concerned college, Chief Editor, Editors and eminent authors were duly rewarded with oral appreciation, certificates, souvenirs, cash prizes, etc.], Mr. Khurshid or any other authority from the Directorate has not written even a single word of appreciation in this regard so far. Rather, getting flared up even more over my blazing success, he has adamantly resorted to disregard my devotion, hard work and honour by sponsoring the criminal acts of public defamation and harassment against me. Likewise, not a single word of appreciation has come from the Secretariat too. Sorrowfully and dejectedly, "If gold rusts, what can iron do."

- All the above-stated mala fide acts of Mr. Khurshid Ahmad obviously show that his behavior towards me lacks due justice, objectivity, balance, moderation, and magnanimity – the traits which are necessarily worthy of such a responsible position. Therefore, if such a person remains my countersigning officer for my PER of the year 2022, my honour and career would completely be ruined for sure.

**2. Adverse Remarks in my PERs of Years 2020 & 2021 may please be expunged on the following main grounds (which are presented here as an addition/ continuation to my already submitted APPEAL):**

- The countersigning officer for my PERs of years 2020 & 2021 Mr. Zahoor-ul-Haq has recorded adverse remarks against me out of his mala fide intentions and a strong acquired chronic personal grudge against me, actually in reaction to my raising voice against some anomalous acts of my those colleagues, who are unfortunately his close friends, of which some are even his old chums from GPGC Haripur and Secretariat Peshawar.
- Like Mr. Khurshid Ahmad, Mr. Zahoor-ul-Haq has also violated Rule 3.6 (a, b, c) about filing up PER (as quoted earlier). In fact, during his own tenure as Director Higher Education from June 2020 upto his retirement in 2022, Mr. Zahoor-ul-Haq never conveyed to me any adverse remarks during the respective years, that is, 2020 & 2021, to mend my behavior in case he found it improper at all. This shows that the purpose before Mr. Zahoor-ul-Haq, in unison with Mr. Khurshid and his team, is just to harm my career rather than to reform things on my part (if any) at the right time in a decent, magnanimous and dignified manner as is always worthy of such a responsible position as JUDGE / EVALUATOR.
- Mr. Zahoor-ul-Haq has recorded adverse remarks against me out of injustice. As a matter of fact, all my PER's of all the previous years including 2020 & 2021 were written with an overall "Good / Very Good" Grade by all the Reporting Officers and endorsed so by all the respective Countersigning Officers except him. This not only puts a question mark on the reliability, fairness and concurrent validity of his assessment about my behavior and performance [which have been outstanding throughout] but is also a violation of Rule 9 regarding filling up PER, which says that "The Countersigning Officers should make an unbiased evaluation of the quality of performance evaluation made by the Reporting Officer."
- Mr. Zahoor-ul-Haq has rejected the evaluation of my Reporting Officer only about me out of almost 100 Lecturers and Professors of my college. In fact, as contrary to this biased act, I am the only one from my college who have achieved a number of outstanding successes and earned great honour for me and my college in various capacities, notably as, (a) a teacher of English language, linguistics and literature (always showed best results, got the Best Teacher Award from the Prime Minister of Pakistan in 2007; taught in Umm al Qura University, KSA, representing my country brilliantly over there), (b) a trainer of





college lecturers and professors (the only one from my college to have been honoured with this prestige, by the Directorate itself; rather, in due honour, a shield alongwith a cash prize and certificate of recognition was presented to my humble self from the Director Higher Education in March 2019), (c) chairman BS amount disbursement committee (no embezzlement, pendency etc. during my 5-year of dedicated work in this tough, volunteer capacity), (d) chairman seminar committee (honoured with a souvenir and a certificate by the Additional Director in Nov, 2021, for the successful conduction of a research seminar ever in the history of the whole college), (e) PhD English research scholar (1st CPA in coursework), (f) MPhil Gold Medalist, (g) research thesis improver (all my research students got 1st CPA in writing Semester Exam, 2022), (h) author (7 Research Articles, 2 theses, a number of guidebooks and projects), (i) Chief-Editor, Editor (English), and eminent Author of various types of writings of the first ever provincial contest winner magazine, of my college for the session 2021-22. Thus, again, there clearly appears not only a question mark on the reliability, fairness and concurrent validity of Mr. Zahoor-ul-Haq's assessment about my behavior and performance but is also a violation of Rules 8 & 9 related to filling up the PER."

- My Reporting Officer of BPS-20 Prof. Muhammad Sajjad Khan is senior to my countersigning officer of BPS-19 and undoubtedly enjoys a far greater reputation and dignity throughout the province for his honesty and competency (he is actually in promotion zone for BPS-21 with no adverse remarks against him) in addition to being in a far better position to assess my behavior and performance more minutely, directly and comprehensively than the countersigning officer sitting in Peshawar, hardly paying only one visit to our college and that too was made so late, that is, at a time when the research seminar ended and the lunch was over, though the lunch had to be arranged for him separately then by the college (i.e., in Nov, 2021).
- While my Reporting Officer has never received a single complaint against me, Mr. Zahoor-ul-Haq has recorded in my PER of the year 2021 that he received direct complaints against me from the staff and the students [which he never shared with my Reporting Officer]. Naturally and noticeably, here arises a big question on the veracity of this claim on the ground that if there was really any complaint against me, then why he didn't share that with my Reporting Officer as per his duty. In fact, it clearly appears that Mr. Zahoor-ul-Haq's assessment about me is absolutely mala fide based on mere concoctions. Rather, it is clearly a act of biased and autocratic nature and is actually a violation of Rule 11 of filling up the PER which says that "The Reporting and Countersigning Officers should be clear, direct, objective, and unambiguous in their remarks. Vague impressions based on inadequate knowledge or isolated incidents should be avoided."
- Mr. Zahoor-ul-Haq never conveyed to me directly or indirectly even a single complaint against me or anything related to it (i.e., warning, explanation, inquiry, counseling, etc.) during the period he mentions regarding his receiving of direct complaints against me (i.e., 2021). But, it can be noticed that, the moment I started to receive great honour from all around for my outstanding contributions for the college magazine with my promotion getting due at the same time, Mr. Khurshid and Mr. Zahoor-ul-Haq suddenly got active and started manipulating things to stop my promotion forever by ruining my PERs of two successive years in one go first, and then, the third one at the end of 2022 (which is not far either) by Mr. Khurshid himself then being a default countersigning officer.
- It is noticeable to mention here that the adverse remarks of my countersigning officer have been communicated to me after a lapse of 1 year, 08 months & 20 days as related to my performance for the year 2020 while after almost 8 months & 20 days as related to my performance for the year 2021 – in fact, just at the time of my promotion to BPS-20. This

*(Handwritten signature)*

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act speaks itself as of purely mala fide nature rather than of a reformative and corrective one. In 2010 PLC (C.S) 1357, Honorable Balochistan Service Tribunal dealt with an identical matter wherein there was a delay of one year in reporting adverse remarks to the officer and the remarks were expunged in the end

- Alhamdulillah, I have never harmed the career or usurped the rights of any of my colleagues. No inquiry has ever been done against me. As such, nothing has ever been conveyed to me by my Reporting Officer or Countersigning Officer about my behavior with the colleagues. Overall, I have passed my life as an exponent of merit, justice, and excellence.
- The allegation on me in my PER of 2020 is that "The officer is ALWAYS in trouble with colleagues." It is so shocking that all goodness or decency about my behavior has been rejected by the use of the high frequency marker "always" by Mr. Zahoor which can never be true of any subordinate or in fact any human being in an absolute manner. Such an extreme remark about me is nothing but an act of sheer bias and stereotyping. Besides, not only I but every God fearing person is always in trouble with those around who either indulge themselves or support others for their unjust acts by usurping the rights of the deserving ones. In fact, the path of virtue is always troublesome. And I prefer such a path as a teacher and as a practicing Muslim with a strong belief in the Grand Accountability.
- While your kind self has already accepted the APPEAL of Prof. Akmal Shah of Govt. Akhtar Nawaz Shaheed College, KTS Haripur, against Mr. Zahoor's concocted and mala fide remarks of similar nature on his PERs of 2020 & 2021, I may please be granted the same favour in accordance with the principles of equity and justice.
- I implore your gracious self to verify the reality and veracity of the complaints and the assessment made thereupon over my PERs of 2020 & 2021; otherwise, such fabricated complaints and mala fide assessments can ruin the future of any civil servant.
- Overall, in view of the mala fide and harassing acts by the high officials of the Directorate, I make an earnest request to your kind self for the expunction of adverse remarks from my PERs of years 2020 & 2021 in the larger interest of justice, fair-play and equity.

**3. A strict legal action should be taken against harassing acts of high officials of Directorate against me on the following main grounds:**

- It is natural that when a junior officer of relatively low rank somehow occupies a senior position in the presence of hundreds of really-eligible honest officers of the right caliber and rank around, such an officer, howsoever resourceful and influential he/she is, obviously lacks due legitimacy, decency, magnanimity, moral strength, professionalism, and competency. As a result, he/she may commit such acts which may not only ruin the career and honour of even such a subordinate who possesses an outstanding career and has earned a good name for the whole department and even the country but also may defame the whole department. What has regrettably happened to me as a subordinate is the worst example of this bitter fact.
- In view of the mala fide and harassing acts by the high officials of the Directorate, I make an earnest request to your kind self to launch a legal departmental enquiry against the cognizable offences of public defamation and harassment as committed against me by the said perpetrators in the larger interest of justice, fair-play, and equity as well as to ensure confidentiality of confidential records and respect for the dignity of the people working in this prestigious department.

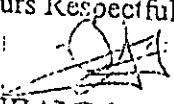
*Zahoor*

4. A due recognition may be conferred upon me, my college, and my team for stupendous hard work we did to achieve the historic win for our magazine in the annual provincial college magazine contest.

As a matter of fact, in the past, the ranking of our magazine before my designation as the Chief Editor, Editor (English Section) and my contributions as a prominent author therein, always used to be lower than even 100. I burned the midnight oil to earn this historic achievement and honour for my college, my whole community as well as my department by and large.

With humble regards and thanks to your gracious self in anticipation,

Yours Respectfully,

  
MUHAMMAD AZMAT,

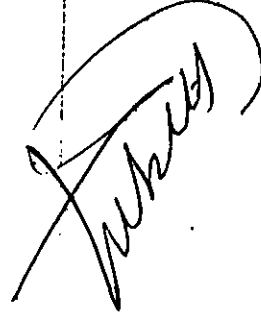
Associate Professor of English (BPS-19),

Govt. Postgraduate College, Haripur,

Department of Higher Education, Khyber Pakhtunkhwa.

Mobile: 0335-5640995

Dated: 5<sup>th</sup> Dec, 2022.





# DIRECTORATE OF HIGHER EDUCATION

*Amir* - **KHYBER PAKHTUNKHWA**

**Rano Garhi, Peshawar**

Tel # 091-2650025 / 9330496

E-mail:- [dhekpakesh@gmail.com](mailto:dhekpakesh@gmail.com) Facebook.com/dhekpakeshwar Twitter.com/dhekpakeshwar

19 124

No. 4222-1 / CA-II/ Estt: Branch: A-12/Mulid Azmat/English

Dated Peshawar the 7 / 03 /2023

To

Dr. Azhar Muhmoed  
Principal,  
Govt; Post Graduate College, Mandian,  
Abbotabad.

SUBJECT

REQUEST/ REMINDER FOR (A) CHANGING  
COUNTERSIGNING OFFICER FOR MY PER OF YEAR 2022,  
(B) EXPUNGING ADVERSE REMARKS FROM MY PERS OF  
YEARS 2020 & 2021, (C) TAKING A LEGAL ACTION  
AGAINST HARASSING ACTS OF HIGH OFFICIALS OF  
DIRECTORATE AGAINST ME. AND (D) GRANTING ME DUE  
RECOGNITION OVER HISTORIC WIN OF OUR MAGAZINE IN  
PROVINCIAL CONTEST.

Respected Sir,

السلام عليكم

I am directed to enclose herewith a copy of letter No. SO (Colleges-III)/HED/ 11-6/2022/PERs/ M. Azmat/456/3408 dated 16.02.2023 received from the Section Officer (Colleges-III), Govt; of Khyber Pakhtunkhwa, Higher Education Department, Peshawar on the subject cited above which is self-explanatory and to state that the Director, Higher Education, Khyber Pakhtunkhwa is pleased to appoint you as Inquiry Officer to probe into the allegations against Mr. Muhammad Azmat, Associate Professor of English, Govt; Post Graduate College, Haripur and conduct a fact finding inquiry and report thereof be sent to this office alongwith clear-cut recommendations within a week positively for onward submission to the Provincial Government, please.

Endst; No. 4222-25 / 1 / 03

**DY: DIRECTOR (ESTABLISHMENT)**

Copy of the above is forwarded to the:-

1. Section Officer (Colleges-III), Govt; of Khyber Pakhtunkhwa, Higher Education Department, Peshawar with reference to his letter No. referred above.
2. Deputy Director (I.T), Local Directorate.
3. Assistant Director (ACR), Local Directorate.
4. PA to Director, Higher Education, Local Directorate.

**DY: DIRECTOR (ESTABLISHMENT)**

*[Handwritten signature]*

(Annexure IV)  
Annex - E

13

Dated: 13<sup>th</sup> March, 2023

The Inquiry Officer Dr. Azhar Mehmood,  
Principal, Govt. Postgraduate College,  
Mandian, Abbottabad.

**Subject: REQUEST/ REMINDER FOR (A) CHANGING COUNTERSIGNING OFFICER FOR MY PER OF YEAR 2022, (B) EXPUNGING ADVERSE REMARKS FROM MY PERS OF YEARS 2020 & 2021, (C) TAKING A LEGAL ACTION AGAINST HARASSING ACTS OF HIGH OFFICIALS OF DIRECTORATE AGAINST ME, AND (D) GRANTING ME DUE RECOGNITION OVER HISTORIC WIN OF OUR MAGAZINE IN PROVINCIAL CONTEST**

Respected Sir! Assalaamu Alaikum!

In compliance to your directive, no. 3159, dated Mandian the 10/03/2023, I hereby ensure my attendance on 13/03/2023 at 12:00 pm noon, respectfully stating that my grievances, as cited in the Subject Line above, are now sub judice in the august Khyber Pakhtunkhwa Service Tribunal (Appeal No. 251/2023) and FIA (Enquiry/Case No. 1297/2022); therefore, it is prayed to kindly wait for their esteemed decisions thereof.

Humble Regards!



Muhammad Azmat,  
Associate Professor of English (BPS-19),  
Govt. Postgraduate College,  
Haripur.



Annex-P

14

The Director,  
Higher Education Khyber,  
Pakhtunkhwa, Peshawar.

**SUBJECT: INQUIRY REPORT REGARDING REQUEST/REMINDER FOR (A) CHANGING COUNTERSIGNING OFFICER FOR MY PER OF YEAR 2022, (B) EXPUNGING ADVERSE REMARKS FROM MY PER OF 2020 & 2021, (C) TAKING A LEGAL ACTION AGAINST HARASSING ACTS OF HIGH OFFICIALS OF DIRECTORATE AGAINST ME AND (D) GRANTING ME DUE RECOGNITION OVER HISTORIC WIN OF OUR MAGAZINE IN PROVINCIAL CONTEST. OF MR. MUHAMMAD AZMAT ASSOCIATE PROFESSOR OF ENGLISH, GOVERNMENT POSTGRADUATE COLLEGE HARIPUR.**

Respected Sir,

Reference the Directorate of Higher Education Khyber Pakhtunkhwa Peshawar, letter ENDST; No. 4222-25/ Dated Peshawar the 07/03/2023, on subject cited above wherein undersigned was appointed as inquiry officer. The undersigned is tasked to conduct a fact-finding inquiry regarding allegations against Mr. Muhammad Azmat Associate Professor of English GPGC Haripur and submit report thereof for pursual of competent authority and further action.

The letter (and relevant documents, Annexed as I, 7pages) is the complaint received from Directorate of Higher Education, against Mr. Muhammad Azmat Associate Prof. of English wherein, different allegations were made against him.

The undersigned contacted the Principal GPGC Haripur about the assignment given by the Directorate of Higher Education. Letters No. 31581 and No.31591 (Annexed as II & III) were sent to the principal and accused officer. It was requested to provide relevant record and arrange the meeting of accused officer on 13/03/2023.

In this regard, the Principal GPGC Haripur arranged a meeting in his office with Mr. Muhammad Azmat, Associate Prof in the office of Principal on 13/03/2023.

The accused officer Prof. Muhammad Azmat submitted his statement (Annexed as IV). In his statement as well as in personal hearing the accused officer submitted that all allegations mentioned in the subject of inquiry are under trial in the Khyber Pakhtunkhwa Service Tribunal (Appeal No. 251/2023) and FIA (Enquiry/ Case No. 1297/2022). Therefore, he can not submit any statement as the case is sub judice in courts and it was requested to wait for their esteemed decisions.

27/3/2023

2

15

**CONCLUSION**

The accused officer in his statement and in personal hearing replied that all above allegations which were cited in the subject of fact-finding inquiry, with same subject matter against the same authority are filed in the court. It was requested to wait for decision of honorable courts before proceeding further. As all allegations with same subject matter and same relief are under trial in the court. The sub judice rule prevents us to discuss or debate the matter pending in court proceeding. Therefore, report is submitted for pursual of competent authority.

*[Handwritten Signature]*  
27/3/2023  
**PROF. DR. AZHAR MEHMOOD**

**PRINCIPAL**  
Government Postgraduate College Mandian  
Abbottabad **Principal**  
Govt. Post Graduate College  
Mandian / Abbottabad

**Dated: 27/03/2023**

*[Handwritten Signature]*

(16  
149)

Facebook

Annex-6Q



Muhammad Azmat > KPPLA Community.

5h • Public

There should be a strict notice of the anomalies of the principals and the blackmailing tactics they use by coming to this post through political support and appeasing their political godfathers in return by all crooked and unscrupulous ways. I have observed for a long time that the majority of them are morally bankrupt, incompetent and unworthy of... See More



Khaliq Ur Rehman

1d • Public



ہائیر ایجوکیشن میں ایک اور اہم تبدیلی - پہلی مرتبہ مشیر ہائیر ایجوکیشن میاں خلیق الرحمن نے کالجز کے پرنسپلز کے لئے انڈرویوز کا انعقاد کیا۔ مشیر اعلیٰ ت...

See More

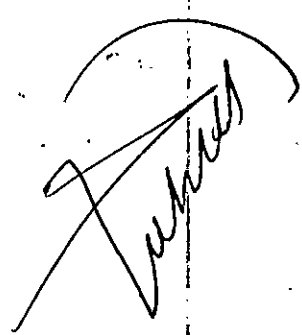


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148 (17)

There should be a strict notice of the anomalies of the principals and the blackmailing tactics they use by coming to this post through political support and appeasing their political godfathers in return by all crooked and unscrupulous ways. I have observed for a long time that the majority of them are morally bankrupt, incompetent and unworthy of such an important leadership position. They get this post by means of the political support, the undue favour of the higher-ups, or some form of bribery. So their very appointment is based on foul means and vicious promise and commitment to slavishly comply with the orders of either their political or bureaucratic godfathers. Once it so happened that one of our principals did not entertain as many candidates for some petty jobs as his political godfather asked him to consider. At this the political master came in a furious mood and abused the Principal, calling the worst names of the principal, but the principal remained silent even over his mother's insult done so violently, so boisterously, so shamefully, and so provocatively by the political don because the principal had got his post through the same politician to satisfy his life-long inferiority complexes. In fact, most of the principals are "haram khor" and hungry for cheap power. This is their main dilemma. Honest principals and genuine leaders are very few. So their eligibility and intentions must be properly evaluated before conferring upon them the sacred responsibility of thousands of students and teachers and the well-being of grand learning institutions.



18

← Q Search



53

10 comments • 1 share

Like

Comment

Share



Muhammad Azmat

8 Sep

Say "No!" to corruption It is so sad that the results of college magazines are still lying unannounced somewhere in some dark cell not only of this session but also of the last session. Is there anybody around to take notice of that in this regard??? Regretfully, it is a sheer disregard of the diligent efforts of the editorial boards, the teachers and the students of the colleges of the whole province. Isn't it a big question mark on the integrity of the gentlemen who are in charge of it???

10

Like

Comment

Share



Muhammad Azmat

8 Sep



Amrii khattak is at Amrii's Studio.

Follow

3 Sep, Lahore, Pakistan

When Asif was stopped by Afghani player - Pak vs Afghanistan 12 of 7 balls... See more

*Handwritten signature*

Annex - H

19

150



GOVERNMENT POSTGRADUATE COLLEGE HARIPUR  
Tel No. 0995-321043 Fax No. 0995-321043  
Email: hrp4109@gmail.com



No. \_\_\_\_\_

Date: 08/07/2020


To

Mr. Muhammad Azmat  
Associate Prof. of English

Subject: EXPLANATION

Reference your post on social media (KPPA Community), of which the copy is attached here with. You violated the rules of business as indicated in the Notification (Dated: 27-05-2019) namely "MISUSE OF SOCIAL MEDIA RESOURCES" (copy is attached herewith for quick reference). You have used the social media for negative propaganda, baseless allegations and defamation of officials, which lead to the damage of ethical values and peaceful co-existence among the community and public. You are also needed to provide a comprehensive note of proofs about your all allegations as you stated for the officials and public figures.

In the light of aforementioned facts, why not a strict disciplinary action is initiated / taken against you according to E&D Rules 2011 and Prevention of Electronic Crimes Act 2016. Your reply of this letter should be reached to this office of the undersigned on or before July 13, 2020 positively.

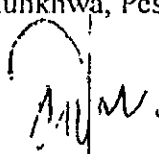
*P-147*  
  
Principal  
Govt. Postgraduate College  
Haripur

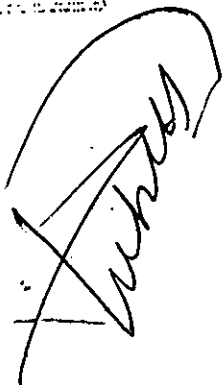
Endst: No. 2889-92

Copy to the:-

1. PA to Secretary, Higher Education Department, Govt of Khyber Pakhtunkhwa, Peshawar.
2. Director, Higher Education Department, Govt of Khyber Pakhtunkhwa, Peshawar.
3. Officer concerned.
4. Personal file.

*DD*  
RECEIVED ON  
13 JUL 2020  
19207/131

  
Principal  
Govt. Postgraduate College  
Haripur



Annex - H

19

150



GOVERNMENT POSTGRADUATE COLLEGE HARIPUR  
Tel No. 0995-321043 Fax No. 0995-321043  
Email: hrp4109@gmail.com



No. \_\_\_\_\_

Dated: 08/07/2020

To

Mr. Muhammad Azmat  
Associate Prof. of English

Subject: EXPLANATION

Reference your post on social media (KPPLA Community), of which the copy is attached here with. You violated the rules of business as indicated in the Notification (Dated: 27-05-2019) namely "MISUSE OF SOCIAL MEDIA RESOURCES" (copy is attached herewith for quick reference). You have used the social media for negative propaganda, baseless allegations and defanation of officials, which lead to the damage of ethical values and peaceful co-existence among the community and public. You are also needed to provide a comprehensive note of proofs about your all allegations as you stated for the officials and public figures.

In the light of aforementioned facts, why not a strict disciplinary action is initiated / taken against you according to E&D Rules 2011 and Prevention of Electronic Crimes Act 2016. Your reply of this letter should be reached to this office of the undersigned on or before July 13, 2020 positively.

Principal  
Govt. Postgraduate College  
Haripur

Endst: No. 2889-92

Copy to the:-

1. PA to Secretary, Higher Education Department, Govt of Khyber Pakhtunkhwa, Peshawar.
- ✓ 2. Director, Higher Education Department, Govt of Khyber Pakhtunkhwa, Peshawar.
3. Officer concerned.
4. Personal file.

RECEIVED ON  
08/07/2020  
19207

Principal  
Govt. Postgraduate College  
Haripur

*[Handwritten signature]*

Annex - I

20

The Director Higher Education,  
Khyber Pakhtunkhwa, Peshawar.

**SUBJECT: APPEAL AGAINST THE USURPATION OF MY DUE RIGHT/UNFAIR NOMINATION OF THE BEST TEACHER FOR THE YEAR 2018-19 BY THE COLLEGE NIMINATION COMMITTEE AND ITS ENDORSEMENT BY THE PRINCIPAL AND HIS REVIEW COMMITTEE AND JMC MEMBERS.**

**Inquiry Officers: 1. Prof. Dr. Ghulam Mustafa, JMC Coordinator/Principal Govt. Postgraduate College, Manshra**

**2. Prof. Altaf Khattak, Govt. Postgraduate College No.1, Abbottabad.**

**Place of inquiry: Govt. Postgraduate College, Haripur**

**Procedure: Personal Hearing, official record and written statements**

**Background:**

A couple of years ago the Government of Khyber Pakhtunkhwa decided to encourage healthy competition amongst the teachers of Government Colleges (Male & Female). For attainment of this objective the criteria was set and sent to JMCs for finalization of best teachers' nomination. For the year 2018-19 the nomination were to be finalized at JMC level and furnished to the Directorate of Higher Education up to 28-02-2019.

In pursuance of the same all JMCs finalized nominations and furnished to the quarter concerned. Mr. Muhammad Azmat, Assoc. Professor of English, GPCG, Haripur submitted appeal against the nomination made by Haripur JMC.

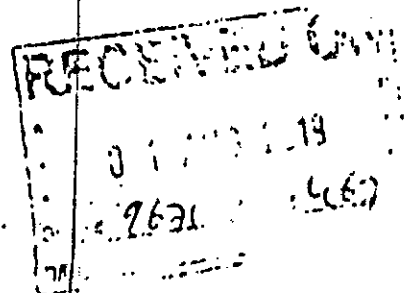
The Director, Higher Education, constituted an inquiry committee vide letter No.12821-22 dated Peshawar 13/06/2019 to probe the subject matter and point out factual position with recommendations/opinion.

**Statement of Allegations:**

The complainants alleged that:

1. The Principal collected feedback from the students he did not teach in the session;
2. The results were not assessed as per laid down criteria;
3. He possesses better computer skills while the college nominee is not even basic user;
4. The committee awarded full marks of lesson planning to its choice candidate;
5. Complainant's presentation marks were not awarded to him;
6. The Principal formed a review committee with mala fide intentions without any intimation to the complainant.

AD (Acad)



Proceedings:

In compliance with the directives of the Director Higher Education, Khyber Pakhtunkhwa Peshawar vide letter No. 12821-22/BTA/AD (Academics); dated 13/06/2019, the Inquiry Committee visited Government Postgraduate College Haripur on 03/07/2019 (after intimation to the concerned) to probe into the matter and find out factual position of the allegations leveled against the Principal, Evaluation Committee and Review Committee.

The Committee first met Mr. Muhammad Azmat and gave him the opportunity of personal hearing regarding the allegation he leveled against the Principal and committee's. Simultaneously, the committee examined thoroughly the record of his appeals to Principal and the Director Higher Education (Annexure-A). He could not provide any evidence (courier/Post Office receipt) in support of his claim that he had submitted appeal to the Director Higher Education, Khyber Pakhtunkhwa, as per procedure.

He verbally confirmed that his allegations were true but when asked whether the feedback obtained by the Principal/Committee was of the students he never taught. He replied that they were his students but not of the session. The criteria say that feedback will be taken from those students who have been taught by the teacher (Annexure-B). For computer literacy he submitted his own written claim rather than from some expert or institution. He could not provide any evidence in support of his lesson presentations in seminar or conference. As per criteria marks can be awarded to a resource person of seminars/conferences where the presenter has to share his own research. He produced certificate of participation in workshop (Annexure-C)

He also questioned the prerogative of the Principal of formation of review committee. He said that it was consisted of the junior faculty members. The Principal did not intimate him about this development though evidence proves his claim baseless (Annexure-D). During this process the Committee observed that the complainant has attitudinal issue. His tone and language was unlikely to the norms of official code.

When asked when he completed his Ph.D, as he has used the word Dr. with his name in the appeal he submitted to worthy Secretary Higher Education. His reply was that in some gathering he was honored with it verbally by someone but he possesses no Ph.D degree. However, he has been enrolled in Ph.D but has not yet started research work. He further said that the Principal was partisan and jealous with him. He submitted his written statement also (Annexure-E).

Subsequently, the Principal, Evaluation Committee and Review Committee members explained their viewpoint before the Inquiry Committee. The Principal said that on receiving directives for nomination of best teacher he constituted a committee consisting of Prof. Naeem Akhtar, Prof. Qazi Ahsan Ahmad and Mr. Rehman Wali Khattak, Assistant Professor (Annexure-F). After completing the process the committee submitted its report in which the score of Prof. Arshad Pervaiz was highest (Annexure-G). On receiving complaint about calculation of marks he constituted a review committee of senior faculty members but due to their engagement somewhere else a review committee consisting of Mr. Aftab Ahmad, Asstt. Professor, Mr. Tariq Naveed, Asstt. Professor and Mr. Naveed Khan, Lecturer was constituted for the needful (Annexure-II). After complete review of documents and

record the Review Committee realized that the former committee had awarded marks to all candidates leniently. The extra marks were deducted from all candidates but still the top position was retained by Mr. Arshad Pervaiz (Annexure-I). The JMC Committee consisting of Prof. Dr. Ashfaqe Ahriad, Principal, GFGC, Haripur, Prof. Azra Yasmeen, Principal, GGDC, Sarai Saleh and Prof. Shafi Khattak, Principal, GDC, Ghazi examined all cases and nominated one male and one female teacher as per criteria to the quarter concerned (Annexure-J).

When the committee members were asked about the procedure they adopted for selection of best teacher they said that they performed their job as per criteria. For feedback names of contesting teachers were announced to the students they taught and collected feedback from them (Annexure-B). So far as result was concerned the contestants selected one class of their choice themselves and we collected record and calculated aggregate result in the light of the laid down formula (Annexure-L). On query about assessing computer literacy the committee told that Mr. Azmat submitted his claim to be computer literate with his own signature while Prof. Arshad Pervaiz submitted a certificate issued by Institute of Computer Science (Annexure-M). Both candidates got equal marks for computer literacy. On question on lesson planning the committee members told that equal marks were awarded to all by nomination committee but after review marks of those contestants were deducted who did not submit appropriate record of lesson planning. Few lesson plans record was provided by Mr. Arshad Pervaiz. Mr. Azmat submitted a page from B.Ed book about contents of a lesson plan but no Lesson Plan was provided to the committee about the courses he taught. (Annexure-N). About publications and presentations in seminars and conferences the committee members told that marks were awarded as per criteria. Mr. Azmat did not provide evidence of participation in a seminar or conference as presenter of paper/resource person. He provided certificates of participation as resource person in workshops that did not fall in the criteria (Annexure-O).

In the wake of nominations Mr. Muhammad Azmat propagated the issue through social and print media that not only defamed the college but also spoiled its environment by causing clash and conflict (Annexure-P). Keeping the negative impact of misuse of social media on academic environment the competent authority has taken serious notice of such activities with extreme displeasure and directed all concerned to monitor such activities and proceed against the offenders under E&D Rules 2011 and Prevention of Electronic Crimes Act, 2011: (Annexure-Q).

The probe through interviews, official record and written statements confirmed that Mr. Azmat appears to be very ambitious with attitudinal problem. Such attitude may destroy growth of institutions as well as sanctity of official hierarchy. No institution or organization can function smoothly if official protocol or code is not observed. The subordinates may have reservation but for addressing their reservations/grievances they are required to stay calm and submit appeal to the higher authority. Involving media in official matters is unlikely of the conduct of a civil servant. This attitude is not healthy for institutional life. It disturbs peaceful environment and creates rifts.

**Findings:**

After thorough examination of the entire relevant record available for the instant appeal, the following facts were observed:

- 1. Feedback was taken from the students whom Mr. Muhammad Azmat taught.

15/1

2. Only one class of each contestant was considered for getting average result.
3. No discrimination was made in awarding computer literacy marks.
4. Lesson planning marks were awarded for actual lesson plans submitted to the review committee.
5. Mr. Muhammad Azmat neither presented any paper in a seminar nor in a conference as a resource person.
6. The Principal dually constituted committees as per his prerogative.
7. Mr. Muhammad Azmat involved social and print media in the matter which defamed the institution.

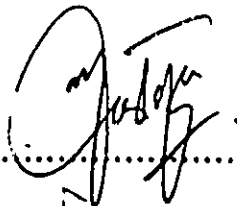
Recommendations:

After thoroughly examining the matter, the Inquiry Committee recommends as follow:

1. The college administration may be advised to show no leniency in awarding marks in such matters to avoid unnecessary inconvenience which compel them to go for reviews. Carefulness will help in preventing clash and conflict in the college.
2. Mr. Muhammad Azmat may be warned to reform his attitude and avoid misuse of social and print media for negative propaganda and defamation of the institution and the department.
3. Instead of proceeding against him under E&D Rules 2011 he may be adjusted/transferred somewhere else for best institutional interest and his reformation.

Inquiry Officers:

1. Prof. Dr. Ghulam Mustafa.....



2. Prof. Altaf Khattak.....

