

**BEFORE THE HONORABLE SERVICE TRIBUNAL,**  
**KHYBER PAKHTUNKHWA, PESHAWAR,**

**SERVICE APPEAL NO. 988/2023**

**JAVERIA HAROON**

.....(Appellant)

**VERSUS**

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
THROUGH CHIEF SECRETARY & OTHERS**

.....(Respondents)

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Law officer

Higher Education department



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES &  
LIBRARIES DEPARTMENT**

**AUTHORITY LETTER**

Mr. Muhammad Sohrab Khan, Law Officer (BPS-17), Directorate of Higher Education, is hereby authorized to submit parawise comments in the honorable Khyber Pakhtunkwa Service Tribunal, Peshawar in Service Appeal No. 988/2023 titled Javeria Haroon VS Chief Secretary, Khyber Pakhtunkwa & others on behalf of official Respondents. It is further stated on oath that in this appeal, the answering respondents have neither been placed ex-parte nor their defense has been struck off.

A handwritten signature in black ink, appearing to read 'Sohrab Khan', written over a horizontal line.

Law officer

Higher Education department

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

**In S.A 988/2023**

Dr. Javeria Haroon

.....Appellant

**VERSUS**

Govt. of KPK, through Chief Secretary & others

.....Respondents

**AFFIDAVIT**

*I, Muhammad Sohrab Khan (Law Officer, Higher Education Department KP), do hereby solemnly affirm and declare on oath that the contents of these **Para Wise Comments** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court. It is further stated on oath that in this appeal the answering respondents have neither been placed ex-parte nor their defense has been struck off.*



**DEPONENT**

**CNIC: 17301-6418910-9**

**Cell No. 0321-5778226**



20

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

S.A # 727/2023

Mst. Javeria Haroon .....

Appellant

Khyber Pakhtunkhwa  
Service Tribunal

**Versus**

Govt. of Khyber Pakhtunkhwa  
Through Secretary, Higher Education Peshawar  
& Others.....

Diary No. 8573

Dated 24-10-2023

Respondents

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

**Respectfully Sheweth: -**

**Preliminary Objections:-**

1. That the appellant has got no cause of action/locus standi to file the instant Service appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands and is trying to conceal material facts.
3. That the appellant is estopped by his own conduct to file the instant service appeal.
4. That the instant service appeal is time barred.

**Facts: -**

- 1) Pertain to record.
- 2) Correct to the extent that the appellant is employee of Higher Education Department Since 2009, rest of the Para pertains to record.
- 3) Pertains to record.
- 4) Incorrect. That the appellant earned Adverse PER for the years 2017 & 2021 and Average PER for the year 2020 Adverse PER for the year 2017 was communicated to the appellant vide letter dated 09/04/2021 (**Annex-A**) against which the appellant filed appeal (**Annex-B**) which has been regretted by the competent authority vide letter dated 03.02.2022 (**Annex-C**). PER for the year 2021 was graded as average which was communicated to the appellant vide letter dated 01/07/2021 (**Annex-D**) Adverse PER for the year 2021 was communicated vide letter dated 14/1/2022 (**Annex-E**) Appeal of the appellant was sent to the competent authority vide letter dated 01.03.2023 (**Annex-F**). It is also worth to mentioned here that the appellant was habitual of absenteeism in this regard so many explanations are also called from her (**Annex-G**) and warnings dated 27.09.2017, 14/01/2021 & 05/03/2021 are also given (**Annex-H**).
- 5) As already explained in para 4
- 6) Incorrect. That the appellant is not aggrieved person as already explained in preceding paras.

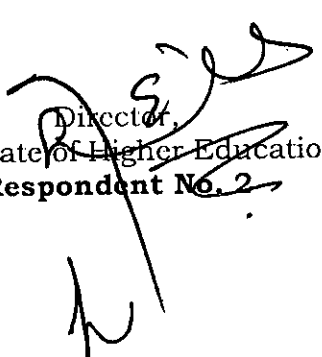
**Grounds: -**

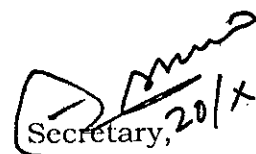
- 1) As already explained in the preceding paras.
- 2) Incorrect. As already explained in para 4 of facts. Reporting officer has called explanation in the year 2017 and warning dated 27/09/2017 was also given by

- 2) Incorrect. As already explained in para 4 of facts. Reporting officer has called explanation in the year 2017 and warning dated 27/09/2017 was also given by the competent authority. In the year 2020 explanations were called by the reporting officer (**Annex-I**) and in year 2021 again warning dated 14/01/2021 & 05/03/2021 were given to the appellant but she did not mend her behaviour.
- 3) Pertain to the reply of respondent No. 7.
- 4) Incorrect. As already explained in preceding para 4 of facts & Para 2 of grounds.
- 5) Pertain to the reply of respondents No. 7 & 8.
- 6) Incorrect. That warning dated 27/09/2017 was given to the appellant.
- 7) Incorrect. Pertain to the reply of respondents No. 7 & 8.
- 8) Incorrect. As already explained in proceeding paras.
- 9) Incorrect. As already explained in proceeding paras.
- 10) Incorrect. That the appellant has been treated within four corners of law.
- 11) Incorrect. That the fundamental rights of the appellant are not violated
- 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 case is based on misconception/misstatement, hence may graciously be dismissed with appropriate cost.

  
Director,  
Directorate of Higher Education,  
**Respondent No. 2**

  
Secretary,  
Higher Education Department,  
**Respondent No. 1**



**DIRECTORATE OF HIGHER EDUCATION**  
**KHYBER PAKHTUNKHWA**  
*Rano Garhi, Chamkanl Stop, Near Govt. Poly Technical Institute*  
**PESHAWAR**

*Ank-A*

Tel # 091-2650016

NO. 8540 /ADI/ACR.

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.

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

*o/c* ASSISTANT DIRECTRESS (ACR)

Endst; No. 8541-47

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

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

*o/c* ASSISTANT DIRECTRESS (ACR) *Amex-c*

To,

Director

Higher Education Department,

Anna-B

Hyber Pakhtunkhwa, Peshawar.

Through Proper Channel

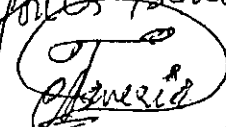
Subj: Appeal for Expunge of Adverse Remarks on PER/ACK

Respected Sir,

With due respects, w.r.t. kind letter No. 8540/AD/ACK dated 09-04-2021 (received via what's app, GPCW, Haripur on 19-4-2021 (9:51 am) during HEART training (MTP-84), 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/PC admissions, students' grievances, Gas, Electricity, Tub well etc.) which may be proved during my both trainings (HEITA and HEART) presentations, assignments, group discussions, Community Services Tasks as well as soft skills and communication skills. I am determined to prove outstanding performance with improvement in future, please with great academic skills.

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 inter personal skills as per rule please.

Thanking you in anticipation,  
DDF

Yours Sincerely,  
  
Inayat Hussain

Dr. Inayat Hussain,  
Assistant Prof. of Chemistry,  
GPCW, Haripur.

Date of - 19th April, 2021. 8873 334





GOV

ENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES &  
LIBRARIES DEPARTMENT

No. SO(C-III)/III/Mrs. Javeria Haroon, AP in Chemistry/2022 //  
Dated Peshawar, February 03, 2022.

To

The Director,  
Higher Education, Khyber Pakhtunkhwa  
Peshawar.

Subject:

ADVERSE PER FOR THE YEAR 2017 IN R/O JAVERIA HAROON, ASST  
PROFESSOR IN CHEMISTRY.

I am directed to refer to your office letter No.3151/AD/ACR dated 01-06-2021 on the subject noted above and to state that the Competent Authority has regretted the request regarding expunction of adverse remarks in PER for the year 2017 in respect of Mrs. Javeria Haroon, Assistant Professor in Chemistry (BS-18), Govt. Postgraduate College for Women, Haripur.

The original PER for the year 2017 is returned herewith for your record.

Encl: as above

(SAMIA JABEEN)  
Section Officer (Colleges-III)

Copy of above is forwarded to PS to Secretary Higher Education Department for information, please.

Section Officer (Colleges-III)

Annex - E





D  
DIREC

And-1  
E OF HIGHER EDUCATION

ER PAKHTUNKHWA

RANO GARHI, CHAMAN STOP, NEAR GOVT. POLY TECHNICAL  
INSTITUTE, PESHAWAR

E-mail: [unepesh@gmail.com](mailto:unepesh@gmail.com) Facebook.com/dhekppeshawar Twitter.com/dhekppeshawar  
Tel # 091-2650016

No 13958 /AD/ACR

Dated Peshawar the 01/7 /2021

To

Ms, Javeria Haroon,  
Assistant Professor of chemistry.  
GPGC(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.

O/C ASSISTANT DIRECTRESS (ACR)

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.wel; 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)

ok Assistant Director  
(Academics/ACR)

Endst; No. 19502-111  
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.

Assistant Director  
(Academics/ACR)

F  
DIRECTORATE OF HIGHER EDUCATION

KHYBER PAKHTUNKHWA

NEAR NORTHERN BY PASS, RANO GARHI PESHAWAR

Tell: 0919330496 Phone: 091-265001

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


No. 1222 /AD (ACR)

Dated: 1 / 03 /2023

The Secretary,  
Higher Education, Archives & Libraries Department,  
Khyber Pakhtunkhwa, Peshawar.

**Subject: APPEAL FOR EXPUNGE OF ADVERSE REMARKS IN PER FOR THE PERIOD 2021.**

I am directed to refer to the cited subject that the PER of Mrs. Javeria Haroon, Assistant Professor of Chemistry, GPGCW, Haripur have adverse remarks from reporting officer (Principal Mrs. Nighat Shaheen) which is further endorsed by countersigning officer (Prof. Zahoor ul Haq) the then Director. Furthermore, attached herewith photocopies of self explanatory appeal vide Annexure-A, comments of the reporting officer vide Annexure-B, comments/views of the countersigning officer on the body of the letter vide Annexure-C, adverse convey letter vide Annexure-D alongwith a single original PER vide Annexure-E (return requested), for expunction or otherwise please.

  
Dr. Nasar Jalil

o/c Assistant Director/ACR

Endst; No. 1223 / 1

Copy of the above is forwarded to;

1. Deputy Director (Female), Local Directorate.
2. Office copy.

  
Dr. Nasar Jalil

o/c Assistant Director/ACR

**DIRECTORATE OF HIGHER EDUCATION  
KHYBER PAKHTUNKHWA**

**NORTHERN BY PASS, RANO GARHI PESHAWAR**

Tell: Phone: 091-9214402

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

No. 4526 /AD (ACR)

Dated: 29/08

Reminder

To,

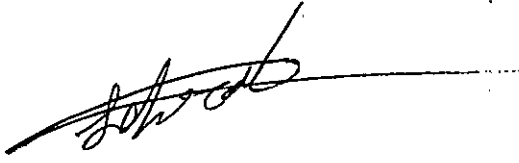
The Section Officer (C-III),  
Higher Education, Archives & Libraries Department,  
Khyber Pakhtunkhwa, Peshawar.


**SUBJECT APPEAL FOR EXPUNGE OF ADVERSE REMARKS IN PER FOR THE PERIOD 2021.**

I am directed to refer to this office letters No.1222, dated 1.3.2023, No.1915 dated 11.4.2023 & No.3599, dated 12.07.2023 on the mentioned subject requesting your esteem remarks / decision regarding Mrs. Javeria Haroon, Assistant Professor of Chemistry GPGCW, Haripur which is still awaited. As the up coming PSB is expected in the month of September, it is important to ensure that all the necessary documents are in order. Besides that, the concerned lady also files a petition in Service Tribunal against the department in same matter.

Your cooperation in this regards will help us evaluate her performance for the year and make decision accordingly.

This office will look forward for the necessary orders from you soon.



  
o/c **Dr. Nasar Jalil**  
Assistant Director/ACF

**DIRECTORATE OF HIGHER EDUCATION**  
**KHYBER PAKHTUNKHWA**  
NEAR NORTHERN UNIVERSITY, MANO GARHI PESHAWAR



Ann-C  
18

Tel: 091-9214402

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

No. 3599 /AD (ACR)

Dated: 12 / 07 /2023

Reminder

To,

The Section Officer (C-III),  
Higher Education, Archives & Libraries Department,  
Khyber Pakhtunkhwa, Peshawar.

**SUBJECT APPEAL FOR EXPUNGE OF ADVERSE REMARKS IN PER FOR THE PERIOD 2021.**

I am directed to refer to this office letters No.1222, dated 1.3.2023 & No.1915, dated 11.4.2023 on the mentioned subject requesting your esteem remarks / decision regarding Mrs. Javeria Haroon, Assistant Professor of Chemistry, GPGCW, Haripur which is still awaited. As the up coming PSB is expected in the month of August, it is important to ensure that all the necessary documents are in order. Besides that, the concerned lady also files a petition in Service Tribunal against the department in same matter.

Your cooperation in this regards will help us evaluate her performance for the year and make decision accordingly.

This office will look forward for the necessary orders from you soon.

**Dr. Nasar Jalil**  
Assistant Director/ACR



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES &  
LIBRARIES DEPARTMENT

BS H

No.SO(C-III) HE/1-2/10/Javeria Haroon/Chem/  
Dated Peshawar, 27<sup>th</sup> September, 2017.

5474-5

To

Ms. Javeria Haroon,  
Lecturer in Chemistry (BS-17)  
Govt. Postgraduate College for Women, Haripur.

Subject: ABSENT FROM DUTY.

I am directed to refer to the subject and to state that you have availed 07-days leave without prior permission in the month of January, 2017 however, the Principal concerned converted your absence period into casual leaves.

You are hereby warned to be care full in future otherwise strict disciplinary action will be initiated against you.

(SHAZIA KHAN)

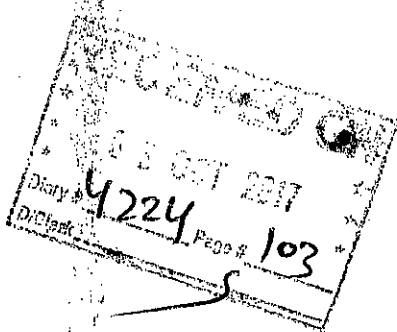
Section Officer (Colleges-III)

Endst: No. & Date of Even

Copy of the above is forwarded to Director Higher Education Khyber Pakhtunkhwa, Peshawar with the request to please place this warning notice in her personal file.

Section Officer (Colleges-III)

DD (F)



1/8  
2/x

Revised  
3/10/2017  
S/II

2528  
3/10  
S/II



**GOVT. POSTGRADUATE COLLEGE FOR WOMEN HARIPUR.**

Phone & Fax No. 0995-611807 Email. [gpgcw1haripur@gmail.com](mailto:gpgcw1haripur@gmail.com)



No. 7077

Dated Haripur the: 14-01- 2021

To

Ms. Javeria Haroon  
Assistant Professor of Chemistry Local College.

Subject: - **WARNING LETTER FOR SHIFLING BLAMES TO OTHERS**

اسلام علیہ

Reference your reply of explanation No.7054-59 Dated 13-01-2021.

As per notification of Higher Education Department Khyber Pakhtunkhawa Dated January 8<sup>th</sup> 2021 all Summer Zone colleges are reopened w-e-f January 11<sup>th</sup> 2021 for teachers- teachers and staff, for making necessary preparations for calling students w-e-f 18-01-2021.

In these days you were supposed to attend the college from 9:00 am to 12:30 pm. On the mentioned date Attendance Register was available for attendance till 10:00am. I myself removed the Register after 10:30 am .

Not accepting your mistakes and try to shoulder off your responsibility by blaming others is a highly non professional attitude.

You are strictly warned to be professional and responsible, learn to accept your mistakes as it is the only way to move forward and improve yourself. If you refuse to do so your mistakes will weigh heavier than they should.

*[Handwritten signature]*

Principal  
Govt. Postgraduate College for Women  
Haripur

Received

*[Handwritten signature]*

14/01/2021  
12:47 pm



**GOVT. POSTGRADUATE COLLEGE FOR WOMEN HARIPUR.**

Phone & Fax No. 0995-611807 Email. [gpgcw1haripur@gmail.com](mailto:gpgcw1haripur@gmail.com)



No. 83

Dated Haripur the: 05/03 2021

To

Ms. Javeria Haroon  
Assistant Professor of Chemistry local College

Subject: - **WARNING**

*Handwritten note in Urdu*

Reference your complaint dated 26.02.2021

It has come to the notice of the undersigned as reported by the Chief Proctor & staff on duty to maintain discipline that you have been repeatedly coming late to class room which creates disturbance among the students. The information has already been conveyed to the office of the undersigned. At that particular day you were only informed to be in time while you were out side the classroom. It is an irresponsible behavior and it is also an excuse for students to skip the class. You are <sup>the</sup> witness as you yourself informed the Chief Proctor that many students bunk your class & stay out side. It is not the duty of Chief Proctor to ensure the attendance of students in your class, only your responsible behavior can make them responsible.

Hope you will take this warning letter seriously & expected to adjust your timing properly as per your assigned time table & show immediate progress.

*Handwritten signature*

Principal

Govt. Postgraduate College for Women  
Haripur

*o/c*

Principal

Govt. Postgraduate College for Women  
Haripur

*Handwritten signature in a circle*

Received 6/03 2021  
on 05/03 2021

*Saturday - 09.4*



GOVT. POSTGRADUATE COLLEGE

FOR WOMEN HARIPUR.

Phone & Fax No. 0995-611807 Email. [gpgcw1haripur@gmail.com](mailto:gpgcw1haripur@gmail.com)



Dated Haripur the: 05/03 2021

To

Ms. Javeria Haroon  
Assistant Professor of Chemistry local College

Subject: - WARNING

اسلام علیہ

Reference your complaint dated 26.02.2021

It has come to the notice of the undersigned as reported by the Chief Proctor & staff on duty to maintain discipline that you have been repeatedly coming late to class room which creates disturbance among the students. The information has already been conveyed to the office of the undersigned. At that particular day you were only informed to be in time while you were out side the classroom. It is an irresponsible behavior and it is also an excuse for students to skip the class. You are the witness as you yourself informed the Chief Proctor that many students bunk your class & stay out side. It is not the duty of Chief Proctor to ensure the attendance of students in your class, only your responsible behavior can make them responsible.

Hope you will take this warning letter seriously & expected to adjust your timing properly as per your assigned time table & show immediate progress.

*[Handwritten signature]*

Principal

Govt. Postgraduate College for Women  
Haripur

o/c

Principal  
Govt. Postgraduate College for Women  
Haripur

*[Handwritten signature]*  
Received

06/03  
07/03 - 2021

Saturday - 09:40



**GOVT. POSTGRADUATE COLLEGE FOR WOMEN HARIPUR.**

Phone & Fax No. 0995-611807 Email. [gpgcw1haripur@gmail.com](mailto:gpgcw1haripur@gmail.com)



No. 7077

Dated Haripur the: 14-01- 2021

To

Ms. Javeria Haroon  
Assistant Professor of Chemistry Local College.

Subject: -

**WARNING LETTER FOR SHIFLING BLAMES TO OTHERS**

اسلام علیہ

Reference your reply of explanation No.7054-59 Dated 13-01-2021.

As per notification of Higher Education Department Khyber Pakhtunkhwa Dated January 8<sup>th</sup> 2021 all Summer Zone colleges are reopened w-e-f January 11<sup>th</sup> 2021 for teachers, teachers and staff, for making necessary preparations for calling students w-e-f 18-01-2021.

In these days you were supposed to attend the college from 9:00 am to 12:30 pm. On the mentioned date Attendance Register was available for attendance till 10:00am. I myself removed the Register after 10:30 am.

Not accepting your mistakes and try to shoulder off your responsibility by blaming others is a highly non professional attitude.

You are strictly warned to be professional and responsible, learn to accept your mistakes as it is the only way to move forward and improve yourself. If you refuse to do so your mistakes will weigh heavier than they should.

Principal  
Govt. Postgraduate College for Women  
Haripur

Received

14/01/2021

12:47 PM