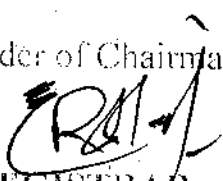


FORM OF ORDER SHEET

Court of _____

Appeal No. 701/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/05/2024	<p>The appeal of Dr. Javeria Haroon presented today by herself. It is fixed for preliminary hearing before touring Single Bench at A.Abad on 30.05.2024. Parcha Peshi given to the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

BEFORE KHYBER PAKHTOONKHWASERVICE TRIBUNAL PESHAWAR

CHECKLIST

Case Title: Dr. Javeria Haqoon vs Hon. Secretary Higher Education, KPK and others

S#	Contents	Yes	No
1.	This appeal has been presented by: <u>Dr Javeria Haqoon</u>	✓	
2.	Whether Counsel/Appellant/Respondent/Department has signed the requisite documents?	✓	
3.	Whether appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned?	✓	
5.	Whether the enactment under which the appeal is filed is correct?	✓	
6.	Whether affidavit is appended?	✓	
7.	Whether affidavit is duly attested by competent oath commissioner?	✓	
8.	Whether appeal/annexures are properly paged?	✓	
9.	Whether certificate regarding filing an earlier appeal on the subject, furnished?	✓	
10.	Whether annexures are legible?	✓	
11.	Whether annexures are attested?	✓	
12.	Whether copies of annexures are readable/clear?	✓	
13.	Whether copy of appeal is delivered to A.G./D.A.G.?	✓	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by Petitioner/Appellant/Respondent?		✓
15.	Whether numbers of referred cases given are correct?		
16.	Whether appeal contains cutting/overwriting?		✓
17.	Whether list of books has been provided at the end of the appeal?	✓	
18.	Whether case relate to this Court?	✓	
19.	Whether requisite number of spare copies attached?	✓	
20.	Whether complete spare copy is filed in separate file cover?	✓	
21.	Whether addresses of parties given are complete?	✓	
22.	Whether index filed?	✓	
23.	Whether index is correct?	✓	
24.	Whether Security and Process Fee deposited? on		
25.	Whether in view of Khyber Pakhtoonkhwa Service Tribunal Rules 1974 Rule 11, notice alongwith copy of appeal and annexures has been sent to respondents? on		
26.	Whether copies of comments/reply/rejoinder submitted? on		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Dr. Javeria Haqoon

Signature: Javeria

Dated: 24-05-2024

BEFORE THE HONOURABLE KHYBER PAKHTOONKHW A SERVICE TRIBUNAL

PESHAWAR Appeal NO. 701/2024

Dr. Javeria Haroon (Ph.D.), Assistant Professor of Chemistry (BPS-18), Govt. Girls Degree College (GGDC), Kot Najibullah, Haripur.

.....Appellant

VERSUS

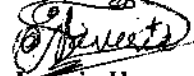
1-Honourable Secretary Higher Education, Khyber Pakhtoonkhwa, Civil Secretariat, Peshawar.

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

INDEX

S#	Description of Documents	Annex	Pages
1.	Grounds of Appeal		1-3
2.	Affidavit		4
3.	Addresses of Parties		5
4.	Copy of the Departmental Letter	"A"	6
5.	Copy of Departmental Appeal	"B"	7-11

Appellant (by self)



Dr. Javeria Haroon (Ph.D.),
Assistant Prof. of Chemistry (BPS-18),
Govt. Girls Degree College,
Kot Najibullah, Haripur.

Dated: 24-05-2024

BEFORE THE HONOURABLE KHYBER PAKHTOONKHWA SERVICE TRIBUNAL ary No. 12974
PESHAWAR

Service Appeal No. 701/2024

Dated 24-05-2024

Dr. Javeria Haroon, Assistant Professor of Chemistry (BPS-18), Govt. Girls Degree College (GGDC), Kot Najibullah, Haripur.

.....Appellant

VERSUS

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

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

.....Respondents

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTOONKHWA SERVICE TRIBUNAL ACT 1974, AGAINST THE IMPUGNED ACTION OF THE RESPONDENTS BY ILLEGAL AND UNLAWFUL ADVERSE REMARKS RECORDED IN THE ACR/PER OF THE APPELLANT FOR THE YEAR 2023 AND AGAINST NO ACTION TAKEN AFTER 90 DAYS ON THE DEPARTMENTAL APPEAL OF APPELLANT UPTO THE EXTENT OF UPGRADATION AND EXPUNCTION OF ADVERSE REMARKS RECORDED IN THE ACR/PER OF THE APPELLANT FOR THE YEAR 2023

PRAYER

Being aggrieved and dissatisfied with non-compliance of rules and regulations and no response of Appellant's departmental appeal after passing 90 days, 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, 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 not to consider no-communicated adverse ACR/PER devoid of related prior counseling related to remarks by reporting officer and related prior personal hearing by regional director as first countersigning officer in prescribed time period 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.

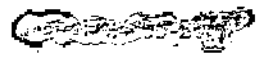
3-Grant compensation for all grievances, unfairness and mishandling Appellant's departmental appeals as Appellant's suffering by hands of senior peers with no written response on sympathetic basis opened a gate for unauthorized continuous sufferings of juniors by hands of seniors whereas all impugned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

4-Set all factual evidences as open proof to be accepted during proceedings and direct the respondents (1 and 2) to provide related departmental notifications, if needed.

Filed to-day
Registrar
24/5/24

5-Club this appeal to prior in process appeal 727/2023 for expunge and upgradation of ACRs/PERs (2017, 2020, 2021, 2022) for expeditious processing as related to promotion in BPS-19.

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



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 and 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.

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 15 years, 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 relegated ACR/PER for the year (2023) with belated communication to Appellant at time of PSB (copy of impugned adverse remarks and related departmental letters here as Annexure "A"), while, Appellant got no written communication about pending decisions from departmental side after her timely written request copy of related departmental expunge appeal here as Annexure "B") for expunge of adverse remarks and up gradation for which neither the Appellant's prior appearance was sought for prior explanation related to introduced adverse remarks and prior counseling with written order at specific date and time by reporting officer, prior personal hearing with written order at specific date and time by countersigning officers, nor any findings or material evidence in support of related adverse remarks were recorded in the belated communicated ACR/PER (2023) from which the Appellant could have drawn her analogies of what went wrong on her part. But, presumptions were named as conclusions in the Appellant's said ACR/PER (2023).

5-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.

GROUND

1-That it is settled proposition of law that subject to its power and authority, the preparation, process, communication, and presentation of Appellant's ACR/PER (2023) 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

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pending decisions regarding up gradation and expunge of said ACR/PER following ACR/PER rules to be placed in Appellant's character dossier in prescribed time for completion of whole process.

2-That after furnishing above bench mark "Very Good" ACR/PER prior in 2019, the average ACR/PER (2023) with intensive personal adverse remarks with non compliance of rules for prior counseling related to adverse remarks by same reporting officer as personal grudge to Appellant despite her continuous request for processing ACR/PER (2023). 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 mandatory with a Warning Letter or Counseling on the subject related to adverse remarks 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 ACR/PER (2023) was recorded after preparation by reporting officer without related prior counseling with written order and explanations with written order related to introduced adverse remarks in prescribed time as well as countersigned by Regional Director as countersigning officer near his 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 clear violation of Section 24A of the General Clauses Act 1897 has been made by not responding to all the appeals 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: 24-05-2024

CERTIFICATE

Certified as per instructions that after getting no response for her departmental appeal, 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 of Higher Education Department, Khyber Pakhtoonkhwa, for expeditious processing of rectification and expunge of adverse remarks along with upgradation of ACR/PER (2023) and related promotion in BPS-19 from initial notification among peers with back and consequential benefits. Nothing is pending related to subject above in any other court of law.

REFERENCE BOOKS

1. A Guidance to Performance Evaluation (2004). Pakistan Public Administration Research Centre, Management Services Wing, Establishment Division, Cabinet Secretariat, Islamabad: 1-138.
2. ESTACODE (2021). Pakistan Public Administration Research Centre, Establishment Division, Cabinet Secretariat, Islamabad: 1-1044.

BEFORE THE HONOURABLE COURT OF WORTHY CHAIRMAN
KHYBER PAKHTOONKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____ /2024

Dr. Javeria Haroon-----Appellant

VERSUS

Secretary to Govt. of KPK, HED (Colleges), Peshawar and others-----Respondents

AFFIDAVIT

I, Dr. Javeria Hroon, 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 Service Tribunal.



Dated: 15-04-2024

DEPONENT

CNIC# 13101-6504896-4

Cell# +92316-1899064

ADDRESSES OF PARTIES

- 1) Honourable Secretary Higher Education, Khyber Pakhtoonkhwa, Civil Secretariat, Peshawar.
- 2) Honourable Director of Higher Education, Directorate of Higher Education (Colleges), Near Northern By Pass, Rano Garhi, Peshawar.

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

Subject: ADVERSE REMARKS RECORDED IN PER FOR THE PERIOD
01.01.2023 TO 31.12.2023.

I am directed to convey adverse remarks recorded in your PER for the period mentioned above by the Reporting officer (Ms.Nighat Shaheen) which is endorsed by the Countersigning officer (Mr. Irshad Ahmed, Regional Director).

Her comments about your Performance on the job as given in Part IV(1) "Agree with the data (in Part-II) as far as paper work is concerned. She has mentioned a long list of duties but in reality she has never been a team player & all faculty members avoid to be a part of her team. In BS classes assessment is 100% internal & result is 100% but at inter level she has produced the lowest result in the college i.e. 33%.

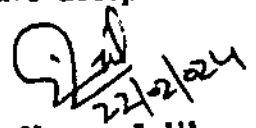
In integrity she writes "Not sure. She disowns her own statements".

In pen picture she writes "Intelligent & talented officer but unfortunately utilizing all her energies to resolve her personal issues & most of time busy in court cases which is badly effecting her performance in the institution. Never accepts her mistakes, always taking counseling in a negative way & deflecting responsibility by placing blame on others.

"She never lets things go and tends to make an issue out of situations" in special aptitude. Along with that you are graded "Average" with the remarks "Not Yet Fit for Promotion".

Supporting documents are enclosed as well.

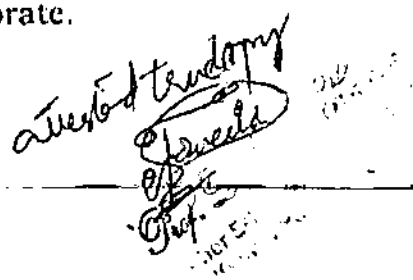
Hopefully you will try your level best to get rid of these imperfections. One spare copy of this D.O. letter is enclosed. This may be signed and returned to this office for placement in your Character Roll. Please note that nothing is to be written on it except your signature and dates in token of having 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.


22/2/24
Dr. Nasar Jallil
Assistant Director/ACR

Encls; No. _____

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

1. The Director, Regional Directorate HED, Hazara at Abbottabad.
2. The Principal, Govt. Postgraduate College for women, Haripur.
3. DD(F), Local Directorate.



Dr. Nasar Jallil
Assistant Director/ACR

To,

The Director,
Higher Education Department,
Khyber Pakhtoonkhwa, Peshawar.

Through Proper Channel

Subject: Appeal for Expunge of Adverse Remarks with Upgradation Recorded in Performance Evaluation Report For the Period 01.01.2023 to 31.12.2023

Respected Director,

I am writing to respectfully dispute the adverse remarks recorded in my Performance Evaluation Report (PER) for the period 01.01.2023 to 31.12.2023 by the Reporting officer (Ms. Nighat Shaheen) which is endorsed by the Countersigning officer (Mr. Irshad Ahmed, Regional Director), as conveyed to me in your letter dated 22.02.2024 received on 26.02.2024 at 1:45 pm via office lady at GPGC(W), Haripur. I am writing to bring to your attention a concerning omission in the evaluation process regarding the recorded adverse remarks. Specifically, I would like to highlight that Mr. Irshad Ahmed, the Countersigning Officer, did not afford me the opportunity for a personal hearing conducted in a transparent and equitable manner via written notice to provide my perspective on the matters raised before endorsing the false assertions made by Ms. Nighat Shaheen. Similarly, Ms. Nighat Shaheen did not afford me the opportunity for counselling and further warning related to imperfections highlighted under special aptitude, integrity, never been a team player and pen picture. As part of the evaluation process by law, individuals are typically given the opportunity to counselling, warning and respond to any adverse remarks or criticisms before they are formally recorded. However, in this instance, I was not provided with the opportunity to address the concerns raised by Ms. Nighat Shaheen directly to Mr. Irshad Ahmed prior to the endorsement of the remarks. This lack of procedural fairness undermines the integrity of the evaluation process and calls into question the validity of the adverse remarks recorded in my PER, 2023. It is imperative that all parties involved in the evaluation process adhere to established protocols and ensure that individuals are afforded their right to a fair and impartial assessment of their performance.

After careful consideration of the comments made by Ms. Nighat Shaheen and endorsed by Mr. Irshad Ahmed, I find several inaccuracies and unjust assessments that I must address. I am writing to bring to your attention a significant contradiction within the recorded adverse remarks. Specifically, Ms. Nighat Shaheen, the Reporting Officer, has herself acknowledged my intelligence and talent, despite her other criticisms. In her assessment, Ms. Nighat Shaheen has described me as an "intelligent and talented officer." This acknowledgment directly contradicts the negative assertions she has made regarding my performance and conduct. It is perplexing that someone who acknowledges my intelligence and talent would simultaneously make unfounded and disparaging remarks about my abilities and professionalism. This admission from Ms. Nighat Shaheen raises doubts about the validity and credibility of the adverse remarks recorded in my PER, 2023. It suggests that her criticisms may be subjective and biased, rather than based on objective evaluation criteria. I urge you to consider the inconsistency in Ms. Nighat Shaheen's assessment and reassess the validity of the adverse remarks recorded in my PER, 2023. It is essential that any evaluation of my performance is conducted impartially and based on factual information rather than personal bias.

attested true copy
Dr. Irshad Ahmed
Higher Education Department,
Khyber Pakhtoonkhwa

Firstly, I am writing to provide additional context to my performance evaluation, particularly regarding the assertion that I am not a team player and that faculty members avoid being part of my team, I must express my disagreement. I have consistently endeavored to collaborate and contribute positively within the team environment, and any perception to the contrary is unfounded and without substantial evidence. As a dedicated member of college teams, I have collaborated with colleagues to ensure the implementation and the enhancement of academic standards within the institution. In fact, I have received positive feedback from several colleagues regarding my collaborative approach and willingness to support team initiatives. I can provide testimonials from fellow faculty members and documentation of successful teamwork projects to refute this claim.

Secondly, the remark regarding integrity and disowning my own statements is baseless. Throughout my tenure, I have consistently upheld the highest standards of integrity and professionalism. I have always taken responsibility for my statements and actions in professional conduct, and any suggestion otherwise is erroneous. As an academic professional, maintaining integrity and accountability is of utmost importance to me. In response to the statement regarding disowning my own statements in the Annual Confidential Report (ACR), 2023, I would like to respectfully rebut this assertion as it lacks attached concrete evidence or specific examples to support such a claim. Without substantiation, it is unjust to attribute this behavior to me. I maintain that I have consistently upheld integrity in my work throughout my tenure. I request that this unsubstantiated allegation be reconsidered or supported with verifiable instances of my professional life before it influences my evaluation.

Thirdly, the assertion that I am preoccupied with personal issues and court cases (falsely set in 2019 as I was not divorced and my house land is in my marriage dowry), thereby affecting my performance, is inaccurate. I scored "Very Good" ACR in 2019 by the same Ms. Nighat Shaheen at that time. While I do face personal challenges as matter of fate like any other individual, they do not interfere with my professional responsibilities. I maintain a strict separation between my personal and professional life, ensuring that any personal matters do not interfere with my duties as an Assistant Professor. Any related legal matters I may be involved in are managed outside of working hours till date via my legal attorney the then President of District Bar Association, Haripur, and do not detract from my dedication to my role as depicted by my regular classes, practical demonstrations, full course coverage as well as prior submission of assigned tasks. ACRs must not contain any personal remarks as per rule. Additionally, I have received commendations from team incharge for my ability to manage workload efficiently with emotional stability despite external challenges.

Fourthly, the characterization of me as someone who deflects responsibility, does not accept mistakes, and takes counseling negatively is unsubstantiated and does not align with my professional conduct. I am open to feedback, actively seek opportunities for growth, and take accountability for my actions and performance as depicted in my previous related appeals to Directorate, HED, KPK. I have proactively pursued professional development opportunities by participating in online professional development workshops and mentoring programs to enhance my skills and address areas of growth always. It is essential that my performance evaluation accurately reflects the efforts I have made to broaden my knowledge base and enhance my professional capabilities. Further, the statement that I tend to make issues out of situations is not reflective of my approach to resolving conflicts or addressing concerns. I strive to maintain professionalism and handle matters in a constructive and collaborative manner. I prioritize resolution techniques to foster a positive work environment. Testimonials from students, and colleagues can attest to my commitment to maintaining professionalism.

Attest to true copy
Prof. Dr. Jamia Khan
Higher Education Department
Khyber Pakhtunkhwa

Contrary to the assertion made by Ms. Nighat Shaheen that I am not a team player, I would like to highlight my dedication, commitment, active participation and contribution as a member of the program team (PTM (Program Team Member)) for the Quality Assurance Cell and as a team member of the committee for fee concession as well as Area Incharge of Science Block consists of two departments including Chemistry and Physics both. My involvement in the Fee Concession Committee and Quality Assurance Cell as well as an Area Incharge underscores my commitment to teamwork and collaborative efforts aimed at improving institutional processes and outcomes. It is evident that I have consistently demonstrated my willingness to work collaboratively with colleagues towards common goals, contrary to the characterization provided in the adverse remarks. I respectfully request that my role as an area incharge and as a member of the team for fee concession and as a program team member for the Quality Assurance Cell be duly recognized and considered when evaluating my performance. It is essential that assessments accurately reflect my contributions and dedication to both my department and the broader institutional objectives. I respectfully request that this aspect of my performance be taken into consideration when reviewing the adverse remarks recorded in my PER, 2023.

It is important to note that my involvement in the Quality Assurance Cell (QAC) and Fee Concession Committee extends beyond the regular academic year, as I have actively participated in its activities even during the summer vacations. Despite the break in regular academic activities, I remained dedicated to supporting the initiatives of the Quality Assurance Cell and Fee Concession Committee and contributing to their objectives during that time as per order. Furthermore, I would like to bring to your attention a personal sacrifice. On a particularly tragic day, my father fell seriously ill. Despite the urgency of the situation, before seeing him, I prioritized my responsibilities to the institution and continued with my work load as a program team member even during the summer vacations. Tragically, my father passed away on the same day, and due to my commitments, I was unable to be by his side during his final moments, as I felt compelled to fulfill my obligations to the college even during the summer vacations. This painful experience underscores my unwavering dedication to my responsibilities, even in the face of personal adversity. I respectfully request that my commitment and sacrifices, both personal and professional, be taken into consideration when evaluating my performance as holistic contributions and dedication to my role within the institution.

I am writing to highlight a crucial aspect of my performance that has been overlooked in the recorded adverse remarks. Specifically, I have consistently performed additional duties assigned to me, in addition to fulfilling my annual responsibilities. Throughout the evaluation period, I have willingly taken on extra duties as assigned, demonstrating my commitment to the institution and my willingness to contribute beyond the scope of my regular responsibilities. Despite the challenges and workload associated with these additional responsibilities, I have managed to fulfill them to the best of my abilities while maintaining the quality of my core duties. All duties were first physically performed before writing their paper work record as agreed by Ms. Nighat Shaheen. This demonstrates my dedication to the institution and my ability to handle a diverse range of tasks effectively. It is essential that my performance evaluation accurately reflects the full scope of my contributions, including the extra duties I have performed. I respectfully request that this aspect of my performance be taken into consideration when reviewing the adverse remarks recorded in my PER.

I am writing to address a significant oversight in the recorded adverse remarks. Specifically, I would like to highlight that I have undertaken additional BS courses of Humanities (Urdu, Islamic Studies) outside of my field of expertise as per order, in addition to fulfilling my regular course load. By undertaking these extra courses, I have demonstrated my commitment to continuous learning and professional growth, as well as my willingness to expand my knowledge

attested true copy
Prof. Dr. Farhat Ishtiaq
Higher Education Department
Khuzdar, Balochistan

beyond the confines of my discipline. This initiative not only enriches my own skill set but also enhances my ability to contribute meaningfully to the institution and its academic community. My BS students of all seven courses in 2023 scored 100% result and my 1st year scored 84% in B.I.S.E. despite I was always assigned class with low grades. Additionally, I got highest teacher evaluation (TE) score (sum up by PTM Botany not by me as PTM Chemistry) from BS Chemistry students under QAC assessment among permanent staff as token to my dedication. Furthermore, the claim that I have produced the lowest results in the college at the inter level is misleading and fails to acknowledge various factors that may influence student performance, many of which are beyond my control as explained in detail in early related appeals to respected Director, HED, KPK. Division of internal and external assessment by Ms. Nighat Shaheen may depict lack of trust on her own administered BS Examination System, Students' Grievance committee, Controller of Examination, and BS Coordination.

I am writing to address the discrepancy in the recorded adverse remarks, specifically regarding the results produced in inter-level assessments. While it has been noted that the result produced in one particular instance was below expectations, it is essential to provide context to this situation. It has come to my attention that several teachers had also produced results even zero percent in their assessments in HED, KPK. However, it is concerning that no adverse entries have been made in their ACRs by the same officers for these instances under legal right of equal treatment across regional directorates of HED, KPK. This inconsistency highlights a lack of equitable treatment in the evaluation process. It is unfair to single out one individual for a performance issue that appears to be prevalent among multiple faculty members. Moreover, single incident must not considered for adverse entry in ACRs as per rule. Additionally, it is important to recognize that one isolated incident over the course of my above 15 years career cannot accurately reflect my overall performance and dedication to my role and does not serve as reason for adverse PER as per rules. I urge you to consider the broader context of performance evaluations within the institution and ensure that assessments are conducted fairly and consistently for all faculty members across HED, KPK. It is crucial that any recorded adverse remarks are based on objective criteria and applied uniformly across the board.

Throughout the evaluation period, I have demonstrated my dedication to the institution and its students by willingly accepting additional teaching assignments as per order. These extra classes, which were outside of my primary field of expertise, were assigned to me to meet the needs of the students and the institution. Despite the challenges associated with teaching subjects outside of my field, I approached these classes with enthusiasm and commitment, striving to provide students with the best possible education. I dedicated extra time and effort to prepare for these classes, ensuring that I could effectively convey the material and support the students in their learning. By undertaking these additional teaching responsibilities, I have demonstrated my flexibility, adaptability, and willingness to go above and beyond to support the academic needs of the institution and its students. It is crucial that my performance evaluation accurately reflects the efforts I have made to meet the demands of these extra classes and contribute to the academic success of the students. I respectfully request that this aspect of my performance be taken into consideration when reviewing the adverse remarks recorded in my PER.

Lastly, after reviewing the supporting documents enclosed with your correspondence, I find that they fail to provide any substantial evidence to support the false assertions made by Ms. Nighat Shaheen and endorsed by Mr. Irshad Ahmed. Despite the claim of deficiencies in my performance as outlined in the PER, the supporting documents provided do not offer any concrete evidence to substantiate these allegations. There is a notable absence of specific incidents, instances, or performance metrics that would validate the claims made against me. Furthermore, the documents fail to address the positive contributions I have made to the

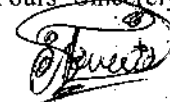
attested true copy
Prof. Dr. Irshad Ahmed
Higher Education
Khyber Pakhtunkhwa

institution, such as successful collaborations, academic achievements, and student engagement initiatives. The lack of balanced documentation undermines the credibility of the recorded adverse remarks and calls into question the validity of the evaluation process. I urge you to conduct a thorough review of the evidence presented in my rebuttal and reconsider the adverse remarks recorded in my PER. It is essential that any assessment of my performance is based on factual information and fair evaluation criteria.

In conclusion, I respectfully request a review of the adverse remarks recorded in my PER, as I believe they do not accurately reflect my performance, conduct, and contributions to the institution. I am open to provide information and evidence including testimonials and related documentation, to support my defense.

Thanking you in anticipation for your attention, understanding and consideration to this matter.

Yours Sincerely,

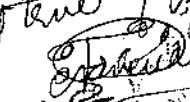


Dr. Javeria Haroon,

A/P Chemistry,

Date: 1st March, 2024.

GGDC, Kot Najibullah, Haripur.

attested true copy

Higher Education Department
Khyber Pakhtunkhwa