



No. SO(Estt.) 10-626/2014  
GOVERNMENT OF THE PUNJAB  
SPECIAL EDUCATION DEPARTMENT  
31-Sher Shah Block New Garden Town, Lahore

Dated Lahore, the October 07, 2025

To

- i. **Ms. Amara Khurshid,**  
Senior Special Education Teacher (BS-17 / PD Field),  
Incharge Headmistress, Govt. Special Education Centre, Sangla Hill.
- ii. **Mr. Masood Ahmed,**  
Driver,  
Govt. Special Education Centre, Sangla Hill.

Subject: SHOW CAUSE-CUM-PERSONAL HEARING NOTICE UNDER SECTION 13(4) OF THE PUNJAB EMPLOYEES, EFFICIENCY, DISCIPLINE AND ACCOUNTABILITY ACT, 2006

**WHEREAS**, disciplinary proceedings were initiated against you by the Competent Authority vide order of inquiry dated 08.11.2024 under Section 3 read with Section 9 of the Punjab Employees, Efficiency, Discipline and Accountability Act, 2006 on the following charges of misconduct & inefficiency by appointing **Mr. Abdur Rafay Rao**, Headmaster (BS-18), Govt. (Middle) Special Education Centre, Kamoki as Inquiry Officer:

**CHARGES AGAINST MS. AMARA KHURSHID (ACCUSED OFFICER)**

- i. The accused officer remained negligent and inefficient in the operation and maintenance of the CCTV surveillance system installed in the bus. Despite repeated instructions to store recorded data with at least fifteen days' backup, the accused officer failed to ensure that the recordings were being properly saved on the hard disk installed in the DVR. This neglect constitutes a breach of duty, as the accused officer did not take timely and adequate steps to repair the faulty recording system.
- ii. The accused officer failed to secure adequate supervisory staff, including a conductor or attendant, for the vehicle transporting students with special needs. While the accused officer requested the provision of staff from the concerned authority, but she failed to properly pursue the request and did not make self-help arrangements to address the issue. This failure contributed to the occurrence of an incident, amounting to negligence in fulfilling the duty of care toward the safety of the students.

- iii. The accused officer remained inefficient in providing a safe and secure transportation facility for students with special needs. These actions, or lack thereof, demonstrated a failure to meet the standard of care required in ensuring the safety and security of vulnerable students during transport. This negligence also resulted in a breach of the duty to provide a safe educational environment.

**CHARGE AGAINST MR. MASOOD AHMED / ACCUSED OFFICIAL**

The accused official was negligent and guilty of a breach of duty in the operation of the bus on 27.08.2024, specifically by operating the vehicle without the presence of a conductor. Eyewitness testimony indicates that at the time of the incident, the bus door was open, resulting in the student, Muhammad Bilal (deceased), aged 13 years, jumping from the moving vehicle, which tragically led to his death. The accused official's failure to ensure that the bus door remained closed constitutes a significant dereliction of duty. During the probe proceedings, the accused official admitted that the incident was a direct consequence of the absence of a conductor, thereby acknowledging responsibility for the failure to provide a safe and secure transportation service for the students.

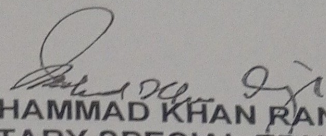
2. **AND WHEREAS**, the Inquiry Officer has submitted inquiry report to this department (**copy enclosed**) and recommended imposition of following penalty upon you;

Sr. No.	Name of Accused Officer	Recommendation
1.	Ms. Amara Khurshid, Senior Special Education Teacher (BS-17 / PD Field), Incharge Headmistress, Govt. Special Education Centre, Sangla Hill.	Minor penalty of withholding of two (2) annual increments
2.	Mr. Masood Ahmed, Driver, Govt. Special Education Centre, Sangla Hill	Minor penalty of withholding of two (2) annual increments

3. **AND WHEREAS**, you are liable to be imposed one or more penalties in terms of Section 4 of the Act *ibid* for the charges against you.

4. **NOW THEREFORE**, in exercise of the powers conferred upon me as Competent Authority under Section 13(4) of the PEEDA Act, 2006, you are hereby called upon to show cause within seven (07) days of the receipt of this notice as to why one or more penalties may not be imposed upon you under the PEEDA Act, 2006. You are allowed to submit additional defence in writing, if any.

5. You are also afforded an opportunity of personal hearing and directed to appear before the undersigned on 16-10-25 at 12:00 Noon for this purpose. If you fail to appear, the case shall be decided *ex-parte*.

  
(MUHAMMAD KHAN RANJHA)  
SECRETARY SPECIAL EDUCATION /  
COMPETENT AUTHORITY

CC.

- i. **Mr. Jaffar Ali**, Superintendent (BS-17), office of District Education Officer (Spl. Edu.), Gujranwala / **Departmental Representative** to ensure delivery of this notice to the accused officer / official and also to appear before the Secretary, Special Education Department on the date fixed for personal hearing alongwith relevant record.
- ii. District Education Officer (Special Education), Lahore, to ensure the delivery of this notice to the accused officer / official through all possible means under intimation to this department.
- iii. P.S. to Secretary, Special Education Department.