

REGISTERED



No. SO(Estt)23-191/2020
GOVERNMENT OF THE PUNJAB
SPECIAL EDUCATION DEPARTMENT
31-Sher Shah Block New Garden Town, Lahore

Dated Lahore, the July 22, 2024

To

1. **Hafiz Muhammad Faisal,**
Junior Special Education Teacher (BS-16 / PD Field),
former Incharge Headmaster, Govt. Special Education Centre, Pir Mahal,
presently under suspension and reported to department.
2. **Ms. Pinkee Sadia Yousaf,**
Junior Special Education Teacher (BS-16 / MC Field),
previously posted at Govt. Special Education Centre, Pir Mahal,
presently under suspension and reported to department.

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

Zainab Saeed

WHEREAS, de novo disciplinary proceedings were initiated against you vide order dated 15.04.2024 under Section 3 read with Section 9 of the Punjab Employees, Efficiency, Discipline and Accountability Act, 2006 on the following charges of inefficiency and misconduct by appointing Mr. Zia Razzaq, Psychologist (BS-17), Incharge Headmaster, Govt. (Secondary) Special Education Centre for Four Disabilities, Samundari as Inquiry Officer;

CHARGES AGAINST HAFIZ MUHAMMAD FAISAL / ACCUSED OFFICER NO. 1

- i. The accused officer's performance during his tenure as Incharge Headmaster has remained poor, as he failed to fulfil his duties in a manner consistent with established standards. Manifestations of inefficiency and mismanagement are evident, notably in the relocation of the classroom for physically handicapped students to the first floor of the Centre, where no ramp was available. This decision has resulted in difficulties for Ms. Zainab and other special-needs / physically handicapped students when navigating the stairs.

Zainab

- ii. As the designated Headmaster Incharge, the accused officer neglected to oversee the diligent and efficient performance of the teaching and allied staff at the Centre. Furthermore, there is a failure to ensure that the staff refrained from engaging in any unethical activities / recording of activities of students through their personal mobiles with mala fide intentions.
- iii. Ensuring the safety of special students constitutes a primary responsibility of the accused officer, who served as the Incharge Head of the Centre. However, the accused officer failed to observe and address the situation wherein a physically handicapped female student, Ms. Zainab, was coerced on 24.10.2023 at about 08:44 a.m. into ascending the stairs through crawling by Ms. Pinkee Sadia Yousaf, JSET. Moreover, said incident video was also recorded by Ms. Pinkee Sadia Yousaf, JSET with the intention of disseminating it on social media, potentially tarnishing the reputation of the Centre and Special Education Department in the eyes of public at large.
- iv. The accused officer, having knowledge of the incident that took place on the 24th of October 2023 at approximately 08:44 a.m., i.e., wherein a physically handicapped female student, Ms. Zainab, was persuaded to climb stairs by way of crawling, and the subsequent recording of a video of this incident by Ms. Pinki Sadia Yousaf, a Junior Special Education Teacher JSET, intentionally withheld this information from higher authorities, including but not limited to the District Education Officer (Special Education), Faisalabad. The accused officer failed to report the incident to the higher authorities and neglected to take prompt action. Consequently, the video circulated on social media, which adversely impacted the reputation of the Centre and the Special Education Department.
- v. The conduct and performance of the accused officer during his tenure as Incharge Headmaster remained below average. This is attributable to his failure to fulfil his responsibilities in a manner in line with established standards. he evaded his substantive duty as JSET (Physically Handicapped Field) and handed over his class to a teacher of blind field. Such conduct had badly impacted the seamless execution of educational activities.

CHARGES AGAINST MS. PINKEE SADIA YOUSAF / ACCUSED OFFICER NO. 2

- i. The primary responsibility of ensuring the safety of special students rests with the accused officer. However, the accused officer engaged in instigating a physically handicapped female student, Ms. Zainab, to ascend stairs through crawling and by doing so she jeopardized the safety of said student. The accused officer instead of stopping the physically handicapped female student, Ms. Zainab, to ascend stairs through crawling or instead of helping her, instigated the said student to do so. Moreover, the accused officer recorded a video of this incident with malicious intent. Subsequently, the accused officer shared the said video on social

media through unrelated individual(s), intending to tarnish the reputation of both the Centre and the Special Education Department. By doing these acts, the accused officer violated the right of safety and privacy of the said student.

- ii. The performance of the accused officer remained subpar because she did not carry out her responsibilities in a suitable manner, in accordance with applicable standards, and continued to interfere in the administrative affairs of the Centre and created unnecessary feud with the Incharge Headmaster, which impeded administrative procedures and created administrative hurdles for the Incharge Headmaster.

2. **AND WHEREAS**, The Inquiry Officer has submitted inquiry report to this department on 02.07.2024 (copy enclosed) and recommended imposition of following penalties;

Sr. No.	Name of accused officer	Penalty Recommended
1.	Hafiz Muhammad Faisal , Junior Special Education Teacher (BS-16 / PD Field), former Incharge Headmaster, Govt. Special Education Centre, Pir Mahal, presently under suspension and reported to department.	"The charges stand fully proved; hence he may be awarded major penalty of removal from service under Section 4(1)(b)(v) of the PEEDA Act 2006".
2.	Ms. Pinkee Sadia Yousaf , Junior Special Education Teacher (BS-16 / MC Field), previously posted at Govt. Special Education Centre, Pir Mahal, presently <i>under suspension</i> and reported to department.	"The charges stand fully proved; hence she may be awarded major penalty of removal from service under Section 4(1)(b)(v) of the PEEDA Act 2006".

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 Act *ibid*, 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 as prescribed under Section 4 of the Act *ibid* may not be imposed upon you. You are allowed to submit additional defense in writing, if any.

5. You are also afforded an opportunity of personal hearing and for said purpose **Additional Secretary, Special Education Department** is appointed **Hearing Officer** under Section 13(4)(c) of the Act *ibid*. Therefore, you are directed to appear before the **Additional Secretary, Special Education Department** as and when the case is fixed for hearing by the Hearing Officer.


(SAIMA SAEED)
SECRETARY SPECIAL EDUCATION /
COMPETENT AUTHORITY

CC.

1. **Additional Secretary, Special Education Department / Hearing Officer.**
2. District Education Officer (Special Education), Faisalabad.
3. **Mr. Muhammad Akmal Shah**, Senior Special Education Teacher (H.I) (BS-17), Government (Middle) Special Education Centre, Tandianwala, District Faisalabad / **Departmental Representative** is directed to ensure delivery of this notice to the accused officers and also to appear before **Additional Secretary, Special Education Department / Hearing Officer** on the date fixed for personal hearing alongwith relevant record.
4. PS to Secretary, Special Education Department.


SECTION OFFICER (ESTT.)
SPECIAL EDUCATION DEPARTMENT