

REGISTERED



To

No. SO(Estt)1-54/2006
GOVERNMENT OF THE PUNJAB
SPECIAL EDUCATION DEPARTMENT
31-Sher Shah Block New Garden Town, Lahore

Dated Lahore, the 29th July, 2024

1. **Ms. Farhana Saba,**
Junior Special Education Teacher (BS-16 / MC Field),
Previously posted at Govt. Special Education Centre, Taxila, District
Rawalpindi,
presently under suspension and reported to department.
2. **Ms. Samina Aslam,**
Junior Special Education Teacher (BS-16 / MC Field),
Previously posted at Govt. Special Education Centre, Taxila, District
Rawalpindi,
presently under suspension and reported to department.
3. **Ms. Fozia Samila,**
Psychologist (BS-18/ Personal),
Previously posted at Govt. Special Education Centre, Taxila, District
Rawalpindi,
presently under suspension and reported to department.
4. **Ms. Saima Nazeer,**
Speech Therapist (BS-18 / Personal),
Previously posted at Govt. Special Education Centre, Taxila, District
Rawalpindi,
presently under suspension and reported to department.
5. **Mr. Aurangzaib Bhatti,**
Headmaster (BS-18/ MC Field),
Previously posted at Govt. Special Education Centre, Taxila, District
Rawalpindi
presently under suspension and reported to department.
6. **Mr. Shahid Suleiman,**
Music Teacher (BS-11),
Previously posted at Govt. Special Education Centre, Taxila,
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**

WHEREAS, joint disciplinary proceedings were initiated against you vide order dated 05.06.2024 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. Qaiser Abbas Shah**, Principal (BS-19), Govt. Secondary School for Hearing Impaired, Jhang as Inquiry Officer;

CHARGES AGAINST MS. FARHANA SABA, JSET (MC FIELD)

1. Ms. Farhana Saba's performance at the Govt. Special Education Centre, Taxila, remained subpar because she did not carry out her responsibilities in a suitable manner, *in accordance with applicable standards*, and continued to form groups with other female employees of the Centre with the intention of interfering in the administrative affairs of the Centre, which impeded administrative procedures.
2. Ms. Farhana Saba instead of performing her duties remained busy in knitting conspiracies alongwith other female staff members of the Centre against the Headmaster with the intention of spoiling the atmosphere of the Centre and she also occasionally misbehaved with the Headmaster.
3. Ms. Farhana Saba instead of working for the welfare of special students remained busy in lobbying for getting Mr. Aurangzaib Bhatti removed from the position of Headmaster for her personal motives.
4. Ms. Farhana Saba remained disobedient and non-cooperative to Headmaster of the Centre regarding her official assignments and defied the lawful orders/instructions issued to her by the Headmaster, due to which academic activities of the Centre were badly ignored and special students suffered vigorously.
5. On 06/05/2024, Ms. Farhana Saba left the class unattended for more than an hour and during this time students of her class beat each other. Due to this negligence of her, brain shunts of one student got displaced.
6. Ms. Farhana Saba habitually used to visit the office of psychologist several times a day for unknown reasons by ignoring the mentally challenged students of her class and left them unattended due to which on one occasion two students went together in same washroom. Ms. Farhana Saba was the duty teacher of day when one male & female student was found together in one washroom.

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7. Ms. Farhana Saba is habitual of using the mobile phone during class hours by ignoring the class work.
8. During class visits by the concerned Headmaster, it was found that Ms. Farhana Saba instead of performing her duties preferred to remain busy gossiping while whiteboard had previous dates and bags of all the students are packed during school hours.
9. Ms. Farhana Saba is habitual of availing sudden & self-claimed casual leaves by sending a message to the Headmaster on same day by writing that 'I am not coming today'. She was advised by the Headmaster to properly file application before availing leaves well in advance but she did not mend her ways. She was counseled by the Headmaster and informed that students suffer a lot and remain unattended without provision of substitute. But instead of following the instructions she passed following remarks;

مجھے تکنا کریں ورنہ آپ تکنا ہوں گے۔

10. Ms. Farhana Saba is habitual of leaving students attendance unmarked for several days and afterwards marks fake attendance.
11. Ms. Farhana Saba misbehaved with the parents of students and they filed application which was inquired into by the Headmaster by constituting Probe Committee and her guilt was established.
12. Ms. Farhana Saba passed very immoral, scandalizing and harassing sentences for Ms. Azra Bano, SSET on her face, in front of several parents and blamed her for sitting in office till late hours after off time to get unnecessary favours. Ms. Azra Bano asked her to refrain from doing so but she kept repeating her sentences and even passed such comments again and in a louder voice.
13. Despite clear cut instructions regarding child safety, one minor MCC student was found alone in top floor stairs and when Ms. Farhana Saba was asked, she rudely said that student went to toilet and she has nothing to do if he goes upstairs.
14. Ms. Farhana Saba used students for personal works as well as for shifting furniture and other heavy things.
15. She often brings her daughter in school and remains busy in looking after her and playing with her by ignoring the students and even uses students to look after her daughter.

Farhana Saba

CHARGES AGAINST MS. SAMINA ASLAM JSET (MC FIELD)

1. Ms. Samina Aslam's performance at the Govt. Special Education Centre, Taxila, remained unsatisfactory because she did not carry out her responsibilities in a suitable manner, *in accordance with applicable standards*, and continued to form groups with other female employees of the Centre with the intention of interfering in the administrative affairs of the Centre, which impeded administrative procedures.
2. Ms. Samina Aslam instead of performing her duties remained busy in knitting conspiracies alongwith other female staff members of the Centre against the Headmaster with the intention of spoiling the atmosphere of the Centre and she also occasionally misbehaved with the Headmaster.
3. Ms. Samina Aslam instead of working for the welfare of special students remained busy in lobbying for getting Mr. Aurangzaib Bhatti removed from the position of Headmaster for her personal motives.
4. Ms. Samina Aslam remained disobedient and non-cooperative to Headmaster of the Centre regarding her official assignments and defied the lawful orders/instructions issued to her by the Headmaster, due to which academic activities of the Centre were badly ignored and special students suffered vigorously.
5. Ms. Samina Aslam is habitual of beating special children severely even does not avoid to use stick for that.
6. Ms. Samina Aslam provoked Ms. Farhana Saba, JSET to misbehave with parents of special students. She passed several disrespectful remarks for the mother of a student named Fahad and ignored to look after her class students. Due to her negligent behaviour two adult students of her class (one male other female) were found in toilet together but even then she instead of looking after her students, kept shouting against mother of Fahad, mother of Ammar-ul-deen, sister of Sidrah, grandmother of Azan.

CHARGES AGAINST MS. FOZIA SAMILA, PSYCHOLOGIST

1. The conduct and performance of Ms. Fozia Samila during her tenure at the Govt. Special Education Centre, Taxila, remained below average. This is attributable to her failure to fulfill her responsibilities in a manner in line with established standards. she has consistently engaged herself in the formation of alliances with fellow female staff members at the Centre,

Samina Aslam

thereby exhibiting an intention to interfere in the administrative affairs of the Centre. Such conduct had adversely impacted the seamless execution of administrative procedures.

2. Ms. Fozia Samila, rather than performing her assigned responsibilities, was preoccupied with orchestrating conspiracies in collaboration with other female staff members of the Centre, with the deliberate intention of disrupting the harmonious environment of the Centre. Furthermore, she periodically / intermittently displayed instances of improper / inappropriate behaviour towards the Headmaster.
3. Ms. Fozia Samila in league with Ms. Farhana Saba, Ms. Samina Aslam and Ms. Saima Nazeer instead of working for the welfare of special students of the Centre, remained busy in lobbying for getting Mr. Aurangzaib Bhatti removed from the position of Headmaster for her personal motives.
4. Ms. Fozia Samila remained disobedient and non-cooperative to Headmaster of the Centre regarding her official assignments and defied the lawful orders/instructions issued to her by the Headmaster, due to which academic activities of the Centre were badly ignored and special students suffered vigorously.
5. Ms. Fozia Samila made a female student sit in school bus while the girl had to go in private transport. The girl remained in school bus for two hours and then was brought back to school and handed over to the parents safely by the help of SMC Staff & support staff members. Each and every teacher / professional was assigned duty by the Headmaster to bring students to buses in queues and ensure their sitting in buses. She was assigned duty regarding students of HIC 4th Class but she never performed that duty and tried to create problem by risking the girl protection and safety.
6. Ms. Fozia Samila misbehaved with the most senior and aged teacher namely Ms. Azra by uttering following insulting and disgraceful remarks in unofficial language.

مس عزرا پاکل جو چکی ہے، سٹھیا کئی ہے، ریٹائرمنٹ قریب ہے ہم اس کی ریٹائرمنٹ خراب کریں گی

7. Ms. Fozia Samila used insulting, immoral and harsh remarks for parents of students. One day MCC student Sana fell down being unattended as teacher Ms. Farhana Saba neglected to attend the students of her class. Ms. Fozia Samila being psychologist was asked to counsel Ms. Farhana Saba but she said following:

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- 1- ٹیاء کی ماں پاگل ہے اور بچی کو سکول کیوں بھیجتی ہے۔
- 2- فہد کی ماں کی جرات کیسے ہوئی اور اسکی اتنی ہمت کہ شکایت لگائے۔
- 3- عمار الدین کی والدہ تم چٹل خور ہو۔
- 4- تم میرے کرہ میں نہیں بیٹھ سکتی ناداغل ہو سکتی ہو۔

8. Ms. Fozia Samila often shouts and pass offensive remarks in front of staff and visitors. On 16th April 2024 while interviews of Daily Wagers were underway, she along with her group members started disturbance in main corridor of the Centre by shouting in front of students, candidates and other staff members. When she was asked to refrain from said activities, her voice even got more louder with aggressive tone. Even at that time when she was passing comments for mother of some student, 2 students (male & female) were reported to be together in same washroom.

9. On 17th April 2024 when Ms. Fozia Samila came to the Centre she was asked about shouting and her behaviour to which she responded that being psychologist such tone & loudness is part of her behaviour. She was confronted by citing example of another psychologist of the department and her reply was as under;

وہ تو پاگل ہے اور اس کا دماغ خراب ہے۔

10. Ms. Fozia Samila also used bad words for the newly hired daily wagers by saying:

رنگ برنگے لوگ سکول میں آگئے ہیں۔

11. Ms. Fozia Samila did not bother to develop Individual Education Plan files for the behaviour and psychological development of the students to sort out and overcome their psychological problems and despite several ultimatums and written orders by the Headmaster, she turned a deaf ear towards that.

12. Ms. Fozia Samila is habitual of availing sudden & self-claimed casual leaves by sending a message on same day stating that 'I am not coming today'. She was advised by the Headmaster not to do so and to avail her leaves after submitting written application well in advance but she did not mend her ways.

13. Ms. Fozia Samila did not bother to get students files checked by the Headmaster and defied the orders / instructions in this

regard. She sent her dairy after 3 months to the Headmaster through a student for signatures but no lesson plans, curriculum delivery plans, I.E.Ps, assessment proforma and evaluation sheets were available with her.

14. She used to punish the students in defiance of policy of the Govt. Being psychologist she is expected to be more sensitized in this regard but instead of counseling through behaviour therapies she is habitual of punishing the students. She had punished some students in front of parents and passed disgraceful remarks toward them too.
15. In session regarding child protection, she being the focal person of center was assigned duty to convey instructions of the department to female teachers but she forwarded incorrect instructions. When few female staff members informed the Headmaster about the instructions passed by her, she labeled them backbiter چٹل خور.

CHARGES AGAINST MS. SAIMA NAZEER, SPEECH THERAPIST

1. The conduct and performance of Ms. Saima Nazeer during her tenure at the Govt. Special Education Centre, Taxila, remained below average. This is attributable to her failure to fulfill her responsibilities in a manner in line with established standards. she has consistently engaged herself in the formation of alliances with fellow female staff members at the Centre, thereby exhibiting an intention to interfere in the administrative affairs of the Centre. Such conduct had adversely impacted the seamless execution of administrative procedures.
2. Ms. Saima Nazeer, rather than performing her assigned responsibilities, was preoccupied with orchestrating conspiracies in collaboration with other female staff members of the Centre, with the deliberate intention of disrupting the harmonious environment of the Centre. Furthermore, she periodically / intermittently displayed instances of improper / inappropriate behaviour towards the Headmaster.
3. Ms. Saima Nazeer in league with Ms. Farhana Saba, Ms. Samina Aslam and Ms. Fozia Samila instead of working for the welfare of special students of the Centre, remained busy in lobbying for getting Mr. Aurangzaib Bhatti removed from the position of Headmaster for her personal motives.

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4. Ms. Saima Nazeer remained disobedient and non-cooperative to Headmaster of the Centre regarding her official assignments and defied the lawful orders/instructions issued to her by the Headmaster, due to which academic activities of the Centre were badly ignored and special students suffered vigorously.
5. She does not perform the speech therapy work and always turns a deaf ear towards the instructions in this regard. Due to her negligence, there is not a single student of HIC Classes who can speak or understand any words.
6. She had not developed I.E.P files for speech development of the students to sort out and overcome their speech problems and despite several orders by the Headmaster she turned a deaf ear.
7. She did not get students files checked by the Headmaster despite several orders. She used to send her dairy after 2 to 3 months to the Headmaster through Aaya for signatures. But no daily, weekly or monthly plans, speech therapy plans, I.E.Ps, assessment proformas and evaluation sheets have ever been shown by her.
8. She was assigned duty with students of HIC KG-1 class last academic year with direction to emphasize their speech training. But she neither did speech training nor class work and often left students unattended due to which 2 students got injured. One student's hand got injured in door of classroom while other student suffered a head injury under her supervision but she did not inform the office of Headmaster regarding happening of such events. Moreover, on the same day, after the incident, she kept sitting in the room with Ms. Fozia Samila at ground floor while students were left unattended at upper floor.
9. She provoked Ms. Farhana Saba to misbehave with parents and a senior teacher namely Ms. Azra Bano, SSET as well as to pass negative, bad and immoral comments about them.
10. She is habitual of availing sudden & self-claimed casual leaves by sending a message on same day stating that '**I am not coming today**'. She was asked to mend her ways and file proper written application for grant of leave in advance but she failed to mend her ways.
11. She was assigned duty of conducting minor speech therapy activity in morning assembly for 2 to 3 minutes so that HIC students would be involved in assembly by uttering some basic

Saima Nazeer

Words e.g., ALLAH, Bismillah, etc. but she never carried out such activity and defied the instructions.

CHARGES AGAINST MR. AURANGZAIB BHATTI

1. Mr. Aurangzaib Bhatti, *while he was posted as Headmaster, Govt. Special Education Centre, Taxila* remained inefficient as he failed to manage the affairs of institute in a befitting manner resulting into formation of groups amongst the female teaching staff and allied professionals of the Centre which negatively impacted the Centre's atmosphere and welfare / educational activities of the special students. On account of his weak administration, lack of leadership qualities, due diligence, good governance and inability to enhance the welfare of special students of the Centre, the educational and rehabilitation activities of the Centre suffered badly.
2. The behaviour of Mr. Aurangzaib Bhatti, during his tenure as Headmaster, with the female staff of the Centre was unreasonable, erratic and egoistical.
3. During the tenure of Mr. Aurangzaib Bhatti, several instances of infliction of corporal punishment upon the special students happened but he despite being aware of these instances failed to take appropriate action against delinquent staff and failed to report the matter to higher authorities for taking disciplinary action. Furthermore, he also failed to ensure safety and security of the special students and failed to devise robust strategy to ensure that such instances do not happen in future.
4. Due to weak administrative control of Mr. Aurangzaib Bhatti, Headmaster, orders / instructions issued by him in capacity of headmaster, Govt. Special Education Centre, Taxila were not complied with by the female teaching staff and allied professionals. Moreover, no report regarding defiance of orders was ever forwarded for taking appropriate action against the delinquent officers.
5. The accused officer failed to monitor whether the teachers and allied staff of the institute are discharging their duties diligently and efficiently and had not indulged in any unethical activity. Mr. Shahid Suleiman, Music Teacher remained involved in immoral activities as he touched 03 adult hearing-impaired girls but the accused officer never reported such incident to higher authorities for appropriate action against the delinquents. The accused officer also has failed to devise a mechanism through which feedback could be obtained regarding safety of the

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special students during school hours and/or within the premises of the institute.

6. Safety of the special students is foremost responsibility of the accused officer being head of the institute but he failed to notice and point out that due to inefficiency and negligence of certain female staff members special students got hurt during school hours and some special students went to single washroom together which demonstrates poor monitoring of the accused officer. CCTV cameras have been installed in the Centre to monitor activities of all staff members and students but the accused officer also failed to monitor the CCTV cameras.

CHARGES AGAINST MR. SHAHID SULEIMAN, MUSIC TEACHER

1. He was involved in immoral activities as he touched 3 adult girls of HIC class. His previous record showed that he was transferred from Hassanabdal center as result of such habits but he failed to mend his ways.
2. He is habitual of leaving the school during school timings and abscond on daily basis and did not correct his behaviour despite several orders by the Headmaster.
3. He uttered derogatory remarks about District Education Officer (Spl. Edu.), Rawalpindi, and others high ups and stated that why DEO has asked him to develop work dairy and assess students for music learning potential.
4. The conduct and performance of the accused officer during his tenure at the Govt. Special Education Centre, Taxila, remained below average. This is attributable to his failure to fulfill his responsibilities in a manner in line with established standards. The inefficiency of the accused officer is manifestly established from the fact that no IEP chart or student diary containing details of lesson plans has been maintained by him.

2. **AND WHEREAS**, the Inquiry Officer after conducting inquiry into the above-mentioned charges, has submitted inquiry report to this department on 19.07.2024 (copy enclosed).

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

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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.

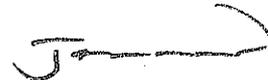
5. You are also afforded an opportunity of personal hearing and for said purpose **Additional Secretary, Special Education Department** is appointed **Hearing Officer** under Section 13(4)(c) of the Act *ibid*. Therefore, you are directed to appear before the **Additional Secretary, Special Education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



(SAIMA SAEED)
SECRETARY to
GOVERNMENT OF THE PUNJAB
SPECIAL EDUCATION DEPARTMENT /
COMPETENT AUTHORITY

CC.

1. **Additional Secretary, Special Education Department / Hearing Officer.**
2. District Education Officer (Special Education), Rawalpindi.
3. **Mr. Kashif Mehmood**, Vice Principal (BS-18), Government Degree College of Special Education, Rawalpindi / **Departmental Representative** is directed to ensure delivery of this notice to the accused officers / official 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