Power of Your Security

SEE SECURITY SERVICES (Pvt) LIMITED

E-mail: info@seesecurityservices.com

Sahota Market, Near Double Road Chowk, Garden Town, Multan Ph: 061 - 651 5522 - 23

SSS/PPRA/01-26 Date: 13-07-2026

The Admin Expert,
Federal Public Procurement Regulatory Authority (PPRA),
1st Floor, FBC Building, G-5/2, Islamabad
Cell # 0313 – 900 7537, Email: sarmadusman@ppra.org.pk

Subject: **Request for Clarification - PPRA Security Services Tender Regarding Non-Compliance with Labour Laws, the PPRA Rules, 2004, and E-Pak Procurement Regulations, 2023**

السلام علیکم ورحمۃ اللہ وبرکاتہ

With reference to the Bidding Document issued by the **Federal Public Procurement Regulatory Authority (PPRA)** and published on the **PPRA e-PADS v2.0 Portal** under **Tender No. P-53225** on **02-07-2026**, with bids scheduled to be opened on **20-07-2026**, for the procurement of **"Procurement of Security Services,"** it is respectfully submitted that several provisions of the Bidding Document are inconsistent with the applicable labour laws, the regulatory framework governing private security companies, and the Public Procurement Rules, 2004 (PPRA Rules, 2004). Clarification is therefore sought on the following matters:

1. Under Rules **4** and **23** of the PPRA Rules, 2004, the Procuring Agency (PA) is required to conduct procurement in a fair, transparent and competitive manner and to prepare clear, complete and unambiguous bidding documents. However, the present **72-page** Bidding Document is vague, internally inconsistent and incapable of ensuring a fair, transparent and competitive procurement process.

It further omits several mandatory statutory requirements, contains provisions that are **ultra vires** the powers of the PPRA, and is inconsistent with the regulatory framework governing private security companies, the applicable labour laws and the PPRA Rules, 2004. It also requires audits and verification of bidders beyond PPRA's statutory mandate, which is limited to evaluating bids against the prescribed eligibility, qualification and evaluation criteria.

Furthermore, under the fundamental rights guaranteed by the Constitution of Pakistan, all private security companies holding valid operating licences issued by the respective Provincial Home Department or the ICT Administration are equally entitled to participate in public procurement without discrimination.

2. These clarifications are submitted under **Rule 31(b)** of the PPRA Rules, 2004, which requires every request for clarification by a bidder, and every response by the Procuring Agency, to be made in writing. Compliance with this requirement is mandatory.

3. Furthermore, the Managing Director, PPRA, Islamabad, vide **Notification No. 1/481/2024/LEGAL/PPRA dated 20-12-2024**, directed all Procuring Agencies to ensure compliance with **Rule 38** of the PPRA Rules, 2004, which requires bids to be evaluated in accordance with the procurement legal framework and without conflict with any applicable law, rule, regulation or Federal Government policy. The Notification further requires compliance with the notified minimum rates of wages and all other applicable labour laws. Likewise, all Federal Government institutions operating within the territorial jurisdiction of a Province are required to comply with the applicable Provincial notifications prescribing minimum wages and other labour laws. *(Copy enclosed).*

4. The **Price Schedule (Page 41)** is inconsistent with the **Minimum Wages Ordinance, 1961**, the **Islamabad Employees' Social Security Ordinance, 1965**, the **Employees' Old-Age Benefits Act, 1976**, the **Workmen's Compensation Act, 1923**, and the notifications issued by the **Directorate of Industries & Labour Welfare, ICT**, prescribing the minimum monthly wages based on **26 working days** and **eight (8) working hours per day (48 hours per week with one weekly rest day)**. Consequently, the Price Schedule is inconsistent with the applicable labour laws, the regulatory framework governing private security companies, and the directions referred to in Paragraph 3 above.

5. PPRA has incorrectly adopted the **Least Cost Based Selection (LCBS)** selection technique in the **Evaluation Criteria** under **BDS Clause 19**, assigning a **70% weight age** to quality and **30%** to cost. This method is unsuitable for routine security services, where minimum wages and other statutory costs are prescribed by law. Technical and financial evaluations should be conducted separately. The financial evaluation should be confined to verifying compliance with the prescribed minimum wages and other statutory requirements. Any bid quoting below, or otherwise deviating from, these statutory requirements should be declared **non-responsive**.

Further, the requirement to furnish **EOBI**, **IESSI** contributions and other statutory records exceeds PPRA's mandate, as compliance with such laws falls within the jurisdiction of the respective statutory authorities. Such requirements create unnecessary barriers to competition.

6. Under the **E-Pak Procurement Regulations, 2023**, bids are required to be submitted electronically through **EPADS** only. Regulation **9(6)** requires bids to be submitted electronically in **PDF format** (until Dynamic SPDs become available), duly authenticated with **e-signatures or digital signatures**. Accordingly, the requirement under **Section D (Submission of Bids), BDS Clause 17**, for the submission of hard copies is contrary to the **E-Pak Procurement Regulations, 2023**.

7. Despite requiring only **five (05) security guards**, PPRA has prescribed disproportionate and discriminatory **Eligibility Criteria** exceeding the requirements of the **Private Security Companies Ordinance and Rules, 2001** applicable in the ICT, thereby restricting competition in violation of the **PPRA Rules, 2004**. These include:

- Minimum workforce of **200** security guards on the company's payroll.
- Minimum **250** licensed weapons.
- Average annual turnover of **PKR 50 million** during the last three financial years.
- Minimum **20** clients during the last five years, including **10** public sector clients.
- At least **five years'** experience in providing security services.
- Minimum **50** metal and explosive detectors.

Moreover, the **Technical Specifications** require security guards to possess a **Metric or equivalent qualification** and experience in **fire fighting** and **first aid**, supported by a certificate issued by the security company. These requirements have no basis in the applicable regulatory framework and bear no reasonable relationship to the deployment of only **five (05) security guards**.

Accordingly, the above **Eligibility Criteria** and **Technical Specifications** are excessive, arbitrary, discriminatory and unduly restrictive of competition, contrary to the **PPRA Rules, 2004**.

8. **Rule 38 of PPRA-04 clearly states that it is the responsibility of the procuring agency to adhere all the state laws during the any procurement process rule ibid stipulates that:**

> *The bidder with the* ***[most advantageous bid], if not in conflict with any other law, rules, regulations or policy*** *of the Federal Government, shall be awarded the procurement contract, within the original or extended period of bid validity.*

Further, **Rule 32** expressly prohibits the inclusion of discriminatory, unreasonable or unnecessarily restrictive conditions in bidding documents and provides that:

> *"Save as otherwise provided, no procuring agency shall introduce any condition which discriminates between bidders or that is considered to be met with difficulty. In determining whether a condition is discriminatory or difficult, reference shall be made to the ordinary practices of the relevant trade, business or service."*

The impugned Eligibility Criteria and Technical Specifications are inconsistent with Rules **32** and **38** of the PPRA Rules, 2004.

9. The Bidding Document also omits a mandatory provision requiring compliance with the applicable labour laws governing the employment of security guards, including **minimum wages, working hours, weekly rest days, overtime, social security, EOBI, group insurance, terms and conditions of employment, termination, and other statutory benefits**.

Accordingly, the relevant clauses of the Bidding Document may kindly be amended by incorporating the following provisions to ensure compliance with the applicable legal framework and promote fair competition:

i) The company will offer the rates based on latest notified minimum rates of wages for security services per month for 26 days 08 hours, including IESSI, (social security) EOBI (@ employer share) contribution, group insurance, company service charges and its relevant rates escalation clauses to each security staff and all applicable taxes. Bids not constituting these factors shall be rejected. **Moreover, where services are provided beyond per month for 26 working days 08 hours, the additional days shall be billed separately, inclusive of all applicable taxes,** in accordance with the notified minimum rates of wages.

ii) The bidder on completion of their bids shall ensure that in addition to normal minimum wages, weekly rest / off days will be paid to their employees and the public / festival holidays announced by the federal / provincial governments to be regulated as per prevailing labour laws and double of notified minimum rates of wages shall be paid to those security staff workers who have perform their duties during public / festival holidays, inclusive of all taxes. An invoice / bill on account of public holidays will be submitted to the procuring agency separately for payment, otherwise the "bidder" employees should avail that declared public / festival holidays with pay and the procuring agency should follow the law accordingly. This factor on occurrence but it should not be taken as a part of the bid accordingly. [Minimum Rates of Wages Notification u/s 5 - The Factories Act, 1934 (Act XXVI of 1934 u/s 49-I) - The Payment of Wages Act, 1936 (No IV of 1936)]

iii) The minimum rates of wages as and when notified by the provincial government for security services will also be effective simultaneously. Contribution charges regarding IESSI (social security) and EOBI (Employees Old-Age Benefits Institution @ employer share), insurance charges and all taxes should be adjusted. In future any tax revised / exempted or imposed by federal / provincial governments shall be adjusted / accepted by both parties as per relevant rules / laws. The company service charges shall be increased at fifteen percent (15%) annually or as and when minimum rates of wages revised.

iv) The procuring agency has no right to impose any fine or penalty for the breach of contract and recover damages from the contractor's invoices of employee's under the labour laws. In case of any dispute arising out of, or relating to the agreement, best efforts shall be made by the parties to amicably resolve, provided that the security staff is not found involved in selling goods of procuring agency. [The Payment of Wages Act, 1936 u/s 8 (3, 4 & 8) 9 (1 & 2) 10]

v) The company will provide Shot Gun / Rifle, Pistols in good and working condition plus fifteen (15) live rounds per arm and issue authority letter of the arms to the security guard and should maintain proper record / register of weapons and ammunition as per rules.

vi) That the security staff are exclusively meant for guarding duties only, they will not be assigned any other responsibility, tasks or duties by the procuring agency whatsoever.

viii) The company should deposit (IESSI) social security, EOBI (Employees Old-Age Benefits Institution) contribution, group insurance at their end and maintain documents, cards of their staff and mention payments in its Annual Report / Financial Statement separately on receipt contribution through monthly bills. The procuring agency will neither be responsible for contributing money to the concerned institutions nor for any compensation in case of incidence or injury.

xi) To safeguard the sensitive places, often certain procuring agencies desire essential technical equipment to ensure safety measured, from the company beyond their regulatory legal jurisdictions, but in the best interest of security hazard it may be provided with mutual consent of both the parties on rent. Thereafter the procuring agency shall be bound to pay an equipment charges bill in addition to monthly services invoices separately for entire period of the contract but it should not be taken as a part of the bid.

- Explosive / Mirror Detector for cars
- Walkie-talkie sets alongwith base
- Walk Through Gate
- Luggage scanning / X-ray machine
- Torches etc.

9. To ensure fairness and compliance with the applicable laws, PPRA is requested to revise the existing Financial Bid Form (Page 41), as it does not adequately reflect the mandatory statutory cost components. The revised format should include the latest notified minimum wages, employer contributions towards IESSI (Social Security) and EOBI, Group Insurance, company overheads, reasonable profit margin, applicable escalation provisions, and all relevant taxes for each category of security personnel. PPRA's role should remain confined to evaluating bids strictly in accordance with the prescribed criteria and the applicable legal framework.

Breakup of Cost - Per Security Guard

Description	Guard / Searchers
Salary (as per minimum rates of wages per month, 26 days 08 hours duty)	
Social Security Contribution Charges (IESSI) @ 6%	
EOBI Contribution Charges @ 5%	
Group Insurance Charges	
Company overheads and the bidder's reasonable profit margin	
Total Exclusive of Taxes = Rs.	
ICT Sales Tax on services @ 15%	
Total inclusive of Taxes = Rs.	

10. **In view of the foregoing, the existing Bidding Document is inconsistent with Rules 4, 23, 29, 32, 38 and 50 of the PPRA Rules, 2004, as well as the applicable labour laws. It is, therefore, respectfully requested that the present tender be cancelled and re-issued after suitably amending the Bidding Document in accordance with the applicable legal framework, thereby ensuring a fair, transparent and competitive procurement process.**

(Shehzad Ahmad Chaudhry)
Director
SEE Security Services (Pvt) Limited
Cell# 0300 – 863 9661, 0333 – 282 9661

Managing Director

No.1/481/2024/LEGAL/PPRA
PUBLIC PROCUREMENT REGULATORY AUTHORITY
CABINET DIVISION
GOVERNMENT OF PAKISTAN

Islamabad, the 20th December, 2024.

Subject: **INSTRUCTIONS REGARDING MINIMUM WAGES FOR PRIVATE SECURITY GUARDS AND OTHERS**

Dear Secretaries, اسلام علیکم

It has been observed by the Authority that various Procuring Agencies are not adhering to the principles laid down under Rule 38 of Public Procurement Rules, 2004 which states that the procuring agencies are under obligation to carry out the procurement in line with the policy of the Federal Government issued from time to time. The case in point is non-compliance of Federal Government policy by various procuring agencies on payment of the minimum wages to security guards & others fixed by the Federal Government for the procurement of services of different categories.

2. Further, Rule 38 of Public Procurement Rules, 2004 necessitates that **"all the procuring agencies are under obligation to evaluate the bid in accordance with Procurement Legal Framework having no conflict with any other laws, rules, regulations or policy of the Federal Government".** With context to the minimum wages, the Federal Government generally fixes the minimum rates during the budgetary secession of each financial year which is binding on all the procuring agencies in terms of Rule 38 of Public Procurement Rules, 2004. Moreover, the National Commission for Human Rights (NCHR) in the matter titled as "minimum salary for sanitary workers and private security guards" vide order dated 19.02.2024 has also directed this Authority to issue clear instructions to all the procuring agencies for compliance of the minimum wages fixed by the Federal Government in public procurement of services of all categories.

3. In view of the above, all Secretaries and Heads of the Autonomous Bodies are requested to issue instructions to all the departments attached or under the administrative control of their Ministry/Division to adhere to Rule 38 of Public Procurement Rules, 2004 and to ensure compliance of the directions passed by the National Commission for Human Rights (NCHR), Islamabad.

With profound regards.

Yours sincerely,

(Hasnat Ahmed Qureshi)

All the Federal Secretaries / Head of Organizations

1st Floor, Federal Bank for Cooperatives Building, Sector G-5/2, Islamabad-Pakistan
Tel: +92-51-9224824, Facsimile: +92-51-9224823
e-mail: mdppra@ppra.org.pk

GOVERNMENT OF PAKISTAN
OFFICE OF THE CHIEF COMMISSIONER
DIRECTORATE OF INDUSTRIES & LABOUR WELFARE
ICT, ISLAMABAD
*****

No. ADLW 8(20)-ICT/2024-307 Islamabad 25th August, 2025

NOTIFICATION

In exercise of powers conferred upon him under Section-4 of the Minimum Wages Ordinance, 1961, read with Law and Justice Division Notification No.F-17(2)/Pub/80 dated 31-12-1980, issued in pursuance of Article-2 of the Islamabad Capital Territory Administration Order 1980 (P.O. No.18 of 1980) and all other powers enabling him in this behalf, the Chief Commissioner ICT, Islamabad has been pleased to fix the minimum monthly wages of un-skilled workers and the Juvenile Workers in all the industrial/commercial establishments in the ICT, Islamabad, w.e.f. July 1st, 2025. The schedule of minimum wages is appended below: -

S.No.	Category of Workers	Minimum rates of wages	
		Per Day	Per Month
1.	Adult Unskilled workers employed in any industry in ICT, Islamabad	Rs. 1,423/- (for 8 working hours)	Rs. 37,000/- (for 48 working hours per week with 1 day off)

Note: "In any case, the minimum wage for 8 hours shall not be less than Rs. 37,000."

BY ORDER OF THE CHIEF COMMISSIONER
ISLAMABAD CAPITAL TERRITORY

Director (Industries & Labour Welfare)
ICT, Islamabad

The Manager,
Printing Corporation of Pakistan Press,
Islamabad.

Copy forwarded to:

- The Deputy Commissioner, ICT, Islamabad.
- The Vice Commissioner, Islamabad Employees Social Security Institution (IESSI).
- PS to The Chief Commissioner, ICT, Islamabad.
- All Industries & Commercial Establishments in Islamabad.

GOVERNMENT OF PAKISTAN
OFFICE OF THE CHIEF COMMISSIONER
DIRECTORATE OF INDUSTRIES & LABOUR WELFARE
ICT, ISLAMABAD

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No. ADLW 8(20)-ICT/2021-306 Islamabad 25th August, 2025

NOTIFICATION

In exercise of powers conferred upon him under Section-4 of the Minimum Wages Ordinance, 1961, read with Law and Justice Division Notification No.F-17(2)/Pub/80 dated 31-12-1980, issued in pursuance of Article-2 of the Islamabad Capital Territory Administration Order 1980 (P.O. No.18 of 1980) and all others powers enabling him in this behalf, the Chief Commissioner ICT, Islamabad has been pleased to fix the following monthly emoluments for part time employees and rates of daily wages with effect from 1st July 2025:-

i.	Daily Wages for Skilled Worker	Rs.	2,089/- per day
ii.	Daily Wages for Semi-Skilled Workers	Rs.	1,628/- per day
iii.	Daily Wages for Un-Skilled Workers	Rs.	1,423/- per day
iv.	Domestic Workers	Rs.	178/- per hour
v.	Monthly Rates for Part Time Workers	Rs.	17,000/- per month (for four hours per day)

BY ORDER OF THE CHIEF COMMISSIONER
ISLAMABAD CAPITAL TERRITORY

Director (Industries & Labour Welfare)
ICT, Islamabad

The Manager,
Printing Corporation of Pakistan Press,
Islamabad.

Copy forwarded to:

- The Deputy Commissioner, ICT, Islamabad.
- The Vice Commissioner, Islamabad Employees Social Security Institution (IESSI).
- PS to The Chief Commissioner, ICT, Islamabad.
- All Industries & Commercial Establishments in Islamabad.