SEE SECURITY SERVICES

(Pvt) LIMITED

Power of Your Security

E-mail: info@seesecurityservices.com

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

SSS/PTA-HQ/01-26 Date: 17-07-2026

The Assistant Director (Procurement),
Pakistan Telecom Authority (PTA),
F-5/1, Islamabad
Cell # 0300 - 514-5757, Email khaliqhussain@pta.gov.pk

Subject: **Clarification Required – Security Services Tender for PTA Headquarters, Islamabad, in Contravention of Labour Laws and the PPRA Rules, 2004**

السلام علیکم ورحمۃ اللہ وبرکاتہ

With reference to the bidding document issued by the Pakistan Telecommunication Authority (PTA), published on the PPRA e-PADS v2.0 Portal under Tender No. P-58103 on 10-07-2026, with bids due to be opened on 28-07-2026, for the procurement of **"Hiring of Security Services for PTA Headquarters, Islamabad,"** it is respectfully submitted that several provisions are inconsistent with the applicable labour laws and the Public Procurement Rules, 2004 (PPRA Rules, 2004).

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 and unambiguous bidding documents. However, the present Bidding Document is vague, internally inconsistent and incapable of ensuring a fair, transparent and competitive procurement process.

It is further noted that the 88-page Bidding Document omits several mandatory statutory requirements. Certain provisions are **ultra vires** the powers of the PTA and inconsistent with the regulatory framework governing private security companies, the applicable labour laws and the PPRA Rules, 2004. ***It also requires audits and unnecessary verifications of bidders beyond its jurisdiction***, which is limited to evaluating bids against the prescribed eligibility, qualification and evaluation criteria.

Under the fundamental rights guaranteed by the Constitution, all private security companies holding a valid operating licences by the concerned **Provincial Home Department** or **ICT Administration,** are equally entitled to participate in public procurements 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 PTA, to be made in writing. Compliance with this requirement is mandatory.

3. Moreover, the Managing Director, PPRA, Islamabad, vide Notification No. 1/481/2024/LEGAL/PPRA dated 20-12-2024, directed all Procuring Agencies (PAs) to ensure compliance with Rule 38 of the PPRA Rules, 2004, which requires **"all Procuring Agencies to evaluate bids in accordance with the procurement legal framework, ensuring there is no conflict with any other 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 the minimum rates of wages and all other applicable labour laws. (Copy enclosed.)

4. The Price Schedule (Page 42) is contrary to 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 **Directorate of Industries & Labour Welfare, ICT notifications prescribing the minimum monthly wages** based on **26 working days and eight (8) hours (48 working hours per week with 1 day off)**. Consequently, the Bidding Document is inconsistent with the applicable labour laws, the regulatory framework governing private security companies and the directions referred to in Paragraph 3 above.

5. Although the PTA requires only **forty (40) security guards/lady searchers and eight (08) supervisors** for its Headquarters, Islamabad, Pages 35-37 prescribe an **LCBS** evaluation model (70% technical, 30% financial) requiring quantitative assessment of matters such as company profile, experience, 24/7 control centre, armed response units, training certificates and deployment of **1,000 security guards** nationwide. These requirements are *disproportionate to the procurement,* inconsistent with the regulatory framework governing private security companies, *discriminatory towards bidders*, and beyond the scope of the PPRA Rules, 2004.

For routine security guard services, technical and financial evaluations must be conducted separately. Since the **minimum rates of wages** and other statutory costs are fixed by law, the financial evaluation should be confined to verifying compliance with the applicable legal requirements. Any bid quoting below, or otherwise deviating from, the prescribed statutory requirements must be declared **non-responsive**.

Furthermore, the Bidding Document requires bidders to furnish **EOBI, IESSI contribution and other statutory records**, which fall within the jurisdiction of the respective statutory authorities, not the PTA. Such verification is beyond the PTA's statutory mandate and creates unnecessary barriers to competition.

6. The Bidding Document repeatedly prescribes a **10% Performance Guarantee** under Clause 47, BDS Clause 20, the GCC and the SCC, calculated on the annual contract value, despite payments **being made on a monthly basis**.

It is respectfully requested that the Performance Guarantee be reduced from **10% to 2%** or **dispensed with altogether.** The present requirement imposes an unnecessary **financial burden on bidders** and results in substantial funds remaining blocked **throughout the contract period**, with little practical benefit to the PTA, particularly **where monthly payments and performance monitoring are already in place**.

Moreover, the PTA already has the statutory remedy of **blacklisting** in the event of contractor default, rendering a 10% Performance Guarantee excessive and disproportionate. *It is further requested that the PTA's requirement for "**Annexure", "Procurement Forms" and "Additional Forms & Documents"** (Pages 68-72, 73-76 and 77–88) be withdrawn, as these requirements are unnecessary, unjustified and beyond the scope of this procurement. In light of the foregoing clarifications, the Bidding Document may accordingly be revised to remove these provisions.*

7. **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.*

Furthermore, Rule 32 of PPRA-04 expressly prohibits discriminatory, unreasonable or difficult conditions in bidding documents as below.

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 ascertaining the discriminatory or difficult nature of any condition reference shall be made to the ordinary practices of that trade, manufacturing, construction business or service to which that particular procurement is related.

8. **In addition to the above, the tender documents do not contain the mandatory provision that prevailing labour laws shall apply to matters relating to the employment of security guards, including minimum wages, terms and conditions of employment, working conditions, termination, and related matters.**

You are therefore requested to amend the relevant clauses of the bidding documents, as they do not fully reflect the requirements of the applicable labour laws. The following provisions may kindly be incorporated to ensure compliance with the prevailing legal framework and to facilitate 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 applicable laws, PTA is requested to revise the existing (Financial Bid Form), on page # 42 as it does not adequately reflect statutory requirements. **The revised cost breakdown should include the latest notified minimum wages, employer contributions towards IESSI (Social Security) and EOBI, group insurance, company overhead and reasonable profit margin, applicable escalation clauses, and all relevant taxes for each category of security personnel.** Its role is limited to evaluating bids strictly in accordance with the prescribed criteria and applicable laws.

Breakup of Cost - Per Security Guard

Description	Guard / Searchers	Supervisor
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		
Withholding Tax (FBR) [Hidden Charges] under Section 153(1)(b) @ 6%		
Total Exclusive of Taxes = Rs.		
ICT Sales Tax on services @ 15%		
Total inclusive of Taxes = Rs.		

10. The Company also relies on the findings of the Wafaqi Mohtasib in Complaint No. MUL-2722/22, dated 04-10-2022, titled *"Maladministration in Award of Security Services by FBR-RTO Multan"*, which held that FBR/RTO Multan must comply with the prescribed ***minimum rates of wages based on per month for 26 working days eight (8) hours***.

The appeal filed by FBR (RTO) Multan against the said findings was subsequently dismissed by the President's Secretariat (Public), Aiwan-e-Sadr, Islamabad, vide order dated 01-01-2024. (Copies of the findings and dismissal order are annexed herewith for ready reference.)

12. In view of the above, you are requested to ensure compliance with prevailing laws. **The existing bidding documents contravene Rules 4, 23, 29, 32, 38 and 50 of the PPRA Rules 2004**. **It is therefore recommended that the existing tender documents be scrapped, and the PTA/PA re-issues the tender for security services with the bidding documents amended in accordance with applicable state laws**.

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

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
*****

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,
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Copy forwarded to:

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- PS to The Chief Commissioner, ICT, Islamabad.
- All Industries & Commercial Establishments in Islamabad.

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

Managing Director

Islamabad, the 20th December, 2024.

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

Dear Secretaries, السلام 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

Date: January 17th, 2001

S.R.O. 481(I)/99

The Private Security Companies Rules, 2001

CDA

*THE PRIVATE SECURITY COMPANIES RULES, 2001

[17th January, 2002]

No. 2 (146)- Home/ 2002.- In exercise of the powers conferred by section 18 of the Private Security Companies Ordinance (VII of 2001), the Chief Commissioner, Islamabad Capital Territory with the approval of the Federal Government is pleased to make the following Rules, namely:—

1. **Short title and commencement.-** (1) These rules may be called the Private Security Companies Rules, 2001.

(2) They shall come into force at once.

2. **Definitions.-** In these Rules, unless there is anything repugnant in the subject or context,—

(a) "applicant" means the Chief Executive of a company, or the Director so authorized by, a registered Private Security Company;

(b) "Ordinance" means the Private Security Companies Ordinance, 2001.

3. **Procedure for grant and renewal of licence etc.-** (1) An applicant shall submit an application in the Form, own to those rule (Annex-) to the Licensing Officer for grant of licence to his Private Security Company has been registered with Securities and Exchange Commission of Pakistan under the Companies Ordinance, 1984, with the approval of the Ministry of Interior.

* Published in the Gazette of Pakistan, Extraordinary, Part III, dated 17th January, 2002, at pages 29-35.

(2) The applicant shall deposit ten thousand rupees with the Federal Government as registration fee.

(3) Licence fee of twenty five thousand rupees shall be deposited in the head of account of Islamabad Capital Territory Administration.

(4) Annual renewal fee of five thousand rupees the licence should be deposited in the head of account of the Islamabad Capital Territory Administration.

4. **Verification.-** (1) The Licensing Officer shall get the antecedents of the company verified through Islamabad Capital Territory Administration as he deems appropriate.

(2) If the applicant is an ex-armed forces employee the Licencing Officer, before grant of licence shall ensure that he has not been court martialled and convicted of an offence involving moral turpitude and has not been involved in anti-state activities or has not been convicted on charges of gross misconduct involving moral turpitude through appropriate channels.

(3) In case of civilian, they are not convicted by Civil Court on account of criminal acts involving moral turpitude including anti-state activities.

5. **Validity.-** A licence issued shall be valid for a period of one year only and shall be extended on payment of the fee specified in sub-rule (4) of rule 4 through any scheduled or post office. Application for renewal of a licence shall be submitted to the Licencing Officer before thirty days of its expiry.

6. **Employment of staff by the licencee.-** (1) The employment of security guards and staff recruited by the Private Security Company shall be governed by all relevant provisions of the Ordinance and shall be cleared from the concerned Special Branch of Police through Licencing Authority.

(2) A security guard employed by a Private Security Company must be properly trained in the use of arms and ammunition kept under a valid licence by the Private Security Company and medically fit and shall produce a certificate of fitness from a registered Medical Practitioner.

(3) The licensee shall arrange at least one week's training of security guards employed by him in the institutions recognized by the Federal Government. A security guard shall not be assigned guarding duty unless he has been imported formal security training.

(4) A security guard employed by a Private Security Company must at least middle standard academic qualifications. This condition shall, however, not apply to the existing security staff inducted before the commencement of these rules.

7. Possession of arms and ammunition by the licencee.- (1) A Competent Authority, a District Magistrate, Senior Superintendent of Police or an Officer authorized may inspect the Company's premises and arrangements made for the safe custody and use of arms and ammunition.

(2) The licensee shall submit the required information pertaining to possession or retainership of arms and ammunition issued to him to the Licensing Officer in such form as he may by order in writing, direct.

8. Identification papers.- The Security Guards shall display identification cards preferably computerized with security features containing the company's names, its licence number allotted by the licencing Officer, name of the card holder, his National Identity Card Number and photograph, issued by the Company. The Company shall deposit the specimen of identification card with the Special Branch of Police, Islamabad.

9. Details of Private Security Company.- The Private Security Company shall provide details of the guards and weapons possessed by them, number of vehicles and any change about its Directors to Islamabad Capital Territory Administration, soon after the change takes place.

10. Change in procedure.- (1) If any change is proposed about the Directors of the company, the same shall be communicated to the Ministry of Interior with proper justification of the change through the Security Exchange Commission of Pakistan for security clearance.

(2) The proprietorship of the company shall not be transferable to any other party except in case of death of a person licensed Ordinance. A member of the family of a deceased shall be entitled to continue the business provided he or she applies for grant of permission to the Licensing Officer to assume business in the event of the death of the original licencee.

11. Uniform.- Security Guards or supervisors of a Private Security Company shall wear a standard uniform as the Federal Government may notify and shall not be similar to the uniform of the Armed Force, Police or any Civil Armed Force.

12. Armed guards.- Armed guards either on static or escort duty shall carry with them the following documents, namely:—

(a) copy of a valid arms licence duly attested by a Magistrate;

(b) user company's authority letter authorising a guard by name to carry the arm and to keep it in his custody on behalf of the company; and

(c) if detailed on mobile armed escort, in addition to documents mentioned above, armed guards shall carry company's letter of authority specifying nature of duty, it's destination and approximate time of duty. While on escort duty guards shall in proper uniform. A company certificate to the effect the escort duty was scheduled for protection of genuine clients who were not involved in any criminal acts or protection was not intended to facilitate or shield any criminal act under the law of the land.

13. Unauthorised Private Security Company.- A Private Security shall be considered illegal if,—

(a) it does not bear proper registration with the Securities and Exchange Commission of Pakistan;

(b) its registration has been cancelled;

(c) has been refused no objection certificate from the Ministry of Interior or licence from the Islamabad Capital Territory Administration; and

(d) has failed to get renewal of its licence for the current year of its operation.

14. Cash in transit.- No Private Security Company shall undertake business of transportation of cash or valuable unless specifically authorised to do so by the Ministry of Interior.

15. Appeal.- Any person aggrieved by an order made by the Licencing Officer under rule 3 may, within thirty days, appeal against such order to the Secretary.

Annexure

APPLICATION FORM UNDER RULE [SEE RULE 3] 161 OF THE PRIVATE SECURITY COMPANY RULES, 2001

1. Name of the Company..

2. Addresses of the Company..

   (a) Head Office ....
   ....
   ....

   (b) Office in ICT ....
   ....
   ....

3. Names of Directors with NIC Nos. — Address

	Names of Directors with NIC Nos.	Address: *Present*	Address: *Permanent*
(a)	....	....	....
(b)	....	....	....
(c)	....	....	....
(d)	....	....	....

4. Local and other addresses of the Directors during the last 10 years, where they have stayed for more than six months:

Address	*From*	*To*
....	....	....
....	....	....
....	....	....

5. Membership of Clubs, Political Parties and Associations (Past and Present) (Name of Organization with date of joining and leaving):

	Name of Club Party	*From*	*To*
a.	....	....	....
b.	....	....	....
c.	....	....	....
d.	....	....	....
e.	....	....	....

6. Names of addresses of at least two Gazetted Officers (BS-17 or above) in Pakistan, who can testify to the applicant, character and antecedents:–

Name	*Address*
....	....
....	....

7. If any FIRs is registered against any Director. Details of the FIRs and previous conviction if any:–

....

....

8. Finger prints:–

....	....	....
(thumb)	(Fore-finger)	(Middle finger)
....	....	
(Ring-finger)	(Little finger)	

Place.................................... *Date*.................... *Signature*.............................

a. I...................... Candidate for appointment to .... hereby certify and solemnly affirm that may answers to the above questions are correct to the best of my knowledge and belief.

b. I fully understand that if the above statement is false in any material respect, or its any material information my security company licence may be cancelled.

Signature...................
Place.......................
Date........................

9. Please tick if following documents are enclosed:–

1.	Memorandum and Article of Associations.	....
2.	Registration Certificate of SECP.	....
3.	Photo-copies of N.I. Cards of the Directors.	....
4.	Under taking on Stamp Paper.	....
5.	Company's Office address in Islamabad.	....
6.	Photographs of the Directors.	....
7.	N.T.N. of the Directors.	....

8. Receipts:–

(i) *Provincial/ICT Administration's Fee Rs. 25,000.*

"Head No. 300000–Deposit and Reserves, 3600000 Other Deposits, 3601010–Deposits made by Local Bodies to meet the claims of Contractor."

(ii) *Federal Government's Registration Fee Rs. 10,000.*

"Major Head–1300000–Misc–Receipts. Minor Head 1390000– Other Receipts (NES). Detailed Head–1391200 Other Receipts–Fees Fines and forfeitures. Sub-Detailed Head (New)–1391213–Other Receipt–Registration Fees for Private Security Companies."

[No. F.____________.]

BY ORDER OF THE CHIEF COMMISSIONER
ISLAMABAD CAPITAL TERRITORY.

SULTAN KHAN,
Deputy Director (Admin).

OMBUDSMAN

WAFAQI MOHTASIB (OMBUDSMAN)'S SECRETARIAT

CLOSURE FINDINGS

Complaint No.	**WMS-MLN/2722/22**
Date of Registration.	02/08/2022
Name and address of the complainant.	**Mr. Shehzad Ahmad Ch. C/O M/S See Security Services** R/O Sahota Market, Double Road, New Garden Town, Multan
Name of the Agency complained against.	**Federal Board of Revenue (FBR)**
Name of the Investigating Officer, Station.	Mr. Mahmood Javed Bhatti, Associate Advisor (Incharge) WMS, R.O. Multan
Subject of complaint.	**Maladministration in award of security services contract**
Date when IO asked for report from Agency	03-08-2022
Date of receipt of report from Agency.	15-08-2022
Number & date of hearings	i) **Number**: 02 ii) **Date** : 17/08/2022 & 23/8/2022
Name & Designation of the Agency's Representative who attended the hearing:	Mr. Abdul Razzaq Khan, Additional Commissioner, RTO, Multan
Whether the complainant attended the hearing.	Attended

WAFAQI MOHTASIB (OMBUDSMAN) APPROVED ON 04 OCT 2022 ISLAMABAD

The complainant alleged maladministration on the premise that his firm See Security Services, being a constituent of one of the bidders, was aggrieved on account of such the Contract having been awarded through mis-procurement by the Regional Tax Office, (Inland Revenue) Multan. The complainant alleged violations of terms & conditions of the requisite tender set by the Agency itself as well as PPRA rules. The complainant sought intervention of this Secretariat.

2. The Agency vide its report dated 16.08.2022 in annotated format submitted that the Procuring Agency has not violated any of the provisions of PPRA rules, 2004 including rule-04 and 23 (1). The Agency denied violation of Minimum Wages Act as well as Minimum Wages of Unskilled Workers Ordinance 1969 and stated that PPRA Rule 38 as well as 25 including other relevant rules were strictly followed. The Agency also submitted copies of relevant documents of procurement proceedings.

3. Hearings were held on 17.08/2022 & 23/8/2022 for determination of mal-administration on the part of the Agency. The representative of the Agency appeared with detailed report and reiterated the stance of the Agency. The complainant was also present on both the hearing dates and put-forth his grievance in detail. Record forwarded by both sides was examined minutely. Parties reiterated their stances and they were heard at a quite length.

4. Perusal of record depicted that as per condition "(3) of the tender floated by FBR, it was clearly mentioned that Bidder/firm shall attach an affidavit of Rs.100/- on judicial stamp paper (latest and original) to the effect that the firm has not been black listed by any of the Govt. Departments. The Agency did not comment upon it as to whether the requisite document was produced by the "most advantageous bidder" since copies of the documents forwarded by the Agency does not contain that specific affidavit. The Agency simply replied that procurement of services was widely advertised strictly in accordance with Rule 12 of the Rules ibid and the work order was awarded as per Rule 38 because the said firm was not blacklisted. Either requisite affidavit was not submitted by the qualifying bidder before opening of tender or submitted subsequently or verbal assurance of the bidder was accepted by the Agency, all these possibilities tantamount to alteration in terms and conditions are violation of rules.

5. The complainant's firm offered rates of security guards excluding the taxes Rs.26,595/-as against the qualifying bidder who offered rates of Rs.21,129/- **inclusive taxes and levies** which is not only against Minimum Wages Act (as the wages paid to the Security Guards must be equal or higher than minimum wages fixed) after the deduction of taxes from their salaries but also violation of terms and conditions of tender as well as PPRA Rules 2004 since in the floated tender term "**inclusive of taxes** used and not exclusive" . The Agency did not comment upon said loophole and violation of terms and conditions of tender/PPRA rules but randomly replied that the bidder had ensured minimum wages under the relevant law. Similarly, working for 12 hours is also against the Punjab Minimum Wages Act 2019 and Minimum Wages of Unskilled Workers Ordinance 1969 approved for 08 hours and 26 days per month.

6. In view of the above, the case is referred to the Chairman, FBR, Islamabad for redressing the grievance of the complainant after thorough probe into the matter and strictly in accordance with relevant law, rules and regulations under intimation to this office within 30 days of receipt of these findings. The case is closed under Regulation 23 (1)(z) of the Wafaqi Mohtasib (Investigation & Disposal of Complaints) Regulations, 2013.

(EJAZ AHMAD QURESHI)
WAFAQI MOHTASIB (OMBUDSMAN)

WAFAQI MOHTASIB (OMBUDSMAN)
APPROVED ON
04 OCT 2022
ISLAMABAD

Rep. No.519/WM/2022
Date of Decision: 1st January, 2024

PRESIDENT'S SECRETARIAT (PUBLIC)
AIWAN-E-SADR
*****

Federal Board of Revenue (FBR)
Vs
Mr. Shahzad Ahmad Ch., M/s See Security Service (Multan)

Sub: **REPRESENTATION FILED BY FBR VS MR. SHEHZAD AHMAD CH., M/S SEE SECURITY SERVICE AGAINST ORDER OF THE WAFAQI MOHTASIB DATED 04.10.2022 IN COMPLAINT NO.WMS-MLN/2722/2022**

Kindly refer to your representation addressed to the Honourable President of Pakistan in the backgrounds mentioned below:-

2. This representation has been filed by Federal Board of Revenue (Agency) against order of the Wafaqi Mohtasib dated 04.10.2022, whereby, the case was closed under Regulation 23(1) (z) of the Wafaqi Mohtasib (Investigation & Disposal of Complaints) Regulations, 2013, on the groundsthat:-

> ***"Perusal of record depicted that as per condition "(3) of the tender floated by FBR, it was clearly mentioned that Bidder/firm shall attach an affidavit of Rs.100/- on judicial stamp paper (latest and original) to the effect that the firm has not been black listed by any of the Govt. Departments. The Agency did not comment upon it as to whether the requisite document was produced by the "most advantageous bidder" since copies of the documents forwarded by the Agency does not contain that specific affidavit. The Agency simply replied that procurement of services was widely advertised strictly in accordance with Rule 12 of the Rules ibid and the work order was awarded as per Rule 38 because the said firm was not blacklisted. Either requisite affidavit was not submitted by the qualifying bidder before opening of tender or submitted subsequently or verbal assurance of the bidder was accepted by the Agency, all these possibilities tantamount to alternation in terms and conditions are violation of rules.***
>
> ***The complainant's firm offered rates of security guards excluding the taxes Rs.26,595/- as against the qualifying bidder who offered rates of Rs.21,129/- inclusive taxes and levies which is not only against Minimum Wages Act (as the Wages paid to the Security Guards must be equal or higher than minimum wages fixed) after the deduction of taxes from their salaries but also violation of terms and conditions of tender as well as PPRA Rules 2004 since in the floated tender terms "inclusive of taxes used and not exclusive". The Agency did not comment upon said loophole and violation of terms and conditions of tender/PPRA rules but randomly replied that the bidder had ensured minimum wages under the relevant laws. Similarly, working for 12 hours is also against the Punjab Minimum Wages Act 2019 and Minimum Wages of Unskilled Workers Ordinance 1969 approved for 08 hours and 26 days per month."***

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The case was referred to Chairman, FBR Islamabad for redressing the grievance of the complainant after thorough the probe into the matter and strictly in accordance with law, rule and regulations.

3. The complainant had a security agency. He was one of the bidders in the contract floated by Regional Tax Office (Inland Revenue Multan). His grievance was that contract was awarded through mis procurement by the Agency.

4. The Agency in its report claimed that they have not violated any PPRA rules. They also denied violation of Minimum Wages Act as well as Minimum Wages of unskilled Worker Ordinance,1969.

5. After hearing the parties, the impugned order was passed. Aggrieved by the said order, this representation has been filed.

6. The case has been heard on 19.12.2023. None-appeared on behalf of the parties.

7. The representation came up for hearing on 28/11/2023, none-appeared on behalf of FBR and neither on behalf of the complainant. The matter was adjourned for today so as to provide opportunity of being heard to the parties, however, none-appeared on behalf of the Agency despite notice issued to them. The lack of interest on behalf of the Agency having filed representation is apparent, the representation thus deserves to be disposed-of.

8. In view of the above, the Hon'ble President has been pleased to reject the representation.

(ASGHAR ALI)
Director (Legal-III)

Mr. Shehzad Ahmed Ch.
C/o M/s See Security Service,
R/o Sahota Market Double Road,
New Garden Town,
Multan.

The Chairman,
Federal Board of Revenue (FBR),
FBR House,
Islamabad.

Copy to:

i. The Secretary, Wafaqi Mohtasib (Ombudsman)'s Secretariat, Constitution Avenue, Islamabad.

ii. The Consultant (P), President's Secretariat (Public), Islamabad, for uploading it on the official website.