



December 15, 2025

Advisor to the Prime Minister
PM House, Islamabad

Subject: Complaint Against Allegations of Violation of Public Procurement Regulatory Authority (PPRA) Rules 2004 in the Tender for the Consultancy Services 'Master Planning, Detailed Designing, Procurement and Construction Supervision for Establishment of Daanish University', Islamabad

Dear Sir,

Transparency International has received a complaint against allegations of violation of Public Procurement Regulatory Authority (PPRA) Rules 2004 in the tender for the consultancy services for the Project Master Planning, Detailed Designing, Procurement and Construction Supervision for Establishment of Daanish University Islamabad (Annex-A).

The complainant has made the following allegations that;

1. The Federal Ministry of Education and Professional Training invited tender for Consultancy Services for Master Planning, Detailed Designing, Procurement and Construction Supervision for the Establishment of Daanish University, under Single Stage-Two Envelope Procedure.
2. M/s NKY Architects and Engineers (Turkey) JV was one of the five bidders participating in the bidding process and was declared technically qualified.
3. Under technical evaluation, the procuring agency has randomly allocated marks for experience without any defined criteria in the RFP. In a joint consortium, the combined experience of all the JV partners is counted. However, the said tender has failed to adhere to normal procurement practice.
4. M/s NKY Architects and Engineers (Turkey) JV approached the Grievance Redressal Committee (GRC) on November 10, 2025.

Transparency International Pakistan Comments & Recommendations

Transparency International Pakistan has reviewed the allegations of the complaint. Prima facie, the allegations seem correct. The following are TI Pakistan's comments:

1. The Federal Ministry of Education and Professional Training must investigate to ensure that the RFP include clear evaluation criteria on "experience" and the same evaluated as per PPRA Rule 29, quoted below:

29. Evaluation criteria.- Procuring agencies shall formulate an appropriate evaluation criterion listing all the relevant information against which a bid is to be evaluated. Such evaluation criteria shall form an integral part of the bidding documents. Failure to provide for an unambiguous evaluation criteria in the bidding documents shall amount to mis-procurement.

2. TI Pakistan requests the Advisor to the Prime Minister to examine the allegations of the complaint, and if found correct, issue directives to the Ministry of Education and Professional Training to evaluate the tenders in a fair and transparent manner as per the evaluation criteria prescribed in the Bidding Documents according to PPRA Rule 29.



Transparency International Pakistan is striving for the across-the-board application of the Rule of Law, which is the only way to stop corruption and achieve zero tolerance against corruption.

With Regards,

Advocate Daniyal Muzaffar
Trustee/Legal Advisor
Transparency International Pakistan

Copies forwarded for the information with a request to take action under their mandate to:

1. Federal Secretary, Ministry of Education and Professional Training, Government of Pakistan, Islamabad.
2. Chairman, Prime Minister's Inspection Commission, Islamabad.
3. Managing Director, Public Procurement Regulatory Authority, Islamabad.
4. Registrar, Supreme Court of Pakistan, Islamabad.

Note:

This is to clarify that Transparency International Pakistan is not a complainant; it acts as a whistleblower and operates under Article 19-A of the Constitution of Pakistan, which gives the right to the public to know how the government is being run by public officers. Article 19-A makes the right to access of information pertaining to a public authority a fundamental right, and a three-member bench in the case of Mukhtar Ahmad Ali vs the Registrar, Supreme Court of Pakistan, Islamabad, headed by Chief Justice Qazi Faez Isa in the landmark judgment on 16 October 2023, in CP No. 3532/2023, has declared that

"What previously may have been on a need-to-know basis Article 19A of the Constitution has transformed it to a right-to-know, and the Access to information is no longer a discretion granted through occasional benevolence, but is now a fundamental right available with every Pakistani which right may be invoked under Article 19A of the Constitution"

To,
Mr. Sohail Akhtar Malik
Senior Joint Secretary (HE)
M/O FE&PT

Date: 09th December 2025

SUBJECT: **OBSERVATIONS ON GRC DECISION UPLOADED ON E-PADS SYSTEM
"CONSULTANCY SERVICES FOR MASTER PLANNING, DETAILED
DESIGNING, PROCUREMENT & CONSTRUCTION SUPERVISION FOR
ESTABLISHMENT OF DAANISH UNIVERSITY, ISLAMABAD.**

Dear Sir/Madam,

With reference to the **GRC decision recently uploaded on the E-PADS system**, we wish to highlight that the concerns of the bidders were not addressed prior to its issuance. We had already shared our **detailed evaluation report**, prepared strictly in accordance with the RFP provisions; however, the GRC Committee did not deliberate on our observations, resulting in a **unilateral decision being posted on the system**.

We would also like to reiterate our reservations regarding the technical scores awarded and the evaluation methodology adopted. The decision uploaded on E-PADS indicates that the same approach was applied to all bidders, including the non-consideration of experience scores for both firms—an approach that is inconsistent with the evaluation criteria defined in the RFP.

Furthermore, with respect to the Methodology / Proposal Presentation section, the RFP does not prescribe any requirement for a separate presentation. This section pertains solely to the clarity, coherence, and quality of the submitted proposal. Despite this, no marks were allocated to us under this component. Notwithstanding the above, and even under the evaluation method reflected in your uploaded decision, our technical proposal still achieves the **highest score**.

For reference, we are **again attaching the detailed evaluation report**, which demonstrates that, even under the methodology applied by your Committee—though we do not agree with it—**our proposal still maintains a high technical ranking**.

We remain confident that the Procuring Agency will continue to **uphold the principles of transparency, fairness, and strict compliance with PPRA Rules**, thereby ensuring a credible and misprocurement-free process. We respectfully request that, going forward, be consulted prior to the uploading of any decisions on the E-PADS system to ensure clarity and alignment.



Handwritten signature: *AA*
Circular stamp: AUTHORIZED REPRESENTATIVE

We look forward to your kind consideration and an early resolution of our grievance.



Engr. Arslan Hanif
Authorized Representative
NKY-AsCE JV

Attachment:

- Detailed Technical Evaluation Report as per client evaluation method
- All Previous Correspondence

CC:

- Managing Director PPRA
- ✓ ➤ Transparency International
- Minister Federal Education