

MODULE 6 | PURCHASING, TENDERS, SUPPLIERS AND CONTRACTS

Emergencies, Complaints and Procurement Records

Practical hospital governance in Punjab, Pakistan

Respond promptly. Use the correct legal route.
Keep a clear record of the decision and its outcome.

AUTHOR

Dr Qurban Hussain Khan

Manage the difficult cases without losing the record

For the Medical Superintendent: know which process applies when supplies become urgent, a bidder complains or a supplier is accused of misconduct.

- Explain the legal basis for urgent procurement.
- Route complaints and contract disputes correctly.
- Follow the blacklisting process and its limits.
- Preserve and disclose procurement records properly.

OFFICIAL SOURCE

A principle tied to a named law, rule or official manual.

WORKING METHOD

A practical control or teaching format to adapt to the authorised system.

TEACHING CASE

An invented hospital example. Amounts are for learning, not spending authority.

Study output

A practical case file with the correct authority, decision, deadline and closure evidence.

Module 6 | Presentation 6 of 6. Allow 45-60 minutes with exercises. All explanations are on the pages; check the cited sources before live use.

First identify the problem you are dealing with

Different problems require different decisions. Giving every problem the label "complaint" hides the legal route.

Problem	Primary route	First question
Immediate threat to service	Emergency assessment and lawful procurement route.	What facts require immediate action?
Bidder challenges the process	Grievance Redressal Committee (GRC); rule 67A where applicable.	Which stage, decision and deadline apply?
Dispute after contract takes effect	The contract and rule 68 dispute method.	Which obligation or remedy is disputed?
Possible supplier misconduct	Verification; rule 21 and its Schedule if blacklisting is pursued.	What allegation can the evidence establish?

Some events require more than one process. Keep each decision, authority and record clear.

Sources: **F8**: rr. 21, 59, 67-68

An emergency needs facts and an authorised decision

Rule 2(q) includes an operational emergency, but it links the term to an abnormal situation requiring immediate action to limit or avoid harm.

Establish the facts

- Record the event, its time, the affected service and the risk to people, property or the environment.
- Explain why the normal procurement timetable cannot meet the immediate need. Distinguish verified facts from estimates.

Establish the authority

- Rule 59(c)(v) permits direct contracting in an emergency. The procuring agency must specify the forum authorised to declare it.
- Identify the actual order and decision-maker for this institution. The title "Medical Superintendent" alone does not prove that power.

An urgent note, a supplier request or an approaching financial year-end does not by itself establish a procurement emergency.

Sources: **F8**: rr. 2(q), 11, 59(c)(v)

Keep the two urgency provisions separate

The reason written on the file must match the provision being used.

Route	What the cited provision requires	Administrative implication
Emergency direct contracting	Rule 59(c)(v): an emergency and the specified forum with authority to declare it.	Record the event, declaration, approvals and chosen scope.
Extreme-urgency negotiated tendering	Rule 59(d)(iii): unforeseeable events prevent meeting bidding time limits; circumstances must not be attributable to the agency.	Establish each condition. This is a separate legal route.
Ordinary competitive procurement	Use the normal applicable method when the facts do not support an exception.	Do not create an exception by changing the wording of the demand.

Do not copy the conditions of one exception into another. Read the full rule and the current approvals for the proposed route.

Sources: **F8**: rr. 22, 59(c)(v), 59(d)(iii)

Prepare a short emergency procurement record

Working checklist. Speed changes the timetable; it does not remove the need to establish lawful authority and what was purchased.

01 Event

What happened, when, and what harm must be prevented?

02 Need

What minimum quantity, service or repair addresses that need?

03 Authority

Who may declare the emergency and approve this purchase?

04 Supplier and price

Why this capable supplier and this supported price?

05 Delivery

Who will verify quality, quantity and actual completion?

06 Follow-up

What remains, who will act, and when will normal supply resume?

Attach the declaration, financial approval, order, price evidence and acceptance record. This checklist is a working format, not a statutory form.

WORKING METHOD | Illustrative material is identified in the text.

An unexpected failure threatens an essential service

Invented case: a sudden oxygen-system failure creates an immediate supply risk. The technical and clinical teams confirm the facts.

Protect the service	Activate the hospital's authorised safety and continuity arrangements immediately.
Define the requirement	Document the safe interim supply or repair, the required period and the technical evidence.
Use the proper forum	Place the emergency facts before the forum empowered to declare an emergency.
Buy and verify	Use the lawful route, competent approvals, a supported price and documented receipt or completion.
Restore routine supply	Track the interim arrangement, permanent correction and the return to normal procurement.

This example teaches administration. Technical and clinical decisions remain with the appropriately authorised professionals.

A preventable shortage needs two separate responses

Invented case: a routine supply order was delayed and essential stock is now nearly exhausted.

Protect current services

- Confirm usable stock, daily need, expected delivery and available lawful supply options.
- If an actual abnormal emergency exists, document it and use the authorised decision process. Do not assume that every shortage qualifies.

Examine why it happened

- Preserve the original demand, reminders, stock information and decision dates. Do not rewrite the history.
- Identify the failed planning or follow-up control and correct it. Any accountability action requires its own applicable process.

A current patient-service risk and an earlier administrative failure can both exist. For rule 59(d)(iii), agency-caused urgency does not meet its stated condition.

Sources: **F8**: rr. 2(q), 4, 8, 59(c)(v), 59(d)(iii)

A failed tender does not automatically permit direct purchase

Check why the competition failed and which lawful options remain.

If all bids are rejected

- Rule 35 governs rejection before acceptance, including bidder notification and provision of grounds on request.
- Rule 36 allows re-bidding after assessing the reasons. Revise specifications, criteria or other conditions where necessary and lawful.

If only one bid remains

- Rule 55A permits award where one complying bid is received, subject to rule 35. Check compliance, value for money and the applicable bidding requirements.
- If an alternative method is proposed, identify and satisfy its own rule 59 basis. Tender failure alone is not that basis.

Lecture 15 explains evaluation. Do not retrospectively change the evaluation criteria to make an unsuitable bid acceptable.

Sources: **F8**: rr. 4, 35-36, 55A, 59

Separate the complaint routes before calculating time

The correct route depends on the issue and stage, not simply on who wrote the letter.

Issue	Route	Scope
Bidder grievance before contract takes effect	GRC under rule 67.	Includes permitted pre-submission and evaluation complaints.
Challenge to a GRC decision	Representation to MD PPRA under rule 67A(1).	Use the decision and evidence of its communication.
Other breach of the procurement rules	Complaint under rule 67A(3).	Any person may complain; it must not be a rule 67 grievance.
Dispute after contract takes effect	Contract method under rule 68.	Mediation or arbitration as provided in the contract.

MD means Managing Director of Punjab PPRA. Blacklisting representations follow rule 21, not the seven-day GRC representation route.

Sources: **F8**: rr. 21, 67-68

Constitute the GRC properly before a complaint arrives

A committee needs a lawful notification, members who can act and the authority to decide within its remit.

Rule 67 requirements

- The GRC must have an odd number of members and proper powers and authorisations.
- Its role concerns bidder complaints before the procurement contract enters into force. Identify its powers and reporting arrangements.

Independence and readiness

- The 18 October 2017 PPRA circular advises an independent GRC. Check applicable instructions for its composition and technical expertise.
- As a working control, record conflicts, substitutes, a case secretary and a method for securing the procurement record.

Do not assume that the evaluation committee should simply review its own disputed decision as the grievance committee.

Sources: **F8**: r. 67(1)-(2) | **P1**: independent GRC circular

Use the correct period and the correct starting event

These periods are stated in the cited rules. Keep the publication, receipt and communication evidence.

Event or action	Period in the rule	Source
Bidder challenges technical evaluation	Within 5 days of announcement of the technical evaluation report.	Rule 67(3)
Bidder challenges final evaluation	Within 10 days after issuance of the final evaluation report.	Rule 67(3), subject to 67(4)
GRC investigates and decides	Within 15 days of receipt of the complaint.	Rule 67(5)
Bidder represents against GRC decision	Within 7 days of communication of that decision.	Rule 67A(1)

Rule 37 separately requires the evaluation report at least 10 days before award. Do not replace that period with the 5-day technical-complaint window.

Sources: **F8**: rr. 37, 67(3)-(5), 67A(1)

Check what may be challenged at each stage

Rule 67 distinguishes a technical-stage complaint from an objection raised after the final report.

Two-envelope or staged review

- After the final report, a complainant cannot reopen technical evaluation under rule 67(4), provided the detailed technical report was uploaded on the Authority's website.
- Keep evidence of that upload. Do not assume that an unpublished technical report triggers the same restriction.

Other situations

- For single-stage single-envelope bidding, rule 67(4) allows objection to any part of the final evaluation report.
- The GRC may also decide a bidder's complaint before the proposal-submission date under rule 67(2)(a). Do not invent a 5- or 10-day trigger for that situation.

Use the procedure actually advertised for this procurement. A timeline copied from a different method can give the wrong answer.

Sources: **F8**: r. 67(2)(a), (3)-(4)

Make the GRC decision understandable and traceable

The committee must investigate and decide within the rule 67 period. The 2024 circular calls for a speaking order: a decision with reasons.

- | | | |
|---|----------------------------------|---|
| 1 | Register and preserve | Record receipt, issues, requested relief and the relevant procurement stage. Secure the file. |
| 2 | Examine the issue | Compare the complaint with the published criteria, bids, evaluation and the procuring agency's explanation. |
| 3 | Decide within remit | State findings and reasons. Use only the powers provided by rule 67(2). |
| 4 | Communicate and follow up | Send the decision, record communication and explain the representation route. Track the resulting action. |

A GRC may recommend scrapping with written reasons under rule 67(2)(e). Do not describe that as an unlimited power to award a contract.

Sources: **F8**: r. 67(2), (5) | **P2**: reasoned order and communication

Prepare the record for a representation to MD PPRA

Rule 67A(1) provides seven days from communication of a GRC decision. Current filing requirements must also be met.

The representation file

- Keep the complaint, GRC decision, communication proof, disputed report and relevant bidding documents together.
- The 30 September 2024 circular sets filing requirements, including authority to file, supporting evidence and a fee. Check the current requirements and amount.

If the GRC has not decided

- The circular allows the submitted GRC petition to be attached where the GRC has not decided within the stipulated period.
- Preserve receipt and elapsed-time evidence, and obtain advice on the proper filing route. Do not treat silence as automatic acceptance of the bidder's claim.

The MD decision is final within the process stated in rule 67A(4). This lecture does not claim that judicial review or other lawful remedies are excluded.

Sources: **F8**: r. 67A | **P2**: filing requirements

Distinguish a filed representation from a suspension order

Rule 67A(2) expressly says that merely filing a representation does not suspend the procurement process.

What to check

- Has MD PPRA issued an actual suspension order? What procurement, action and period does it cover?
- Check the current stage, publication periods, unresolved directions and any applicable order from another competent forum.

What to record

- Keep the representation, receipt details, order and proof of communication to those implementing it.
- Record the lawful basis for the next step. Do not rush an award to defeat a pending challenge or ignore an actual suspension.

The no-automatic-suspension statement here concerns rule 67A representations. It is not a blanket instruction that every type of complaint can be ignored.

Sources: **F8**: rr. 37, 67A(2)

After the contract takes effect, read the dispute clause

Rule 68 requires disputes between the contract parties to be settled through mediation or arbitration, with the method provided in the contract.

Build the factual record

- Identify the disputed obligation, relevant clause, dates, notices, performance evidence and amounts.
- Preserve the supplier's position and the hospital's response. Separate accepted facts from matters still disputed.

Use the agreed lawful method

- Check the notice route, authorised representatives and the mediation or arbitration terms.
- Obtain competent legal and financial advice before settlement or concession. Neither the MS nor a committee may waive rights without authority.

Contract remedies and blacklisting are separate decisions. A contract dispute does not automatically establish a ground for debarment.

Sources: **F8**: rr. 21, 68

Start with a specific ground and reliable evidence

Rule 21 permits debarment for a specified period. It is a formal decision that affects future participation.

Ground in rule 21(1)	Examples of relevant evidence	Key control
Conduct detrimental to public interest or good practices	Verified conduct, its context and effect.	State the exact alleged act.
Consistent failure to perform obligations	Contract, repeated defaults, notices and responses.	Show the pattern and the obligation.
Contract not performed up to the mark	Agreed standards and documented performance findings.	Use the actual contractual standard.
Corrupt practice	Verified documents and evidence supporting the allegation.	Do not treat suspicion as a finding.

Before deciding, follow rule 21 and the appended Schedule. A disagreement, complaint or adverse rumour is not itself a completed blacklisting process.

Sources: **F8**: r. 21(1), Schedule

Check the scope of every debarment order

An order from one hospital does not automatically exclude the supplier from every public procurement in Punjab.

Procuring agency decision

- Under rule 21(1), an agency may debar a bidder or contractor from that agency's procurement for a specified period.
- The agency must send its decision to PPRA for publication. It may request wider debarment under rule 21(2)(b).

PPRA decision

- MD PPRA may debar the supplier from all or some procuring agencies under rule 21(3). Read the actual scope and period.
- The 7 July 2023 circular confirms this distinction. Check identity, dates, any later order and the current published status.

Do not silently turn another agency's limited order into a province-wide exclusion. Apply the actual legal scope.

Sources: **F8**: r. 21(1)-(3) | **P3**: agency scope and amended bidding documents

Write a precise show-cause notice

The rule 21 Schedule sets the required process. A show-cause notice gives the supplier the allegation and an opportunity to answer.

Allegation	State the precise act or omission, relevant facts and supporting record.
Proposed period	State the maximum period of debarment proposed by the procuring agency.
Possible wider action	If intended, state the proposal to request PPRA debarment across procuring agencies.
Reply opportunity	Allow at least 7 days for the written reply under Schedule paragraph 3.
Service record	Keep the issued notice and evidence of delivery; use the authorised communication process.

Use neutral language until the evidence and response have been considered. The notice starts the process; it does not predetermine the finding.

Sources: **F8**: r. 21(6), Schedule paras. 1-3, 17

Complete the hearing and decision process fairly

The Schedule distinguishes closing a case after the reply from proceeding to a personal hearing and decision.

- | | | |
|----------|---------------------------------|--|
| 1 | Consider the reply | After receiving the reply, the agency may close the matter or issue a personal-hearing notice. |
| 2 | Give hearing notice | Where a personal hearing is held, allow at least 7 days for appearance under Schedule paragraph 6. |
| 3 | Assess the record | Decide on the available record and the hearing if availed. Follow the Schedule where no reply is received. |
| 4 | Meet the decision period | Decide within 15 days from the personal hearing; where adjourned, count from the last personal hearing. |

Keep notices, service evidence, replies, hearing minutes and the material considered. Non-attendance does not permit an unsupported finding.

Sources: **F8**: Schedule paras. 4-8

Issue a reasoned order and preserve the review route

Give reasons for both the finding and the chosen duration. Communicate the order and send it for the required publication.

Decision or action	Applicable provision	Period or requirement
Agency debarment order	Schedule paras. 9-12, 15.	Communicate it, explain the representation route and send it to PPRA.
Representation to MD PPRA	Rule 21(4): agency decision under 21(1), or rule 20 declaration.	Within 30 days from publication of the information on PPRA's website.
Representation to Chairperson	Rule 21(5): MD order under 21(3) or 21(4).	Within 30 days of the order.

Keep both communication and website-publication evidence. The 30-day rule 21 route is different from the 7-day route against a GRC decision.

Sources: **F8**: r. 21(4)-(6), Schedule paras. 9-16

Verify suspected forged documents at the original source

The PPRA circular of 3 May 2024 addresses certificates, licences, supply orders, financial instruments and authorisation letters.

- | | | |
|---|---------------------------------|---|
| 1 | Preserve the document | Keep the bid version and the allegation. Do not overwrite or replace the submitted evidence. |
| 2 | Verify directly | Seek confirmation from the issuing body or original source through an authentic channel. |
| 3 | Apply the proper process | Evaluate responsiveness lawfully. For established forged-document cases, follow rule 21 and the Schedule. |
| 4 | Refer as required | The circular directs referral to PPRA for wider debarment. State that intention in the show-cause notice. |

The circular also notes possible criminal consequences. Any referral or proceeding is separate from a criminal finding by the competent forum.

Sources: **P4**: verification and referral directions | **F8**: r. 21, Schedule

Treat warning signs as reasons to examine the evidence

Working examples. A warning sign is not proof of misconduct.

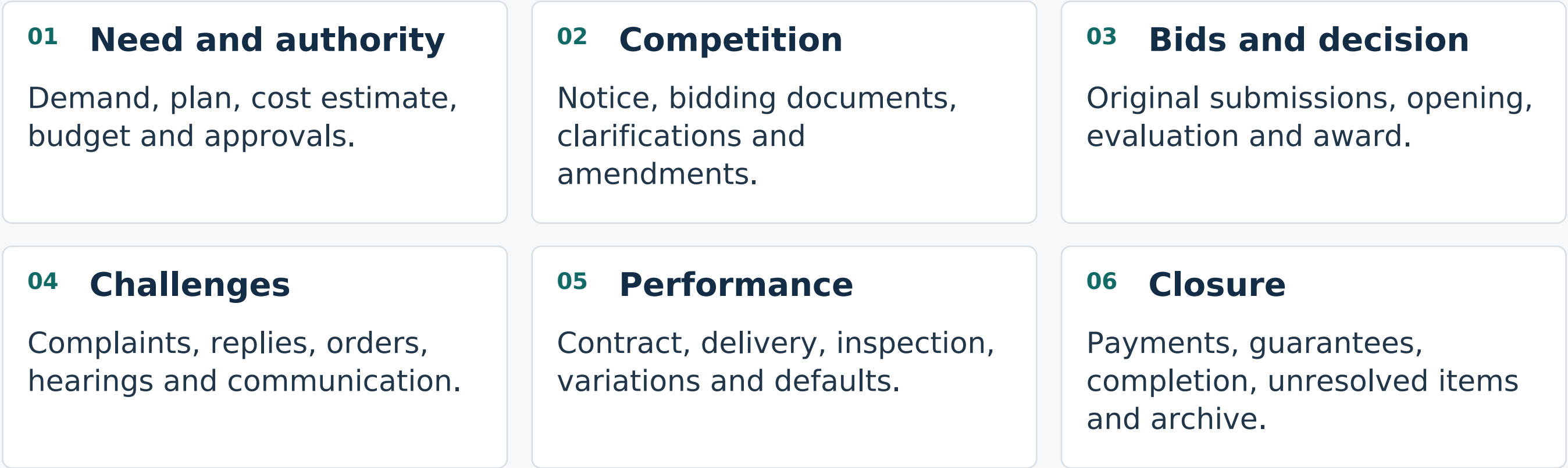
Warning sign	Practical response	Record to preserve
A decision-maker has a supplier connection	Declare the interest and obtain an authorised conflict-management decision.	Disclosure, reassignment or other documented decision.
Bids share unusual errors or contact details	Preserve the originals and examine the explanation through the authorised process.	Original bids, comparison and verified findings.
Someone asks to alter dates or replace a bid	Preserve the original record and report through the appropriate authority.	The request, system history and the response.

Use fair process. Do not accuse a supplier publicly, invent a penalty or exclude it without the required legal basis.

WORKING METHOD | Illustrative material is identified in the text.

Build one indexed procurement file from start to finish

Working file structure. Link all volumes and digital records through the same procurement reference.



Keep the actual record, including rejected or superseded versions where relevant. A later summary cannot replace missing primary evidence.

WORKING METHOD | Illustrative material is identified in the text.

Apply transparency and confidentiality at the correct stage

Confidentiality during evaluation and public access after award are different duties.

Before the report is announced

- Rule 58 requires evaluation information to remain confidential until announcement of the evaluation report.
- As a working control, restrict access and preserve a log of authorised sharing. Do not give one bidder privileged evaluation information.

After the contract is awarded

- Rule 66 requires documents related to bid evaluation and contract award to be made public as soon as award occurs.
- Only relevant proprietary or public-interest information may be withheld under rule 66(2), with prior PPRA approval. Do not apply a blanket "confidential" label.

Keep evidence of publication and any authorised withholding. Other applicable information and data-protection requirements must also be respected.

Sources: **F8**: rr. 58, 66

Five years is a minimum record period

Rule 65 requires the procurement record and associated documents to be kept for at least five years, subject to applicable regulations.

What the rule establishes

- Keep the associated documents with the procurement record. A final purchase order alone is not the full file.
- The five-year minimum is not an instruction to destroy every file at its fifth anniversary. Check the applicable retention and disposal requirements.

Working archive controls

- Assign a custodian, archive reference, access control and retrievable paper or digital copies.
- Keep unresolved audit, investigation, litigation, warranty and claim records under the applicable hold. Record who authorised any eventual disposal.

Rule 69 treats a breach of the procurement rules as mis-procurement. A complete file helps establish the facts; it does not erase a breach.

Sources: **F8**: rr. 65, 69

Close the service problem and the administrative file

Invented case: an urgent replacement restored a failed hospital system. A bidder later questions the purchase and a delivery discrepancy is found.

Immediate service	Document what was restored, when, and the technical acceptance evidence.
Procurement decision	Locate the legal route, emergency declaration, approvals, supplier choice and price support.
Complaint route	Identify who complains, the issue and the stage. Use the applicable rule; do not assume every complaint goes to the GRC.
Delivery discrepancy	Verify the facts, prevent incorrect certification and use the contract or misconduct process that the evidence supports.
Closure	Record the decision, communication, recovery or other remedy, remaining actions and archive location.

One successful repair does not close every financial or legal issue. One complaint does not prove that the purchase was unlawful.

Check the route before you choose the response

Write your answer and the reason before turning to the next page.

1 | Emergency label

A routine tender was forgotten. Staff propose buying a full year's supply immediately and writing "emergency" on the note. What must change?

Which facts and authority must be established?

2 | Complaint and award

A bidder files a rule 67A representation. No suspension order has been identified. Has filing alone suspended the procurement?

What further checks are required?

3 | Scope of debarment

Another hospital blacklisted a supplier under rule 21(1). Staff propose excluding it from this hospital solely because of that order. Is that enough?

Which order determines the scope?

Answer using the legal basis, the evidence and the actual authority. Do not rely on the urgency or confidence of the person making the request.

Answers and reasons

Use the evidence, the procurement stage and the actual source of authority.

1 | Establish the facts and limit the scope

Check actual stock and risk, the emergency definition, the empowered forum and lawful options. Justify the immediate requirement; do not use the label to approve an unsupported annual purchase.

2 | Filing alone is not suspension

Rule 67A(2) says mere filing does not suspend proceedings. Check for an actual order and comply with other applicable periods and directions before any next step.

3 | Read the order's scope

Agency debarment applies to that agency. Check whether MD PPRA has ordered wider debarment or another valid ground applies. Do not automatically enlarge the other hospital's order.

An operational decision becomes defensible through accurate facts, the correct power and a fair documented process, not through the label attached to it.

Sources: **F8**: rr. 2(q), 21, 59, 67A(2) | **P3**: scope of agency debarment

Prepare a difficult-case control sheet

Use a non-confidential real case or the invented examples in this lecture.

1 | Identify the route

Describe the problem, procurement stage, applicable provision and authorised decision-maker.

2 | Build the evidence index

List the facts, documents, dates, publication or service proof and missing information.

3 | Set the next action

Name the responsible person, legal deadline, required decision and closure evidence.

Review whether an independent reader could identify why the action was taken, who had authority, what the evidence proved and what remains unresolved.

Module 6 is complete. Lectures 13-18 cover planning, tender documents, evaluation, suppliers, contracts and difficult procurement cases.

WORKING METHOD | Illustrative material is identified in the text.

Sources and continued use | 1

Select a source title or its official-source link to open the document.

F8

Punjab Procurement Rules 2014

Official compilation amended through 24 September 2025. Rule references identify the legal basis of the lesson. Read with later notifications and the current orders applicable to the procurement.

Punjab Procurement Regulatory Authority | [Official source](#) | [Notifications](#)

P1

Independent Grievance Redressal Committee

Circular dated 18 October 2017. Advises an independent grievance committee. Read with the current rule 67, committee notification and applicable instructions.

Punjab Procurement Regulatory Authority | [Official source](#)

P2

Complaints and representations to MD PPRA

Circular dated 30 September 2024. Explains filing requirements and reasoned GRC orders. Use rule 67A for the seven-day period from communication of the decision; check current fees and forms.

Punjab Procurement Regulatory Authority | [Official source](#)

Educational material by Dr Qurban Hussain Khan. Source editions are stated; verify later amendments and applicable institutional orders before live use.

Sources and continued use | 2

Select a source title or its official-source link to open the document.

P3

Scope of blacklisting by a procuring agency

Circular dated 7 July 2023. Clarifies that agency debarment applies to that agency. Wider debarment requires the applicable PPRA process; use amended standard bidding documents.

Punjab Procurement Regulatory Authority | [Official source](#)

P4

Verification and action on fake or forged documents

Circular dated 3 May 2024. Requires original-source checks and action under rule 21 and its Schedule for established forged-document cases, including referral to PPRA for wider debarment.

Punjab Procurement Regulatory Authority | [Official source](#)

Educational material by Dr Qurban Hussain Khan. Source editions are stated; verify later amendments and applicable institutional orders before live use.