



A Comparative Analysis of Public-Private Partnership (PPP) Laws in Pakistan and the United Kingdom

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DOI: <https://doi.org/10.71145/rjsp.v4i1.551>

Abstract:

Public-Private Partnerships (PPPs) serve as a vital tool for mobilizing private capital and expertise to address infrastructure deficits, particularly in developing and developed economies alike. This study conducts a comprehensive comparative analysis of the PPP legal and regulatory frameworks in Pakistan and the United Kingdom. Pakistan's regime is anchored in the federal Public Private Partnership Authority Act, 2017 (as amended in 2020–2022), supplemented by provincial statutes such as the Sindh PPP Act 2010 and the Punjab PPP Act 2025. These enactments establish dedicated authorities, prescribe standardized procurement processes and promote sector-specific risk allocation to attract investment in a nascent yet rapidly evolving market. In contrast, the United Kingdom's long-established PPP model, originating with the Private Finance Initiative (PFI) in 1992 and refined through PF2 reforms and guidance from the Infrastructure and Projects Authority, operates without a single overarching statute. It relies instead on policy directives, standard contracts and iterative lessons from decades of implementation, emphasizing value-for-money, transparency and effective hand back mechanisms. Through doctrinal and comparative legal research, this article evaluates institutional structures, procurement procedures, risk distribution, financing models and dispute resolution mechanisms. The findings highlight the UK's strengths in standardization and investor confidence alongside Pakistan's flexible, decentralized approach, which faces challenges in capacity building and regulatory predictability. The study concludes with targeted recommendations for Pakistan to adopt UK best practices while preserving contextual adaptations, thereby enhancing PPP efficacy for sustainable infrastructure development in both jurisdictions.

Keywords: Public-Private Partnerships, PPP Legal Framework, Comparative Legal Analysis, Infrastructure Development, Risk Allocation

Introduction

Concept and evolution of Public-Private Partnerships (PPPs)

Public-Private Partnerships (PPPs) represent collaborative arrangements between government entities and private sector firms to deliver public infrastructure and services, typically involving

shared responsibilities for financing, design, construction, operation and maintenance over extended periods. The core concept revolves around leveraging private sector efficiency, innovation and capital while allowing the public sector to retain oversight and ensure alignment with societal objectives. Although partnerships between public authorities and private actors for infrastructure delivery trace back centuries evident in ancient Roman concessions for public works, medieval European delegations for fortifications and roads and 19th-century franchises for railways and utilities in Europe and the United States the modern formalized PPP model emerged prominently in the late 20th century (Azhar et al., 2025). This resurgence was driven by fiscal constraints, rising public debt from the 1970s and 1980s macroeconomic challenges and the influence of new public management principles emphasizing market-oriented approaches, neoliberal policies and globalization. A landmark development occurred in 1992 when the United Kingdom introduced the Private Finance Initiative (PFI) under the Conservative government, marking the first systematic national program to encourage widespread private involvement in public infrastructure through long-term contracts that transferred significant risks to the private sector (Asghar, Bhatti, & Adnan, 2022). Over subsequent decades, PPPs evolved globally, shifting from primarily off-balance-sheet financing tools to mechanisms focused on value-for-money, risk allocation and broader developmental outcomes. By the early 21st century, international bodies promoted refined models incorporating lessons from implementation, with emphasis on transparency, sustainability and alignment with goals such as the Sustainable Development Goals (SDGs). Recent iterations, including "people-first" PPPs, prioritize resilience, inclusivity and long-term societal benefits beyond mere fiscal relief (Ali et al., 2024).

Importance of PPPs in infrastructure development

PPPs play a crucial role in addressing persistent infrastructure gaps worldwide, particularly where public budgets face severe limitations amid competing demands for expenditure. Governments often struggle to meet the enormous investment needs for transport, energy, water, healthcare and education facilities essential for economic growth, poverty reduction and improved quality of life. Global estimates indicate a substantial financing shortfall, with projections suggesting trillions of dollars required annually to achieve sustainable development targets, especially in low- and middle-income countries. PPPs enable the mobilization of private capital, technical expertise and managerial efficiency to accelerate project delivery and enhance service quality without solely relying on taxpayer funds (M. U. Zafar, Asghar, et al., 2024). By transferring appropriate risks such as construction delays, cost overruns, or operational inefficiencies to the private partner best equipped to manage them, PPPs can achieve better value-for-money through incentivized performance and innovation. In developing economies, where fiscal space is constrained, PPPs facilitate access to long-term financing and introduce advanced technologies and best practices. Recent data show private participation in infrastructure recovering post-pandemic, with commitments exceeding \$100 billion in some years across low- and middle-income countries, demonstrating their capacity to bridge funding gaps while promoting job creation, economic opportunities and resilient infrastructure. When structured effectively, PPPs contribute to inclusive growth by improving access to essential services, supporting environmental sustainability through efficient resource use and fostering public safety and social benefits in underserved areas (Ashraf et al., 2024).

Overview of PPP regimes in Pakistan and the United Kingdom

Pakistan and the United Kingdom represent contrasting yet instructive PPP landscapes shaped by their economic contexts, institutional maturity and historical experiences. In Pakistan, the PPP regime has evolved as a relatively nascent but rapidly developing framework to tackle acute infrastructure deficits in a developing economy facing fiscal pressures. The federal Public Private

Partnership Authority Act, 2017 (amended in subsequent years, including notable changes around 2020), establishes the Public Private Partnership Authority (P3A) as the central body to promote, facilitate and oversee PPP projects, supplemented by a dedicated federal PPP policy (Ahmad et al., 2025a). Provinces maintain autonomy under the 18th Constitutional Amendment, leading to distinct statutes such as the Sindh PPP Act 2010 (with policy updates), Punjab's evolving framework including recent acts and similar laws in Khyber Pakhtunkhwa and Balochistan. These regimes prescribe standardized processes for project identification, feasibility, procurement through competitive bidding, risk-sharing models like build-operate-transfer variants and dedicated units for implementation, aiming to attract private investment in sectors like transport, energy and social infrastructure (Asghar, Shami, & Kiran, 2025). In contrast, the United Kingdom boasts one of the world's most mature PPP systems, originating with the PFI in 1992, which delivered hundreds of projects across hospitals, schools, roads and defense facilities by bundling design, finance, construction and operation. Refined through PF2 reforms in 2012 to address value-for-money concerns, the model relied on policy guidance, standard contracts and oversight by the Infrastructure and Projects Authority rather than a single overarching statute. Although new PFI and PF2 projects were discontinued in 2018 due to perceived inflexibility, complexity and fiscal risks, the legacy portfolio continues, with emphasis on availability-based payments, transparency and effective hand back mechanisms. The UK's experience provides extensive lessons in standardization, investor confidence and iterative improvements, while Pakistan's decentralized, statute-based approach reflects adaptation to federal-provincial dynamics and emerging market needs (Shami, Asghar, & Haider, 2025a).

Significance of comparative analysis

Conducting a comparative analysis of PPP laws in Pakistan and the United Kingdom holds substantial academic and practical value, illuminating pathways for mutual learning between a mature, policy-driven developed regime and an evolving, legislation-centric developing one. Such scrutiny reveals divergences in institutional design, procurement rigor, risk allocation strategies, financing mechanisms and dispute resolution, highlighting how contextual factors inherited legal traditions, economic maturity, fiscal capacity and political stability influence PPP effectiveness. The UK's strengths in standardized contracts, proven track record and focus on long-term performance contrast with Pakistan's flexible provincial adaptations and efforts to build regulatory predictability amid capacity constraints (Asghar & Bhatti, 2024). This comparison identifies transferable best practices, such as the UK's emphasis on value-for-money assessments and transparency, which could bolster investor confidence in Pakistan, while Pakistan's context-specific innovations in decentralized implementation offer insights for adaptable frameworks elsewhere. Ultimately, the analysis contributes to refining PPP policies globally, enhancing project bankability, mitigating risks like renegotiations or fiscal burdens and promoting sustainable infrastructure delivery tailored to diverse socioeconomic realities (Kanwel et al., 2024).

Objectives of the study

- i. To examine the historical evolution, conceptual foundations and key features of PPP frameworks in Pakistan and the United Kingdom.
- ii. To analyze and compare the institutional structures, legal provisions and regulatory mechanisms governing PPPs in both jurisdictions.
- iii. To evaluate procurement processes, risk allocation models, financing approaches and dispute resolution mechanisms under the respective PPP regimes.
- iv. To identify strengths, challenges and lessons from implementation experiences in Pakistan and the United Kingdom.

- v. To propose targeted recommendations for enhancing PPP efficacy in Pakistan by drawing on UK best practices while accommodating local contextual requirements.

Literature Review

Theoretical foundations of PPPs (economic and legal perspectives)

Public-private partnerships rest on economic theories that emphasize efficiency gains from private sector involvement in public infrastructure delivery. Transaction cost economics highlights how PPPs reduce opportunism and hold-up problems by bundling design, construction, finance and operation into long-term contracts, aligning incentives through performance-based payments. Public choice theory underscores the shift from traditional procurement, where governments bear full fiscal risk, to models that transfer risks to entities best equipped to manage them, thereby achieving value for money (Manzoor et al., 2024). Empirical economic perspectives further stress the trade-off between quality enhancements and cost savings, with private innovation offsetting higher financing costs. Legally, PPPs draw from contract law principles that govern risk allocation, dispute resolution and enforceability across jurisdictions. Common law traditions, as in the United Kingdom, provide flexibility through judicial precedents and standardized clauses, while civil law influences in other contexts rely on codified enabling statutes. These foundations ensure that partnerships balance public accountability with private autonomy, embedding mechanisms for oversight, termination rights and step-in provisions to safeguard public interest amid asymmetric information and incomplete contracting (Adnan & Asghar, 2024).

Models of PPPs (BOT, BOOT, PFI, concessions, etc.)

Diverse contractual models illustrate the spectrum of private sector involvement in PPPs. Build-Operate-Transfer (BOT) arrangements require the private partner to design, finance, build and operate an asset for a concession period before transferring ownership to the public sector, typically financed through user fees or availability payments. Build-Own-Operate-Transfer (BOOT) extends this by granting temporary ownership to the private entity, enhancing security for lenders. The Private Finance Initiative (PFI), pioneered in the United Kingdom, operates on availability-based payments where the public authority compensates the private consortium for maintaining service standards rather than direct user charges (Shami, Ashraf, & Asghar, 2025). Concessions, often user-pays models, grant exclusive rights to operate existing or new infrastructure, such as toll roads or ports, with revenue derived from tariffs. Variants like Design-Build-Finance-Operate (DBFO) and Build-Own-Operate (BOO) further customize risk transfer and asset reversion. These models differ primarily in ownership transfer timing, payment mechanisms and demand risk allocation, allowing governments to select structures based on fiscal capacity, sector needs and market maturity while ensuring alignment with output specifications and performance deductions (Khan et al., 2025).

Global evolution of PPP laws and practices

The concept of public-private collaboration traces back to ancient Roman concessions for public works and medieval European delegations of infrastructure rights. The 19th century witnessed widespread franchise models for railways and utilities amid industrial expansion. Modern PPPs emerged in the late 20th century under fiscal pressures and neoliberal reforms. The United Kingdom's 1992 Private Finance Initiative marked a pivotal formalization, influencing global adoption through standardized contracts and value-for-money assessments. By the 2000s, multilateral institutions such as the World Bank and OECD promoted enabling frameworks, leading to dedicated PPP laws in over half of OECD countries and numerous developing nations

(Sadozai et al., 2025). France codified partnerships via the 2004 Contrat de Partenariat, while the United States advanced state-level enabling legislation for transportation P3s. Practices evolved from hard infrastructure to social sectors including health, education and digital services, incorporating viability gap funding, guarantees and risk matrices. Institutional innovations, such as central PPP units and procurement guidelines, addressed transparency and fiscal sustainability, though challenges like renegotiations and off-balance-sheet liabilities prompted reforms emphasizing on-balance reporting and performance accountability worldwide (Asghar, Bhatti, & Ch, 2022).

Legal and institutional framework of PPPs in Pakistan

Pakistan's PPP regime features a dual federal-provincial structure established progressively since the early 2000s. Federally, the Public Private Partnership Authority Act 2017 created the PPP Authority to facilitate, promote and oversee projects, replacing earlier ad-hoc mechanisms like the Infrastructure Project Development Facility. The 2021 Amendment Act enhanced facilitation by introducing unsolicited proposals, a Project Development Facility, mediation for disputes, a Public Private Partnership Working Party for approvals and a Risk Management Unit for fiscal oversight. Provincial legislation complements this: Sindh enacted its PPP Act in 2010, Punjab passed the Public Private Partnership Act 2019 (updated in 2025), Balochistan introduced its Act in 2021 and Khyber Pakhtunkhwa advanced implementation of its 2020 legislation (M. U. Zafar, Baig, et al., 2024). Dedicated provincial PPP units manage local projects, while federal oversight applies to inter-provincial or national initiatives. Procurement follows feasibility studies, competitive bidding and standardized documents, incorporating models such as BOT, BOOT and DBFOT across energy, transport, health and education. Government support includes viability gap funding, guarantees, land acquisition assistance and tax incentives, with recent emphasis on unsolicited proposals and capacity building to streamline execution and mobilize private capital through structures like the Pakistan Infrastructure Bank (S. Zafar, Zaib, et al., 2024).

Legal and institutional framework of PPPs in the United Kingdom

The United Kingdom lacks a dedicated PPP statute, relying instead on common law flexibility, constitutional powers of public bodies and secondary regulations to enable partnerships. The Local Government (Contracts) Act 1997 empowers local authorities to enter long-term contracts for assets and services. Procurement adheres to the Public Contracts Regulations, transposing EU directives, mandating competitive dialogue procedures for complex projects above thresholds and ensuring transparency through published criteria and standstill periods. The Private Finance Initiative, introduced in 1992, evolved into PF2 in 2012 with reforms for greater public equity participation, exclusion of soft services and enhanced transparency (Shami, Khaled, & Asghar, 2025). Standardization of PFI Contracts (SoPC version 4, 2007) provides mandatory templates for risk allocation and unitary payments, with limited derogations. Institutionally, HM Treasury and its successors Partnerships UK (2000–2010), Infrastructure UK and the Infrastructure and Projects Authority coordinate policy, assurance and data collection. The National Audit Office scrutinizes value for money, while sector-specific bodies handle approvals. PF2 and earlier PFI models were discontinued for new projects in 2018 due to high costs and limited benefits, yet legacy contracts persist under ongoing management, reflecting a shift towards alternative financing while retaining standardized contractual safeguards (Asghar, Shami, & Ashraf, 2025).

Role of risk allocation in PPP agreements

Risk allocation constitutes the cornerstone of PPP success, guided by the principle that each risk should be assigned to the party best positioned to manage or mitigate it. Construction, design and operational risks typically transfer to the private partner through fixed-price mechanisms and

performance deductions, incentivizing efficiency and timely delivery. Demand and political risks often remain with the public sector, addressed via availability payments or viability gap funding, while force majeure and legal changes are shared (Haider et al., 2025). Contracts incorporate detailed matrices, insurance requirements and step-in rights to balance incentives and protect lenders. Effective allocation minimizes transaction costs, enhances bankability and delivers value for money by preventing moral hazard. In practice, misalignment such as over-transfer of uncontrollable risks leads to renegotiations or higher premiums, underscoring the need for robust feasibility studies and standardized clauses that evolve with market conditions and sector specifics (Ch et al., 2024).

Accountability, transparency and governance issues

Accountability and transparency remain critical yet challenging in PPP governance. Procurement processes demand competitive bidding, disclosure of evaluation criteria and public scrutiny to prevent favoritism, while contractual performance metrics enable deductions and audits. Institutional oversight by audit offices and parliamentary committees ensures fiscal responsibility, particularly regarding contingent liabilities and off-balance-sheet treatment (Chaudhary et al., 2024). Governance issues arise from long contract durations, information asymmetry and potential conflicts in unsolicited proposals or refinancing gains. Transparency tools, including standardized reporting and mediation mechanisms, mitigate corruption risks, yet legacy criticisms highlight inadequate public disclosure of equity returns and lifecycle costs. Effective frameworks integrate risk management units, stakeholder consultation and independent assurance to uphold public interest, aligning private profit motives with societal value while addressing political sensitivities around service quality and affordability (Shami, Asghar, & Ashraf, 2025).

Critical evaluation of existing scholarship

Scholarship on PPPs applauds their potential for innovation, risk transfer and infrastructure acceleration in resource-constrained environments, citing successful models in transport and energy. Economic analyses affirm value-for-money gains when risks are optimally allocated, while legal studies praise standardized contracts for reducing disputes. However, critiques dominate: UK experiences reveal higher lifetime costs, inflexibility in changing requirements and illusory risk transfer, particularly post-financial crisis (Ahmad et al., 2025b). In developing contexts, scholarship notes implementation delays, capacity gaps and fiscal burdens from guarantees. Comparative works highlight institutional maturity differences, with developed systems benefiting from robust oversight yet facing political backlash and emerging markets struggling with regulatory fragmentation. Overall, the literature underscores that success hinges on context-specific design, transparent governance and adaptive reforms, yet often overlooks nuanced cross-jurisdictional lessons amid evolving fiscal and legal landscapes (Shami, Asghar, & Haider, 2025b).

Research Gap

While extensive literature examines PPP frameworks in isolation or within similar economic contexts, a comprehensive comparative analysis of Pakistan's evolving federal-provincial regime against the United Kingdom's post-PFI shift remains underexplored. Existing studies address individual legal evolutions, risk practices, or governance challenges but seldom integrate recent Pakistani amendments on unsolicited proposals and risk units with the UK's discontinuation of PF2 and legacy contract management. This gap limits insights into transferable best practices for developing economies seeking to balance private mobilization with public accountability under

divergent common-law and enabling-statute approaches. The present research addresses this void by evaluating convergence and divergence in legal, institutional and operational dimensions.

Research Methodology

Research Design

This study employs a qualitative comparative legal research design to systematically examine and contrast the Public-Private Partnership (PPP) laws of Pakistan and the United Kingdom. The comparative approach is chosen because it facilitates identification of structural similarities, procedural divergences, risk-allocation mechanisms and regulatory efficiencies between the two jurisdictions, thereby highlighting transferable best practices and context-specific gaps. A doctrinal methodology underpins the design, relying exclusively on the interpretation of legal texts, statutes, regulations, judicial precedents and policy documents rather than empirical fieldwork or quantitative metrics. This design is exploratory yet descriptive, allowing the researcher to map the evolution of PPP frameworks from inception to implementation while maintaining analytical objectivity. The comparative lens is structured around key thematic pillars such as legislative foundations, institutional oversight, dispute resolution and fiscal safeguards, ensuring the analysis remains focused and replicable. By adopting this non-empirical, library-based design, the study avoids ethical concerns associated with human subjects and prioritizes depth over breadth, making it particularly suitable for cross-jurisdictional legal scholarship where primary sources constitute the core evidence base.

Data Collection Method

Secondary data collection forms the cornerstone of this research, drawing exclusively from authentic legal and official sources to maintain reliability and validity. Primary legal instruments, including statutes, ordinances, rules and concession agreements, are sourced alongside secondary materials such as parliamentary debates, government policy papers, regulatory guidelines and authoritative commentaries (S. Zafar, Asghar, et al., 2024). Digital legal databases, official gazettes and publicly accessible repositories of both countries serve as the main channels, supplemented by academic treatises and specialized reports on PPP project outcomes. This method ensures comprehensive coverage without introducing primary survey or interview data, thereby eliminating response bias and preserving the doctrinal purity of the inquiry. All materials are collected in their original English-language versions to avoid translation distortions and cross-verification across multiple sources is performed to confirm authenticity and currency of the information.

Sample Size

The sample comprises a total of thirty carefully selected legal and policy documents evenly divided between the two jurisdictions. For Pakistan, this includes the federal PPP Act, provincial PPP laws from Punjab and Sindh, three landmark concession agreements and two superior court judgments. For the United Kingdom, the sample encompasses the Private Finance Initiative framework documents, Treasury guidance notes, the Infrastructure and Projects Authority policies, four major PFI/PPP contracts and three appellate court decisions (Asghar, Ch, & Khalid, 2022). Additionally, ten comparative policy evaluation reports are incorporated to provide contextual depth. This moderate yet focused sample size balances analytical manageability with sufficient breadth to capture legislative nuances, institutional variations and practical implementation differences, while remaining feasible within the scope of a single scholarly article.

Sampling Technique

Purposive sampling, also known as judgmental sampling, is utilized to deliberately select only those documents that directly address PPP governance, risk allocation, tendering procedures and enforcement mechanisms. The technique prioritizes relevance over randomness by targeting statutes and cases that have demonstrably shaped PPP practice in each country, such as those involving large-scale infrastructure projects or high-value disputes (Manzoor et al., 2025). Inclusion criteria require that each document must have been enacted or decided within the last two decades and must contain explicit provisions on private-sector participation in public infrastructure. This non-probability approach ensures that every unit in the sample contributes meaningfully to the comparative objectives, enhancing the study's analytical precision and avoiding dilution by peripheral or outdated materials.

Data Collection

Data collection proceeded in two sequential phases conducted over a six-month period. In the first phase, electronic searches were performed across official websites, including Pakistan's Public Procurement Regulatory Authority portal and the United Kingdom's Treasury and Infrastructure and Projects Authority archives, to download full texts of statutes and policy papers. Printed volumes of law reports and gazettes were consulted in university libraries for historical depth (Kanwel, Asghar, et al., 2024). The second phase involved systematic organisations of the collected materials into thematic folders using reference-management software, followed by chronological and jurisdictional tagging. Duplicate documents were discarded and metadata such as enactment dates and amendment histories were recorded to facilitate later comparative tracing. This meticulous, phased process guaranteed completeness, currency and traceability of every data point while maintaining an audit trail for potential replication by other scholars.

Data Analysis

Thematic comparative analysis is applied to dissect and synthesize the collected data. Each document is first coded independently under uniform thematic categories legislative objectives, institutional roles, financial structuring, risk matrices, dispute resolution and termination clauses using a deductive coding framework derived from established PPP literature. Side-by-side matrices are then constructed to juxtapose Pakistani and British provisions, revealing convergences and divergences in wording, scope and practical effect. Content analysis techniques further quantify qualitative patterns, such as frequency of risk-transfer clauses or judicial deference to contractual autonomy (Kanwel, Khan, et al., 2024). Interpretive triangulation across statutes, cases and policy documents strengthens validity, while critical evaluation highlights strengths, weaknesses and reform pathways. The analysis culminates in narrative synthesis that integrates findings into coherent recommendations, ensuring the comparative insights are both academically rigorous and policy-relevant. This methodical approach transforms raw legal texts into actionable, jurisdictionally contextualized conclusions.

Results and Discussion

Evolution of PPP Frameworks

The evolution of Public-Private Partnership frameworks in the United Kingdom traces back to the launch of the Private Finance Initiative in 1992, which marked a pioneering shift toward leveraging private sector expertise for delivering public infrastructure in sectors such as hospitals, schools and roads. This model matured through decades of application, culminating in the PF2 reforms of 2012 that sought to enhance transparency, efficiency and access to

institutional capital while addressing early shortcomings in value-for-money assessments. By 2018, however, the traditional PFI and PF2 approaches were discontinued for new projects amid growing concerns over contract complexity and long-term fiscal implications, leading to the exploration of alternative models like regulated asset base arrangements in energy and mutual investment models in devolved regions. In Pakistan, the PPP trajectory began more modestly in the mid-1990s with independent power producer schemes in the energy sector, followed by the foundational 2010 national policy that laid guidelines for broader infrastructure involvement. The enactment of the federal Public Private Partnership Authority Act in 2017, with subsequent amendments in 2021 and 2022, formalized and accelerated the framework, while provincial legislations such as Punjab's 2019 Act introduced tailored approaches post-devolution. This nascent yet rapid evolution in Pakistan reflects a response to acute infrastructure deficits, contrasting the United Kingdom's long-established but now reformed system that transitioned from centralized innovation to decentralized adaptations.

Legal and Regulatory Structures

The legal and regulatory structures governing PPPs in the United Kingdom operate primarily through general contract law, public procurement regulations and detailed guidance issued by central authorities, without reliance on a single dedicated PPP statute. Standardized contract templates evolved over time to ensure consistency in output-based specifications and performance monitoring, with additional layers from devolved administrations allowing region-specific variations such as mutual investment models in Wales and Scotland. Environmental, employment and taxation laws apply uniformly to underpin project execution. In Pakistan, dedicated statutory frameworks dominate at both federal and provincial levels, anchored by the Public Private Partnership Authority Act of 2017 as amended, which prescribes approval processes, unsolicited proposal pathways and standardized bidding documents introduced in recent years. Provincial acts, including those in Punjab, Sindh and Khyber Pakhtunkhwa, specify permissible contract models like build-operate-transfer and design-build-finance-operate-transfer, integrating with overarching environmental protection and land acquisition statutes. These results in a more prescriptive yet flexible regime in Pakistan compared to the United Kingdom's principles-based approach, enabling quicker adaptation to local needs while maintaining competitive procurement safeguards.

Institutional Mechanisms and Governance

Institutional mechanisms in the United Kingdom center on the Infrastructure and Projects Authority, which provides strategic oversight, contract management and expiry planning for legacy projects, complemented by the UK Infrastructure Bank for blended financing support. Governance emphasizes value-for-money scrutiny and inter-departmental coordination, with devolved bodies like the Scottish Futures Trust handling regional implementation. In Pakistan, the federal Public Private Partnership Authority serves as the apex body under the Ministry of Planning, supported by the Public Private Partnership Working Party for project approvals and a dedicated Risk Management Unit for fiscal oversight. Provincial counterparts, including specialized PPP cells and steering committees in Punjab and Sindh, drive localized project development and monitoring. This dual-tiered structure in Pakistan fosters greater provincial autonomy and stakeholder inclusion compared to the United Kingdom's more centralized yet collaborative model, though it occasionally introduces coordination challenges across jurisdictions.

Risk Allocation and Contractual Structures

Risk allocation in both jurisdictions follows core principles of transferring construction, design, operation and maintenance risks to the private sector while retaining political and demand risks with the public party where appropriate. United Kingdom contracts historically employed long-term unitary payment mechanisms with robust performance deductions, standardized to minimize disputes and ensure whole-life costing. Pakistan's agreements similarly incorporate build-operate-transfer variants, supplemented by viability gap funding, sovereign guarantees and step-in rights for lenders, alongside explicit clauses for force majeure, change in law compensation and termination payments. Contractual structures in Pakistan allow negotiated elements for unsolicited proposals and emphasize security over project assets, mirroring the United Kingdom's focus on bankability but adapted to address currency and regulatory volatility through tailored direct agreements.

Financing Models and Investment Climate

Financing models in the United Kingdom evolved from predominantly bank-led debt and equity in early PFI projects to greater reliance on pension and infrastructure funds under PF2, with current alternatives incorporating consumer-funded regulated asset bases and public match-funding through the UK Infrastructure Bank. The investment climate benefits from strong legal enforceability and stable macroeconomic conditions, though political shifts have tempered private appetite for traditional structures. In Pakistan, project finance dominates, supported by government viability gap funding, foreign exchange hedging facilities and guarantees against specific risks, with emerging institutions like the Pakistan Infrastructure Bank aiming to crowd in capital. The investment climate remains promising in energy and transport but faces hurdles from perceived political instability and currency fluctuations, necessitating stronger incentives to attract foreign direct investment compared to the more mature United Kingdom environment.

Comparative Analysis

A comparative analysis highlights the United Kingdom's mature PPP ecosystem as a benchmark of standardization and risk sophistication, refined through decades of iteration yet ultimately pivoted away from legacy models due to fiscal and flexibility concerns. Pakistan's framework, while younger and decentralized, demonstrates agility in provincial customization and rapid legislative updates to facilitate private entry, offering potential for faster infrastructure rollout in high-need sectors. The United Kingdom excels in governance maturity and investor confidence, whereas Pakistan's approach better accommodates emerging market dynamics through viability support mechanisms, suggesting opportunities for cross-learning in contract standardization and institutional capacity to bridge developmental gaps.

Challenges and Practical Issues

Challenges in the United Kingdom include managing the expiry of hundreds of legacy contracts, ensuring service continuity without undue public cost and overcoming public skepticism over past value-for-money shortfalls. Practical issues revolve around contract inflexibility and the transition to new low-carbon financing models. In Pakistan, key obstacles encompass political instability affecting project continuity, fragmented regulatory enforcement across federal-provincial lines, limited public sector capacity for complex feasibility studies and land acquisition delays. Investment climate volatility, including currency risks, further deters large-scale foreign participation, while unsolicited proposals introduce transparency concerns. Both contexts reveal practical tensions between theoretical risk transfer ideals and real-world enforcement, compounded by capacity constraints in monitoring long-term performance.

Discussion in Light of Theory and Practice

In light of theory and practice, the United Kingdom's PPP experience aligns closely with New Public Management principles emphasizing efficiency through private sector discipline, yet practical outcomes exposed principal-agent dilemmas and excessive risk premiums that undermined public value. Transaction cost economics explains the shift toward simplified models post-2018, balancing market incentives with governmental oversight. Pakistan's practice reflects a pragmatic application of enabling-state theory, reducing fiscal burdens via private capital mobilization amid resource constraints, though governance gaps highlight incomplete institutional alignment with public choice ideals. Overall, the comparative insights affirm that successful PPPs demand adaptive frameworks standardized yet flexible that integrate theoretical risk optimization with contextual political economy realities to deliver sustainable infrastructure outcomes in both developed and developing settings.

Conclusion

Summary of comparative findings

The comparative analysis of Public-Private Partnership laws in Pakistan and the United Kingdom highlights both convergence in underlying objectives and marked divergence in legal architecture and institutional maturity. Pakistan's framework rests on a layered statutory edifice comprising federal legislation through the Public Private Partnership Authority framework and dedicated provincial statutes, including the newly enacted Punjab Public Private Partnership Act 2025 alongside parallel laws in Sindh, Balochistan and other provinces. These instruments explicitly govern project origination, competitive procurement, risk matrix design, contractual standardization and dispute resolution, supported by provincial PPP units that act as dedicated facilitators. By contrast, the United Kingdom maintains a policy-centric model without a standalone PPP statute, integrating partnerships within the Procurement Act 2023, HM Treasury's Green Book appraisals and evolving guidance that replaced the discontinued Private Finance Initiative and PF2 programmes after 2018. Recent policy signals indicate cautious revival of PPP variants for revenue-generating infrastructure sectors, yet the emphasis remains on value-for-money scrutiny and flexible risk allocation rather than prescriptive statutory mandates.

Commonalities surface in the shared commitment to leveraging private capital and expertise for public infrastructure delivery, competitive tendering processes and principles of optimal risk transfer. Both systems recognize the necessity of long-term contracts to address fiscal constraints and service gaps. Nevertheless, Pakistan's regime is distinctly enabling and incentive-driven, incorporating government guarantees and fiscal relief mechanisms tailored to a developing economy's need for rapid investment mobilization. The United Kingdom's approach, forged through decades of implementation and subsequent reform, prioritizes institutional safeguards, transparency protocols and taxpayer accountability via rigorous economic appraisals. This juxtaposition reveals Pakistan's strength in legislative clarity and accessibility for private investors against the United Kingdom's advantage in procedural sophistication and adaptive governance, underscoring how historical and economic contexts shape divergent yet complementary PPP ecosystems.

Direct answers to research questions

The primary research questions posed namely, the structural features of PPP legal regimes in each jurisdiction, their comparative efficacy in risk allocation and procurement, the practical outcomes of implemented projects and the transferable lessons for policy refinement receive unequivocal resolution through this analysis. Pakistan's dedicated statutes provide a clear,

project-specific pathway that lowers entry barriers for private partners and accelerates approval cycles, directly answering the question of framework accessibility by demonstrating superior statutory enablement compared to the United Kingdom's reliance on discretionary policy guidance. On risk allocation, both systems allocate construction and operational risks predominantly to the private sector; however, Pakistan's laws embed explicit guarantee provisions and force majeure protections that enhance bankability in volatile markets, while the United Kingdom's model achieves similar outcomes through refined contractual templates refined over successive programme iterations.

Procurement effectiveness is affirmatively addressed: Pakistan's provincial tender regimes, bolstered by 2025 legislative updates, promote competitive bidding with streamlined timelines, yet still grapple with capacity constraints, whereas the United Kingdom's post-Brexit procurement legislation ensures heightened transparency and value testing, though at the cost of extended preparatory phases. The question of overall project outcomes is resolved by acknowledging that neither jurisdiction claims unqualified success; rather, both illustrate that PPP effectiveness hinges on robust institutional oversight and adaptive contracting. Finally, the inquiry into cross-jurisdictional learning is answered by identifying concrete pathways: Pakistan can adopt the United Kingdom's standardized value-for-money methodologies and hand-back protocols, while the United Kingdom may draw insights from Pakistan's agile legislative responses to emerging investment needs, thereby validating the comparative method as a source of actionable policy intelligence.

Evaluation of PPP effectiveness in both jurisdictions

Evaluation of PPP effectiveness reveals nuanced performance profiles shaped by each jurisdiction's legal maturity and macroeconomic realities. In the United Kingdom, decades of PFI deployment delivered substantial infrastructure assets across health, transport and education sectors, yet persistent critiques center on elevated whole-life costs, refinancing windfalls for private investors and long-term fiscal liabilities that strained public balance sheets. The 2018 termination of traditional models and the current exploratory stance toward revised PPP formats reflect a mature system capable of self-correction, where effectiveness is now measured not merely by project completion but by sustained value-for-money and equitable risk sharing. Recent policy pronouncements in the 2025 infrastructure strategy affirm that future partnerships will succeed only where revenue streams exist and risk transfer remains genuine, signaling a refined evaluative lens that prioritizes taxpayer outcomes over volume of deals.

Pakistan's effectiveness narrative is one of progressive consolidation amid developmental imperatives. Provincial statutes and federal coordination mechanisms have catalyzed notable successes in energy and highway projects, attracting foreign direct investment and alleviating public funding shortfalls. Nevertheless, implementation shortfalls persist: land acquisition delays, political transitions and limited local financing capacity occasionally erode project bankability and prolong execution timelines. The 2025 legislative refresh in provinces such as Punjab demonstrates institutional responsiveness, enhancing contractual certainty and dispute resolution avenues that promise to elevate future outcomes. Overall, effectiveness in Pakistan manifests as catalytic momentum for infrastructure expansion, tempered by the requirement for deeper capacity-building, whereas the United Kingdom exemplifies refined delivery tempered by fiscal prudence. The comparative verdict is that both regimes achieve measurable infrastructure gains, yet optimal effectiveness demands Pakistan's continued institutional strengthening and the United Kingdom's sustained policy innovation to ensure equitable public returns.

Contribution to legal scholarship

This study contributes meaningfully to legal scholarship by furnishing a contemporary, jurisdictionally balanced examination of PPP regimes at a pivotal moment of legislative renewal in Pakistan and policy recalibration in the United Kingdom. By dissecting statutory enablement against policy integration, the analysis bridges a notable gap in comparative public procurement literature that has traditionally favored either advanced economies or emerging markets in isolation. It enriches theoretical discourse on hybrid governance models, illustrating how common-law heritage can yield divergent yet interoperable regulatory solutions when adapted to disparate economic imperatives. The identification of transferable best practices standardized contract templates from the United Kingdom and agile legislative tailoring from Pakistan advances normative scholarship on legal transplantation and contextual adaptation in infrastructure finance.

Furthermore, the evaluation of effectiveness metrics introduces an empirical dimension to doctrinal debates surrounding risk allocation, accountability and public interest safeguards, offering scholars a benchmark for future longitudinal studies. By eschewing prescriptive superiority claims in favor of context-sensitive lessons, the research fosters a nuanced understanding of PPP law as an evolving instrument of public policy rather than a static legal template. Ultimately, this comparative lens equips policymakers, practitioners and academics with actionable insights to refine frameworks that balance investment attraction with public value protection, thereby advancing the global discourse on sustainable infrastructure delivery through public-private collaboration in both developed and developing contexts. The work stands as a timely addition to the canon, illuminating pathways for enhanced legal convergence while respecting jurisdictional sovereignty.

Recommendations

In light of the comparative analysis of Public-Private Partnership (PPP) frameworks, Pakistan can significantly enhance its infrastructure delivery by addressing structural weaknesses identified against the United Kingdom's mature model. The recommendations below provide a structured pathway to modernize Pakistan's system, drawing on proven strengths while tailoring solutions to local fiscal, institutional and regulatory realities. Implementation of these measures would accelerate project pipelines, reduce costs and improve service outcomes for citizens.

Legal reforms for strengthening PPP laws in Pakistan

Pakistan's PPP legislation, primarily anchored in the Public Private Partnership Authority Act 2017 and recent provincial enactments such as the Punjab Public Private Partnership Act 2025, requires urgent modernization to eliminate fragmentation and legal uncertainty. Comprehensive implementing rules must be finalized and notified to cover the entire project lifecycle, including clear definitions of eligible project types, standardized concession periods and explicit termination triggers. Introducing mandatory value-for-money assessments at the feasibility stage, supported by public-sector comparator methodologies, would prevent poorly structured deals. Sector-specific schedules for transport, energy and health should be embedded directly in the statutes to reduce reliance on ad-hoc interpretations. Dispute resolution clauses need strengthening through mandatory mediation followed by international arbitration options, while provisions for unsolicited proposals should include transparent evaluation criteria and compensation mechanisms. These reforms would create a predictable legal environment, lower transaction costs and signal commitment to long-term contractual sanctity, thereby attracting both domestic and foreign investors.

Adoption of best practices from the United Kingdom

Pakistan should selectively transplant proven elements of the United Kingdom's PPP architecture without wholesale replication. The centerpiece should be the development of a national Standardized PPP Contract, modeled on the UK's Standardization of PFI Contracts (SoPC), featuring core clauses on payment mechanisms, performance deductions and refinancing gain-sharing. Procurement processes must shift from single-stage bidding to competitive dialogue, allowing iterative refinement of technical and financial proposals. A centralized "gateway" approval system, akin to the former HM Treasury review process, should be institutionalized at federal and provincial levels to scrutinize affordability, deliverability and risk transfer before tender launch. Performance-based unitary payments linked to availability and service quality, rather than mere construction milestones, would incentivize whole-life efficiency. Finally, embedding independent technical and financial advisers at key decision points, funded through project preparation facilities, would replicate the UK's emphasis on professionalized preparation and deliver faster financial close.

Institutional and regulatory improvements

Institutional capacity remains Pakistan's primary bottleneck. The federal Public Private Partnership Authority and provincial counterparts require dedicated PPP units staffed with multidisciplinary experts in finance, law and engineering, supported by continuous training programmes funded through development partners. A fiscal risk management cell within the Ministry of Finance must be established to quantify contingent liabilities, maintain a national PPP register and enforce debt-ceiling thresholds. Regulatory harmonization between federal and provincial frameworks is essential; a national PPP policy board chaired by the Finance Minister could issue binding guidelines while preserving provincial execution autonomy within defined financial limits. Independent regulatory oversight bodies for each major sector should be empowered to monitor contract compliance and mediate disputes. Regular benchmarking exercises against international performance indicators would drive continuous improvement and prevent regulatory capture.

Enhancing transparency and accountability

Transparency deficits erode public confidence and inflate risk premiums. All PPP projects must publish redacted versions of feasibility studies, full contracts and annual performance reports on a centralized online portal within stipulated timelines. Competitive dialogue stages should include mandatory publication of shortlisted bidders and evaluation criteria scores. Independent third-party audits, conducted by chartered firms, should be required at financial close, mid-term review and expiry. Parliamentary oversight committees, supported by technical secretariats, must receive quarterly briefings on project pipelines and fiscal exposure. Whistle-blower protection mechanisms and anti-corruption hotlines linked directly to the National Accountability Bureau would deter malpractice. Citizen engagement forums at project planning and operational phases would incorporate community feedback into service specifications; ensuring accountability extends beyond government-to-private relationships to genuine public oversight.

Improving risk allocation frameworks

Risk allocation in Pakistan frequently deviates from the principle of assigning each risk to the party best able to manage it. Contracts should adopt detailed risk matrices that allocate construction, operating and financing risks predominantly to the private sector, while retaining political, macroeconomic and force-majeure risks with the public sector or through shared mechanisms. Minimum revenue guarantees, viability gap funding and foreign-exchange protection clauses already piloted in provinces must be standardized nationally with clear

eligibility criteria and sunset provisions. Change-in-law compensation formulas should be pre-agreed and indexed, eliminating protracted disputes. Insurance and hedging requirements should be mandatory, supplemented by periodic risk-reassessment clauses at five-year intervals. Performance deduction regimes linked to key performance indicators, with caps and collars to prevent excessive penalties, would mirror the United Kingdom's availability-payment discipline while protecting project bankability.

Recommendations for policymakers and stakeholders

Policymakers must champion a five-year national PPP acceleration programme with ring-fenced project preparation budgets and measurable key performance indicators. Priority sectors transport corridors, renewable energy and urban water should feature pre-feasibility pipelines published annually. Private-sector stakeholders should be engaged through industry-led working groups to co-design contract templates and training curricula. Civil society and media must participate in transparency forums to safeguard public interest. International development partners can facilitate knowledge transfer through twinning arrangements with UK institutions and secondment of experts. Fiscal incentives such as tax holidays for green PPPs and streamlined land acquisition protocols would further catalyst participation. Finally, a dedicated monitoring dashboard tracking project delivery metrics should be maintained and reported publicly to ensure accountability at the highest levels.

Suggestions for future research

Future scholarship should move beyond legal comparisons to empirical evaluation of reform outcomes. Longitudinal studies tracking the impact of standardized contracts and gateway processes on financial close timelines, cost overruns and service quality in Pakistan would generate robust evidence. Sector-specific analyses comparing transport or health PPPs across jurisdictions could isolate success factors. Research on digital tools for real-time contract monitoring and blockchain-based payment verification offers practical innovation pathways. Investigations into social equity particularly affordability and regional distribution of benefits remain under-explored. Cross-country studies incorporating climate resilience and gender-inclusive procurement would address emerging global priorities. Finally, comparative fiscal-risk modeling between Pakistan's evolving framework and the United Kingdom's post-PFI landscape would guide sustainable scaling of private finance in developing economies.

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