



**INSPECTION REPORT INTO THE ALLEGED IRREGULARITIES IN THE  
PROCUREMENT FOR THE PROVISION OF MEDICAL INSURANCE TO STAFF  
AND THEIR DEPENDENTS REF NO. UWA/SRVS/2025-2026/00001**

**ENTITY: UGANDA WILDLIFE AUTHORITY**

**COMPLAINANT: UAP OLD MUTUAL**

**MAY 2025**

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## **ACRONYMS**

BDS	-	Bid Data Sheet
PDU	-	Procurement and Disposal Unit
PDE	-	Procuring and Disposing Entity
PPDA	-	Public Procurement and Disposal of Public Assets Authority
UGX	-	Uganda Shillings
UWA	-	Uganda Wildlife Authority

## 1.0 SUMMARY OF FACTS

1. On 19<sup>th</sup> February 2025, Uganda Wildlife Authority initiated the procurement for the provision of medical insurance of staff and their dependents on a three-year framework arrangement at an estimated cost of UGX. 6.5 billion.
2. On 14<sup>th</sup> March 2023, the Contracts Committee approved the Open Domestic Bidding method, solicitation document and Evaluation Committee indicated in Table 1 below:

**Table 1: Evaluation Committee**

No	Name of Bidder	Designation
1.	Mr. Charles Tumwesigye	Senior Manager Field Operations
2.	Ms. Philomera Gumikiriza	Human Resource Manager
3.	Mr. Emmanuel Mwanja	Management Accountant
4.	Mr. Andrew Ssebalu	Ag. Procurement Manager

3. On 20<sup>th</sup> March 2025, Uganda Wildlife Authority published a bid notice in the New Vision Newspaper with a deadline of bid closing of 10<sup>th</sup> April 2025. A total of six bidders were issued with the bidding document as indicated in Table 2 below:

**Table 2: List of Bidders issued with the Bidding Document**

No	Name of Bidder
1.	Prudential Assurance (U) Ltd
2.	UAP Old Mutual
3.	Jubilee Insurance
4.	Case med Insurance Ltd
5.	Sanlam Life Insurance
6.	AAR Health Services

4. On 26<sup>th</sup> March 2025, UAP Old Mutual sought clarification to the requirements in the bidding document.
5. On 28<sup>th</sup> March 2025, the Entity responded to the request for clarification and sent a copy of the response to the clarification to all bidders.
6. On 10<sup>th</sup> April 2025, the Entity received and opened four bids as detailed below:

**Table 1: List of bids received**

No	Name of Bidder	Bid Price (UGX)
1.	Case Med Insurance	6,058,893,750
2.	AAR Health Services (U) Limited	6,551,378,750
3.	Sanlam Life Insurance Ltd	6,234,216,000
4.	Prudential Assurance (U) Ltd	6,155,660,000

7. On 15<sup>th</sup> April 2025, UAP old Mutual submitted a complaint to the Authority.

8. On 28<sup>th</sup> April 2025, the Authority launched an inspection into the matter in accordance with Section 8 (i) of the Public Procurement and Disposal of Public Assets Act, Cap 205.

## 2.0 OBJECTIVES OF THE INSPECTION

The objectives of the inspection were to establish whether:

1. The requirement for ownership & operation of an inhouse hospital and emergency response transport facilities including first aid kits, ambulances and airlifting services were restrictive;
2. The Entity refused to respond to the request for clarification sought by the complainant; and
3. The Entity refused to hold a pre-bid meeting to enable open discussion with bidders and clarification on the statement of requirement.

## 3.0 LAWS APPLICABLE

- i. The Public Procurement and Disposal of Public Assets Act, Cap 205;
- ii. The Public Procurement and Disposal of Public Assets (Rules and Methods for Procurement of Supplies, Works and Non-consultancy Services) Regulations, 2023; and
- iii. The bidding document issued.

## 4.0 METHODOLOGY

1. The Authority reviewed the following documentation:
  - i. Procurement Requisition;
  - ii. Solicitation document issued to bidders;
  - iii. Records of bid closing and bid opening;
  - iv. Bids submitted by Property Services Ltd; and
  - v. Contracts Committee minutes.
2. The Authority met the following persons indicated in Table 4:

**Table 4: Persons Met**

No.	Name	Designation
1.	Ms. Philomera Gumikiriza	Human Resource Manager/ UWA
2.	Mr. Andrew Ssebalu	Ag. Procurement Manager /UWA
3.	Mr. Stephen Adrapi	Country Manager /UAP Old Mutual

## 5.0 FINDINGS BY THE AUTHORITY

### 5.1 Whether the requirement for ownership & operation of an inhouse hospital and emergency response transport facilities including first aid kits, ambulances and airlifting services were restrictive

1. The complainant alleged that the requirements for ownership & operation of an inhouse hospital and emergency response transport facilities including first aid kits, ambulances and airlifting services were unduly restrictive and impaired competition.
2. Section 3 (Evaluation Methodology and Criteria) of the bidding document part 6.2 under technical evaluation criteria items (e), (g) and (h) respectively required bidders among other services to provide the following:
  - i. Evidence of ownership /operation of an in-house hospital;
  - ii. Provision of an administrable, well equipped first aid kit to UWA headquarter and the protected areas with a resident nurse where there are medical facilities and visiting nurse on monthly basis in protected areas where they do not have medical facilities;
  - iii. Evidence of possession of necessary facilities, tools and equipment to handle emergency cases like well-equipped ambulances and should be in position to offer airlifting services for extreme cases from remote locations.
3. The complainant sought clarification from the Entity on 26<sup>th</sup> March 2025 on requirements in the bidding document for ownership/operation of an inhouse hospital and emergency facilities, tools and equipment like first aid kits, ambulances and airlifting services.
4. The Authority noted that the Entity in its response to the complainant's request for clarification dated 28<sup>th</sup> March 2025 provided justification to the above requirements as follows:
  - i. Ownership of an in-house hospital:

The Uganda Wildlife Authority (UWA) operates in harsh environments where rangers and staff are at high risk of attacks from poachers or dangerous groups, often resulting in severe injuries that require specialized in-house hospital care. Current challenges include managing these critical cases with providers who lack in-house hospitals, leading to delays from third-party involvement. An in-house hospital is essential for immediate responses, continuous medical oversight by specialists, and real-time guidance to ensure timely and effective treatment without external delays. To improve healthcare in UWA Protected Area clinics, a provider with an in-house hospital is needed to supervise clinic management and provide monthly nurse visits. This setup will ensure quality healthcare by facilitating seamless transitions between covered and non-covered services, flexible payment arrangements, and internal handling of interruptions. Additionally, it will enable better case management for

emergencies and cases exceeding medical limits, reducing delays caused by third parties and ensuring easy access to super-specialists for both on-site and off-site medical care.

ii. Emergency facilities, Tools and Equipment:

UWA requires a provider with their own emergency equipment to deliver immediate, life-saving responses without third-party delays. This includes having the necessary tools and professionals readily available to handle critical cases efficiently. Providers must also demonstrate ownership of sufficient emergency equipment and may need to provide evidence of contractual agreements for additional resources to ensure preparedness for all scenarios.

5. The Entity in its submission to the Authority stated that it was procuring medical insurance services for its staff some/ majority of which operate from the Wildlife Conservation areas (National parks) across the country which are located in remote areas and are hard to reach. That this has made it fail to obtain adequate medical attention for its staff in real time especially in instances of emergencies. As a result, it often experiences high risks of life-threatening instances and has in the past lost staff due to lack of emergency rescue medical services. That the risk will be averted by having a provider with an in-house hospital and emergency response facilities including ambulances and airlifting services and who can provide standby resident medical staff / nurses in the conservation areas to provide the required urgent medical attention in cases of emergencies and also be quick to contact their in-house hospital system for escalation of complex cases without any level of delay and save life for its staff who are often prone to life threatening circumstances due to the wild nature of environment in which they operate.
6. Regulation 34 (3) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-consultancy Services) Regulations, 2023 requires that a Procuring and Disposing Entity shall prepare a description of the statement of requirements, in a manner that determines that the supplies, works or non -consultancy services are fit for the purpose for which they are being procured and are of the appropriate quality.
7. The Authority found that the requirements for inhouse hospital systems & nurses as well as emergency response facilities are necessary especially for the remote areas to enable the Entity provide exhaustive medical attention that can easily save the lives of staff and hence fit for purpose as provided under Regulation 34 (3) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-consultancy Services) Regulations, 2023.
8. The Authority hence found that the above requirements are reasonable given the medical risks faced by UWA staff in their unique operational environment and are hence not restrictive. The Authority hence found no merit in the above allegation.

**5.2 Whether the Entity refused to respond to the request for clarification sought by the complainant**

1. The complainant alleged that it sought for clarification from the Entity on the requirements for emergency facilities, tools & equipment and ownership of an inhouse hospital but the Entity ignored the request.

2. The Authority noted that on 27<sup>th</sup> March 2025, the Entity received a request for clarification from the complainant in regard to the requirement for ownership of an inhouse hospital and emergency facilities, tools and equipment (ambulances and airlifting services).
3. The Authority also noted that on 28<sup>th</sup> March 2025, the Entity responded to the above request for clarification and a copy of the response was shared to all participating bidders which is attached as Annex A.
4. Regulation 59 (3) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-consultancy Services) Regulations, 2023 requires the Entity to respond to the clarification sought in writing and copied to all bidders.
5. The Authority found that the Entity properly responded to the clarification sought by the complainant and copy all participating bidders.
6. On 7<sup>th</sup> April 2025, the complainant responded to the letter by the Entity of 28<sup>th</sup> March 2025 and further requested for reconsideration on the same concerns as earlier raised the letter dated 26<sup>th</sup> March 2025 to provide any further clarification but did not receive a response.
7. Regulation 59 (1) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-consultancy Services) Regulations, 2023 requires the Entity to state in the bidding document the date by which clarification shall be sought.
8. ITB 7.1 in the Bid Data Sheet of the bidding document issued to bidders indicated that bidders shall seek clarification not later than 4<sup>th</sup> April 2025.
9. The Authority found that the complainant's further request for clarification dated 7<sup>th</sup> April 2025 and received by the Entity on the same date was submitted after the deadline set for receiving and responding to requests for clarifications as required under ITB 7.1 (4<sup>th</sup> April 2025). Therefore, the Entity was not bound to respond to this clarification.
10. The Authority therefore found that the Entity properly responded to the request for clarification that was submitted within time and hence found no merit in the above allegation.

**5.3 Whether the Entity refused to hold a pre-bid meeting to enable open discussion with bidders and clarification on the statement of requirements**

1. The complainant alleged that the Entity did not provide for a pre-bid meeting to enable bidders engage with it and offer clarification on the terms of reference / Statement of Requirement.
2. The Entity submitted that the Statement of Requirements / TORs was in its view very clear and hence did not envisage a need for a pre-bid meeting.

3. Regulation 60 (1) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-consultancy Services) Regulations, 2023 provides that the Entity may hold a pre-bid meeting to allow potential bidders seek clarification.
4. The Authority found that it is not mandatory for the Entity to hold a pre-bid meeting. The bidders may request for clarification in writing and the Entity is required to respond in writing as already showed in allegation (5.2) above.
5. The Entity did not refuse to hold a pre-bid meeting but rather deemed the Statement of Requirements/TORs sufficiently clear, negating the need for a pre- bid meeting. The Authority found that the Entity was not obligated to hold a pre-bid meeting as stipulated in Regulation 60 (1) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-consultancy Services) Regulations, 2023, which provides that a PDE may hold pre-bid meetings to allow potential bidders seek clarification. The complainant sought clarification and was adequately responded to in writing by the Entity. The Authority concluded that the Entity was not mandated to hold a pre-bid meeting and thus finding no merit in the allegation.

#### **6.0 STATUS OF THE PROCUREMENT**

The Authority found that the procurement was at evaluation stage of the procurement process.

#### **7.0 CONCLUSION**

In light of the above findings, the Authority found no merit in the allegations and recommends that the Accounting Officer should:

1. Proceed with the procurement process to its logical conclusion in accordance with the requirements in the bidding document issued to bidders and the PPDA Act Cap 205 and PPDA Regulations 2023.
2. Remain responsible for ensuring value for money and that implementation of the awarded contract is in accordance with the terms and conditions in the bidding document and in accordance with the provisions of the PPDA Act Cap 205.