

**THE PUBLIC PROCUREMENT AND DISPOSAL OF PUBLIC
ASSETS AUTHORITY**

**PROCUREMENT AND DISPOSAL AUDIT REPORT FOR
MINISTRY OF HEALTH FOR FINANCIAL YEAR 2021/2022**

JULY 2023

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Acronyms

AO	Accounting Officer
CC	Contracts Committee
EC	Evaluation Committee
EMS	Emergency Medical Services
FY	Financial Year
GCC	General Conditions of Contract
HPDU	Head, Procurement and Disposal Unit
MOH	Ministry of Health
NOBEB	Notice of the Best Evaluated Bidder
PDE	Procuring and Disposing Entity
PDU	Procurement and Disposal Unit
PPDA	Public Procurement and Disposal of Public Assets Authority
RFP	Request for Proposals
SBD	Standard bidding document
SCC	Special Conditions of Contract
UGX	Uganda Shillings

EXECUTIVE SUMMARY

The Public Procurement and Disposal of Public Assets Authority (PPDA) conducted a performance Audit of your Entity that covered twenty-three (23) procurement and disposal transactions for the Financial Year 21/22. The overall objective of the audit was to assess and establish the degree of compliance of Ministry of Health' procurement and disposal system and processes with the provisions of the PPDA Act, 2003 and PPDA Regulations, 2014 and assess the level of performance over the period under review.

From the findings of the audit exercise, the performance of Ministry of Health for the Financial Year 21/22 was **moderately satisfactory** with an overall weighted average risk rating of **36.9%**. The risk rating was weighted to determine the overall risk level of the Entity as detailed in Chapter 3 of the audit report.

Despite the moderately satisfactory performance, the following key exceptions were noted:

1. Huge variance between planned and actual amounts in the procurement for T-shirts for Village Health Teams (VHTs). There was a huge variance between the estimated amount and the contract price of UGX 490,000,000. Poor budgeting may deny resource allocation to other priority areas.
2. Failure to fully implement seven recommendations from a previous PPDA audit, representing 41.2% non-compliance. Failure to fully implement the Authority's recommendations affects the performance of the procurement and disposal function in the Entity.
3. Delays in four procurements worth UGX 1,468,669,000 which affects service delivery.
4. Failure to fully adhere to the evaluation criteria during evaluation in six procurements worth UGX 17,049,476,301. Passing a non-compliant bidder gives false indication of competition levels in the bidding process.
5. Signing of contracts after expiry of bid validity period in three procurements worth UGX 3,592,608,000. The legality of the contracts may be challenged, which would affect implementation and hence service delivery.
6. Failure to enforce requirement on submission of securities in ten procurements worth UGX 12,874,463,563, the Entity did not enforce submission of securities by providers contrary to the contract terms which required submission of a performance security amounting to 10% of the contract value. The Entity has no fall back in the event the Provider fails to perform.
7. Delayed contract implementation in three procurements worth UGX 5,153,301,401. Contract implementation was not undertaken as per the contractual terms and was delayed past the contracted timeline of delivery. Delayed contract implementation affects service delivery.

In light of the above, the Authority recommends the following:

1. The Heads of Department should ensure that the budgeting process is done thoroughly to minimize variations. The responsible officers should ensure that market price assessment is

carried out where variances are noted between the estimated and final contract prices in accordance with Regulation 5 (3) of the PPDA (Rules and Methods of Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2014.

2. The Accounting Officer should take corrective action and also engage all stakeholders to develop strategies on implementation of all the Authority's recommendations in accordance with Section 9 (1) (a) of the PPDA Act, 2003.
3. The Accounting Officer should put in place mechanisms to ensure that procurement and disposal processes are carried out in an efficient manner in accordance with Section 48 of the PPDA Act, 2003.
4. The Head, Procurement and Disposal Unit should ensure that the Evaluation Committee members strictly adhere to the criteria set out in the solicitation document in accordance with Regulation 7 of the PPDA (Evaluation) Regulations, 2014.
5. The Procurement and Disposal Unit should monitor the validity of bids to ensure that at contract signing, the bids are still valid.
6. The Accounting Officer should ensure that where performance security is a requirement in the contract, submission of this is enforced.
7. Contract Managers should ensure that contract supervision is effectively carried out to ensure that terms and conditions of the contract (such as delivery timelines) are met as required under Regulation 53 (1) a & b of the PPDA (Contracts) Regulations, 2014.

CHAPTER 1: INTRODUCTION

1.1 The Entity

The Ministry of Health is a government body set up with the mandate of stewardship and leadership of the health sector. The Ministry of Health is responsible for policy review and development, supervision of health sector activities, formulation and dialogue with health development partners, strategic planning, setting standards and quality assurance, resource mobilization, advising other Ministries, departments and agencies on health-related matters, and ensuring quality, health equity, and fairness in contribution towards the cost of health care. The period of audit was characterised by the effects brought about by the COVID-19 pandemic and thus the management of procurements and disposal was equally affected.

The following were the members of the Contracts Committee during the period under review:

Table 1: List of Contracts Committee members

No	Name	Date of Appointment	Committee Position
1.	Dr. Muruta Allan Niyonzima	5 th August 2020	Chairperson
2.	Mr. Kabagambe Richard	5 th August 2020	Secretary
3.	Dr. Hafsa Lukwata Sentongo	5 th August 2020	Member
4.	Mr. Tukahirwa James	5 th August 2020	Member
5.	Ms. Allen Bucyana	24 th November 2020	Member

1.2 Background

The Public Procurement and Disposal of Public Assets Authority carried out the Audit of Ministry of Health that covered a representative sample of twenty-three (23) procurement and disposal transactions under the Financial Year. The audit involved a review of the procurement structure, procurement processes, as well as contract performance following the provisions of the Public Procurement and Disposal of Assets Act, 2003 and Central Governments (PPDA) Regulations, 2014. The audit scope mainly covered procurements towards managing the effects brought about by the COVID-19 pandemic.

1.3 Main Objectives

The overall objective of the performance audit was to assess and establish the degree of compliance of Ministry of Health' procurement system and processes with the provisions of the PPDA Act, 2003 and the Central Governments (PPDA) Regulations, 2014 and assess the level of procurement and disposal performance over the period.

The specific objectives were to establish:

- The level of compliance by the Entity with the general provisions of the PPDA Act and Regulations;
- The level of compliance with the PPDA Act, 2003 in the conduct of procurement and disposal activities; and

1.4 Performance Audit Scope

The audit involved a review of the procurement process, general compliance issues and contract implementation on sample basis. Table 2 shows the analysis of the population versus the sampled cases. The list of sampled transactions is contained in **Appendix 2**.

Table 2: The Distribution of the transaction Population and Sample

No.	Procurement/ Disposal Method	Population		Sample		% Sample vs Popn (Value)	% Sample Vs Popn (Number)
		Value (UGX)	No.	Value (UGX)	No.		
1.	Open Domestic Bidding	43,585,416,924	26	6,190,835,389	4	14.2	15.4
2.	Direct Procurement	22,698,858,391	21	19,973,116,750	5	87.9	23.8
3.	Restricted Bidding	95,199,937,230	53	81,207,082,902	11	85.3	20.7
4.	Request for Quotations/proposals	19,290,413,574	133	-	-	-	-
5.	Consultancy - Publication without EOI	529,932,002	4	159,190,201	2	30	50
6.	Consultancy- Publication with EOI	488,104,000	3	0	-	-	-
7.	Single Source	199,041,856	4	0	-	-	-
8.	Public Auction	-	1	-	1		100
	Total	181,991,703,977	244	107,530,225,242	23	59	23

1.5 Performance Audit Methodology

Records and documents for each sampled procurement were examined and relevant evidence obtained to derive audit conclusions. This involved a review of the Entity's procurement/disposal planning, initiation, bidding, evaluation, contract placement and implementation.

CHAPTER TWO: FINDINGS OF THE AUTHORITY

2.1 Compliance by the Entity with the general provisions of the PPDA Act, 2003 and Regulations, 2014

2.1.1 Variations between planned and actual amounts

In the procurement for T-shirts for Village Health Teams (VHTs), there was a huge variance between the estimated amount and the contract price. The estimate was UGX 1.2 billion whereas the contract price was UGX 710,000,000 hence a variance of UGX 490,000,000.

Implication

Poor budgeting which denies resource allocation to other priority areas.

Recommendations

- The Heads of Department should ensure that the budgeting process is done thoroughly to minimize variations.
- The Accounting Officer should ensure that market price re-assessment is carried out where variances are noted between the estimated and final contract prices in accordance with Regulation 5 (3) of the PPDA (Rules and methods of Procurement of Supplies, Works and Non-Consultancy services) Regulations, 2014

Management Response

Management stated that the variation was caused by the global supply chain challenges evidenced by the limited information at the time of COVID-19 epidemic times. The Entity pledged to always reassess the market price whenever there is a variation, during the evaluation stage.

2.1.1 Implementation of previous audit recommendations

Out of the seventeen (17) audit recommendations for the financial year 2018/2019, the Authority observed seven recommendations were not fully implemented, representing 41.2% non-compliance. These are listed in Table 3 below:

Table 3: Status of implementation of previous Audit Recommendations

No.	Recommendation	Status of implementation	Management Response
1.	The Head, Procurement and Disposal Unit should ensure that the Evaluation Committee members strictly adhere to the criteria set out in the solicitation document in accordance with Regulation 7 of the PPDA (Evaluation) Regulations, 2014.	Partially implemented	The Ministry has partially implemented this requirement and where there gaps to be addressed, quality assurance will be adopted.

No.	Recommendation	Status of implementation	Management Response
2.	Heads of User Departments should ensure that appointed Contract Managers prepare contract implementation plans in accordance with Regulation 53 (3) (g) of the PPDA (Contracts) Regulations, 2014.	Partially implemented	Contract Implementation plans are always available with the contract manager however the challenge remains for the contract managers to submit the plans to the PDU.
3.	Heads of User Departments should submit to the Procurement and Disposal Unit copies of all procurement related correspondences for maintenance on their respective procurement action files in accordance with Section 31(o) of the PPDA Act 2003.	Partially implemented	Sustaining a complete file in the PDU has been a challenge however the PDE continues to engage the User Departments to improve in this area.
4.	The Accounting Officer should desist from signing contracts whose bid validity has expired since they are irregular and contrary to Regulation 52 (5) of the PPDA (Rules and Methods for procurement of Supplies, Works and Non- Consultancy Services) Regulations, 2014.	Partially implemented	PDU will continue to monitor and advise the Accounting Officer whenever signing the contract and a check list will be attached on every file.
5.	The Accounting Officer should ensure that providers are given full and timely payment in accordance with Regulation 49 (3) of the PPDA (Contracts) Regulations, 2014.	Partially implemented	Whenever funds are available providers are paid within the specified time.
6.	The Accounting Officer should ensure that disposal of obsolete items is expedited and conducted in accordance with the PPDA (Disposal) Regulations, 2014.	Partially implemented	The PDE conducts a disposal every year.
7.	The Accounting Officer should prevail over Heads of User Departments to ensure that Contract Managers carry out their functions in accordance with Regulation 53 of the PPDA (Contracts) Regulations, 2014.	Partially implemented	The Ministry has sensitized and conducted trainings to ensure the User Departments to perform their functions, roles and obligations.

Implication

Failure to fully implement the Authority's recommendations affects the performance of the procurement and disposal function in the Entity.

Recommendation

The Accounting Officer should take corrective action and also engage all stakeholders to develop strategies on implementation of all the Authority's recommendations in accordance with Section 9 (1) (a) of the PPDA Act, 2003.

Management Response

Management took note of this and pledged to improve in implementing recommendations of the Authority through regular internal training.

2.2 Compliance with the PPDA Act, 2003 and Regulations, 2014 in the conduct of procurement and disposal activities

2.2.1 Short Bidding Period

In the procurement for production of audio visual properties on prevention of communicable diseases, the Entity used consultancy without publication of an expression of interest method. The bidding document was issued on 21st January 2022. bid closing was 28th January 2022 and thus a short bidding period given to bidders contrary to the requirement of a minimum of 15 working days required as per Regulation 27 (3) (a) of the PPDA (Procurement of Consultancy Services) Regulations, 2014.

Implication

Short bidding period limit the submissions of bids by potential bidders, thus affecting competition.

Recommendation

The Authority noted the Entity's response and recommends that the Contracts Committee should ensure that the period for preparation of bids given to bidders is in accordance with Regulation 27 (3) (a) of the PPDA (Procurement of Consultancy Services) Regulations, 2014.

Management Response

Management stated that due to the peculiar circumstances caused by Covid-19, use of short bidding periods was inevitable.

2.2.2 Delays in the procurement process

Delays were observed in the following four procurements worth UGX 1,468,669,000:

Table 4: Procurements where delays were observed

.No	Subject of Procurement	Observations	Management Response
1.	In the procurement for Uniforms and Personal Protective Equipment for EMS teams	<ul style="list-style-type: none">There was delay by the Procurement and Disposal Unit to make a submission to the Contracts Committee for approval of the bidding document, the Evaluation Committee and the shortlist of	The delayed submissions by the Procurement and Disposal Unit were caused by incomplete specifications.

.No	Subject of Procurement	Observations	Management Response
		<p>Officer had approved funding on 5th November 2021 but Procurement and Disposal Unit made the submission on 20th January 2022, causing a delay of 2 months and 2 weeks.</p> <ul style="list-style-type: none"> • Delay by the Procurement and Disposal Unit to issue the bidding document to bidders. The Contracts Committee approved the procurement method, the Evaluation Committee, and the bidding document on 1st February 2022, however, the date of issue of the bidding document was 21st February 2022, hence a delay of 3 weeks. 	
2.	Procurement of T-Shirts for VHTs	Delayed submission by the Procurement and Disposal Unit (PDU) to Contracts Committee. The Accounting Officer approved funding on 17 th July 2021, but the PDU submission was on 6 th September 2021, a delay of 35 working days.	The delayed submissions by Procurement and Disposal Unit were caused by incomplete specifications.
3.	Procurement of Spare parts for Kayunga Hospital	Delayed PDU submission to the Contracts Committee for approval of the procurement method, bidding document, Evaluation Committee and shortlist of bidders. The Accounting Officer confirmed availability of funding on 29 March 2022, but PDU made the submission to the Contracts Committee on 3 rd May 2022, a delay of one month.	The delayed submissions by Procurement and Disposal Unit were caused by incomplete specifications.
4.	Production of audio visual properties on prevention of communicable diseases	The requisition was raised on 4 th August 2021, the Accounting Officer confirmed availability of funding on 10 th August 2021. The Contracts Committee approved the procurement method, shortlisted	The delayed submissions by Procurement and Disposal Unit were caused by incomplete Terms of reference.

No	Subject of Procurement	Observations	Management Response
		firms and the bidding document on 14 th December 2021, four months later.	

Implication

Delays in making submissions affects service delivery.

Recommendations

- The Head of the User Departments should ensure that they prepare complete statement of requirements which are submitted as attachments to the requisition to ensure that the process delivers what the Entity needs.
- The Entity should organise capacity building for the User Departments in the area of drawing up statements of requirements.

2.2.3 Delayed evaluation

In the procurement for production of audio-visual properties on prevention of communicable diseases, where the Entity used consultancy services without publication of an expression of interest, the bid closing was on 28th January 2022. The Technical Evaluation Report was dated 28th March 2022. The evaluation process took long and there was no request for extension. This was contrary to Regulation 42 (2) of the PPDA (Procurement of Consultancy Services) Regulations, 2014 which stipulates that technical proposals shall be evaluated within thirty working days.

Implication

Delayed evaluation affects service delivery.

Recommendation

The Authority noted the Entity's response and recommends that the evaluation of proposals for consultancy services should be undertaken within the period stated under Regulation 42 (2) of the PPDA (Procurement of Consultancy Services) Regulations, 2014.

Management Response

Management stated the members of the Evaluation Committee include technical staff who were always engaged in multiple field activities which delays evaluation exercises.

2.2.4 Irregularities in Evaluation

In the following six procurements worth UGX 17,049,476,301, the evaluation criteria was not fully adhered to by the Evaluation Committee. These are listed in Table 5 below:

Table 5: Procurements where the Evaluation Criteria was not fully adhered to:

No.	Subject of Procurement	Observation	Management Response
1.	Procurement of air conditioners and electrical rooms	• Vetiver Associates, the Best Evaluated Bidder did not submit a	• The Entity regrets the gaps caused by the

No.	Subject of Procurement	Observation	Management Response
		<p>Trading Licence for 2022 but was marked as compliant.</p> <ul style="list-style-type: none"> • DYUT Engineering Consults Ltd submitted a Tax Clearance Certificate that was addressed to Uganda Electricity Distribution Company Ltd but was marked as compliant. • DYUT Engineering Consults Ltd did not submit Power of Attorney authorizing David Lyagoba as its authorized signatory but this was also marked as compliant. • MHZ Solutions Ltd submitted an expired Trading License which had expired on 8th January 2022, but was marked as compliant. The bidding period was between 6th May and 16th May 2022. • MHZ Solutions Ltd did not submit Power of Attorney authorizing Tom Muhumuza as its authorized signatory but this was also marked as compliant. • MHZ Solutions Ltd did not submit Tax Clearance Certificate but was assessed as compliant. 	<p>Evaluation Committee. however the Entity has put in place mechanisms to ensure that quality assurance is carried out before evaluation reports are forwarded for approval and with the introduction of the Electronic Government Procurement most of these anomalies have greatly reduced</p>
2.	Production of audio visual properties on prevention of communicable diseases	<p>Wrong assessment of a bidder as shown below:</p> <ul style="list-style-type: none"> • The trade licence submitted by Different Media Ltd was dated 17th December 2020, expiring on 17th December 2021. Bid closing was on 28th January 2022 and by this date, the license was no longer valid. The bidder did not submit a Tax Clearance Certificate to indicate that they fulfil their obligations to pay taxes (Bidding document required the bidder to provide evidence of this by submission of an income tax 	<ul style="list-style-type: none"> • The Entity regrets the gaps caused by the Evaluation Committee however the entity has put in place mechanisms to ensure that quality assurance is carried out before evaluation reports are

No.	Subject of Procurement	Observation	Management Response				
		<p>clearance for 2020. Bidder did not submit evidence of fulfilment of social security contributions).</p> <ul style="list-style-type: none"> • Different Media Ltd did not provide Power of Attorney authorising submission of proposal by Kenneth Odong Pras. 	<p>forwarded for approval and with the introduction of the Electronic Government Procurement most of these anomalies have greatly reduced.</p>				
3.	Procurement of Uniforms and Personal Protective Equipment for EMS teams	<ul style="list-style-type: none"> • The assessment by the Evaluation Committee was incomplete as indicated below: <ul style="list-style-type: none"> i. The requirement for submission of a valid Tax Clearance Certificate as per the eligibility criteria under preliminary examination was not assessed, yet the bidding document stated this as a requirement. ii. Proven experience in the supply of uniforms and Personal Protective Equipment (PPEs) in the last 3 years was not checked yet this was required in the solicitation document and was a material deviation. 	<ul style="list-style-type: none"> • The entity regrets the gaps caused by the evaluation committee however the entity has put in place mechanisms to ensure that quality assurance is carried out before evaluation reports are forwarded for approval and with the introduction of the Electronic Government Procurement most of these anomalies have greatly reduced 				
4.	Construction of staff house in Nakapiripirit, Amudat, and Moroto districts under the	<p>Exceptions under evaluation</p> <table border="1" data-bbox="619 1843 1082 1951"> <thead> <tr> <th data-bbox="619 1843 874 1951">Requirement under Bidding Document</th> <th data-bbox="874 1843 1082 1951">Bulmark's bid</th> </tr> </thead> <tbody> <tr> <td data-bbox="619 1951 874 1982"></td> <td data-bbox="874 1951 1082 1982"></td> </tr> </tbody> </table>	Requirement under Bidding Document	Bulmark's bid			<p>1. This was error of omission. 2. There was no certificate of completion because</p>
Requirement under Bidding Document	Bulmark's bid						

No.	Subject of Procurement	Observation	Management Response
	Karamoja region staff houses project	<p>Sub-factor 6.2.5 Financial resources required the bidder to demonstrate ability to obtain a line of credit from a reputable bank of UGX 1,000,000,000.</p> <p>The bidder stated that they could obtain a line of Credit of UGX 2,000,000,000 from Equity Bank. There was no corresponding communication from the Bank to support this statement.</p> <p>The Authority observed that their bid had a letter dated 3rd December 2021 from Equity Bank showing a line of credit of UGX 200,000,000 to Bulmak Farm and Apartments, who was not the bidder.</p> <p>The bidder was therefore non-complaint on this criterion.</p>	the contract was extended for completion to 29 th September 2023.
5.	Procurement of VHT items under Covid-19 response (Oximeters, gumboots and medicine boxes)	The Authority observed that the following bidders had some exceptions in their bids, but were assessed as compliant by the Evaluation Committee:	The Entity regrets the gaps caused by the Evaluation Committee however the Entity has put in place mechanisms to ensure that quality assurance is

No.	Subject of Procurement	Observation	Management Response
		<p>i. The bid from Minga Supplies did not have a Tax Clearance Certificate nor a NSSF certificate,</p> <p>ii. Roshe Logistics Ltd submitted a Tax Clearance Certificate addressed to Ministry of Defence dated 27th August 2020. The certificate was valid from 1st July 2020 ending 30th June 2021. By the time of bid submission validity of the certificate had expired. Rosche did not also submit a NSSF certificate, which was a requirement in the bidding document.</p>	<p>carried out before evaluation reports are forwarded for approval and with the introduction of the Electronic Government Procurement most of these anomalies have greatly reduced.</p>
6.	Procurement of a firm to undertake auctioning for items for disposal	<p>The Authority observed that two bidders submitted bids on 27th May 2022 and the bids had the following exceptions, but were assessed by the Evaluation Committee as compliant. The details are shown below:</p> <ul style="list-style-type: none"> • The Tax Clearance Certificate submitted by Bailiff Master Ltd was addressed to Office of the Auditor General. • Ritchiebros Auctioneers submitted a Tax Clearance Certificate dated 4th May 2022 addressed to Ministry of Energy and Mineral Development but was assessed as compliant. 	<p>The evaluation criteria did not require the Tax clearance to be specific to the Entity but as long as the bidder indicated that he was tax compliant.</p>

Implication

Passing a non-compliant bidder gives false indication of competition levels in the bidding process.

Recommendation

The Evaluation Committee should ensure that during an evaluation, no amendments or addition to the evaluation criteria stated in the bidding document are made as stipulated under Regulation 7 (2) of the PPDA (Evaluation) Regulations, 2014.

2.4.3 Failure to communicate to bidders on correction of arithmetic errors

In the procurement for construction of staff houses in Nakapiripirit, Amudat, and Moroto districts under the Karamoja region staff houses Project, correction of arithmetic errors worth (+) UGX 300,552,000 were made by the Evaluation Committee. The Evaluation Committee only communicated to the affected bidder, Bulmark Associates Ltd and did not copy to other bidders.

Implication

This affects transparency.

Recommendation

The Authority noted the Entity's response and recommends that the Evaluation Committee should ensure that communication of correction of arithmetic errors is made to other bidders that participated in the bidding process.

Management Response

Only one firm Bulmark Associates was assessed at financial evaluation stage. Communication of arithmetic errors was only made to only Bulmark Associates who was qualifying at this stage.

2.3 Efficiency and Effectiveness in Contract Implementation

2.3.1 Signing of contracts after expiry of bid validity period

In the following three procurements valued at UGX 3,592,608,000 contracts were signed after expiry of the bid validity period:

Table 6: Procurements where contracts were signed after expiry of bid validity period

No.	Subject of Procurement	Amount (UGX)	Exceptions observed
1.	Procurement of 20,000 Ustar COVID 19 testing cartridges for Entebbe Airport	1,421,028,000	Signing contract on 6 th January 2022 after expiry of the bid validity on 30 th December 2021.
2.	Procurement of a 30 seater coaster for Covid 19 testing laboratory at Entebbe International Airport	252,000,000	Signing contract on 25 th January 2022 after expiry of the bid validity on 31 st December 2021.
3.	Procurement of 3000 tip pulse oximeters, 2,200 oxygen cylinder trolleys, 2000 oxygen cylinder keys and 2000 oxygen cylinder spanners under Covid-19 Project.	1,919,580,000	The bid submitted by Bessel Trading Company Ltd was dated 30 th September 2021 and their bid validity was up to 31 st December 2021. The contract was signed on 25 th January 2022, by which their bid validity had expired.
	TOTAL	3,592,608,000	

Implication

The legality of the contracts may be challenged, which would affect implementation and hence service delivery.

Recommendation

The Procurement and Disposal Unit should monitor the validity of bids to ensure that at contract signing, the bids are still valid.

Management Response

Management stated that the Procurement and Disposal Unit would always monitor and ensure that bids are valid before contract signing.

2.3.2 Failure to enforce requirement on submission of securities

In the following ten procurements worth UGX 12,874,463,563, the Entity did not enforce submission of securities by providers contrary to the contract terms which required submission of a performance security amounting to 10% of the contract value:

1. Uniforms and Personal Protective Equipment for Emergency Medical Services (EMS) teams
2. Procurement of T-shirts for Village Health Teams (VHTs)
3. Procurement of aprons for Village Health Teams (VHTs)
4. Procurement of 20,000 Ustar COVID- 19 testing cartridges for Entebbe Airport
5. Procurement of a 30 seater coaster for Covid 19 testing laboratory at Entebbe International Airport
6. Supply of branded black back pack bags for VHT Kit for all VHTs in the country to handle Covid-19 Second wave
7. Procurement of bio-safety cabinets for Covid-19 Laboratory at Entebbe International Airport
8. Procurement of Sub light Activated Formulation Extract (SAFE)/larviciding chemicals for Kigezi and Lango Sub-Regions
9. Construction of staff houses in Nakapiripirit, Amudat, and Moroto Districts under Karamoja Regional Staff Houses Project: MOH/Wks/21-22/00010
10. Procurement of 3000 tip pulse oximeters, 2,200 Oxygen cylinder trolleys, 2000 oxygen cylinder keys and 2000 oxygen cylinder spanners under Covid-19 Project

Implication

The Entity has no fall back in the event the Provider fails to perform.

Recommendation

The Authority noted the Entity's response but maintains the finding and recommends that the Accounting Officer should ensure that where performance security is a requirement in the contract, submission of this is enforced.

Management Response

As a result of the COVID-19 pandemic there was urgency to procure, therefore the Entity focused more on delivery where even partial deliveries were made other than performance securities

2.3.3 Delayed contract implementation

In the following three procurements valued at UGX 5,153,301,401 contract implementation was not undertaken as per the contractual terms and was delayed past the contracted timeline:

Table 7: Procurements with delayed contract implementation

No.	Subject of Procurement	Amount (UGX)	Exceptions noted under delivery	Management Response
1.	Procurement of aprons for Village Health Teams (VHTs)	1,583,276,800	Delivery was to be made on 28 th February 2022 but actual delivery was on made on 4 th April 2022, hence a delay in delivery of 36 days.	The deliveries were caused by logistical issues as a result of the COVID-19 pandemic.
2.	Procurement of Sublight Activated formulation extract (SAFE) for Kigezi and Lango Sub-regions	312,950,000	Contract was signed on 18 th May 2022. At the time of audit in March 2023, there was no record of delivery of the chemical.	The provider faced supply chain and logistical challenges following a factory repair and maintenance during the delivery time.
3.	Construction of staff house in Nakapiripirit, Amudat, and Moroto districts under Karamoja regional staff houses project	3,257,074,601	The completion date was twelve months from the contract signature date (11 th April 2022). At the time of audit in March 2023, there were no certificates of completion availed to confirm progress on work done. Further to that, there was no evidence of payment, record of appointment of a Contract Manager.	There was no certificate of completion because the contract was extended to 29 th September 2023.
	TOTAL	5,153,301,401		

Implication

Delayed contract implementation affects service delivery.

Recommendation

Contract Managers should ensure that contract supervision is effectively carried out to ensure that terms and conditions of the contract (such as delivery timelines) are met as required under Regulation 53 (1) a & b of the PPDA (Contracts) Regulations, 2014.

Management Response

Management stated that the Contract Managers were always encouraged to maintain contract management reports.

2.3.4 Delayed Payments

In the procurement of T-shirts for Village Health Teams (VHTs) valued at UGX 710,000,000, deliveries were made on 4th April 2022 and the by the time of the audit in March 2023 there was no evidence of payment to Southern Range Nyanza Ltd. Delivery at been made on 4th April 2022 and an invoice received by the Ministry. The agreement stated that payment was to be made within 30 days after receipt of the invoice i.e. the latest date of payment should have been latest 5th May 2022.

Recommendation

The Accounting Officer should ensure that payments are made within the stipulated timeframe.

Management Response

The delays in payments were as a result of rigorous verification processes of the items supplied.

2.3.5 Records not availed

The following procurements had some records not availed at the time of audit:

Table 8: Records not availed

No.	Subject of Procurement	Records not seen on file
1.	Procurement of oxygen cylinders and regulators	There was no evidence of delivery of these to the intended beneficiary Institutions.
2.	Supply of branded black back pack bags for VHT kits for all VHTs in the country to handle Covid-19 Second wave	<ul style="list-style-type: none">• No evidence of distribution of bags to the VHTs (End Users).• No contract management plan and reports.
3.	Procurement of patient beds and mattresses	<ul style="list-style-type: none">• No evidence of delivery of supplies and distribution to the intended beneficiaries
4.	Procurement of air Conditioners and Electrical rooms	<ul style="list-style-type: none">• No payment records
5.	Procurement of bio-safety cabinets for Covid-19 Laboratory at Entebbe International Airport	<ul style="list-style-type: none">• No record of payment
6.	Procurement of Sublight Activated Formulation Extract (Safe) for Kigezi and Lango Sub-Regions	<ul style="list-style-type: none">• No record of payment
7.	Procurement of a one year maintenance and service contracts for non Philips	<ul style="list-style-type: none">• There were no contract management records on file.

No.	Subject of Procurement	Records not seen on file																										
	equipment (X-Rays, Ultrasound Scanners, and dental X-Ray) across the country by Computech																											
8.	Consultancy services for the development of the E-IDSR (Eidsr-Electronic Integrated Disease Surveillance and Response) interface for an Integrated Data Collection and Reporting System for Covid-19 (Covid-19 National Repository)	<p>The following was the training budget as per the Consultant's proposal. There was no evidence as to whether this was undertaken by the Consultant:</p> <table border="1" data-bbox="799 689 1355 1496"> <thead> <tr> <th data-bbox="807 696 885 730">No.</th> <th data-bbox="898 696 1150 730">Aspect</th> <th data-bbox="1163 696 1241 730">Qty</th> <th data-bbox="1254 696 1347 730">USD</th> </tr> </thead> <tbody> <tr> <td data-bbox="807 734 885 931">1.</td> <td data-bbox="898 734 1150 931">Requirements gathering stakeholders workshop and national level data users' workshop</td> <td data-bbox="1163 734 1241 931">83</td> <td data-bbox="1254 734 1347 931">3,320</td> </tr> <tr> <td data-bbox="807 936 885 1043">2.</td> <td data-bbox="898 936 1150 1043">Facilitation of national level volunteers</td> <td data-bbox="1163 936 1241 1043">3</td> <td data-bbox="1254 936 1347 1043">2,700</td> </tr> <tr> <td data-bbox="807 1048 885 1218">3.</td> <td data-bbox="898 1048 1150 1218">Transport refund for stakeholders' and national level data users workshops</td> <td data-bbox="1163 1048 1241 1218">88</td> <td data-bbox="1254 1048 1347 1218">1,320</td> </tr> <tr> <td data-bbox="807 1223 885 1285">4.</td> <td data-bbox="898 1223 1150 1285">District trainings' data bundles</td> <td data-bbox="1163 1223 1241 1285">140</td> <td data-bbox="1254 1223 1347 1285">2,100</td> </tr> <tr> <td data-bbox="807 1290 885 1496">5.</td> <td data-bbox="898 1290 1150 1496">Specialised COVID-19 units (CTUs, POEs, Quarantines) data entry and end user training</td> <td data-bbox="1163 1290 1241 1496">70</td> <td data-bbox="1254 1290 1347 1496">1,050</td> </tr> </tbody> </table> <p data-bbox="794 1500 1359 1597">There was no evidence as to whether an end to end user manual and metadata dictionary was developed for the client.</p>			No.	Aspect	Qty	USD	1.	Requirements gathering stakeholders workshop and national level data users' workshop	83	3,320	2.	Facilitation of national level volunteers	3	2,700	3.	Transport refund for stakeholders' and national level data users workshops	88	1,320	4.	District trainings' data bundles	140	2,100	5.	Specialised COVID-19 units (CTUs, POEs, Quarantines) data entry and end user training	70	1,050
No.	Aspect	Qty	USD																									
1.	Requirements gathering stakeholders workshop and national level data users' workshop	83	3,320																									
2.	Facilitation of national level volunteers	3	2,700																									
3.	Transport refund for stakeholders' and national level data users workshops	88	1,320																									
4.	District trainings' data bundles	140	2,100																									
5.	Specialised COVID-19 units (CTUs, POEs, Quarantines) data entry and end user training	70	1,050																									

CHAPTER THREE: OVERVIEW OF THE PERFORMANCE OF THE ENTITY

This Section will present graphically the scores per area assessed under different audit questions

3.1. Overall Audit Conclusion

The performance of Ministry of Health for the Financial Year 21/22 was moderately satisfactory with overall weighted average risk rating of 31%.

The risk rating is as follows:

Table 9: Risk Rating

Risk Rating	Description of Performance
0-30%	Satisfactory
31-70%	Moderately Satisfactory
71-100%	Unsatisfactory

Entity's Performance

The risk rating was weighted to determine the overall risk level of the Entity. The weighting was derived using the average weighted index as shown below: -

Table 10: Risk Rating

Risk category	No.	No. %	Value (UGX)	Value %	Weights	Total weighted Average	
						By No.	By Value
High	3	13	3,592,608,000	3	0.6	3	1.8
Medium	7	31	22,021,559,563	21	0.3	21	6.3
Low	9	39	79,286,153,872	75	0.1	75	7.5
Satisfactory	4	17	1,460,273,808	1	0	1	0
Total	23	100	106,360,595,243	100	1.0	21	15.6

$$\text{Weighted Average (By no.)} = \frac{\sum \text{Weighted Score}}{60} \times 100 = \frac{21}{60} \times 100 = 35.5\%$$

$$\text{Weighted Average (By Value)} = \frac{\sum \text{Weighted Score}}{60} \times 100 = \frac{15.6}{60} \times 100 = 26\%$$

$$\text{Combined Weighted Average} = \frac{35.5 + 26}{2} = 31\%$$

Figure 2: Risk Rating by Number

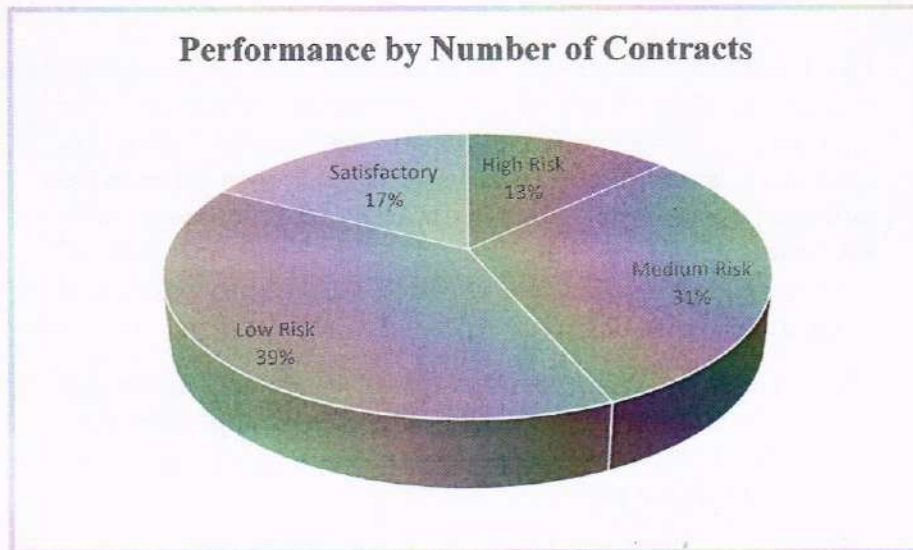
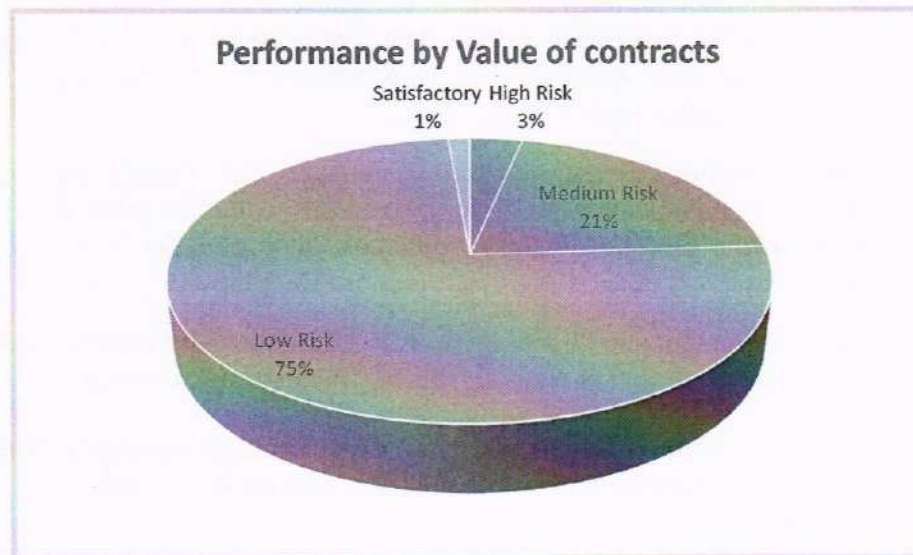


Figure 3: Risk Rating by Value



Ministry of Health should implement the recommended action plan on page 24.

3.2. Recommended Action Plan

Ministry of Health should implement the following recommendations within the timeframe given in order to improve its performance in procurement and disposal.

Table 11: Action Plan

No.	Recommended Action	Target Date
1.	The Heads of Department should ensure that the budgeting process is done thoroughly to minimize variations. The Accounting Officer should ensure that market price re-assessment is carried out where variances are noted between the estimated and final contract prices in accordance with Regulation 5 (3) of the PPDA (Rules and methods of Procurement of Supplies, Works and Non-Consultancy services) Regulations, 2014.	Continuous
2.	The Accounting Officer should take corrective action and also engage all stakeholders to develop strategies on implementation of all the Authority's recommendations in accordance with Section 9 (1) (a) of the PPDA Act, 2003.	Immediate
3.	The Head of the User Departments should ensure that they prepare complete statement of requirements which are submitted as attachments to the requisition to ensure that the process delivers what the Entity needs. The Entity should organise capacity building for the User Departments in the area of drawing up statements of requirements	Continuous
4.	The Evaluation Committee should ensure that during an evaluation, no amendments or addition to the evaluation criteria stated in the bidding document are made as stipulated under Regulation 7 (2) of the PPDA (Evaluation) Regulations, 2014.	Continuous
5.	The Procurement and Disposal Unit should monitor the validity of bids to ensure that at contract signing, the bids are still valid.	Continuous
6.	The Accounting Officer should ensure that where performance security is a requirement in the contract, submission of this is enforced.	Continuous
7.	Contract Managers should ensure that contract supervision is effectively carried out to ensure that terms and conditions of the contract (such as delivery timelines) are met as required under Regulation 53 (1) a & b of the PPDA (Contracts) Regulations, 2014.	Continuous

Appendix 1: Summary of case by case

HIGH RISK PROCUREMENTS

No	Subject of procurement	Reasons for Medium risk rating
1.	Procurement of oximeters, oxygen cylinders, cylinder spanners under COVID_19	<ul style="list-style-type: none"> No performance security submitted by the supplier. Contract was signed based on an expired bid. No record of delivery
2.	Procurement of 20,000 Ustars cartridges for testing at Entebbe International Airport	<ul style="list-style-type: none"> Contract signed based on expired bid.
3.	Procurement of a 30 seater coaster for COVID-19 testing laboratory at Entebbe International Airport	<ul style="list-style-type: none"> Performance security not provided by Supplier. Contract signed based on expired bid validity.

MEDIUM RISK PROCUREMENTS

No	Subject of procurement	Reasons for Medium risk rating
1.	Procurement of biosafety cabinets for COVID-19 laboratory at Entebbe International Airport	<ul style="list-style-type: none"> Performance security not enforced by the Entity. No record of payment seen.
2.	Procurement of aprons for VHTs under COVID-19	<ul style="list-style-type: none"> Performance security not enforced by the Entity Delayed contract implementation
3.	Construction of staff houses in Nakapiripirit, Amudat, and Moroto district	<ul style="list-style-type: none"> Evaluation criteria not fully adhered to. Failure to communicate correction of arithmetic errors. Delayed contract implementation
4.	Procurement of uniforms and PPEs	<ul style="list-style-type: none"> Delayed processes Evaluation criteria not fully adhered to.
5.	Consultancy services to produce audio/visual properties on communicable diseases	<ul style="list-style-type: none"> Short bidding period. Delayed processes. Long evaluation process
6.	Supply of branded black back pack bags for VHT kit for all VHTs	<ul style="list-style-type: none"> Performance security not proved by the supplier. No contract management plan. No record of distribution of the bags to the end users.
7.	Procurement of T-shirts for VHTs	<ul style="list-style-type: none"> Delayed process. Variation between planned amount and actual amount. Delayed payment.

LOW RISK PROCUREMENTS

No	Subject of procurement	Reasons for Low risk rating
1.	Procurement of 18 PSA medical gases plant	<ul style="list-style-type: none"> Delayed contract implementation.
2.	Maintenance and service contracts for non-Philips imaging equipment	<ul style="list-style-type: none"> No contract management records availed
3.	Supply and delivery of disinfecting chemical for Kigezi and Lango sub-regions	<ul style="list-style-type: none"> No record of payment. Delayed contract implementation

No	Subject of procurement	Reasons for Low risk rating
4.	Procurement of air conditioners and electrical rooms	<ul style="list-style-type: none"> • Evaluation criteria not fully adhered to. • No record of payment
5.	Procurement of patient beds and mattresses	<ul style="list-style-type: none"> • No record of distribution to the end-users.
6.	Procurement of oximeters, oxygen cylinders, cylinder spanners under COVID-19	<ul style="list-style-type: none"> • Performance security not proved by the supplier
7.	Consultancy services for the development of the EIDSR interface for an integrated data collection and reporting system	<ul style="list-style-type: none"> • No record of training undertaken for the Ministry staff as required under the contract.
8.	Procurement of spare parts for Kayunga Hospital	<ul style="list-style-type: none"> • Delayed process.
9.	Procurement of oxygen cylinders and regulators	<ul style="list-style-type: none"> • There was no evidence of delivery of these to the intended beneficiaries

SATISFACTORY CASES

Provision of a fleet management system for tracking motor vehicles
Procurement of furniture for records office and curtains
Disposal process for FY 21/22
Supply and delivery of two station wagons

Appendix 2: Sample List for Audit for FY 2021/2022

NO.	PROCUREMENT REFERENCE NO.	SUBJECT OF PROCUREMENT	METHOD OF PROCUREMENT	PROVIDER	AMOUNT (UGX)
1.	MOH/SUPLS/21-22/00006	PROCUREMENT OF OXYGEN CYLINDERS AND REGULATORS	DIRECT PROCUREMENT	GLOBAL GASSES	5,035,138,750
2.	MOH/SUPLS/20-21/00038	PROCUREMENT OF OXIMETERS, GUMBOOTS AND MEDICINE BOXES	DIRECT PROCUREMENT	VVSAOL INVESTMENT LIMITED	12,952,000,000
3.	MOH/SUPLS/21-22/00021	PROCUREMENT OF 18 PSA MEDICAL GASES PLANT	RESTRICTED BIDDING	GLOBAL GASES GROUP FZE	67,078,383,240
4.	MOH/SUPLS/21-22/00123	PROCUREMENT OF BIOSAFETY CABINETS FOR COVID-19 LABORATORY AT ENTEBBE AIRPORT	RESTRICTED BIDDING	PALIN CORPORATION	570,779,162
5.	MOH/SUPLS/21-22/00130	PROCUREMENT OF APRONS FOR VHTS UNDER COVID-19	RESTRICTED BIDDING	RWAMS (U) LTD	1,583,276,800
6.	MOH/WRKS/21-22/00010	CONSTRUCTION OF STAFF HOUSES IN NAKAPIRIPIT, AMUDAT AND MOROTO DISTRICT UNDER KARAMOJA SRAFF HOUSES PROJECT	OPEN DOMESTIC BIDDING	BULMARK ASSOCIATES LTD	3,257,074,601
7.	MOH/SUPLS/21-22/00158	SUPPLY AND DELIVERY OF LARVICIDING CHEMICALS FOR KIGEZI AND LANGO SUB-REGION	DIRECT PROCUREMENT	INNOVATIVE RESEARCH AND DEVELOPMENT CORPORATION	312,950,000
8.	MOH/NCONS/21-22/00183	PROCUREMENT OF UNIFORMS AND PPES	RESTRICTED BIDDING	EVERGREEN SAFARIS LTD	540,015,000

NO.	PROCUREMENT REFERENCE NO.	SUBJECT OF PROCUREMENT	METHOD OF PROCUREMENT	PROVIDER	AMOUNT (UGX)
9.	MOH/NCONS/21-22/00050	MAINTENANCE AND SERVICE CONTRACTS FOR NON PHILIPS IMAGING EQUIPMENT	OPEN DOMESTIC BIDDING	COMPUTECH	483,688,980
10.	MOH/SUPLS/21-22/00241	SUPPLY AND DELIVERY OF TWO (2) STATION WAGONS	OPEN DOMESTIC BIDDING	CFAO MOTORS (U) LTD	1,280,441,808
11.	MOH/SUPLS/21-22/00471	PROVISION OF A FLEET MANAGEMENT SYSTEM FOR TRACKING MOTOR VEHICLES	OPEN DOMESTIC BIDDING	KESTREL (U) LTD	1,169,630,000
12.	MOH/CONS/21-22/00062	CONSULTANCY SERVICES TO PRODUCE AUDIAL VISUAL PROPERTIES ON COMMUNICABLE DISEASES	CONSULTANCY WITHOUT PUBLICATION OF EOI	FEX MEDIA LTD	100,654,000
13.	MOH/SUPLS/21-22/00271	PROCUREMENT OF AIR CONDITIONERS AND ELECTRICAL ROOMS	RESTRICTED BIDDING	VETIVAR ASSOCAITES LTD	199,732,700
14.	MOH/SUPLS/20-21/00058	SUPPLY OF BRANDED BLACK BACK PACK BAGS FOR VHT KIT FOR ALL VHTS IN THE COUNTRY TO HANDLE COVID-19 SECOND WAVE	RESTRICTED BIDDING	WAN AND ONE LTD	2,307,760,000
15.	MOH/SUPLS/20-21/00016	PROCUREMENT OF PATIENT BEDS AND MATTRESSES	RESTRICTED BIDDING	JOINT MEDICAL STORES	5,999,724,000
16.	MOH/SUPLS/20-21/00060	PROCUREMENT OF T-SHIRTS FOR VHTS	RESTRICTED BIDDING	SOUTHERN RANGE NYANZA LTD	710,000,000
17.	MOH/SUPLS/20-21/00148	PROCUREMENT OF 20,000 CARTRIDGES FOR TESTING AT ENTEBBE AIRPORT	DIRECT PROCUREMENT	USTAR TECHNOLOGIES (U) LTD	1,421,028,000

NO.	PROCUREMENT REFERENCE NO.	SUBJECT OF PROCUREMENT	METHOD OF PROCUREMENT	PROVIDER	AMOUNT (UGX)
18.	MOH/SUPLS/20-21/00039	PROCUREMENT OF OXIMETERS, OXYGEN CYLINDERS, KEYSBAND OXYGEN CYLINDER SPANNERS UNDER COVID-19	RESTRICTED BIDDING	BESSEL TRANDING COMPANY LTD	1,919,580,000
19.	MOH/SUPLS/20-21/00125	PROCUREMENT OF A 30 SEATER COASTER FOR COVID-19 TESTING LABORATORY AT ENTEBBE INTERNATIONAL AIRPORT	DIRECT PROCUREMENT	METU ZHONGTONG BUS CO. LTD	252,000,000
20.	MOH/NCONS/20-21/00274	CONSULTANCY SERVICES FOR THE DEVELOPMENT OF THE E-IDSR INTERFACE FOR AN INTEGRATED DATA COLLECTION AND REPORTING SYSTEMS FOR COVID-19	SHORTLIST WITHOUT EOI	HAELTH INFORMATION SYSTEMS PROGRAM (HISP)	58,536,202
21.	MOH/SUPLS/21-22/00238	PROCUREMENT OF SPARE PARTS FOR KAYUNGA HOSPITAL	RESTRICTED BIDDING	POSH SUPPLIES LTD	118,000,000
22.	MOH/SUPLS/21-22/00260	PROCUREMENT OF FURNITURE FOR RECORDS OFFICE AND CURTAINS	RESTRICTED BIDDING	FOOTSTEPS FURNITURE LTD	179,832,000
23.	DISPOSAL OF ASSETS				

Appendix 3: Risk Rating Criteria

RISK	DESCRIPTION	AREA	IMPLICATION
HIGH	Such procurements were considered to have serious weaknesses, which could cause material financial loss or carry risk for the regulatory system or the entity's reputation. Such cases warrant immediate attention by senior management. Significant deviations from established policies and principles and/or generally accepted industry standards will normally be rated "high".	Planning: Lack of or failure to procure within the approved plan	This implies emergencies and use of the direct procurement method which affects competition and value for money.
		Bidding Process: Use of wrong/inappropriate procurement methods, failure to seek Contracts Committee approvals and usurping the powers of the PDU.	This implies use of less competitive methods which affects transparency, accountability and value for money.
		Evaluation: Use of inappropriate evaluation methodologies or failure to conduct evaluation.	This implies financial loss caused by awarding contracts at higher prices or shoddy work caused by failure to recommend award to a responsive bidder.
		Record Keeping: Missing procurement files and missing key records on the files namely; solicitation document, submitted bids, evaluation report and contract.	This implies that one cannot ascertain the audit trail namely; whether there was competition and fairness in the procurement process.
		Fraud/forgery: Falsification of Documents	This implies lack of transparency and value for money.
		Contract Management: Payment for shoddy work or work not delivered.	This implies financial loss since there has been no value for money for the funds spent and the services have not been received by the intended beneficiaries.
MEDIUM	Procurements that were considered to have weaknesses which, although less likely to lead to material financial loss or to risk damaging the regulatory system or the entity's reputation, warrant timely management action using the existing management	Planning: Lack of initiation of procurements and confirmation of funds.	This implies committing the Entity without funds thereby causing domestic arrears.
		Bidding Process: Deviations from standard procedures namely bidding periods, standard formats, use of PP Forms and records of issue and receipts of bids, usage of non-qualified bidders and splitting procurement requirements.	This implies lack of efficiency, standardisation and avoiding competition.

RISK	DESCRIPTION	AREA	IMPLICATION
	<p>framework to ensure a formal and effective system of management controls is put in place. Such procurements would normally be graded “medium” provided that there is sufficient evidence of “hands on management control and oversight” at an appropriate level of seniority.</p>	<p>Procurement Structures: Lack of procurement structures</p> <p>Record Keeping: Missing Contracts Committee records and incomplete contract management records.</p> <p>Contract and Contract Management: Failure to appoint Contract Supervisors, failure to seek the Solicitor General’s approval for contracts above UGX. 200 million and lack of notices of Best Evaluated Bidders.</p>	<p>This implies lack of independence of functions and powers and interference in the procurement process.</p> <p>This implies that one cannot ascertain the audit trail namely; whether the necessary approvals were obtained in a procurement process.</p> <p>This leads to unjustified contract amendment and variations which lead to unjustified delayed contract completion and lack of value for money. Bidders are not given the right of appeal.</p>
		<p>Failure by the Entity to incorporate in the solicitation document aspects of gender, social inclusion, environment, health and safety.</p> <p>Aspects of gender, social inclusion, environment, health and safety not covered by the contractor during contract implementation.</p>	
LOW	<p>Procurements with weaknesses where resolution within the normal management framework is considered desirable to improve efficiency or to ensure that the business matches current market best practice. Deviations from laid down detailed procedures would normally be graded “low” provided that there is sufficient</p>	<p>Planning: Lack of procurement reference numbers.</p>	<p>This leads to failure to track the procurements which leads to poor record keeping.</p>
		<p>Bidding Process: Not signing the Ethical Code of Conduct</p>	<p>This leads to failure to declare conflict of interest and lack of transparency.</p>

RISK	DESCRIPTION	AREA	IMPLICATION
	evidence of management action to put in place and monitor compliance with detailed procedures.		

SATISFACTORY

Relates to following laid down procurement procedures and guidelines and no significant deviation is identified during the conduct of the procurement process based on the records available at the time.