PUBLIC PROCUREMENT AND DISPOSAL
OF PUBLIC ASSETS AUTHORITY
"Regulating for Results"

REPORT ON COMPLIANCE INSPECTION OF ABIM DISTRICT LOCAL GOVERNMENT FOR FINANCIAL YEAR 2024/25

JUNE 2026

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ACRONYMS

AO	Accounting Officer
BOQs	Bills of quantities
CC	Contracts Committee
FY	Financial Year
LPO	Local Purchase Order
LTD	Limited
PDE	Procuring and Disposing Entity
PDU	Procurement and Disposal Unit
PPDA	Public Procurement and Disposal of Public Assets Authority
UGX	Uganda Shillings

EXECUTIVE SUMMARY

The Public Procurement and Disposal of Public Assets Authority conducted a compliance inspection of Abim District Local Government, covering a representative sample of ten procurement transactions worth UGX 8,729,329,280 for the Financial Year 2024/25.

The overall objective of the compliance inspection was to assess and establish the degree of compliance of Abim District Local Government's procurement and disposal system and processes with the provisions of the PPDA Act, Cap. 205 and the attendant PPDA Regulations, and to assess the level of procurement and disposal performance over the inspection period.

The procurement and disposal activities of Abim District Local Government for the Financial Year 2024/2025 were carried out with a moderate level of compliance with the provisions of the PPDA Act, Cap. 205, and the attendant Regulations. While the Entity maintained the requisite procurement structures and implemented most planned procurement activities, notable weaknesses were observed in records management, implementation of previous audit recommendations, initiation of procurement requirements, bid receipt and opening procedures, adherence to procurement timelines and disposal planning.

Consequently, Abim District Local Government's performance for the Financial Year 2024/2025 was assessed as **Moderately Satisfactory**, with an overall weighted average risk rating of **48%**, as detailed in Chapter 3 of this report.

The following key exceptions were noted:

1. Section 44(1) of the PPDA Act, Cap. 205 states that "*A procuring and disposing entity shall maintain records on its procurement and disposal proceedings for a period of seven years*." The Inspection revealed that the Procurement and Disposal Unit lacked a proper storage room for the bids received and the procurement action files. The files and bids were piled on the floor in the PDU Office, exposing them to risks such as moisture, dust, pest damage, misplacement, and difficulty retrieving them. Poor storage exposes documents to physical damage, loss, and deterioration; increases the risk of unauthorised access; undermines the principles of confidentiality and accountability by allowing sensitive information to be compromised; and weakens proper record management controls.

2. Section 10 of the PPDA Act, Cap. 205 requires Procuring and Disposing Entities to act on the Authority's recommendations. The entity received its previous Inspection report for the Financial Year 2023/2024 in May 2025. Of 14 recommendations, seven (50%) were fully implemented, five (36%) were partially implemented, and two (14%) were not implemented. Failure to fully implement Inspection recommendations indicates a lack of commitment to improving the performance of the procurement and disposal function and signals a weak implementation mechanism by the Entity.

3. Section 51 of the PPDA Act, Cap. 205 states that "All *procurement and disposal shall be conducted in a manner which promotes economy, efficiency, and value for money*." Furthermore, Section 129 (1) (f) of the PPDA Act, Cap. 205, states that "a person who delays the opening of bids, the evaluation of bids, or making an award decision contrary to the requirements of the Act, commits an offense." The Authority observed an average delay of five months across three procurements worth UGX 604,341,480, at various stages

of the procurement process. These delays create lengthy lead times, which in turn impede timely service delivery to the intended beneficiaries.

4. Regulation 2(1) of the PPDA (Disposal of Public Assets) Regulations, 2023 requires the Accounting Officer, in each financial year, to review the public assets of a Procuring and Disposing Entity and identify those to be disposed of in the subsequent financial year. However, the Authority was not furnished with a Disposal Plan for the financial year 2024/2025. As a result, no disposal activities were undertaken during the financial year. Failure to dispose of obsolete assets inhibits the achievement of value for money, as funds are tied up in assets and are also lost through further depreciation.

5. Regulation 50 (1) of the PPDA (Contracts) Regulations, 2023 states that "*The Accounting Officer shall appoint a person from the user department to be the contract manager.*" Regulation 50 (3) of the same Regulations requires the contract manager to prepare a contract management plan using Form 49. Regulation 52 of the PPDA (Contracts) Regulations, 2023 requires the contract manager to manage the obligations and duties of the procuring and disposing entity specified in the contract. Furthermore, Regulation 36 (1) of the PPDA (Contracts) Regulations, 2023 requires a procuring and disposing entity to ensure that all procurement requirements for works are adequately insured from the commencement of the works to the end of the defect liability period. The Authority observed irregularities in nine procurements worth UGX 5,487,088,780 that contravene the above Regulations. The lack of contract management records hinders verification of contract performance, compromises accountability, and delays corrective action.

In light of the above findings, the Authority recommends the following;

1. The Accounting Officer should:
   i. Implement immediate corrective actions to mitigate the risks associated with poor storage of procurement documents, such as damage from moisture, dust, and pests, as well as misplacement or difficulty in retrieval, while expediting the completion of the office space and acquisition of appropriate storage facilities in accordance with Section 44 (1) of the PPDA Act, Cap. 205;

   ii. Establish an audit recommendation register and conduct quarterly monitoring to ensure the full implementation of the Authority's recommendations to improve the Entity's performance, in accordance with Section 10 (1) (a) of the PPDA Act, Cap. 205.

   iii. Develop and implement a procurement tracking mechanism to monitor and promptly address delays across all stages of the procurement process, in line with Section 51 of the PPDA Act, Cap. 205.

   iv. Dispose of obsolete assets promptly in accordance with Section 51 of the PPDA Act, Cap. 205

2. The Heads of User Departments should;
   i. For all contracts, nominate Contract Managers for appointment by the Accounting Officer in accordance with Regulation 50 (1) of the PPDA (Contracts) Regulations, 2023

ii. Task contract supervisors to prepare monthly reports on the progress of each contract, and a copy is submitted to the Accounting Officer and the Procurement and Disposal Unit for record-keeping as required under Regulation 52 (3) (g) of the PPDA (Contracts) Regulations, 2023.

Abim District Local Government should implement the recommended action plan outlined on page 24 of this report.

CHAPTER ONE: INTRODUCTION

1.1 Background

The Public Procurement and Disposal of Public Assets Authority conducted a compliance inspection of Abim District Local Government, covering a representative sample of ten procurement transactions worth UGX 8,729,329,280 for the Financial Year 2024/25. The Inspection reviewed procurement structures, procurement and asset disposal processes, and contract performance in accordance with the provisions of the Public Procurement and Disposal of Public Assets Act, Cap. 205 and the attendant PPDA Regulations.

1.2 Overall Objective

The overall objective of the inspection was to assess and determine the degree of compliance of Abim District Local Government's procurement system, process, and disposal process with the provisions of the Public Procurement and Disposal of Public Assets Act, Cap. 205, and the attendant PPDA Regulations, and to assess the level of procurement performance over the Inspection period.

The specific objectives were to:

1. Establish the Entity's level of compliance with the general provisions of the PPDA Act, Cap. 205, and the attendant PPDA Regulations regarding the performance of the procurement structures and the conduct of the procurement process;
2. Assess the extent to which the Entity's disposal process complies with the provisions of the PPDA Act, Cap. 205, and the PPDA (Disposal of Public Assets) Regulations 2023; and
3. Assess the efficiency and effectiveness of contract implementation, including the application of Environmental, Social, Health and Safety (ESHS) Requirements in the procurement process.

1.3 Procurement structures of the Entity

The key players in the procurement structure at Abim District Local Government include the Chief Administrative Officer (Accounting Officer), the Procurement and Disposal Unit, the Contracts Committee, and the User Departments.

Section 28 of the PPDA Act, Cap. 205 gives the Accounting Officer overall responsibility for the successful execution of procurement, disposal, and contract management within the Procuring and Disposing Entity. During the Financial Year 2024/2025, Mr. Opio Moses served as the designated Accounting Officer.

Section 29(1) of the PPDA Act, Cap. 205 states that "a Contracts Committee shall be composed of the members specified in Schedule 4 to this Act." Schedule 4 of the PPDA Act, Cap. 205 requires the Contracts Committee of a Procuring and Disposing Entity to comprise five members, namely: a chairperson, a secretary, and three other members. During the Inspection period, the Entity's Contracts Committee was not fully constituted, comprising only four members instead of the required five. However, on 26th February 2026, an additional member, Mr. Akamu Joshua, was appointed to the Committee, thereby rendering the Contracts Committee fully constituted, as illustrated in Table 1 below:

Table 1: List of Contracts Committee Members

No.	Name	Position	Date of appointment	Title
1.	Mr. Jimmy Owiny Opio	Chairperson	9th January 2024	District Commercial Officer

2.	Mr. Leo Amwona	Secretary	1st February 2024	Senior Agricultural Officer
3.	Ms. Jane Amaro Diroks	Member	14th August 2025	Community Development Officer
4.	Dr. Tino Salome Okongor	Member	14th August 2023	District Health Officer
5.	Mr. Akamu Joshua	Member	26th February 2026	Senior Assistant Secretary

Section 28(1)(c) of the PPDA Act, Cap. 205 mandates that the Accounting Officer establish and maintain an adequately staffed Procurement and Disposal Unit. During the year under review, the Entity's Procurement and Disposal Unit was fully staffed with two members. The staff of the Procurement and Disposal Unit is shown in Table 2 below:

Table 2: Staffing of the Procurement and Disposal Unit

No.	Name	Job Title	Academic Qualification
1.	Ms. Adong Mary Christine	Senior Procurement Officer	Bachelor's in Procurement and Logistics Management.
2.	Mr. Oryem Moses Geofrey	Procurement Officer	Bachelor's in Procurement and Logistics Management.

1.4 Inspection Scope

The Inspection involved a sample-based review of the procurement and disposal processes, general compliance issues, and contract implementation. The Inspection covered a representative sample of ten procurement transactions worth UGX 8,729,329,280 for the Financial Year 2024/25. The sample was selected using stratified random sampling, based on Contracts Committee minutes and monthly procurement and disposal reports. The list of sampled transactions is contained in Annex 1. Table 3 below details the distribution of the transaction population and the sample.

Table 3: Analysis of the population and sample selected for the Inspection of FY2024/25.

Procurement method	Popn Value (UGX)	Sample Value (UGX)	% Value	Popn no	Sample no	% no
Open Bidding	7,899,565,637	7,899,565,637	100	5	5	100
Framework	1,667,442,229	361,559,913	22	54	2	04
Request for Quotations	1,416,628,019	468,203,730	33	31	3	10
Total	**10,983,635,885**	**8,729,329,280**	**79**	**90**	**10**	**11**

1.5 Methodology

An entry meeting was held on 17th November 2025. The Authority examined records and documents for each sampled procurement transaction and/or disposal and gathered relevant evidence to form inspection conclusions. This included reviewing the Entity's procurement and disposal planning, initiation, bidding, evaluation, contract placement, and related processes. At the end of the document review, a physical verification was conducted to assess the level of contractual delivery and fit for purpose.

During the inspection, the Authority conducted interviews with staff from the Procurement and Disposal Unit and the User Departments to gather crucial qualitative information on the internal control systems and processes in place.

A debrief meeting to discuss the preliminary findings was held with the Entity's management and staff on **21st November 2025**. The Authority prepared the management letter and sent it to the Entity on **30th April 2026**, requesting a management response by **5th May 2026**. The response was submitted on **22nd May 2026.**

After data collection and before writing the report, the Regional Manager reviewed the working papers for completeness. The working papers include a detailed chronology of findings for each sampled transaction. The Inspection report presents the key findings and conclusions.

CHAPTER TWO: KEY FINDINGS AND RECOMMENDATIONS

2.1 COMPLIANCE BY THE ENTITY WITH THE GENERAL PROVISIONS OF THE PPDA ACT, CAP. 205, AND THE PPDA REGULATIONS, 2023, WITH REGARD TO THE PERFORMANCE OF THE PROCUREMENT STRUCTURES AND CONDUCT OF PROCUREMENT AND DISPOSAL PROCESSES

2.1.1 Poor storage of procurement records

Section 44 (1) of the PPDA Act, Cap. 205 states that "*A procuring and disposing entity shall maintain records on its procurement and disposal proceedings for a period of seven years.*"
The Inspection revealed that the Procurement and Disposal Unit lacked a proper storage room for the bids received and the procurement action files. The files and bids were stacked on the floor in the PDU Office, exposing them to risks of damage from moisture, dust, and pests, as well as misplacement or difficulty in retrieval. Table 3 below shows the condition of the documents during the Inspection:

Figure 1: Evidence of poor storage of procurement records at the Procurement and Disposal Unit.

Pictured above are Procurement records (bids and procurement action files) stacked on the PDU office floor and on the tables

Implication

Poor document storage exposes documents to physical damage, loss, and deterioration, and increases the risk of unauthorised access. This undermines the principles of confidentiality and accountability, as sensitive information may be compromised and proper record-keeping controls weakened.

Management response

The Inspection observation is noted. Management has committed to allocating adequate space for both office and storage in the Health Department Block, due for completion.

Authority's comment

The Authority noted the Entity's response; however, the measures cited are still underway and do not adequately address the immediate risks associated with improper storage of procurement records, particularly the risks of loss, damage, and unauthorized access. The Entity is therefore advised to expedite the procurement and installation of filing cabinets to ensure secure storage, protection, and restricted access to records until the new office facilities are completed.

Recommendation
The Accounting Officer should implement immediate corrective actions to mitigate risks associated with poor storage of procurement documents, including damage from moisture, dust, and pests, as well as misplacement or difficulty retrieving them.

2.1.2 Failure to fully implement 50% of the previous Inspection recommendations

Section 10 of the PPDA Act, Cap. 205 requires Procuring and Disposing Entities to act on the Authority's recommendations. Abim District Local Government received its previous Inspection report for the Financial Year 2023/2024 in May 2025. Of the 14 recommendations, seven (50%) were fully implemented, five (36%) were partially implemented, and two (14%) were not implemented, as detailed in Table 4 below:

Table 4: Implementation of Previous Inspection Recommendations

No.	Recommendation	Status
1.	The Accounting Officer should:	
	i. Ensure that the Procurement and Disposal unit is adequately facilitated with sufficient space and filing cabinets to properly execute its function in accordance with Section 33 (o) of the PPDA Act, Cap. 205;	Not implemented
	Management response *The observation is noted. Management has committed to allocating adequate space for both office and storage in the Health Department Block, due for completion* **Authority's comment** The Authority noted the Entity's response; however, the measures cited are still in progress and do not adequately address the immediate risks associated with improper storage of procurement records, particularly the risks of loss, damage, and unauthorised access. The Entity is therefore advised to expedite the procurement and installation of filing cabinets to ensure secure storage, protection, and restricted access to records until the new office facilities are completed.	
	ii. Ensure that the Internal Inspection Unit carries out comprehensive periodic reviews of the procurement and disposal processes and system right from planning to contract management as opposed to only verification of supplies and works before payment in accordance with Regulation 27 of the PPDA (Procuring and Disposing Entities) Regulations 2023;	Partially implemented
	Management response *Quarterly internal Inspection exercises and reports now include procurement performance as a functional area within supplies and works before payment, in accordance with Regulation 27 of the PPDA (Procuring and Disposing Entities) Regulations 2023. Evidence of internal Inspection reports is available.* **Authority's comment** The Authority noted the entity's response; however, no documentary evidence was provided for verification.	
	iii. Come up with a strong mechanism and strategy that will ensure that all Inspection recommendations are regularly monitored and implemented in accordance with Section 10 of the PPDA Act, Cap. 205, to improve the Entity's performance. This could include training, including them among key performance indicators, and discussing them in top management meetings, among others	Partially implemented
	Management response	

No.	Recommendation	Status
	Management is committed to improving performance as per the guidance from the Authority	
	ii. Along with management, regularly review the implementation of the procurement plan and update the procurement plan in accordance with Section 60 (7) of the PPDA Act, Cap. 205, to ensure improved performance	Partially implemented
	Management response *This is being accordingly implemented as evidenced by the submissions of Procurement Plan amendments to PPDA (copy of the amended procurement plan)* **Authority's comment** The Authority noted the Entity's response; however, the Entity did not adequately update its procurement plan during implementation. This is evidenced by an over-expenditure of UGX 330,975,647 relative to the approved procurement plan. The Entity is therefore advised to ensure timely review and updating of procurement plans to reflect actual procurement requirements and available funding.	
	iii. Ensure that all procurements are undertaken in a manner that enhances efficiency and economy as required by Section 51 of the PPDA Act, Cap. 205;	Partially implemented
	Management response *Noted for further improvement*	
	iv. Task the District Environmental Officer, District Community Development Officer, Contract Manager, and District Labour Officer to regularly monitor projects to ensure that contractors implement ESHS requirements in accordance with Section 66 of the PPDA Act, Cap. 205	Not implemented
	Management response *Noted for further improvement*	
	v. Task the District Agricultural Engineer to support the beneficiary farmers in coming up with an operations and maintenance plan that will ensure proper servicing and maintenance of the system for smooth functionality.	Partially Implemented
	Management response *Noted for further improvement*	

Implication
Failure to fully implement Inspection recommendations indicates a lack of commitment to improving the performance of the procurement and disposal function and signals a weak implementation mechanism within the Entity.

Recommendation
The Accounting Officer should establish an audit recommendation register and conduct quarterly monitoring to ensure the full implementation of the Authority's recommendations to improve the Entity's performance, in accordance with Section 10 (1) (a) of the PPDA Act, Cap. 205.

2.1.3 Procurement Plan Implementation
Section 60 (2) of the PPDA Act, Cap. 205 states that "*a Procuring and Disposing Entity shall plan its procurement and disposal in a rational manner.*" The Authority assessed the Entity's FY 2024/25 procurement plan and found an absorption rate of 103% and a budget overrun

of UGX 330,975,647, representing 3% of the procurement plan. Table 5 below provides details on the plan and the utilisation of funds.

Table 5: Procurement plan implementation

Analysis of procurement spend	
Total procurement plan value inclusive of VAT (UGX)	10,744,799,296
Total procurement spend value inclusive of VAT (UGX)	11,075,774,943
Procurement plan implementation rate (%)	103
Implementation variance (UGX)	(330,975,647)
Budget overrun (%)	3

Implication
The over-expenditure of UGX 330,975,647 could indicate unplanned procurement, resulting in cash flow shortages that affect other planned activities and delay payments, potentially leading to domestic arrears.

Management Response
The variances above were indeed realised due to the following reasons;

- *Ongoing UGIFT projects for the Construction of Magamaga Seed Secondary School that relate to the FY 2022-2023, whose actual balance was not captured*
- *The payment of outstanding debts to contractors. However, going forward, the entity will ensure compliance with Section 60 (7) of the PPDA Act, Cap. 205, to ensure amendments & reporting are always done*

Authority's comment
The Authority noted the Entity's response. However, the cited reasons, including outstanding balances from prior financial years and the settlement of outstanding contractor obligations, should have been adequately reflected through timely amendments and updates to the procurement plan in accordance with Section 60 (7) of the PPDA Act, Cap. 205.

Recommendations
The Accounting Officer should institute quarterly procurement plan reviews to align planned procurements with actual budget releases and revenue collection. Any significant changes should be formally approved and reflected in the updated procurement plan in accordance with Regulation 4 of the PPDA (Procurement Planning) Regulations, 2023.

2.1.4 Irregularities during initiation
Section 36(1) of the PPDA Act, Cap. 205 provides that the User Department of a Procuring and Disposing Entity is responsible for supporting the procurement and disposal process by liaising with and assisting the Procurement and Disposal Unit. The User Department must initiate procurement and disposal requirements, forward them to the Procurement and Disposal Unit, and provide the necessary technical inputs, including statements of requirements and technical specifications, to ensure that procurement needs are clearly defined and within budget.

The Authority noted the following irregularities during the initiation of five procurements worth UGX 863,550,863, including failure to provide statements of requirements at initiation, failure to complete the funds accountability section, and approval of a procurement requisition by a District Engineer without formal delegation, as indicated in Table 6 below:

Table 6: Procurements with irregularities during initiation

No	Procurement	Contract Value (UGX)	Irregularities	Management responses
1.	Construction of Kanu Piped Water Scheme Phase II	265,878,700	The Bills of Quantities (BoQs) were not attached by the User Department at the initiation stage.	*The observation is true. This was later shared with PDU before the approval by the CC and all shortlisted bidders as Per the copy attached*
2.	Design, Supply and Installation of 05 Units of Micro Scale Irrigation Equipment in Abim District	184,184,500	• BoQs were not provided at the initiation of the procurement. • There was confirmation of the availability of funds by the Accounting Officer, but the date of confirmation was not indicated.	*The BOQs are here attached as seen in the issued email to all shortlisted bidders (copy attached)*
	Authority's comment The Authority noted that although the Entity later provided the Bills of Quantities (BOQs), the concern pertains to the initiation stage of the procurement process. The Inspection established that the procurement requisition was submitted and approved by the Accounting Officer without the accompanying BOQs, as they were not attached to the requisition form. Consequently, the Procurement and Disposal Unit received an incomplete requisition, as indicated in the management response to exception 2.1.6 on page 11, and was compelled to wait for the submission of the BOQs before proceeding with the procurement process, resulting in avoidable delays.			
3.	Supply of Fuel and Lubricants	207,281,633	• The District Engineer confirmed the availability of funding on behalf of the Accounting Officer without formal delegation. • BoQs were not attached at initiation.	*This was due to capacity gap by the officer, The entity is planning to conduct trainings with HODs on procurement regulations and guidelines*
4.	Supply of 500 Three-seater desks to ten selected schools in Abim District.	100,900,030	• The funds availability section was left blank. • There were no specifications of the desks attached at initiation.	*All procurements are initiated based on confirmation of funds availability by the AO & The BOQs and drawings are attached as seen in the issued email to all shortlisted bidders (copy attached)*

No	Procurement	Contract Value (UGX)	Irregularities	Management responses
				Authority's comment No evidence was submitted for verification
5.	Supply and delivery of science equipment and chemical reagents in Abim District.	105,306,000	The funds availability section was left blank.	*All procurements are initiated based on confirmation of funds availability by the AO (Copy attached)* **Authority's comment** No evidence was submitted for verification
	TOTAL	**863,550,863**		

Implications

- The funds availability section serves as the budget tracker for any particular procurement transaction. Therefore, failure to fill out the budget tracker deprives the Accounting Officer of vital information on fund availability and prevents confirmation of the availability of funds.
- Failure to provide statement of requirements at initiation hinders the Procurement and Disposal Unit from preparing bidding documents on time, thereby causing delays in the procurement process.

Recommendations

1. The Heads of User Departments should always attach statement of requirements at the initiation of their Procurements in accordance with Section 36 (1) (c) of the PPDA Act, Cap. 205
2. The Accounting Officer should require the Head of Finance to always indicate the amount of funds available at the initiation of the budget allocation before the Accounting Officer confirms funding.

2.1.5 Irregularities in the receipt and opening of bids

Regulation 69 (6) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023 states that "*The closure of the process of submission of bids shall be managed by at least one member of the Procurement and Disposal Unit and shall be witnessed by a member of the Contracts Committee or a member of the User Department nominated by the User Department.*"

The Inspection found that in two procurements worth UGX 366,778,730, the records of bid receipt and bid opening were signed only by a representative of the Procurement and Disposal Unit, with no representation from the Contracts Committee or the User Departments. These procurements are summarised in Table 7 below:

Table 7: Procurements with irregular receipt and opening of bids

No	Subject of procurement	Contract value (UGX)	Inspection findings
1.	Construction of Kanu Piped Water Scheme Phase II	265,878,700	The bid opening was witnessed by one member, Mr. Moses

			Geofrey, from the Procurement and Disposal Unit.
2.	Supply of 500 Three-seater desks to ten selected schools in Abim District.	100,900,030	The receipt of bids was not witnessed by a member of the Contracts Committee or the user department.
	TOTAL	**366,778,730**	

Implication
Failure to witness bid receipt and opening is an indicator of lack of transparency and could lead to tampering with bids.

Management Response
Management has noted the gaps for further improvement

Recommendation
The Head of the Procurement and Disposal Unit should coordinate with the members of the Contracts Committee and the User Department to ensure that a designated representative is present to witness the bid receipt and opening in accordance with Regulation 69 (6) of the PPDA (Rules and Methods for Procurement of Supplies, Works, and Non-Consultancy Services) Regulations, 2023.

2.1.6 Delays in the procurement process
Section 51 of the PPDA Act, Cap. 205 provides that "*All procurement and disposal shall be conducted in a manner which promotes economy, efficiency, and value for money.*"
Furthermore, Section 129 (1) (f) of the PPDA Act, Cap. 205 states that *"a person who delays the opening of bids, the evaluation of bids, or making an award decision contrary to the requirements of the Act, commits an offense."*

The Authority observed an average delay of five months in three procurements worth UGX 604,341,480 across different stages of the procurement process, as shown in Table 8 below:

Table 8: Delays in the procurement process

No	Subject of Procurement	Contract Amount (UGX)	Inspection finding
1.	Construction of Kanu Piped Water Scheme Phase II	265,878,700	• There was a delay in confirmation of funds available by the Accounting Officer. Initiation was on 24th July 2024 whereas confirmation of funds by the Accounting Officer was on 9th August 2024 implying a delay of **13 working days.** • There was a delay in approval of the Procurement Method and appointment of the Evaluation committee members. Confirmation of the funds available by the Accounting Officer was on 9th August 2024 whereas the approval of the method and Evaluation committee members by Contracts Committee was on 10th February

<table>
<tr><th>No</th><th>Subject of Procurement</th><th>Contract Amount (UGX)</th><th>Inspection finding</th></tr>
<tr><td></td><td></td><td></td><td>2025 implying a delay of five months.</td></tr>
<tr><td colspan="4">Management response
The delay was due to incomplete submission by the user department to PDU as the BoQs were provided later hence the start of the procurement</td></tr>
<tr><td>2.</td><td>Design, Supply and Installations of 05 Units of Micro Scale Irrigation Equipment in Abim District</td><td>184,184,500</td><td>There was delay in approval of the method and Evaluation Committee members. Confirmation of funding by the Accounting Officer was on 8th August 2024 while Contracts Committee decisions were on 8th April 2025 implying a delay of nine months</td></tr>
<tr><td colspan="4">Management response
The delay was due to an incomplete submission by the user department to PDU. The guidelines provide for approval of such a beneficiary list by the District Technical Planning Committee. No BoQs or designs were attached.

Authority's comment
The Authority noted the Entity's response; however, there was no evidence provided to support the management response such as the notification of the User department on incomplete submissions</td></tr>
<tr><td>3.</td><td>Supply of road construction materials and other consumables</td><td>154,278,280</td><td>Delayed evaluation: Bids were opened on 6th June 2024, but the evaluation was concluded on 2nd August 2024. The process took 20 working days instead of the required 10 working days, contrary to Regulation 4(1)(a) of the PPDA (Evaluation) Regulations, 2023, which mandates that evaluation for supplies or non-consultancy services be completed within ten working days from the date of bid opening.</td></tr>
<tr><td colspan="4">Management response
The delay was due to the busy schedules of the technical officers required for the bid evaluation. However, going forward, there will be adherence to the timelines stipulated in the regulations.</td></tr>
<tr><td></td><td>TOTAL</td><td>604,341,480</td><td></td></tr>
</table>

Implication

Delays in the procurement process create lengthy lead times, which in turn impede timely service delivery to the intended beneficiaries.

Recommendation

1. The Accounting Officer should approve only purchase requisitions that include a statement of requirements

2. The Heads of User Departments should prepare and submit statement of requirements together with the purchase requisitions for the timely and effective commencement of procurement activities

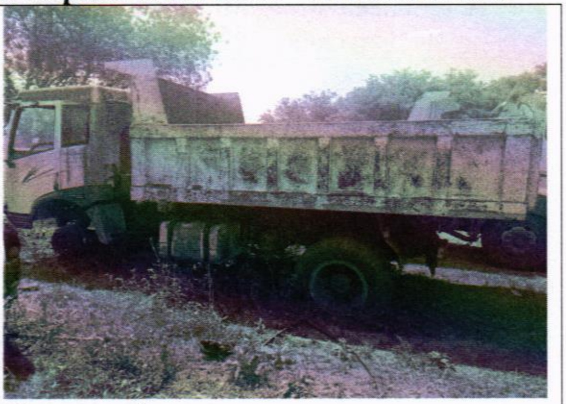
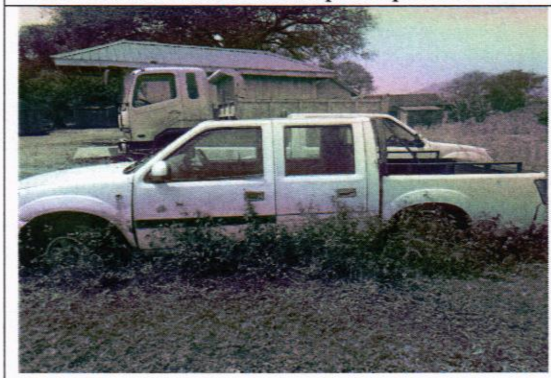
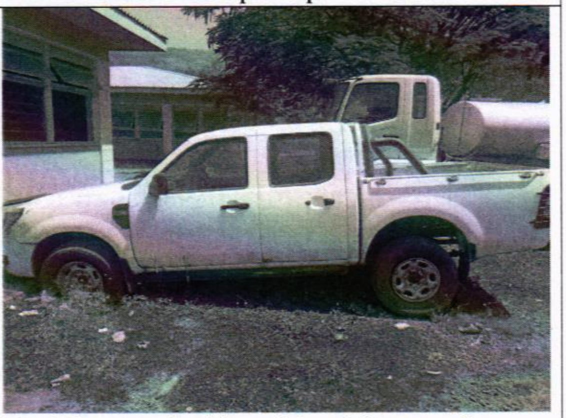
3. The Head, Procurement and Disposal Unit, should;
   i. Develop and implement a procurement tracking mechanism to monitor and promptly address delays across all stages of the procurement process, in line with Section 51 of the PPDA Act, Cap. 205.
   ii. Strengthen procurement evaluation planning by instituting clear schedules and ensuring the timely appointment and readiness of evaluation committees to prevent avoidable delays in the procurement cycle. The Entity should also adopt appropriate digital platforms to facilitate virtual evaluation meetings where physical sessions are constrained, to ensure timely and efficient completion of evaluation activities

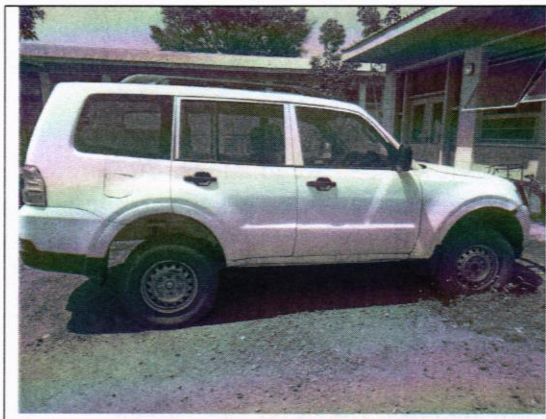
2.2 COMPLIANCE OF THE ENTITY'S DISPOSAL PROCESS WITH THE PROVISIONS OF THE PPDA ACT, CAP. 205 AND PPDA REGULATIONS, 2023

2.2.1 Failure to dispose of obsolete assets

Regulation 2 (1) of the PPDA (Disposal of Public Assets) Regulations, 2023 requires the Accounting Officer, in each financial year, to undertake a review of the public assets of a Procuring and Disposing Entity and identify those to be disposed of in the subsequent Financial Year. However, the Authority was not furnished with a Disposal Plan for the Financial Year 2024/2025. As a result, no disposal activities were undertaken during the Financial Year.
The images in Table 9 below illustrate some of the Entity's assets that were not disposed of:

Table 9: Pictures of some of the assets due for disposal taken on 19th November 2025

 Mitsubishi Double-cabin pickup truck	 Tipper truck
 Double-cabin pickup truck	 JMC Double-cabin pickup
 A grounded and non-functional Suzuki ambulance parked idle with flat tyres	 Ford Ranger double-cabin pickup truck

	
A grounded white Mitsubishi Pajero SUV on 19th November 2025	A grounded white Toyota Hilux double-cabin pickup truck donated by UNDP

Implications

- Failure to prepare a disposal plan prevents the Entity from disposing of the obsolete assets.
- Failure to dispose of obsolete assets inhibits the achievement of value for money, as funds are tied up in assets and lost through further depreciation

Management Response

The Inspection recommendation is noted. The disposal process has been initiated through a Board of Survey Report, and a letter was sent to MoWT & MoLHUD requesting a Government Valuer. Copies of the responses appointing the valuers to determine the reserve prices for disposal are attached for Inspection verification.

Authority's comment

The Authority noted the Entity's response; however, the reported actions remain at a preliminary stage. The disposal process should have been completed by June 2025, in accordance with the approved timelines. The Entity is therefore advised to expedite completion of the disposal process without further delay.

Recommendation

The Accounting Officer should promptly dispose of obsolete assets in accordance with Section 51 of the PPDA Act, Cap.205.

2.3 EFFICIENCY AND EFFECTIVENESS IN CONTRACT IMPLEMENTATION INCLUDING THE APPLICATION OF ENVIRONMENTAL, SOCIAL, HEALTH AND SAFETY (ESHS) REQUIREMENTS IN THE PROCUREMENT PROCESS.

2.3.1 Irregularities during contracting and contract execution

Regulation 50(1) of the PPDA (Contracts) Regulations, 2023 states that "The Accounting Officer shall appoint a person from the user department to be the contract manager." Regulation 50(3) of the same Regulations requires the contract manager to prepare a contract management plan using Form 49. Regulation 52 of the PPDA (Contracts) Regulations, 2023 requires the contract manager to manage the obligations and duties of the procuring and disposing entity specified in the contract. Furthermore, Regulation 36(1) of the PPDA (Contracts) Regulations, 2023 requires a procuring and disposing entity to ensure that all procurement requirements for works are adequately insured from the commencement of the works to the end of the defect liability period. The Authority observed irregularities contravening the above Regulations in nine procurements worth UGX 5,487,088,780, as shown in Table 10 below.

Table 10: Transactions with irregularities at contracting and contract management

<table>
<tr><th>No</th><th>Subject of Procurement</th><th>Contract value (UGX)</th><th>Observations</th></tr>
<tr><td>1.</td><td>Design, Supply and Installations of 05 Units of Micro Scale Irrigation Equipment in Abim District</td><td>184,184,500</td><td>• No evidence for contract with Hizmet as this was not attached on file by the Entity.
• No evidence for insurance cover for workers by Techford Contractors and Suppliers Limited as this was required in the SCC under GCC 18.1 (a).
• No evidence for submission of program of works by Techford Contractors and Suppliers Limited as this was required in the SCC under GCC 36.1.
• No evidence for "as built drawings" by Techford Contractors and Suppliers Limited as this was required in the SCC under GCC67.1.
• BOQs were not attached to the contract by the contractor as these were required.
• No evidence of insurance provided by Techford Ltd
• No contract management plan and report
• No payment records
• No evidence of completion</td></tr>
<tr><td colspan="4">Management response
The documents in query have been for retrieved for verification

Authority's comment
The Authority noted the entity's response; however, no documentary evidence was provided for verification.</td></tr>
<tr><td>2.</td><td>Supply of Fuel and Lubricants</td><td>207,281,633</td><td>• No evidence of insurance
• No contract management plan and report
• No payment records
• No evidence of completion
• The Entity issued an LPO to Makro Energy Limited at UGX 5,400 which is a higher price than the framework price of UGX 5,100 for 178 litres which caused a financial loss of UGX 53,400.</td></tr>
<tr><td colspan="4">Management response
Payment records are here availed. Notably, fuel prices keep changing however this is taken note for further improvement</td></tr>
</table>

<table>
<tr><th>No</th><th>Subject of Procurement</th><th>Contract value (UGX)</th><th>Observations</th></tr>
<tr><td colspan="4">Authority's comment
The Authority noted the entity's response; however, no documentary evidence was provided for verification.</td></tr>
<tr><td>3.</td><td>Construction of Kanu Piped Water Scheme Phase II</td><td>265,878,700</td><td>• No evidence for submission of the program of works by the contactor as this was required in the special conditions of the contract.
• "As built "drawings or operating and maintenance manuals were not provided as these were required in the Special Conditions of the Contract.
• No contract management plan and report
• No evidence for project progress reports
• No payment records
• No evidence of completion</td></tr>
<tr><td colspan="4">Management response
The construction works are carried out in phases. The other documents in query are presented here for verification

Authority's comment
The Authority noted the entity's response; however, no documentary evidence was provided for verification.</td></tr>
<tr><td>4.</td><td>Supply of 500 Three-seater desks to ten selected schools in Abim District.</td><td>100,900,030</td><td rowspan="3">• Contract management plan and report not on file.
• Payment records not on file.
• Evidence of completion not on file.
• There is no appointment of a contract manager</td></tr>
<tr><td>5.</td><td>Supply and delivery of ICT equipment in Abim District.</td><td>315,414,000</td></tr>
<tr><td>6.</td><td>Supply and delivery of science equipment and chemical reagents in Abim District.</td><td>105,306,000</td></tr>
<tr><td colspan="4">Management response
Payment records have been retrieved. Management has noted this gap for further improvement

Authority's comment
The Authority noted the entity's response; however, no documentary evidence was provided for verification.</td></tr>
<tr><td>7.</td><td>Construction of Adea Seed Secondary School in Abim District</td><td>3,325,000,000</td><td>• Failure to prepare a contract implementation plan and monthly progress reports which made it hard to ascertain the project's physical, financial and time status.</td></tr>
</table>

<table>
<tr><th>No</th><th>Subject of Procurement</th><th>Contract value (UGX)</th><th>Observations</th></tr>
<tr><td></td><td></td><td></td><td>• Inadequate payment information; only three Interim Payment Certificates were seen on file, IPC two and three were missing.
• No proof of payment and invoices</td></tr>
<tr><td colspan="4">Management response
The records of the payment documents in query have been retrieved and are here for verification

Authority's comment
The Authority noted the entity's response; however, no documentary evidence was provided for verification.</td></tr>
<tr><td>8.</td><td>Supply of road construction materials and other consumables</td><td>154,278,280</td><td>• The framework contracts for Por Megi investments and Ciakel U Ltd were signed against no agreed price lists.
• The following firms were issued with LPOs however, the Entity did not provide a breakdown of the specific items to be supplied;
- Vain Investments Ltd – UGX 34,711,680 (8 May 2025)
- Vain Investments Ltd – UGX 44,339,200 (8 May 2025)
- Por Megi Enterprises Ltd – UGX 2,272,500 (9 May 2025)
- Por Megi Enterprises Ltd – UGX 33,668,000 (9 May 2025)
- Ciakel U Ltd – UGX 2,075,000 (8 May 2025)
- Ciakel U Ltd – UGX 37,211,900 (8 May 2025)
• There was no evidence of delivery or receipt of the supplies.
• Payment records were missing.
• Failure to appoint a contract manager.
• Contract management reports missing.</td></tr>
<tr><td colspan="4">Management response
The records of the documents in query have been retrieved and are here for verification

Authority's comment
The Authority noted the entity's response; however, no documentary evidence was provided for verification.</td></tr>
<tr><td>9.</td><td>Rehabilitation of 10km of community access roads in Abim</td><td>828,845,637</td><td>• There was no proof of insurance paid by provider yet it was required as per</td></tr>
</table>

No	Subject of Procurement	Contract value (UGX)	Observations
	Subcounty, Abim District Under Batch A		attached in Special Conditions of the Contract. • There were no project supervision reports provided. • No payment records were not provided. • Advance payment guarantee was not provided.
Management response *A letter was issued to the contractor correct the defects and all the records of the documents in query have been retrieved and are here for verification* **Authority's comment** The Authority noted the entity's response; however, no documentary evidence was provided for verification.			
	TOTAL	**5,487,088,780**	

Implications

- The lack of contract management records hinders verification of contract performance, compromises accountability, and delays corrective action.
- Failure to appoint contract supervisors exposes the Entity to the risk of poor contract management, which results in failure to implement contracts in accordance with the agreed terms and conditions of the contract.

Recommendations

The Heads of User Departments should;

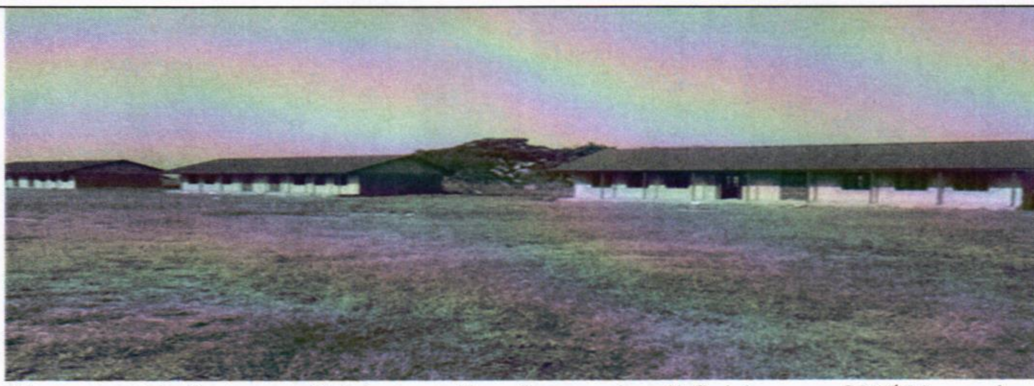
1. For all contracts, nominate Contract Managers for appointment by the Accounting Officer in accordance with Regulation 50(1) of the PPDA (Contracts) Regulations, 2023.
2. Task contract supervisors with preparing monthly reports on the progress of each contract and submit a copy to the Accounting Officer and the Procurement and Disposal Unit for record-keeping as required under Regulation 52 (3) (g) of the PPDA (Contracts) Regulations, 2023.

2.2.2 Physical verification

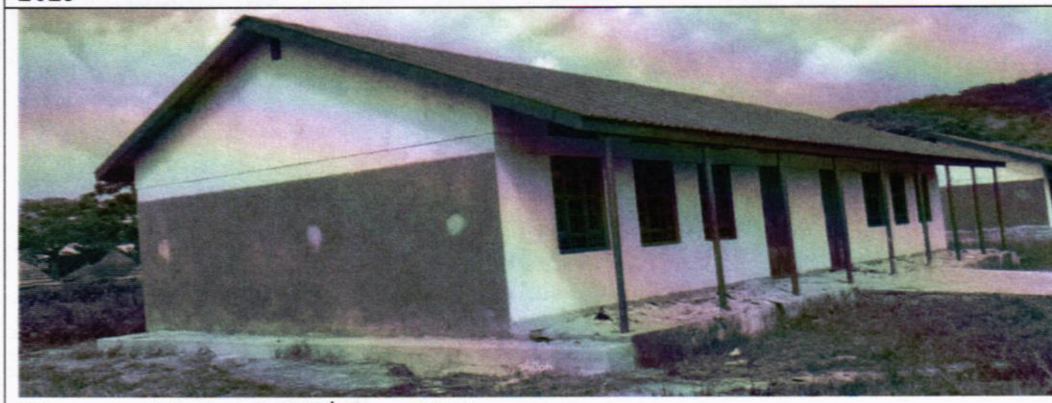
On 21st November 2025, the Authority undertook physical verification of four selected projects and identified the irregularities presented in Table 11 below for management's attention. Updated photographic evidence as of 18th June 2026 reflects the current status and progress of the respective projects.

Table 11: Issues noted during physical verification on 21st November 2025

NO	ISSUES NOTED
1.	**Subject**: Construction of Adea Seed Secondary School in Abim District **Reference Number**: ABIM501/WRKS/2024-2025/00001 **Procurement Method**: ODB **Contractor**: Visvar Investments Limited



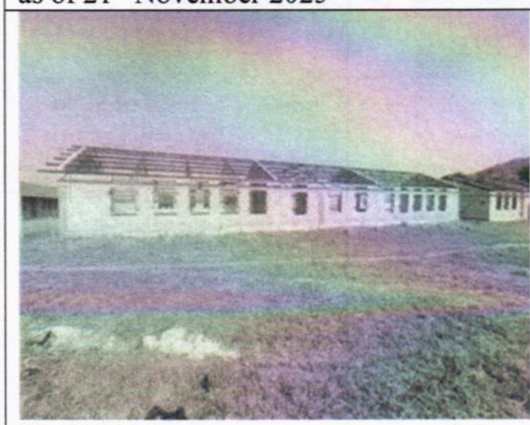
Classroom blocks are roofed, but pending floor and wall finishes as of 21st November 2025



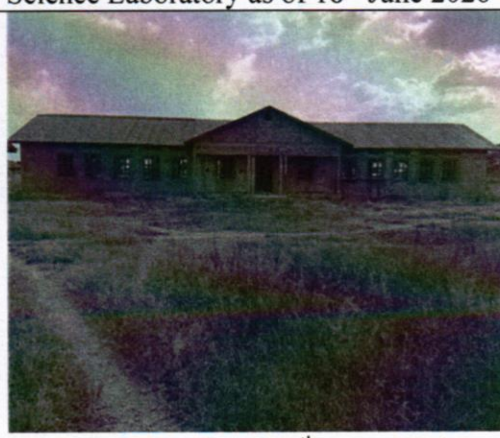
Classroom block as of 18th June 2026

The science laboratory was not yet roofed as of 21st November 2025

Science Laboratory as of 18th June 2026



The ICT laboratory was not yet roofed as of 21st November 2025



ICT Laboratory as of 18th June 2026

One of the staff toilets at the foundation level as of 21st November 2025

Staff VIP latribe as of 18th June 2026

There was no hoarding of the site as of 21st November 2025

Workers on site without personal protective gears on 21st November 2025

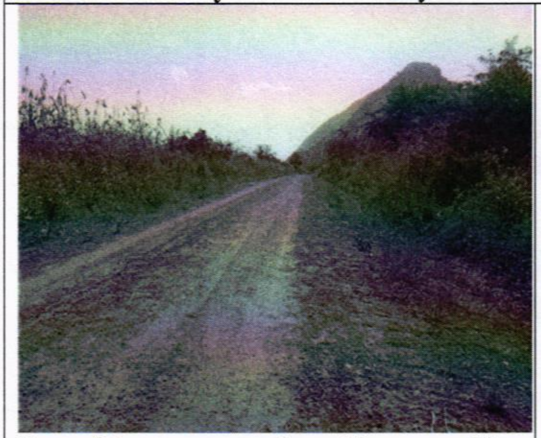
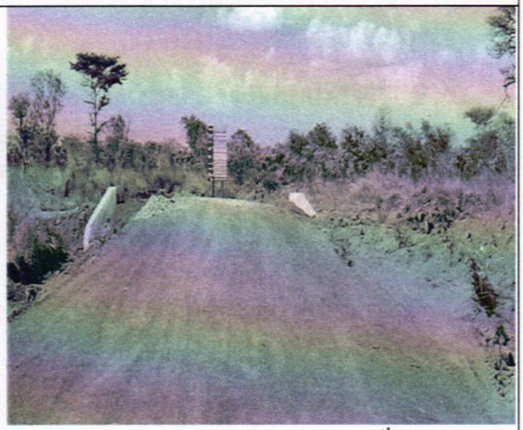
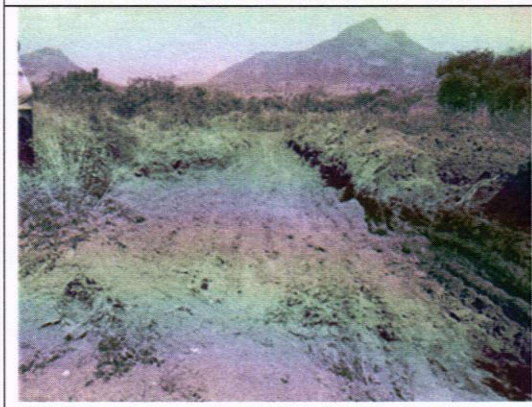
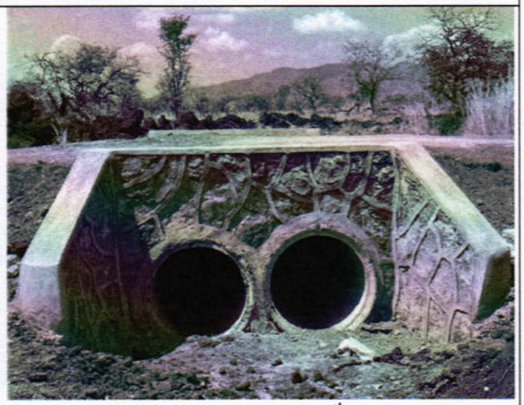
2. **Subject:** Construction of Kanu Piped Water Scheme Phase II **Method**: RFQ
Ref: Abim801/Wrks/24-25/00025 **Provider**: Rejime Contractors Ltd
Contract amount; UGX 265,878,700 **Contract date**: 14th April 2025
Intended completion date: 10th June 2025 **Start date**: 14th April 2025
Contract manager: District Water Officer
Defects Liability Period: 90 working days
The following issues were noted;

- Solar panels partly covered by the bush
- No periodic maintenance as the security and distribution houses were partly covered by the bush
- No security personnel were found on site

Solar panels are partly covered by the bush

No periodic maintenance as the security and distribution houses were partly covered by the bush

3. **Subject**: Rehabilitation of 10Km road in Abim District of Otalaber -Adwal Road
Reference Number: MOLG-NOSP/ABIM/WORKS/23-24/00032/A9
Procurement Method: ODB **Contractor**: Spike Engineering Consult Ltd
Contract value: UGX 828,845,637 **Contract date**:18th March 2025
Start date: 1st April 2025 **Contract manager**: District Engineer

<table>
<tr><td rowspan="3"></td><td colspan="2">Intended completion date: 30th November 2025
Defects Liability Period: 180 days.</td></tr>
<tr><td>
Part of the constructed road is covered by the bush as of the 21st November 2025</td><td>
Otalaber -Adwal Road as of 18th June 2026</td></tr>
<tr><td>
Drainage channels not yet completed as of 21st November 2025</td><td>
Drainage channels as of 18th June 2026</td></tr>
</table>

Implication

Incomplete or poorly managed projects impact safety, compliance, and overall success.

Management Response

Management is committed to implementing the recommendations to ensure effective project implementation and to achieve value for money.

Recommendations

1. The Contract Managers for the above projects should develop and implement corrective action plans, closely monitor contractor performance, and take timely contractual interventions to facilitate completion of the projects in accordance with Regulation 52(1) and (2) of the PPDA (Contracts) Regulations, 2023.
2. For environmental and safety issues, the Accounting Officer should task the Environmental and District Community Development Officers with ensuring compliance and regularly reporting on progress.

CHAPTER THREE: OVERVIEW OF THE PERFORMANCE OF THE ENTITY

This section will present the scores by area assessed for different inspection questions graphically.

3.1 Overall Inspection Conclusion

The performance of Abim District Local Government for the Financial Year 2024/25 was moderately satisfactory, with an overall weighted average risk rating of 48%.

3.2 Entity's Performance

The risk rating was weighted to determine the Entity's overall risk level. The weighting was derived using the average weighted index shown in Table 12 below:

Table 12: Risk score

Risk Category	No of Sampled Procurements	% No	Value (UGX)	% Value	Weights	Total weighted average	
						By No.	By Value
High	0	0	0	0	0.6	0.0	0.0
Medium	9	90	8,624,023,280	98.7	0.3	27	29.6
Low	1	10	105,306,000	1.3	0.1	1.0	0.13
Satisfactory	0	0	0	0	0.0	0.0	0.0
Total	**10**	**100**	**8,729,329,280**	**100**	**1.0**	**28**	**29.7**

Weighted Average (By no.) = $\frac{\sum \text{Weighted Score}}{60} \times 100 = \frac{28}{60} \times 100 = 46.7\%$

Weighted Average (By Value) = $\frac{\sum \text{Weighted Score}}{60} \times 100 = \frac{29.7}{60} \times 100 = 49.5\%$

The average weighted risk rating = $\frac{46.7 + 49.5}{2}$ = **48%**

Table 13: Risk rating

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

3.3 Graphical Representation of the Entity's Performance

Figure 2: Showing performance by number of contracts

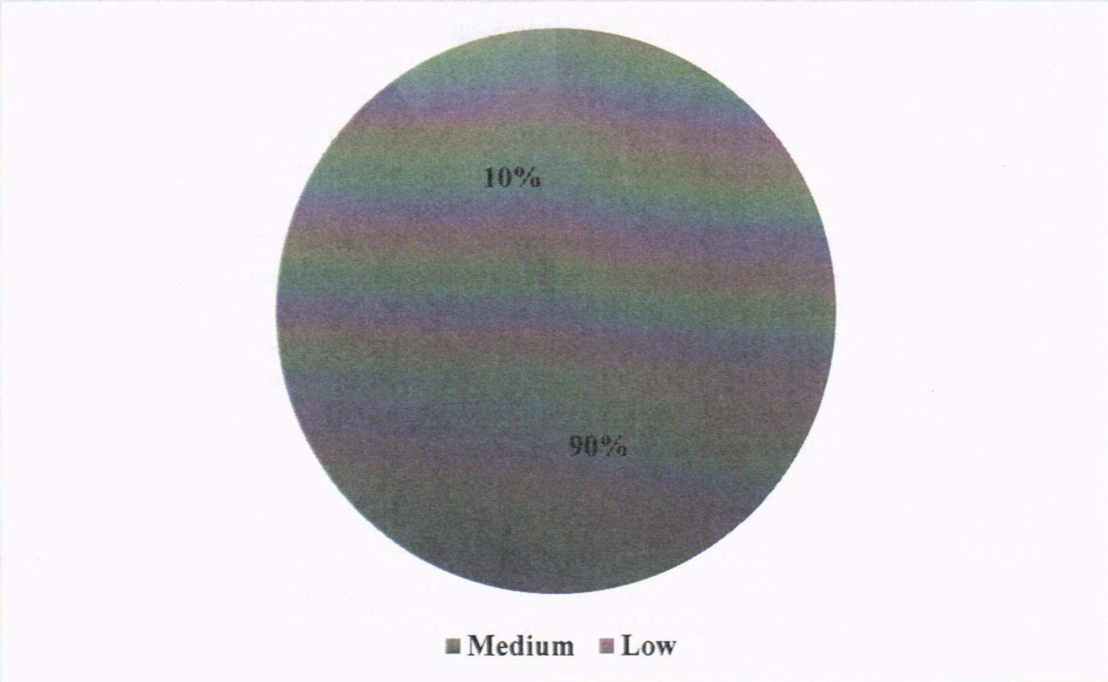
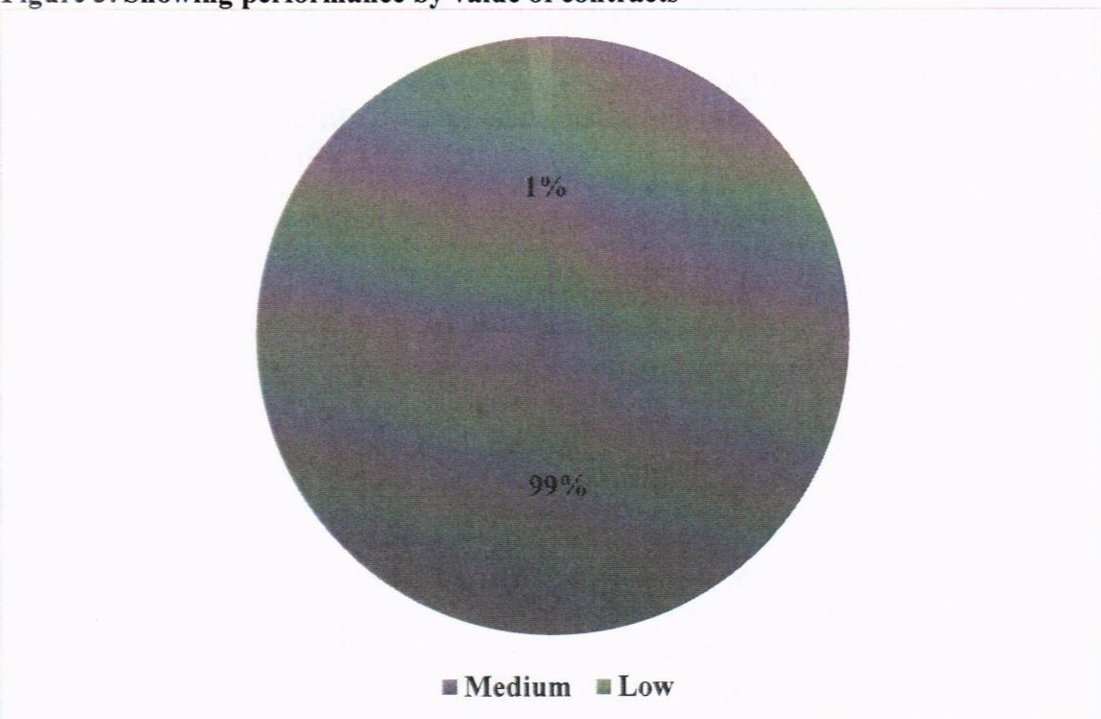


Figure 3: **Showing performance by value of contracts**



3.4 Compliance inspection conclusion

The procurement and disposal activities of Abim District Local Government for the Financial Year 2024/2025 were carried out with a moderate level of compliance with the provisions of the PPDA Act, Cap. 205, and the attendant Regulations. While the Entity maintained the requisite procurement structures and implemented most planned procurement activities, notable weaknesses were observed in records management, implementation of previous audit recommendations, initiation of procurement requirements, bid receipt and opening procedures, adherence to procurement timelines, disposal planning, and contract management.

The inspection further revealed deficiencies in contract administration and project implementation, including incomplete works, inadequate maintenance arrangements, non-compliance with environmental, social, health and safety requirements, and execution delays. These findings indicate persistent weaknesses in governance, contract administration, and supervision. If left unaddressed, they may continue to undermine service delivery, compromise value for money, and hinder the Entity's ability to achieve its mandated objectives and Government development priorities.

Overall, Abim District Local Government's performance was moderately satisfactory, with a weighted average risk rating of 48%. Management is therefore urged to strengthen procurement efficiency and contract management, and to ensure consistent compliance with the PPDA Act, Cap. 205, and the attendant Regulations to address identified gaps and improve its overall risk rating in subsequent assessments.

3.5 Recommended Action Plan

Abim District Local Government should implement the recommendations in Table 14 within the specified timeframe to improve its performance in Procurement and Disposal.

Table 14: Recommended Action Plan

Finding	Recommended action	Responsible officers	Timeline
Poor storage of procurement documents	Equip the PDU with filing cabinets and shelves	Accounting officer	Within 30 days
Failure to implement previous audit recommendations	Establish an audit recommendation register and conduct quarterly monitoring		
Delays in the procurement process	Develop and implement a procurement tracking mechanism		
Failure to dispose of obsolete assets	Dispose of obsolete assets promptly		Within 90 days
Irregularities in Contract Management	Appoint contract managers for all contracts		Immediate
	Prepare monthly reports on the progress of each contract	Contract managers	Monthly

Annex 1: ABIM DLG SAMPLE LIST AND RISK RATING PER CASE FOR FINANCIAL YEAR 2024/2025

No.	Reference Number	Subject of Procurement	Method of Procurement	Provider	Contract Amount (UGX)	RISK RATING
1.	Abim801/Wrks/2024-2025/00001	Construction of Adea Seed Sec. School	ODB	Visvar Investment Ltd	3,325,000,000	Medium
2.	MOLG-NOSP/ABIM/WORKS/2023-2024/00032/A9	Rehabilitation of a 10 km road in the Abim District of the Otalaber-Adwal Road. (The project is planned and budgeted by MOLG with Mbale DLG as an implementing Partner)	ODB	Spike Engineering Consult Ltd	828,845,637	Medium
3.	Abim801/Wrks/2024-2025/00015	Supply & Delivery of ICT Equipment, Science Equipment & Reagents to Selected Seed Secondary Schools - Lot 1 Abim District	ODB	St Mary's Computer Technologies Ltd	315,414,000	Medium
4.	Abim801/Wrks/2024-2025/00015	Supply & Delivery of ICT Equipment, Science Equipment & Reagents to Selected Seed Secondary Schools - Lot 2 Abim District	ODB	A.N Ddamulira Ltd	105,306,000	Low
5.	Abim801/Wrks/2024-2025/00025	Construction of Kanu Piped Water Scheme Phase II	RFQ	Rejime Contractors LTD	265,878,700	Medium
6.	Abim801/Supls/2024-2025/00001	Supply of Fuel and Lubricants	ODB	Bling Power Ltd and Makro Energy Limited	207,281,633	Medium
7.	Abim801/Wrks/2024-2025/00030	Design, Supply & Installation of 05 sites Micro Scale Irrigation Scheme in Abim District	RFQ	Techford Contractor and Suppliers Ltd	101,425,000	Medium
8.	Abim801/Supls/2024-2025/00002	Supply of Road Construction Materials &Other Consumables	ODB	• Vain Investments Ltd	154,278,280	Medium

No.	Reference Number	Subject of Procurement	Method of Procurement	Provider	Contract Amount (UGX)	RISK RATING
				• Por Megi Enterprises Ltd • Ciakel U Ltd		
9.	Abim801/Supls/2024-2025/000018	Supply of 500 Three-Seater Desks to Selected Schools in Abim District Under the Education Department	RFQ	Basham Associates (U) Ltd	100,900,030	Medium
				TOTAL	**5,404,329,280**	

CONTRACT AUDIT

No.	Reference Number	Subject of Procurement	Method of Procurement	Provider	Contract Amount (UGX)
1.	Abim801/Wrks/2024-2025/00002	Construction of Kiru Seed Sec. School	ODB	Visvar Investment Ltd	3,325,000,000
				TOTAL	**3,325,000,000**

Annex 2: RISK RATING FOR ABIM DLG

Medium risk contracts

No	Medium risk contracts	Reasons for Medium risk
1.	**SUBJECT:** Construction of Kanu Piped Water Scheme Phase II **METHOD:** RFQ **REF:** Abim801/Wrks/24-25/00025 **Contract value:** UGX 265,878,700	• The Bills of Quantities (BoQs) were not attached at the initiation stage by the User Department. • Bid opening was witnessed by one member, Moses Geofrey, from the Procurement and Disposal Unit. • Ibanda Ibrahim did not sign the evaluation report, yet he was a member of the Evaluation Committee. • There was a delay in the confirmation of funds available by the Accounting Officer. Initiation was on 24th July 2024, whereas the Accounting Officer's confirmation of funds was on 9th August 2024, implying a delay of 13 working days. • There was a delay in the approval of the Procurement Method and the appointment of the Evaluation committee members. Confirmation of the funds available by the AO was on 9th August 2024, whereas the Contracts Committee approved the method and Evaluation Committee members on 10th February 2025, implying a delay of five months. • No evidence for submission of the program of works by the contractor as this was required in the Special Conditions of the Contract. • "As-built "drawings or operating and maintenance manuals were not provided, as these were required in the Special Conditions of the Contract. • Contract management plan and report were not attached to the file. • Project progress reports were not attached on file. • Payment records were missing • Evidence of completion was missing.
2.	**SUBJECT:** Design, Supply, and Installation of 05 Units of Micro-Scale Irrigation Equipment in Abim District **METHOD:** RFQ **REF:** Abim801/Wrks/24-25/00030 **PROVIDER:** Techford Contractors and Suppliers Limited AND Hizmet Services Limited **Contract value:** UGX 184,184,500	• BoQs were not provided at the initiation of the procurement. • There was a delay in the approval of the method by the Evaluation Committee members. Confirmation of funding by the Accounting Officer was on 8th August 2024, while the Contracts Committee decisions were on 8th April 2025, implying a 9-month delay. • No evidence for a contract with Hizmet, as this was not attached to the file by the Entity. • No evidence for submission of program of works by Techford Contractors and Suppliers Limited, as this was required in the SCC under GCC 36.1. • No evidence for "as-built drawings" by Techford Contractors and Suppliers Limited, as this was required in the SCC under GCC67.1. • BOQs were not attached to the contract by the contractor as these were required.

No	Medium risk contracts	Reasons for Medium risk
		• No Contract management plan and report • Missing payment records • No Evidence of completion
3.	**Subject:** Supply of 500 Three-seater desks to ten selected schools in Abim District. **Ref No:** Abim801/Supls/2024-2025/00018 **Procurement method: RFQ** **Contractor:** M/s Basham Associates (U) Ltd. **Contract value:** UGX 100,900,030	• The funds availability section was left blank. • There were no specifications of the desks required attached on file. • The receipt of bids was not witnessed by a Contracts Committee member or a member of the user department. • No contract management plan and report not on file. • Payment records not on file. • Evidence of completion not on file. • There is no appointment of a contract manager on file.
4.	**SUBJECT:** Supply and delivery of ICT equipment in Abim District. **Ref No.** Abim801/Moes/Supls/24-25/00015 lot1. **Procurement method: ODB** **Contractor:** M/s St. Mary's Computer Technologies Ltd **Contract value:** UGX 315,414,000	• The funds availability section was left blank. • Contract management plan and report not on file. • Payment records not on file. • Evidence of completion not on file. • There is no official appointment of a contract manager.
5.	**Subject:** Supply of road construction materials and other consumables **Reference Number:** ABIM801/SUPLS/2024-2025/00002 **Procurement Method**: ODB **Contractor:** • **Vain Investments Ltd** • **Por Megi Enterprises Ltd** • **Ciakel U Ltd** **Contract value:** UGX 154,278,280	• Delayed evaluation: Bids were opened on 6 June 2024, but the evaluation was concluded on 2nd August 2024. The process took 20 working days instead of the required 10 working days, contrary to Regulation 4(1)(a) of the PPDA (Evaluation) Regulations, 2023, which mandates that evaluation for supplies or non-consultancy services be completed within ten working days from the date of bid opening. • The framework contracts for Por Megi investments and Ciakel U Ltd were signed against no agreed price lists. • The following firms were issued with LPOs; however, the Entity did not provide a breakdown of the specific items to be supplied. - Vain Investments Ltd – **UGX** 34,711,680 (8 May 2025) - Vain Investments Ltd – UGX 44,339,200 (8 May 2025) - Por Megi Enterprises Ltd – UGX 2,272,500 (9 May 2025) - Por Megi Enterprises Ltd – UGX 33,668,000 (9 May 2025) - Ciakel U Ltd – UGX 2,075,000 (8 May 2025) - Ciakel U Ltd – UGX 37,211,900 (8 May 2025)

<table>
<tr><th>No</th><th>Medium risk contracts</th><th>Reasons for Medium risk</th></tr>
<tr><td></td><td></td><td>There was no evidence of delivery or receipt of the supplies.
Payment records were missing.
Failure to appoint a contract manager.
Contract management reports are missing.</td></tr>
<tr><td>6.</td><td>Subject: Construction of Adea Seed Secondary School in Abim District
Reference Number: ABIM501/WRKS/2024-2025/00001
Procurement Method: ODB
Contractor: Visvar Investments Limited
Contract value: UGX 3,325,000,000</td><td>Failure to prepare a contract implementation plan and monthly progress reports, which made it hard to ascertain the project's physical, financial, and time status.
Inadequate payment information; only three Interim Payment Certificates were seen on file, IPCs two and three are missing.
No proof of payment and invoices</td></tr>
<tr><td>7.</td><td>SUBJECT; Supply of Fuel and Lubricants
METHOD: ODB
REF: Abim801/Supls/ 24-25/00001
PROVIDER: Bling Power Limited and Makro Energy Limited.
Contract value: UGX 207,281,633</td><td>The District Engineer confirmed the availability of funding on behalf of the Accounting Officer without formal delegation.
BoQs were not attached at initiation.
Limited competition; the entity shortlisted only 1 bidder less than the minimum of 6 required.
There was no evidence for invitation to bid for Makro Energy Limited. Evaluation was carried out but no evidence for invitation to bid by the Entity.
No evidence for evaluation as there was no Evaluation Report attached on file.
No contract management plan and report
No payment records
No evidence of completion
The Entity issued an LPO to Makro Energy Limited at a higher price than the framework price. This is shown in the table below;
<table>
<tr><th>LPO Date</th><th>Description</th><th>Framework Price</th><th>LPO Price</th><th>Qtty</th><th>Possible Loss (UGX)</th></tr>
<tr><td>17th April 2025</td><td>Diesel</td><td>5100</td><td>5400</td><td>178</td><td>53,400</td></tr>
</table></td></tr>
<tr><td>8.</td><td>Subject: Rehabilitation of 10km of community access roads in Abim Subcounty, Abim District Under Batch A
Reference Number: MoLG-NOSP/ABIM/WORKS/2023-2024/00032/A9
Procurement Method: National Competitive bidding</td><td>There was no proof of insurance paid by provider yet it was required as per attached Special Conditions of the Contract.
There were no project supervision reports provided.
No payment records were not provided.
Advance payment guarantee was not provided</td></tr>
</table>

No	Medium risk contracts	Reasons for Medium risk
	Contractor: Spike Engineering Consult Limited.	
9.	**Subject:** Construction of Kiru Seed Secondary School in Abim District **Reference number**: Abim801/Wrks/2024-2025/00002 **Procurement method**: ODB **Contractor:** Visvar Investment Limited **Contract value:** UGX 3,325,000,000	• Inadequate contract monitoring and supervision • Non- compliance with the Environmental, Social, Health and Safety (ESHS) safeguards

LOW RISK

10.	**SUBJECT:** Supply and delivery of science equipment and chemical reagents in Abim District. **Ref No.** Abim801/Moes/Supls/24-25/00015 Lot 2 **Procurement method: ODB** **Contractor:** M/s A.N. Ddamulira. **Contract value:** UGX 105,306,000	The funds availability section was left blank.

Annex 3: Risk Rating Criteria

RISK	DESCRIPTION	AREA	IMPLICATION
HIGH	Such procurements were considered to have serious weaknesses that could cause material financial loss or pose risks to 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 the 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 the 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 from awarding contracts at higher prices or from shoddy work resulting from failure to recommend an 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 Inspection trail, namely, whether there was competition and fairness in the procurement process.
		Fraud/forgery: Falsification of Documents	This implies a 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	**Planning:** Lack of procurement initiation 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	This implies inefficiency, a lack of standardization, and avoidance of competition.

RISK	DESCRIPTION	AREA	IMPLICATION
	management 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.	issue and receipts of bids, usage of non-pre-qualified firms, and splitting procurement requirements.	
		Procurement Structures: Lack of procurement structures	This implies a lack of independence of functions and powers, as well as interference in the procurement process.
		Record Keeping: Missing Contracts Committee records and incomplete contract management records.	This implies that one cannot ascertain the Inspection trail, namely, whether the necessary approvals were obtained in a procurement process.
		Contract and Contract Management: Failure to appoint Contract Supervisors, failure to seek the Solicitor General's approval for contracts above UGX. 200 million, and a lack of notices of Best Evaluated Bidders.	This leads to unjustified contract amendments and variations, resulting in delayed contract completion and a lack of value for money. Bidders are not given the right of appeal.
		Failure by the Entity to incorporate in the solicitation document aspects of gender, social inclusion, environment, health, and safety. Aspects of gender, social inclusion, environment, health, and safety are not covered by the contractor during contract implementation.	
LOW	Procurements with weaknesses where resolution within the normal management framework is considered desirable to improve efficiency or to ensure that	**Planning:** Lack of procurement reference numbers.	This leads to failure to track the procurements which leads to poor record keeping.
		Bidding Process: Not signing the Ethical Code of Conduct	This leads to failure to declare conflict of interest and lack of transparency.

RISK	DESCRIPTION	AREA	IMPLICATION
	the business matches current market best practice. Deviations from laid-down detailed procedures would normally be graded "low," provided that there is sufficient evidence of management action to put in place and monitor compliance with those procedures.		

SATISFACTORY

Relates to the 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.