PUBLIC PROCUREMENT AND DISPOSAL OF PUBLIC ASSETS AUTHORITY

"Regulating for Results"

REPORT ON COMPLIANCE INSPECTION OF BUKWO DISTRICT LOCAL GOVERNMENT FOR FINANCIAL YEAR 2024/2025

JULY 2026

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

ACRONYMS

AO	Accounting Officer
BEB	Best Evaluated Bidder
BOQs	Bills of quantities
CC	Contracts Committee
CIPS	Chartered Institute of Purchasing and Supply
ESHS	Environmental, Social, Health and Safety
FY	Financial Year
LTD	Limited
MBA	Master's in Business Administration
MOFPED	Ministry of Finance, Planning and Economic Development
PDE	Procuring and Disposing Entity
PDU	Procurement and Disposal Unit
PGD	Post Graduate Diploma
PPDA	Public Procurement and Disposal of Public Assets Authority
RDB	Restricted Domestic Bidding
RFQ	Request for Quotation
TCC	Tax Clearance Certificate
UGX	Uganda Shillings

EXECUTIVE SUMMARY

The Public Procurement and Disposal of Public Assets Authority carried out a compliance inspection of Bukwo District Local Government, covering a sample of ten procurement transactions worth UGX 1,017,417,300 for the Financial Year 2024/2025.

The overall objective of the compliance inspection was to assess and establish the degree of compliance of Bukwo 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 inspection noted that Bukwo District Local Government had maintained the key procurement and disposal governance structures, including a fully staffed Procurement and Disposal Unit and a duly constituted Contracts Committee. However, several compliance, control, and performance weaknesses requiring management attention were identified. These included inadequate records management; partial or non-implementation of previous audit recommendations; low implementation of the approved procurement plan; failure to reserve procurement opportunities for Special Interest Groups adequately; delays in the procurement process; limited bidder participation; irregularities in bid evaluation; award of contracts at prices exceeding approved cost estimates; deficiencies in contract documentation; failure to submit statutory procurement reports; missing procurement records; weaknesses in contract management; and inadequate incorporation of Environmental, Social, Health and Safety (ESHS) requirements in procurement documentation.

Overall, the inspection concluded that the procurement and disposal activities of Bukwo District Local Government were **Moderately Satisfactory**, with an overall weighted average risk rating of **53%**, as detailed in Chapter 3 of this report.

The following key exceptions were noted:

1. Section 44(1) of the PPDA Act, Cap. 205 requires Procuring and Disposing Entities to retain records of their procurement and disposal proceedings for at least seven years. The inspection found that the Procurement and Disposal Unit lacked a dedicated storage room for received bids and procurement action files. The files and bids were stacked on the floor in the PDU Office, exposing them to damage from moisture, dust, as well as misplacement or difficulty in retrieving them. Poor document storage exposes them to physical damage and loss, increasing the risk of unauthorised access. This undermines the principles of confidentiality and accountability, as sensitive information may be compromised;

2. Section 10 of the PPDA Act, Cap. 205 requires Procuring and Disposing Entities to act on the Authority's recommendations. Bukwo District Local Government received its previous audit report for the 2023/2024 financial year in June 2025. Of the eight recommendations, one (13%) was fully implemented, two (25%) were partially implemented, and five (62%) were not implemented. Failure to implement audit 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;

3. Guideline 11 of 2024, Paragraph 2.1 (i), requires every Procuring and Disposing Entity to allocate at least 15% of its annual procurement plan budget to registered associations of Women, Youth, and Persons with Disabilities. However, the inspection found that the procurement plan was developed without provisions to reserve portions of procurement for these designated groups. Failure to include Women, Youth, and Persons with Disabilities undermines the Government of Uganda's efforts to increase their participation in public procurement;

4. Regulation 15(1) of the PPDA (Procuring and Disposing Entities) Regulations, 2023 requires every Procuring and Disposing Entity to submit monthly reports by the 15^{th} day of the following month. The inspection found that the Entity failed to prepare and/or submit all monthly procurement reports for the review period. This lapse is attributed to weaknesses in internal controls over reporting, including inadequate monitoring and a lack of enforcement of reporting timelines within the Entity. This reflects a lack of transparency, undermining the Authority's oversight role in monitoring the Entity's compliance with the legal procurement framework;

5. Regulation 6(1)(b) of the PPDA (Contracts) Regulations, 2023 requires the Accounting Officer to confirm that the contract price is not higher than the market price established before the commencement of the procurement process. However, the Authority observed that the Entity awarded seven contracts worth UGX 771,443,000 at prices that were higher than the respective market prices determined at the commencement of the procurement process. This resulted in an aggregate excess of UGX 118,519,000 over the approved estimates. The Entity incurred unbudgeted expenditure of UGX 118,519,000, thereby exposing public funds to inefficiencies and potential budgetary distortions;

6. 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. The Entity did not prepare a Disposal Plan for the Financial Year 2024/2025. Subsequently, no disposal activities were undertaken during the Financial Year. Failure to dispose of assets exposes them to theft and to further depreciation, resulting in a loss of value; and

7. Section 66 of the PPDA Act, Cap. 205 requires entities to include in the statement of requirements that the works be environmentally and socially responsive. The Authority found that in six procurement transactions worth UGX 424,219,000, Environmental, Social, Health, and Safety requirements were not clearly captured in the bidding documents and, subsequently, in the contracts. Unclear environmental, social, health, and safety requirements can lead to environmental harm, worker and public health risks, delays in contract implementation, and outcomes that fail to meet end-user requirements.

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

The Accounting Officer should:

i. Equip the Procurement and Disposal Unit with filing cabinets and storage space to maintain and archive records of the procurement and disposal process in accordance with Section 33(o) of the PPDA Act, Cap. 205

ii. Appoint a task force to oversee 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. Earmark 15% of the annual procurement plan for contract awards to registered associations of Women, Youth, and Persons with Disabilities, in accordance with Guideline 11 of 2024
iv. Submit all monthly reports on procurement transactions conducted by the Procuring and Disposing Entity to the Authority by the fifteenth day of the following month, in accordance with Regulation 15(1) of the PPDA (Procuring and Disposing Entities) Regulations, 2023.
v. Verify, before contract award, that the contract price does not exceed the market prices established at the commencement of the procurement process, in accordance with Regulation 6(1)(b) of the PPDA (Contracts) Regulations, 2023. Where the recommended contract price exceeds the established market prices, the Accounting Officer should require the User Department to provide a documented justification for the variance and, where justified, approve the additional funds in writing before contract award.
vi. Dispose of obsolete assets in a timely manner in accordance with Section 51 of the PPDA Act, Cap. 205
vii. Task Heads of User Departments to prepare adequate Statements of Requirements that are clear, precise, and inclusive of ESHS issues, with input from subject-matter experts, to enable PDU to prepare higher-quality bidding documents that will attract many more responsive bidders, in accordance with Regulation 34(5) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023.

2. The Head, Procurement and Disposal Unit, should budget and plan for filing cabinets and shelves in the next financial year

Bukwo District Local Government should implement the recommended action plan on page 25 of this report.

CHAPTER ONE: INTRODUCTION

1.1 Background
The Public Procurement and Disposal of Public Assets Authority conducted a compliance inspection of Bukwo District Local Government, covering a sample of ten procurement transactions for the Financial Year 2024/2025. 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 establish the degree of compliance of Bukwo District Local Government's procurement and disposal processes with the provisions of the Public Procurement and Disposal of Public Assets Act, Cap. 205 and attendant PPDA Regulations, and assess the level of procurement performance over the inspection period.

The specific objectives were to:
1. Establish the level of compliance by the Entity 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 Scope of the Inspection
The inspection covered a sample of ten procurement transactions worth UGX 1,017,417,300 for the Financial Year 2024/2025. The list of sampled transactions is set out in Annex 1.

1.4 Methodology
An entry meeting was held on 27th April 2026. A sample of ten procurement transactions was selected using stratified random sampling, based on the Contracts Committee minutes and monthly procurement and disposal reports. The Authority examined records and documents for each sampled procurement transaction and/or disposal and obtained the relevant evidence to derive conclusions. This involved a review of the Entity's procurement and disposal planning, initiation, bidding, evaluation, contract placement and processes. At the end of the document review, a physical verification was undertaken to ascertain the level of contractual delivery and fit for purpose.

During the inspection, the team held consultations with staff from the Procurement and Disposal Unit and the User Departments to obtain crucial qualitative information on the internal control systems and processes in place.

A debrief meeting to discuss preliminary inspection findings was held with the Entity's management and staff on **29th April 2026**. The Authority prepared the management letter, which was sent to the Entity on **1st June 2026,** requesting a management response by **5th June 2026.** The management response was submitted on **16th June 2026**.

The inspection report presents the key findings and conclusions arising from the inspection.

1.5 Procurement structures

The key players in the procurement structure at Bukwo District Local Government include the Chief Administrative Officer, who serves as the Accounting Officer; the Procurement and Disposal Unit; the Contracts Committee; and the User Departments.

Section 28 of the PPDA Act, Cap. 205 assigns 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. Lorwor Soze Jimmy served as the designated Accounting Officer.

Section 28 (1) (c) of the PPDA Act, Cap. 205 authorises the Accounting Officer to establish a Procurement and Disposal Unit staffed at an appropriate level. The Authority noted that the Entity's Procurement and Disposal Unit was fully staffed with three members, including a Senior Procurement Officer and two Procurement Officers. The Unit's staffing is shown in Table 1 below:

Table 1:Staffing of the Procurement and Disposal Unit

S/N	Name	Title	Academic Qualifications
1.	Mr. Araptai Joseph	Senior Procurement Officer	CIPS level 6, MBA, PGD in Procurement and Supply Chain Management, Bachelor's in Procurement and Supply Chain Management
2.	Ms. Cherop Emily	Procurement Officer	PGD in Procurement and Supply chain management, Bachelor's of Procurement and Supply chain management
3.	Mr. Sawani Jackson Mutai	Procurement Officer	Bachelor's in Procurement and Supply chain management and Diploma in stores management

Section 29(1) of the PPDA Act, Cap. 205 provides that a Contracts Committee shall be composed of the members specified in Schedule 4 to the Act. Schedule 4 requires the Contracts Committee of a Procuring and Disposing Entity to consist of five members, namely: a chairperson, a secretary, and three other members. During the period under review, the Entity's Contracts Committee was fully constituted, as detailed in Table 2 below.

Table 2: List of Contracts Committee Members

S/N	Name	Position	Date of Appointment	Tittle
1.	Mr. Kibet Walter	Chairman	10th September 2025	Senior Planner
2.	Mr. Kusuro Isaac	Secretary	10th September 2025	Senior Education Officer
3.	Ms. Chemutai Olive	Member	10th September 2025	Senior Environmental Officer
4.	Mr. Chemutai Simon Onesimas	Member	10th September 2025	Health Biostatistician
5.	Mr. Sande Dismas	Member	10th September 2025	Principal Agricultural Officer

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 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 requires Procuring and Disposing Entities to retain records of their procurement and disposal proceedings for at least seven years. The inspection found that the Procurement and Disposal Unit lacked a dedicated storage room for received bids and procurement action files. The files and bids were stacked on the floor in the PDU Office, exposing them to the risks of damage from moisture, dust, and pests, as well as to misplacement or difficulty retrieving them, as shown in Figure 1 below.

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

Procurement action files and bids stacked on the floor of the PDU Office as of 27th April 2026

Implication

Poor document storage exposes them to physical damage and loss, increasing the risk of unauthorised access. This undermines the principles of confidentiality and accountability, as sensitive information may be compromised.

Management response

Management has taken note of the anomaly and shall, in future, improve in record keeping and management

Recommendation

The Accounting Officer should equip the Procurement and Disposal Unit with filing cabinets and storage space to maintain and archive records of the procurement and disposal process in accordance with Section 33(o) of the PPDA Act, Cap. 205.

2.1.2 Failure to fully implement 75% of the previous audit recommendations

Section 10 of the PPDA Act, Cap. 205 requires Procuring and Disposing Entities to act on the Authority's recommendations. Bukwo District Local Government received its previous audit report for the 2023/2024 financial year in June 2025. Of the eight recommendations, two (25%) were fully implemented, two (25%) were partially implemented, and four (50%) were not implemented, as detailed in Table 3 below:

Table 3: Implementation of Previous Audit Recommendations

No.	Recommendation	Status	Management Response
1.	**The Accounting Officer should: -**		
	i. Ensure compliance and proactively address factors contributing to low bidder turnout by investigating potential barriers and implementing corrective measures to enhance participation, to uphold the principles of fairness, transparency, and competitiveness under Sections 48 and 49 of the PPDA Act, Cap. 205;	Not implemented	*Action is being taken* **Authority's comment** The Authority noted the Entity's response. However, no documentary evidence was provided to demonstrate that the stated action had been initiated or implemented. Consequently, the matter remains unverified.
	ii. Ensure disposal of obsolete assets as recommended by the board of survey report in accordance with Regulation 2 of the PPDA (Disposal) Regulations, 2023, Section 60(2) of the PPDA Act, Cap. 205	Not implemented	*Implementation is in progress. Funds for the invitation of the Chief Government Valuer have been availed, and the disposal Task force team, chaired by the Head PDU, has been formed* **Authority's comment** No documentary evidence to substantiate the reported progress in implementation, including proof of funds allocation or formal appointment/constitution of the Disposal Task Force, was provided.
	iii. Ensure that the Entity does not enter into any contract where the cost exceeds the available budget or prevailing market prices unless there is a written commitment for the additional required funds, in accordance with Regulation 7(1) of the PPDA (Contracts) Regulations, 2023	Not implemented	*The matter shall be addressed in due course, not to affect the forthcoming projects*
	iv. Ensure that contract management teams closely monitor contractors to ensure contracts are performed in accordance with the terms and conditions specified in the Contract and with Regulation 52 of the PPDA (Contracts) Regulations, 2023.	Partially implemented	*Management has taken note of the guidance*

No.	Recommendation	Status	Management Response
2.	The Accounting Officer, with the assistance of the Internal Audit department, should establish a robust system to ensure that all audit recommendations are consistently tracked and implemented. In order to enhance the Entity's performance in accordance with Section 10 of the PPDA Act, Cap. 205	Not implemented	*Management has taken note of the guidance*
3.	The Head of Procurement and Disposal Unit, Contracts Committee, and Accounting Officer should ensure strict adherence to evaluation criteria and fairness principles as per Sections 48 and 76 (3) of the PPDA Act, Cap. 205, and hold Evaluation Committee members accountable for any breaches of Regulation 5 of the PPDA (Evaluation) Regulations, 2023.	Partially implemented	*Management has taken note of the guidance*

Implication

Failure to implement audit 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.

Management response

Management has taken note of the recommendation, and the specific issues raised by the inspection have been responded to as per the specific columns above

Recommendation

The Accounting Officer should appoint a task force to oversee 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 Failure to implement 37% of the Procurement plan

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 63%, with a variance of UGX 986,589,800, indicating that 37% of the plan was not implemented. Table 4 below provides details on the plan and fund utilisation.

Table 4: Procurement plan implementation

Analysis of procurement spend	
Total procurement plan value inclusive of VAT (UGX)	2,652,000,000
Total procurement spend value inclusive of VAT (UGX)	1,665,410,200
Procurement plan implementation rate (%)	63
Implementation variance (UGX)	986,589,800
Budget overrun (%)	37

Source: Entity's procurement plan submitted to the Authority and procurement transactions for FY 24/25.

The Authority further observed that five procurements worth UGX 788,000,000 included in the approved procurement plan for the period under review were not implemented, as detailed in Table 5 below:

Table 5: Unimplemented Procurements

No	Subject of procurement	Estimated cost (UGX)
1.	Construction of Senedet Seed Secondary School	700,000,000
2.	Supply of motorcycles	32,000,000
3.	Supply of Veterinary Vaccines and Medicine	10,000,000
4.	Construction of an Incinerator for the Production Department	10,000,000
5.	Supply of Hass Avocado seedlings	36,000,000
	TOTAL	**788,000,000**

Implication

Procurements worth UGX 986,589,800 were not implemented, depriving the intended beneficiaries of service delivery commensurate with that value.

Management Response

Procurements worth UGX 700,000,000 for the construction of Senendet Seed School under the UgIFT program were not expended yet work was done, because the Ministry of Finance did not release the funding by the end of the FY2024/2025, which would have otherwise raised the procurement absorption rate to 89% of the total Procurement budget, management shall ensure however that, in future the procurement plan is regularly updated. Evidence of the letter from MoFPED indicating the release of funds in the FY2025/2026 instead of 2024/2025 is attached herewith for verification

Authority's comment

The Authority noted the entity's response; however, the procurement for the construction of Senendet Seed School was not reported as implemented, and there was no evidence that the MoFPED released funds for 2024/2025 in FY 2025/26.

Recommendations

The Accounting Officer should;

i) Regularly conduct, or designate others to conduct, a review of the procurement plan to ensure it aligns with the Entity's current circumstances, in accordance with Section 60 (7) of the PPDA Act, Cap. 205.

ii) Strengthen records management by enforcing a standardised procurement file checklist to be completed for every transaction before file closure. All procurement files should be reviewed and certified complete, with mandatory inclusion of key supporting documents such as approved procurement plans, signed contracts, implementation/progress reports, and payment records. This should be operationalised through routine internal file inspections to ensure compliance, improve traceability of transactions, and facilitate timely audit verification.

2.1.4 Irrational Procurement Planning and Scheduling

Section 60 (2) of the PPDA Act, Cap. 205 requires a Procuring and Disposing Entity to plan its procurements rationally. The inspection found that the Entity's Procurement Plan for the period under review set uniform invitation and contract award dates for all planned procurement transactions, regardless of the nature, value, or complexity of the procurements. This anomaly indicates inadequate planning and a non-analytical approach to plan preparation.

Implications

- Using uniform, unrealistic timelines undermines the effectiveness of the Procurement Plan as a planning and control tool.
- It exposes the Entity to implementation delays, weak coordination of procurement activities, and the risk of noncompliance with established procurement procedures, which may ultimately affect timely service delivery and value for money.

Management Response

Management has taken note of the recommendation for future implementation

Recommendation

The Accounting Officer should task the Head, Procurement and Disposal Unit, with preparing realistic procurement plans that incorporate activity-specific timelines based on procurement methods, complexity, and statutory lead times, in accordance with Section 60 (2) of the PPDA Act, Cap. 205.

2.1.5 Failure to reserve at least 15% of the annual procurement plan for awarding contracts to Women, Youth, and PWDs

Guideline 11 of 2024, Paragraph 2.1 (i), requires every Procuring and Disposing Entity to allocate at least 15% of its annual procurement plan budget to registered associations of Women, Youth, and Persons with Disabilities. However, the inspection found that the procurement plan was developed without provisions to reserve portions of procurement for these designated groups.

Implication

Failure to include Women, Youth, and Persons with Disabilities undermines the Government of Uganda's efforts to increase their participation in public procurement.

Management Response

Management has taken note of the recommendation for future implementation

Recommendation

The Accounting Officer should earmark 15% of the annual procurement plan for contract awards to registered associations of Women, Youth, and Persons with Disabilities, in accordance with Guideline 11 of 2024.

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.*"

The Authority noted an average delay of seven weeks between AO's confirmation of funding and the PDU's request for CC approval of the procurement method, bidding document, shortlist of bidders, and evaluation committee in two procurements worth UGX 165,533,000, as shown in Table 6 below.

Table 6: Procurements with delays in the procurement process

No	Subject of Procurement	Contract Value (UGX)	Findings
1.	Renovation of the (3) three-classroom block at Kortek Primary school	44,412,000	AO approved the procurement on 06th Nov 2024, but PDU submitted Form 5 Part II on 27th Dec 2024, causing a delay of seven weeks
2.	Fencing of Eastern College, Chebinyiny	121,121,000	
	Total	**165,533,000**	

Implication

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

Management response

Management has noted the issue raised by inspection for subsequent implementation.

Recommendation

The Accounting Officer should conduct all procurements in a manner that promotes economy, efficiency, and value for money in accordance with Section 51 of the PPDA Act, Cap. 205.

2.1.7 Low bidder participation

Section 49 of the PPDA Act, Cap. 205 states that "*all procurement and disposal shall be conducted in a manner that maximises competition and achieves value for money.*"

The Authority observed that the Entity received an average of one bid per procurement across six procurements worth UGX 424,219,000. The consistently low response rate indicates weak bidder participation and reduced competition, which may undermine value for money, limit market competitiveness, and increase the risk of non-optimal procurement outcomes. Table 7 below lists the procurements with low bidder participation

Table 7: Procurements with low bidder participation

No	Subject of procurement	Contract value (UGX)	Method of Procurement	No of bidders invited	No of bids received
1.	Fencing of Eastern College, Chebinyiny.	121,121,000	RDB	4, but none acknowledged receipt	1
2.	Renovation of the (3) three-classroom block at Kortek Primary School	44,412,000	RFQ	11, but none acknowledged receipt	1
3.	Construction of a 5-stance VIP Latrine at Chepkuto Primary School	31,871,000	RFQ		1

No	Subject of procurement	Contract value (UGX)	Method of Procurement	No of bidders invited	No of bids received
4.	Construction of Ninety Cubic (90m3) Water Reservoir Tank	65,415,000	RFQ	7, but none acknowledged receipt	1
5.	Gravity flow scheme Extension to Kapchemogen Parish in Brim Sub-County	86,400,000	RFQ		1
6.	Upgrade of Chebinyinyi Gravity Flow Scheme in Kapterewo Sub-County	75,000,000	RFQ		1
	Total	**424,219,000**			1

Implication
This impedes competition, thus leading to a failure to achieve value for money.

Management Response
The entity has investigated and found the cause of low bidder participation most likely to be collusion by bidders, illiteracy and high costs associated with the bidding process, the entity recommends the urgent need to implement e-procurement which will highly salvage the vice, in the meantime management shall continue to institute mechanisms within its control such as strengthening market engagement, broadening the pool of eligible providers, confirming bidders' receipt of solicitation documents, allowing adequate response time, and monitoring bidder response trends to identify and address recurring barriers to participation, in accordance with Sections 48 and 49 of the PPDA Act, Cap. 205.

Authority's comment
The Authority noted the Entity's response and the measures proposed to address low bidder participation. Although collusion, illiteracy, and the costs associated with the bidding process may contribute to low bidder participation, the Entity has not provided sufficient evidence of specific actions taken to mitigate solvable challenges, such as collusion. The proposed e-procurement implementation has been acknowledged and is due to be rolled out in the next financial year.

Recommendation
The Accounting Officer should;

1. Review the causes of low bidder participation and implement measures to improve competition in subsequent procurements. This should include strengthening market engagement, broadening the pool of eligible providers, confirming bidders' receipt of solicitation documents, allowing adequate response time, and monitoring bidder response trends to identify and address recurring barriers to participation, in accordance with Sections 48 and 49 of the PPDA Act, Cap. 205.
2. Conduct investigations into bidder collusion, and where warranted, such bidders should be eliminated and forwarded to the Authority for suspension for breaching the ethical code of conduct for Providers.

2.1.8 Irregularities during evaluation

Regulation 5 (1) of the PPDA (Evaluation) Regulation, 2023 states that: "*The evaluation of bids shall be conducted in accordance with the evaluation criteria specified in the bidding documents*". However, the Authority noted that in three procurement transactions worth UGX 218,186,300, the evaluation committees passed bidders who did not meet the criteria set out in the bidding documents. Details are shown in Table 8 below.

Table 8: Procurements with irregularities at evaluation

No	Subject of procurement	Contract value (UGX)	Findings
1.	Fencing of Eastern College, Chebinyiny	121,121,000	• Incomplete evaluation report; no subject of procurement mentioned, no introduction, no details of invitation, no details of bid receipt and opening. • Under detailed technical evaluation, the entity required a completion schedule of 2months; however, the BEB (Kortek General Agencies Ltd) offered 4 months and was considered responsive. • The financial comparison did not indicate whether the BEB was VAT-inclusive or VAT-exclusive.
2.	Renovation of (3) three-classroom block at Kortek Primary school	44,412,000	• Incomplete evaluation report; no subject of procurement mentioned; the report was signed by only 2 people (Naikima Micheal and Chemutai Ali); the other approved EC members did not sign (Chebaran Jonex, Ngeywo Cosmas, and Araptai Joseph) • Under detailed technical evaluation, the entity required a completion schedule of 2 months; however, the BEB (Kortek General Agencies Ltd) offered 4 months • The BEB did not indicate whether or not their price was VAT Inclusive or Exclusive • Indicated that the bidder was compliant with the TCC requirement, yet he did not provide it • The BEB did not provide the certified and respective technical personnel qualification certificates, CVs and academic documents, but was declared compliant • The BEB did not provide the completion schedule or work plan, but was considered to have an

No	Subject of procurement	Contract value (UGX)	Findings
			acceptable two-month completion schedule
3.	Supply of science kits, chemical reagents, and laboratory equipment	52,653,300	• The BEB (BAM Construction Surveyors Ltd) submitted an expired trading license, bid submitted on 29th Jan 2025, expired on 15th of Aug 2024, but was considered compliant • The evaluation report lacks an introduction, details of the invitation, details of the bid closing, opening, and details of the evaluation methodology
	Total	**218,186,300**	

Implications

- This is a red flag that members of the Evaluation Committees may have engaged in unethical practices or lacked adequate capacity to review bids, which could have compromised fairness and transparency in the evaluation process.
- This may lead to the award of contracts to non-compliant bidders, which could result in substandard work and failure to achieve value for money.

Management response

Management has noted the gaps identified by the inspection and requests that the authority conduct tailored capacity-building for most of the technical Staff who form the evaluation committee. However, some of the issues raised have been rectified, and are attached herewith for verification.

Authority's comment

The Authority noted the Entity's response and will engage the Procurement and Disposal Capacity Building Department to plan and implement appropriate capacity-building interventions for the Entity's staff during the Financial Year 2026/2027.

Recommendations

1. The Evaluation Committees should strictly adhere to the evaluation criteria outlined in the solicitation documents. Firms that do not comply should be eliminated in accordance with Regulations 5(1) and (2) of the PPDA (Evaluation) Regulations, 2023.
2. The Contracts Committee should confirm that the principles of fairness and transparency are observed in the evaluation process, in accordance with Section 48 of the PPDA Act, Cap. 205 before approving the evaluation reports.

2.1.9 Contracting above the approved estimated cost.

Regulation 6(1)(b) of the PPDA (Contracts) Regulations, 2023 requires the Accounting Officer to confirm that the contract price is not higher than the market price established before the commencement of the procurement process. However, the Authority observed that the Entity awarded seven contracts worth UGX 771,443,000 at prices that were higher than the respective market prices determined at the commencement of the procurement process. This resulted in an aggregate excess of UGX 118,519,000 over the approved estimates. As a result, the Entity incurred unplanned expenditure, exposing public funds to inefficiencies, budgetary distortions, and reduced value for money. Details of procurements contracted for amounts above the approved estimated cost are shown in Table 9 below.

Table 9: Procurements contracted above the approved estimated cost

No	Subject of procurement	Contract value (UGX)	Estimated cost (UGX)	Variance (UGX)
1.	Fencing of Eastern College, Chebinyiny	121,121,000	80,000,000	41,121,000
2.	Design, Supply, and Installation of UGIFT Micro-scale Irrigation systems for 10 farmers, phase 1	257,845,000	360,000,000	19,095,000
3.	Design, Supply, and Installation of UGIFT Micro-scale Irrigation systems for 4 farmers, phase 2	121,250,000		
4.	Renovation of (3) three-classroom block at Kortek Primary school	44,412,000	30,000,000	14,412,000
5.	Upgrade of Chebinyinyi Gravity Flow Scheme in Kapterewo Sub-County	75,000,000	61,524,000	13,476,000
6.	Gravity flow scheme Extension to Kapchemogen Parish in Brim Sub-County	86,400,000	66,400,000	20,000,000
7.	Construction of Ninety Cubic (90m3) Water Reservoir Tank	65,415,000	55,000,000	10,415,000
	Total	**771,443,000**	**652,924,000**	**118,519,000**

Implication

The Entity incurred unbudgeted expenditure of UGX 118,519,000, thereby exposing public funds to inefficiencies and potential budgetary distortions.

Management Response

Management shall ensure that, in the future, effective market assessment, feasibility studies, realistic project appraisals, and the preparation of realistic Budgets and Bills of quantities are conducted prior to the commencement of the procurement process to avoid Budget overlaps and overruns.

Recommendation

The Accounting officer should verify, before contract award, that the contract price does not exceed the market prices established at the commencement of the procurement process, in accordance with Regulation 6(1)(b) of the PPDA (Contracts) Regulations, 2023. Where the recommended contract price exceeds the established market prices, the Accounting Officer should require the User Department to provide a documented justification for the variance and, where justified, approve the additional funds in writing before contract award.

2.1.10 Poorly drafted contracts

Regulation 9(2) of the PPDA (Contracts) Regulations, 2023, provides that a contract document should conform to the form of contract specified in the bidding document. The Authority found that the Entity had poorly drafted six contracts worth UGX 530,910,000. Some contracts had deficiencies, including failure to follow the agreement format in the bidding document, failure to include certain clauses, and failure to attach Bills of Quantities, among others, as indicated in Table 10 below:

Table 10: Procurements with poorly drafted contracts

<table>
<tr><th>No</th><th>Subject of Procurement</th><th>Contract value (UGX)</th><th>Findings</th></tr>
<tr><td>1.</td><td>Design, Supply, and Installation of UGIFT Micro-scale Irrigation systems for 10 farmers, phase 1</td><td>257,845,000</td><td rowspan="2">✓ No contract duration
✓ No GCC
✓ No statement of requirements
✓ No payment schedules
✓ No payment terms</td></tr>
<tr><td>2.</td><td>Design, Supply, and Installation of UGIFT Micro-scale Irrigation systems for 4 farmers, phase 2</td><td>121,250,000</td></tr>
<tr><td>3.</td><td>Construction of Ninety Cubic (90m3) Water Reservoir Tank</td><td>65,415,000</td><td rowspan="2">The contract lacked the following documents listed in the agreement below.
a) General condition of the contract
b) Special Conditions of the contract
c) The priced Bill Quantities</td></tr>
<tr><td>4.</td><td>Gravity flow scheme Extension to Kapchemogen Parish in Brim Sub-County</td><td>86,400,000</td></tr>
<tr><td></td><td>TOTAL</td><td>530,910,000</td><td></td></tr>
</table>

Implication

A lack of clear information in the contract may result in unnecessary conflicts between the service provider and the Entity, which may ultimately lead to litigation.

Management response

The payment Schedule, Payment terms, the priced bills of quantities, GCC and SCC are all available for Verification

Authority's comment

The Authority noted the Entity's response; however, no documentary evidence was provided for verification

Recommendation

The Head, Procurement and Disposal Unit should prepare contracts that include clear contract details in accordance with Regulation 9 (1) of the PPDA (Contracts) Regulations, 2023.

2.1.11 Failure to submit all Monthly Procurement Reports for the FY 2024/2025

Regulation 15(1) of the PPDA (Procuring and Disposing Entities) Regulations, 2023 requires every Procuring and Disposing Entity to submit monthly reports by the 15th day of the following month. The inspection found that the Entity failed to prepare and/or submit all monthly procurement reports for the review period. This lapse is attributed to weaknesses in internal controls over reporting, including inadequate monitoring and a lack of enforcement of reporting timelines within the Entity.

Implication
This reflects a lack of transparency, undermining the Authority's oversight role in monitoring the Entity's compliance with the legal procurement framework.

Management Response
Management has noted the issue raised by the inspection for immediate action

Recommendation
The Accounting Officer should always submit all monthly reports on procurement transactions conducted by the Procuring and Disposing Entity to the Authority by the 15th day of the following month, in accordance with Regulation 15(1) of the PPDA (Procuring and Disposing Entities) Regulations, 2023.

2.1.12 Missing records.
Section 33 (o) of the PPDA Act, Cap. 205 requires the Procurement and Disposal Unit to maintain and archive records of the procurement and disposal process. However, the Authority noted that procurement files for eight procurements worth UGX 910,546,300 had missing records, as shown in Table 11 below.

Table 11: Procurements with missing records

No	Subject of Procurement	Contract value (UGX)	Missing records
1.	Fencing of Eastern College, Chebinyiny	121,121,000	✓ Progress reports ✓ Payment voucher ✓ Completion certificate
2.	Supply of ICT Equipment to Senendet Seed Secondary School	161,450,000	✓ Bid invitation notice ✓ Bidding document ✓ Evaluation report ✓ Best Evaluated Bidder notice ✓ Contract document
3.	Supply of science kits, chemical reagents, and laboratory equipment	52,653,300	✓ Bid invitation notice ✓ Bidding document ✓ Evaluation report ✓ Best Evaluated Bidder notice ✓ Contract management records
4.	Design, Supply, and Installation of UGIFT Micro-scale Irrigation systems for 10 farmers, phase 1	257,845,000	✓ Bidding document ✓ Evaluation report ✓ Best Evaluated Bidder notice ✓ Contract mgt plan ✓ Completion/handover certificate
5.	Design, Supply, and Installation of UGIFT Micro-scale Irrigation systems for 4 farmers, phase 2	121,250,000	

No	Subject of Procurement	Contract value (UGX)	Missing records
			✓ Payment records
6.	Renovation of the (3) three-classroom block at Kortek Primary school	44,412,000	✓ Contract management plan ✓ Progress reports ✓ Completion certificate
7.	Construction of Ninety Cubic (90m3) Water Reservoir Tank	65,415,000	✓ Bidding document
8.	Gravity flow scheme Extension to Kapchemogen Parish in Brim Sub-County	86,400,000	✓ Bidding document
	Total	**910,546,300**	

Implication

- Missing procurement records undermine transparency, accountability, and auditability of the procurement process. This limits the Entity's ability to demonstrate compliance with the PPDA Act, Cap. 205 and attendant Regulations, and may conceal irregularities such as unauthorised procurements, improper evaluation, delayed awards, or poor contract management.
- It also exposes the Entity to loss of institutional memory, disputes with providers, and possible sanctions for failure to maintain procurement and disposal records for the prescribed period.

Management response

Management has noted the recommendation for implementation. The missing documents stated have now been retrieved and forwarded for verification, herewith attached

Authority's comment

The Authority noted the entity's response; however, no documentary evidence was provided.

Recommendation

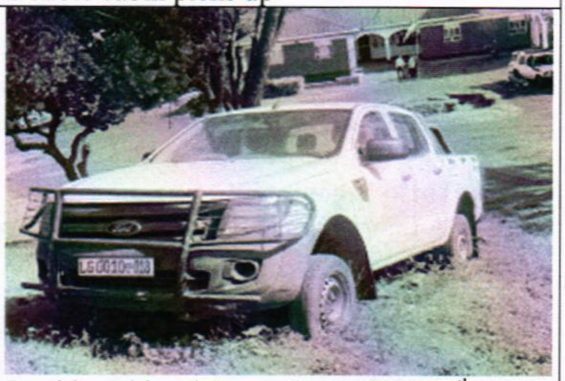
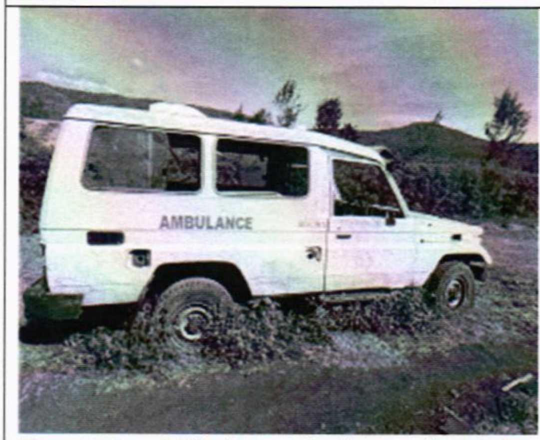
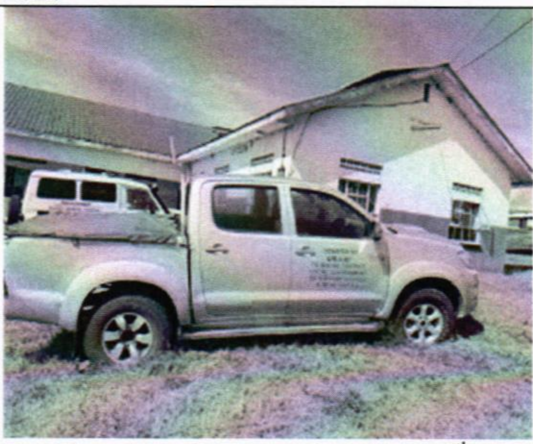
The Accounting Officer should institute a structured procurement records management system, including proper filing, indexing, secure storage, and routine file completeness checks by the PDU, to support easy retrieval and verification of procurement and disposal records in accordance with Section 33 (o) of the PPDA Act, Cap. 205

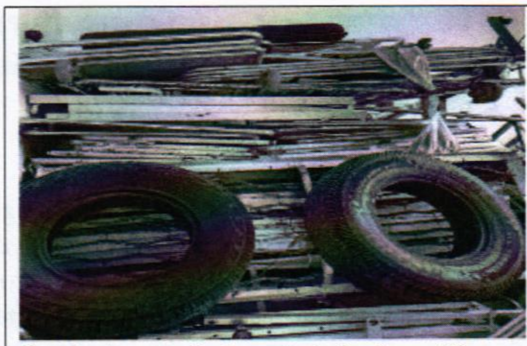
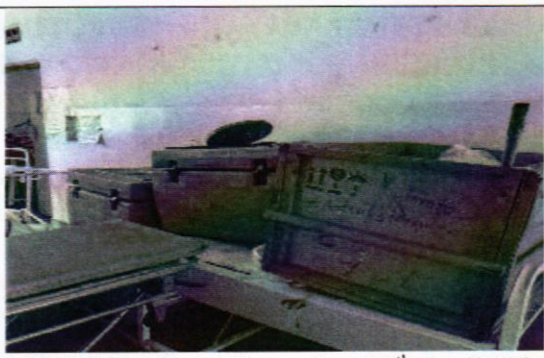
2.2 COMPLIANCE OF THE ENTITY'S DISPOSAL PROCESS WITH THE PROVISIONS OF THE PPDA ACT, CAP. 205 AND PPDA REGULATIONS, 2023

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 12 below illustrate some of the Entity's assets that were not disposed of:

Table 12: Pictures of some of the assets due for disposal taken on the 29th of April 2026

 Motor cycles	 Double cabin picks up
 Double cabin pick-up pictured on 29th April 2026	 Double cabin pick-up pictured on 29th April 2026
 Toyota Land Cruiser ambulance pictured on 29th April 2026	 Double cabin pick-up pictured on 29th April 2026

	
Stacked metal hospital beds with used vehicle tyres pictured on 29th April 2026	Medical furniture pictured on 29th April 2026
	
General scrap and debris pictured on 29th April 2026	Client Feedback Box and a pedestal stand pictured on 29th April 2026
	
Obsolete hospital beds pictured on 29th April 2026	Corrugated metal sheets and Heavy-Duty Vehicle Tires pictured on 29th April 2026

Implication

Failure to dispose of assets exposes them to theft and to further depreciation, resulting in a loss of value

Management Response

The entity has already initiated the Disposal process; a task force has been established and is in the process of inviting the Chief Mechanical Engineer.

Authority's comment

The Authority noted the entity's response; however, no evidence was provided to substantiate the management response

Recommendation

The Accounting Officer should always dispose of obsolete assets in a timely manner 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 Failure to seek the Solicitor General's approval

Regulation 6 (1) (f) of the PPDA (Contracts) Regulations, 2023 requires Procuring and Disposing Entities not to issue contracts, purchase orders, or any communication conveying acceptance of a bid that binds the Entity to a contract without obtaining all necessary approvals, including, where applicable, clearance from the Solicitor General. The Authority noted that the Accounting Officer failed to obtain the Solicitor General's clearance for the Design, Supply, and Installation of UGIFT Micro-scale Irrigation systems for 10 farmers, Phase 1, valued at UGX 257,845,000.

Implications

- The Entity committed the government to contractual obligations without obtaining the required clearance.
- There is a risk of entering into contracts with unfavourable terms, which could result in financial loss or legal disputes.

Management Response

The entity has taken note of the anomaly for future implementation since this was an oversight due to the nature of the contract, which was mainly a co- financing arrangement with the beneficiary community

Recommendation

The Accounting Officer should always obtain the Solicitor General's clearance for all contracts exceeding UGX 200,000,000 before signing, in accordance with Regulation 6 (1) (f) of the PPDA (Contracts) Regulations, 2023.

2.3.2 Irregularities during contracting and contract execution

Regulation 50 (3) of the PPDA (Contracts) Regulations, 2023 requires the contract manager to prepare a contract management plan using Form 49. Regulation 12 (a) of the same Regulations provides that the contract shall become effective upon receipt of a Performance Securing Declaration. 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 and appropriately insured from the commencement of the works to the end of the defect's liability period. The Authority observed irregularities contravening the above Regulations in four procurements worth UGX 476,031,300 as shown in Table 13 below;

Table 13: Procurements with irregularities during contracting and contract execution

No	Subject of Procurement	Contract value (UGX)	Findings
1.	Fencing of Eastern College, Chebinyiny	121,121,000	• Contradicting signature dates: The agreement listed the signature date as 20th Feb 2025. The contractor signed on 20th Feb 2025, while the Accounting Officer (CAO) signed on 19th March 2025.
2.	Renovation of (3) three-classroom block at Kortek Primary school	44,412,000	

No	Subject of Procurement	Contract value (UGX)	Findings
			• GCC (y) of the contract stated that the contract manager is the District Education Officer. However, the AO appointed Naikima Micheal as the Inspector of Schools • No form 49, contract management plan • No performance securing declaration • No insurance cover obtained from the contractor
3.	Supply of science kits, chemical reagents, and laboratory equipment	52,653,300	• Contradicting signature date: The Agreement states that the Agreement was made on 20th March 2025, while the AO and the service provider's stamp indicate 4th May 2025 • No performance securing declaration • No appointment of a contract manager
4.	Design, Supply, and Installation of UGIFT Micro-scale Irrigation systems for 10 farmers, phase 1	257,845,000	• Contract awarded at UGX 257,845,000, yet the bid price was UGX 165,040,000 • No Form 49, contract management plan • No performance securing declaration
	Total	**476,031,300**	

Implications

- Failure to obtain a Performance Securing Declaration leaves the Entity at risk of being unable to seek redress in the event of nonperformance.
- Failure to obtain insurance coverage may result in financial, legal, and reputational exposure if accidents, losses, or damage occur during contract execution
- The absence of a Contract Management Plan weakens contract administration and limits the Entity's ability to systematically monitor the contractor's performance, delivery timelines, quality standards, payment milestones, risks, and the obligations of both parties. This may result in delayed implementation, poor-quality deliverables, undocumented variations, cost overruns, payment disputes, and failure to achieve value for money.

Management Response

Management has noted the issues identified by the inspection and has since rectified the gaps. In the subsequent procurements, effort shall be made to ensure that such anomalies are completely minimised.

Recommendations

The Accounting Officer should;

1. Task the contract managers to fulfil their roles and responsibilities in accordance with Regulations 52(1) and (2) of the PPDA (Contracts) Regulations, 2023, as highlighted in the table above.
2. Always require all Contractors to procure, submit, and maintain valid insurance policies before mobilization. No work should commence until insurance coverage has been verified, and the policies should remain valid throughout the contract implementation period to mitigate potential risks, in accordance with Section 36(1) of the PPDA (Contracts) Regulations, 2023.
3. Obtain a Performance Securing Declaration before the contract commences, in accordance with Regulation 12(1)(a) of the PPDA (Contracts) Regulations, 2023.

2.3.3 Failure to include clear provisions on Environment, Social, Health, and Safety issues in the statement of requirements

Section 66 of the PPDA Act, Cap. 205 requires entities to include in the statement of requirements that the works be environmentally and socially responsive. The Authority found that in six procurement transactions worth UGX 424,219,000, Environmental, Social, Health, and Safety requirements were not clearly captured in the bidding documents and, subsequently, in the contracts. The details are provided in Table 14 below:

Table 14: Procurements for which the ESHS issues were not clearly stipulated

S/No.	Subject of Procurement	Contract Amount UGX)
1.	Fencing of Eastern College, Chebinyiny	121,121,000
2.	Renovation of (3) three-classroom block at Kortek Primary school	44,412,000
3.	Construction of a 5-stance VIP Latrine at Chepkuto Primary School	31,871,000
4.	Upgrade of Chebinyinyi Gravity Flow Scheme in Kapterewo Sub-County	75,000,000
5.	Construction of Ninety Cubic (90m3) Water Reservoir Tank	65,415,000
6.	Gravity flow scheme Extension to Kapchemogen Parish in Brim Sub-County	86,400,000
Total		**424,219,000**

Implication

Unclear environmental, social, health, and safety requirements can lead to environmental harm, worker and public health risks, delays in contract implementation, and outcomes that fail to meet end-user requirements.

Management Response

Management has noted the issues raised by the inspection for implementation

Recommendation
The Accounting Officer should task Heads of User Departments to prepare adequate Statements of Requirements that are clear, precise, and inclusive of ESHS issues, with input from subject-matter experts, to enable PDU to prepare higher-quality bidding documents that will attract many more responsive bidders, in accordance with Regulation 34(5) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023

CHAPTER THREE: OVERVIEW OF THE PERFORMANCE OF THE ENTITY

This section will present graphically the scores for each area assessed

3.1 Overall Conclusion

The performance of Bukwo District Local Government for the Financial Year 2024/2025 was moderately satisfactory, with an overall weighted average risk rating of **53%.**

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 as shown in Table 15 below:

Table 15: Summary of performance of Bukwo District Local Government

Risk Category	Number of Sampled Procurements	% No	Value (UGX)	% Value	Weights	Total weighted average	
						By No.	By Value
High	2	20	165,533,000	16.2	0.6	12.0	9.72
Medium	6	60	700,069,300	68.8	0.3	18.0	20.6
Low	2	20	151,815,000	15.0	0.1	2.0	1.5
Satisfactory	0	0.0	0	0.0	0.0	0.0	0.0
Total	**10**	**100.0**	**1,017,417,300**	**100.0**	**1.0**	**32.0**	**31.8**

Weighted Average (By no.) = $\frac{\sum \text{Weighted Score}}{60} \times 100 = \frac{32}{60} \times 100 = 53\%$

Weighted Average (By Value) = $\frac{\sum \text{Weighted Score}}{60} \times 100 = \frac{31.8}{60} \times 100 = 53\%$

The average weighted risk rating = $\frac{53 + 53}{2}$ = **53%**

Table 16: The risk rating is as follows:

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

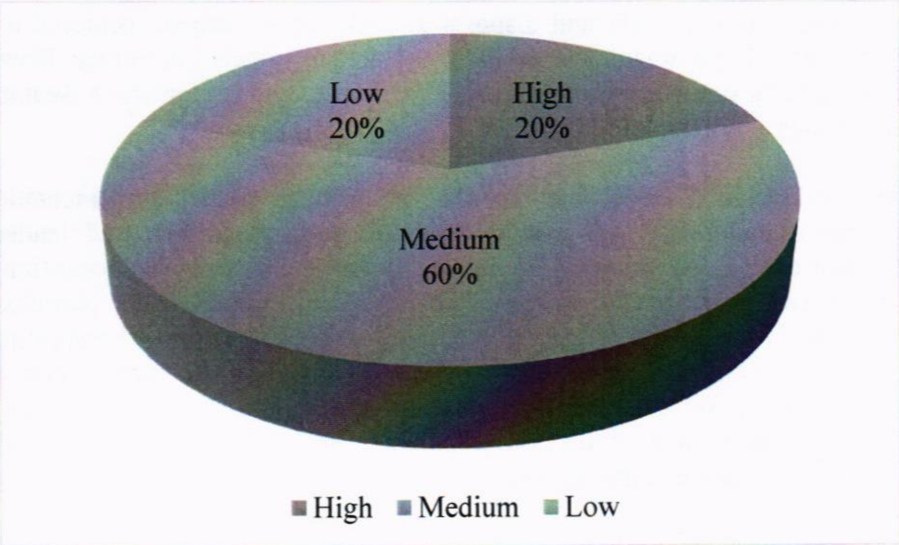
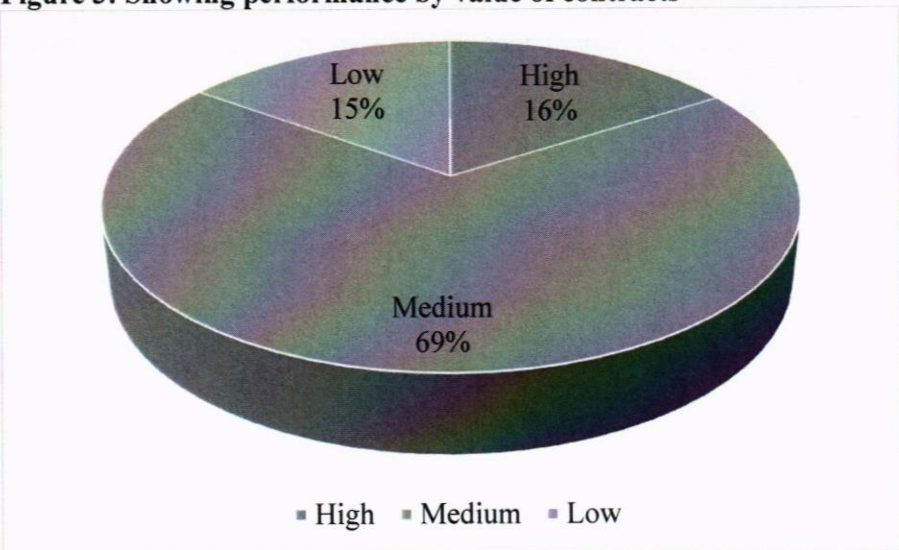


Figure 3: Showing performance by value of contracts



3.4 Inspection Conclusion

The procurement and disposal activities of Bukwo District Local Government for the Financial Year 2024/2025 were assessed as moderately compliant with the provisions of the PPDA Act, Cap. 205, the PPDA Regulations, 2023, and the applicable PPDA Guidelines. The Entity maintained the requisite procurement and disposal governance structures, including a fully staffed Procurement and Disposal Unit and a duly constituted Contracts Committee. However, the inspection identified a number of compliance, governance, and performance weaknesses that require management's urgent attention.

The key weaknesses included inadequate records management, partial implementation of previous audit recommendations, low procurement plan implementation, and inadequate reservation of procurement opportunities for Special Interest Groups. The inspection also identified delays at various stages of the procurement cycle, limited bidder participation, irregularities in bid evaluation, award of contracts at prices exceeding approved cost estimates, deficiencies in procurement and contract documentation, failure to submit mandatory procurement reports to the Authority, missing procurement records, weaknesses in contract management, and inadequate integration of Environmental, Social, Health and Safety (ESHS) requirements into procurement documentation.

Although the identified weaknesses do not fundamentally compromise the overall integrity of the Entity's procurement and disposal system, they point to deficiencies in procurement planning, records management, contract administration, and internal control. If not addressed, these weaknesses may adversely affect transparency, accountability, value for money, and the achievement of intended service delivery outcomes. Management is therefore urged to implement the recommendations contained in this report within the prescribed timelines, strengthen internal oversight and compliance monitoring mechanisms, and ensure full adherence to the PPDA legal and regulatory framework to improve the efficiency, effectiveness, and integrity of the procurement and disposal function.

3.5 Recommended Action Plan

Bukwo District Local Government should implement the following recommendations in Table 17 within the timeframe given in order to improve its performance in Procurement and Disposal.

Table 17: Recommended Action Plan

Finding	Recommended action	Responsible Officer	Timeline
Poor storage of Procurement documents	Equip the Procurement and Disposal Unit with filing cabinets and storage space	Accounting Officer	Within 30 days
Failure to fully implement previous audit recommendations	Establish an audit recommendation register and conduct quarterly monitoring		
Failure to consider SIGs in Procurement	Develop a list of Special interest group providers and preserve at least 15% of the entity's procurements		Starting from the FY 2026/27
Non-submission of monthly reports to the Authority	Submit all monthly reports on procurement transactions conducted by the Entity to the Authority		Monthly
Contracting above the approved estimated cost	Verify, before contract award, that the contract price does not exceed the market prices established at the commencement of the procurement process, in accordance with Regulation 6(1)(b) of the PPDA (Contracts) Regulations, 2023.		Starting from the FY 2026/27
Failure to dispose of Obsolete assets	Dispose of obsolete assets in a timely manner		Within 90 days
Failure to consider ESHS issues in SORs	Include applicable ESHS issues in all SORs	District Environmental Officer	Starting from the FY 2026/27

ANNEX 1: TRANSACTION SAMPLE LIST FOR BUKWO DISTRICT LOCAL GOVERNMENT FOR FY 24/25

No	REF NO	SUBJECT OF PROCUREMENT	METHOD OF PROCUREMENT	PROVIDER	CONTRACT VALUE	Risk rating
1.	BUKW819/WRKS/24/25/000010	Fencing of Eastern College Chebinyiny Secondary School.	RDB	Kortek General Agencies Ltd	121,121,000	High
2.	BUKW819/WRKS/24/25/000016	Upgrade of Chebinyiny Gravity Flow Scheme in Kaptererwo Sub-County	RFQ	Kortek General Agencies Ltd	75,000,000	Medium
3.	BUKW819/WRKS/24/25/000017	Construction of a 90 m3 water reservoir tank at Suam Sub-County	RFQ	Kapmaymay Investments Company Ltd	65,415,000	Low
4.	BUKW819/WRKS/24/25/000017	Gravity Flow Scheme in Kapchemogen Parish, Brim, Sub-County	RFQ	Kortek General Agencies Ltd	86,400,000	Low
5.	BUKW819/WRKS/24/25/000013	Renovation of (3) three-classroom block at Kortek Primary school	RFQ	Sumotwo Sons and Daughters Company Ltd	44,412,000	High
6.	BUKW812/WRKS/2024/2025/00011	Construction of a 5-stance VIP Latrine at Chepkuto Primary School	RFQ	Sumotwo Sons and Daughters	31,871,000	Medium
7.	BUKW819/WRKS/24/25/00062	Design, Supply, and Installation of UGIFT Micro-scale Irrigation systems for 4 farmers, phase 2	RDB	Sesom (U) Ltd	121,250,000	Medium
8.	BUKW819/WRKS/24/25/00060	Design, Supply, and Installation of UGIFT Micro-scale Irrigation systems for 10 farmers, phase 1	ODB	Rivan Engineering (U) Ltd	257,845,000	Medium
9.	BUKW819/SUPLS/24/25/00050	Supply of science kits, chemical reagents, and laboratory equipment	RFQ	Bam Construction and Surveyors Ltd	52,653,300	Medium
10.	BUKW819/MOES/SUPLS/24/25/00025	Supply and delivery of ICT Equipment	RDB	Ideal Merchant Property Holdings (U) Ltd	161,450,000	Medium
	TOTAL				**1,017,417,300**	

ANNEX 2: RISK RATING PER CASE

HIGH-RISK CONTRACTS

No	High-risk contracts	Reasons for high risk
1.	**Subject:** Fencing of Eastern College, Chebinyiny **Method:** Open bidding **Contractor**: Kortek General Agencies Ltd **Ref:** BUKW819/WRKS/24/25/000010 **Contract value:** UGX 121,121,000	• Conducted outside the proc plan • Irregularities at initiation • Irregularities during evaluation • Low bidder participation • Delays in the proc process • Irregularities during contracting and contract execution • ESHS issues not included • Contracted above the approved estimated cost **Missing records** • Progress reports • Payment voucher • Completion certificate
2.	**Subject:** Renovation of (3) three-classroom block at Kortek Primary School **Reference Number:** BUKW819/WRKS/24/25/000013 **Procurement Method:** ODB **Contractor** Sumotwo Sons and Daughters Company Ltd **Contract value:** UGX 44,412,000	• Conducted outside the proc plan • Irregularities at initiation • Irregularities during evaluation • Low bidder participation • Delays in the proc process • Irregularities during contracting and contract execution • ESHS issues not included • Contracted above the approved estimated cost **Missing records** • Contract management plan • Progress reports • Completion certificate

MEDIUM RISK

No	Medium-risk contracts	Reasons for medium risk
3.	**Subject:** Supply of ICT Equipment to Senendet Seed Sec. school **Method:** OPEN BIDDING **Ref: BUKW819/WRKS/24/25/000025** **Provider:** Ideal Merchant Property Holdings (U) Ltd **Contract value:** UGX 161,450,000	• Irregularities at initiation • **Missing records** • Form 5 Part I and II • Specifications • Bid invitation notice • Bidding document • Evaluation report

No	Medium-risk contracts	Reasons for medium risk
		• Best Evaluated Bidder notice • Contract • Contract manager appointment letter • Contract mgt plan
4.	**Subject:** Supply of science kits, chemical reagents, and laboratory equipment **Ref No:** BUKW819/WRKS/24/25/000050 **Procurement method: Open bidding** **Contractor: Ms** Bam Construction and Surveyors Ltd **Contract value:** UGX 52,653,300	• Irregularities at initiation • Irregularities during evaluation • Irregularities during contracting and contract execution **Missing records** • Form 5 Part I and II • Specifications • Bid invitation notice • Bidding document • Evaluation report • Best Evaluated Bidder notice • Contract manager appointment letter • Contract mgt plan • Delivery note • Goods received note • Payment voucher
5.	**Subject:** Design, Supply, and Installation of UGIFT Micro-scale Irrigation systems for 10 farmers, phase 1 **Ref No.** BUKW819/SUPLS/24/25/000060. **Procurement method: ODB** **Contractor:** M/s Rivan Engineering (U) Ltd **Contract value:** UGX 2,57,845,000	• Irregularities at initiation • Poorly drafted contract • Failure to seek the Solicitor General's approval • Contracted above the approved estimated cost **Missing records** • Form 5 Part I and II • Specifications • Bid invitation notice • Bidding document • Evaluation report • Best Evaluated Bidder notice • Contract manager appointment letter • Contract mgt plan • Completion/handover certificate • Payment records

No	Medium-risk contracts	Reasons for medium risk
6.	**Subject:** Design, Supply, and Installation of UGIFT Micro-scale Irrigation systems for 4 farmers, phase 2 **Reference Number:** BUKW819/SUPLS/24/25/000062. **Procurement Method**: ODB **Contractor:** Sesom (U) Ltd **Contract value:** UGX 121,250,000	• Irregularities at initiation • Poorly drafted contract • Failure to seek the Solicitor General's approval • Contracted above the approved estimated cost **Missing records** • Bidding document • Evaluation report • Best Evaluated Bidder notice • Contract manager appointment letter • Contract mgt plan • Completion/handover certificate • Payment records
7.	**Subject:** Construction of 5-stance VIP Latrine at Chepkuto Primary School **Method:** ODB **Ref:** BUKW819/WRKS/24/25/000011 **Provider:** Sumotwo Sons and Daughters **Contract value:** UGX 31,871,000	**Missing records** • Contract • Form 5
8.	**Subject:** Upgrade of Chebinyinyi Gravity Flow Scheme in Kapterewo Sub-County **Reference Number:** BUKW819/WRKS/24/25/000016 **Procurement Method**: ODB **Contractor:** Kortek General Agencies Ltd	• Irregularities at initiation • Irregularities during evaluation • Low bidder participation • Irregularities during contracting and contract execution • ESHS issues not included • Contracted above the approved estimated cost **Missing records** • Contract

LOW RISK

9.	**Subject:** Construction of Ninety Cubic (90m3) Water Reservoir Tank **Ref No.** BUKW819/WRKS/24/25/000016 **Procurement method: ODB** **Contractor:** M/s Kapmaymay Investments Company Ltd **Contract value:** UGX 65,415,000	• Irregularities at initiation • Low bidder participation • Irregularities during contracting and contract execution • ESHS issues not included • Contracted above the approved estimated cost

		• Missing bidding document
10.	**Subject**: Construction of Ninety Cubic (90m3) Water Reservoir Tank **Ref No**. BUKW819/WRKS/24/25/000017 **Procurement method**: ODB **Contractor**: M/s Kortek General Agencies Ltd **Contract value**: UGX 86,400,000	• Irregularities at initiation • Low bidder participation • Irregularities during contracting and contract execution • ESHS issues not included • Contracted above the approved estimated cost • Missing bidding document

ANNEX 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	**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	This implies lack of efficiency, standardisation and avoiding 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 lack of independence of functions and powers and interference in the procurement process.
		Record Keeping: Missing Contracts Committee records and incomplete contract management records.	This implies that one cannot ascertain the audit 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 lack of notices of Best Evaluated Bidders.	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.
		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 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 the business matches current market best	**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
	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 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.