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

COMPLIANCE INSPECTION REPORT FOR FINANCIAL YEAR 2024/2025

MASAKA CITY COUNCIL

JUNE 2026

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FY	Financial Year
GCC	General Conditions of Contract
PDE	Procuring and Disposing Entity
PDU	Procurement and Disposal Unit
PPDA	Public Procurement and Disposal of Public Assets Authority
SCC	Special Conditions of Contract

EXECUTIVE SUMMARY

The Public Procurement and Disposal of Public Assets Authority (PPDA) conducted a compliance inspection of Masaka City Council for FY 2024/2025, covering 12 sampled procurement and disposal transactions. The inspection assessed compliance with the PPDA Act, Cap. 205, the PPDA Regulations, 2023, and PPDA Guidelines, 2024, as well as the Entity's procurement performance during the period.

Overall, the Entity's procurement and disposal activities were generally compliant with the applicable legal and regulatory framework. The required procurement and disposal structures were in place, and the disposal transactions reviewed were satisfactorily conducted. However, the inspection identified weaknesses, including failure to implement previous audit recommendations, low procurement plan implementation, failure by the Internal Audit Unit to conduct procurement audits, execution of procurements outside the approved procurement plan, use of bidder shortlists that had not been approved by the Contracts Committee, delayed disposal of obsolete assets, and failure to appoint contract managers for some procurement contracts.

Although these weaknesses did not materially undermine the overall integrity of the procurement system, they revealed deficiencies in procurement planning, contract management, internal controls, disposal management, and monitoring that could adversely affect service delivery, value for money, transparency, accountability, and achievement of the Government objectives. The Entity's performance for FY 2024/2025 was therefore assessed as **Moderately Satisfactory**, with an overall weighted average risk score of **35%**, requiring targeted management interventions to strengthen procurement planning, contract management, disposal management, internal audit oversight, and compliance with statutory and regulatory requirements.

The following key exceptions were noted:

1. Section 10 (1) (a) of the PPDA Act, Cap. 205 requires the Procuring and Disposing Entity to comply with the Act and promote performance improvement in its procurement and disposal function. The Authority found that the Entity failed to fully implement 58% of the previous audit recommendations for FY 2024/2025, which hindered performance improvement of the Entity's procurement and disposal function.

2. Section 60 (7) of the PPDA Act, Cap. 205 requires the Procuring and Disposing Entity, on a quarterly basis and in any other case, wherever necessary, to review and update its procurement plan. The Authority found that Masaka City failed to implement planned procurements worth UGX 5,102,819,543, which was 62% of the total procurement budget for the Financial Year 2024/2025. This hindered service delivery and denied to the intended beneficiaries benefit from services.

3. Regulation 27 (a) of the PPDA (Procuring and Disposing Entities) Regulations, 2023 requires the Internal Audit Department of a Procuring and Disposing Entity to audit the method used for a procurement and the payments made, to establish whether the supplies, works or services are properly ordered, received, verified and paid for in accordance with the Public Finance Management Act, 2015. The Authority found that the Internal Audit Department did not conduct procurement audit throughout the Financial Year 2024/2025 which exposed the Entity to the risk of flouting procedures.

4. Section 60 (10) of the PPDA Act, Cap. 205 provides that a procurement shall not be carried outside the procurement plan except in emergency situations. The Authority found that the Entity executed procurement for construction of facilities (2 classroom blocks) for St. Anthony Secondary School Kayunga worth UGX. 394,560,140 which was not on the approved procurement plan for the Financial Year 2024/2025. This posed a risk of failing to pay the providers and accumulating domestic arrears.

5. Regulation 53 (6) of the PPDA ((Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023 requires the Procurement and Disposal Unit to make a submission to the Contracts Committee for approval of a shortlist of bidders using Part II of Form 5 in Schedule 1. The Authority found that the Entity used shortlists of bidders which were not approved by the Contracts Committee in six procurement transactions worth UGX 608,234,712. This exposed the Entity to the risk of non-competitive procurements, potential favouritism, and selection of suboptimal bidders, ultimately leading to inefficient.

6. Regulations 2 (1) and (2) of the PPDA (Disposal of Public Assets) Regulations, 2023 provides that for the purposes of disposal planning, an Accounting Officer shall, in each financial year, cause the public assets of a Procuring and Disposing Entity to be reviewed, to identify the public assets to be disposed of in the following financial year and may use the Board of Survey or a User Department to identify the public assets to be disposed of. During physical verification, the Authority found items which had not been disposed which included motor vehicles and road construction equipment. This exposed the Entity to the risk of financial loss due to continuous loss of value (depreciation) for the assets held redundant for so long without disposal and a risk of theft and vandalism.

7. Regulation 51 (1) of the PPDA (Contracts) Regulations, 2023 provides that a User Department shall nominate an existing member of staff with appropriate skills and experience, or who is supervised by a member of staff with appropriate skills and experience, as a contract supervisor and inform the Accounting Officer in writing copied to the Internal Audit Department, Secretary Contracts Committee and any other relevant stakeholders informing them of the designated contract supervisor, who shall take full responsibility. The Authority observed that Contract Managers were not appointed in two procurements worth UGX. 178,043,450, which could result into sub-standard deliverables or shoddy and delayed works which contradicts the principle of efficiency and effectiveness in service delivery.

In light of the above Exceptions, the Authority Recommends the following:

1. The Accounting Officer should:
   i. Regularly carry out a review of 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;
   ii. Prepare a time-bound implementation action plan for the recommendations not fully implemented, assign each action to a named responsible officer with clear deadlines and maintain an implementation tracker with required evidence for each action.
   iii. Task the Heads of the User Departments & Head, Procurement and Disposal Unit to always review the procurement and disposal plan at initiation stage of every procurement

and disposal process and effect updates in accordance with Section 60 (10) of the PPDA Act, Cap. 205; and

iv. Expedite the process of Asset disposal in line with Regulation 2(1) of the PPDA (Disposal of Public Assets) Regulations, 2023 to avoid further loss of Asset value.

2. Head Procurement and Disposal Unit should submit shortlists of bidders to the Contracts Committee for approval prior to bid invitations, in accordance with Regulation 53 (6) of the PPDA ((Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023.
3. The Heads of User Departments should nominate a Contract Manager with the appropriate skills and experience for appointment by the Accounting Officer in accordance with Regulation 51 (1) of the PPDA (Contracts) Regulations, 2023.

4. The Head, Internal Audit should audit the procurement and disposal function on a quarterly basis in accordance with Regulation 27 (a) of the PPDA (Procuring and Disposing Entities) Regulations, 2023.

Masaka City Council should implement the recommended action plan on page 30 of this report.

CHAPTER 1: INTRODUCTION

1.1 Background

The Public Procurement and Disposal of Public Assets Authority (PPDA) conducted a compliance inspection of Masaka City Council for the Financial Year 2024/2025 and reviewed 12 sampled procurement transactions. The inspection involved a review of procurement structures, procurement and asset disposal processes, as well as contract performance following the provisions of the PPDA Act, Cap. 205, the PPDA Regulations, 2023 and PPDA Guidelines, 2024

1.2 Inspection Objectives

The overall objective of the compliance inspection was to assess and establish the degree of compliance of Entity's procurement system, process and disposal with the provisions of the PPDA Act, Cap. 205, the PPDA Regulations, 2023 and PPDA Guidelines, 2024 and the level of procurement performance over the inspection period.

The specific objectives of the inspection of Masaka City Council were to:

1. Establish the level of compliance by the Procuring and Disposing Entity (PDE) with the general provisions of the PPDA Act, Cap. 205 and the attendant PPDA Regulations with regard to the performance of the procurement structures and conduct of procurement processes;
2. Assess the degree of compliance of the Masaka City Councl's disposal process with the provisions of the PPDA Act, Cap. 205 and the attendant PPDA Regulations; and
3. Assess the level of efficiency and effectiveness in contract implementation including the application of Environmental, Social, Health and Safety (ESHS) requirements in the procurement process.

1.3 Structure of the Entity

According to Section 28 of the PPDA Act, Cap. 205, the Accounting Officer has the overall responsibility for the successful execution of procurement, disposal and contract management in the Procuring and Disposing Entity. The Accounting Officer of Masaka City Council during the Financial Year under review was Mr. Daniel Christopher Kaweesi, the Town Clerk.

The Permanent Secretary/Secretary to the Treasury of the Ministry of Finance Planning & Economic Development approved the members of the Contracts Committee listed in Table 1 below:

Table 1: Contracts Committee for the FY 2024-2025

No.	Name	Job Title	Position on Committee	Date of Appointment
1.	Mr. Stephen Kakeeto	City Education Officer	Chairperson	22nd October 2024
2.	Mr. Ramathan Lumala	SNR Asst. Town Clerk	Member	22nd October 2024
3.	Mr. Jonan Mugume	Economic Planner	Secretary	2nd August 2024
4.	Ms. Janet Doris Lujuna	Education Officer	Member	2nd August 2024
5.	Ms. Mary Sheilla Akello	Agriculture Officer	Member	2nd August 2024

According to Section 33 of the PPDA Act, Cap. 205, all procurement or disposal activities of the Procuring and Disposing Entity except adjudication and the award of contract were to be managed by the Procurement and Disposal Unit. The Procurement and Disposal Unit during the financial year under review had one staff, Mr. Rashid Sebyala, whose details are as indicated in Table 2 below:

Table 2: Staff in the Procurement and Disposal Unit

No.		Name	Position	Qualification
1.		Mr. Rashid Sebyala	Senior Procurement Officer	• Bachelor of Procurement and Logistics Management. • Post Graduate in Public Administration. • Professional Diploma in Procurement and Supply (CIPS Level 6)

1.4 Scope of the Inspection

The compliance inspection involved a review of the procurement process, disposal process, general compliance issues and contract implementation of 12 transactions under the Financial Year 2024/2025, vide ***Appendix 2***.

1.5 Inspection Methodology

Two Senior Officers-Performance Monitoring, and One Officer conducted the exercise under the supervision of the Regional Manager. During the exercise, they examined records and documents for each sampled procurement transaction and obtained relevant and sufficient evidence to derive the compliance inspection conclusions. This involved a review of the Entity's procurement/disposal planning, initiation, bidding, evaluation, contract placement and management.

During the compliance inspection exercise, the auditors met with the staff from the Procurement and Disposal Unit, Contracts Committee, Internal Audit and User Departments, where necessary, to obtain crucial qualitative information about the internal control system and processes in place.

The inspection exercise commenced on 13th April, 2026, and a debrief meeting to discuss preliminary findings was held with the Entity management and staff on 15th April, 2026, before the team could embark on preparation of the management letter. The management letter was sent to the Entity on 20th May 2026 with a request to submit a management response by 27th May, 2026, which was submitted on 10th June, 2026 via mail.

On completion of data collection and before writing the report, the Inspection Manager reviewed the working papers for completeness. The working papers contained chronology of findings on each of the sampled transactions. The inspection report presents the key findings and conclusion arising from the inspection.

CHAPTER 2: FINDINGS AND RECOMMENDATIONS

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

2.1.1 Failure to fully Implement the Previous Audit Recommendations for FY 2022/2023

Section 10 (1) (a) of the PPDA Act Cap. 205 states that ''*where there is persistent breach of this Act or regulations made, or guidelines issued, under this Act, the Authority may- (a) direct the concerned Procuring and Disposing Entity to take such corrective action, as may be necessary in the circumstances, to rectify the breach*''.

The Entity was issued with a performance audit report for financial year 2022/2023 dated 24th May 2024 with 12 recommendations, with two (16%) recommendations not implemented and five (42%) partially implemented as indicated in the Table 3 below:

Table 3: Implementation of Previous Recommendations

No.	Recommended Action	Implementation Status	Management Response
1.	The Accounting Officer should establish the possible causes of the low bidder response and devise mechanisms of increasing competition in the Entity's procurement processes to achieve value for money	Not implemented	*Management acknowledged the observation and stated that for improvement of bidder participation, sensitization meetings and public adverts were done but the turn up of bidders was still low.* **Authority's Comment**: Noted the Management response; however, no evidence of sensitization meetings and adverts was availed for verification.
2.	The Accounting Officer should ensure that all procurements are conducted in a manner that promotes transparency, accountability and fairness in accordance with Section 45 of the PPDA Act 2003	Partially implemented	*Management stated that all procurements are carried out in a transparent manner and that Entity advertises procurement opportunities and maintained transparency process in accordance with procurement Regulations.* **Authority's Comment:** Noted the Entity's response; however, the Entity was still shortlisting and inviting less bidders than recommended resulting into low bidder participation. Further

No.	Recommended Action	Implementation Status	Management Response
			observations included irregularities at evaluation stage and failure to deliver Best Evaluated Bidder Notices in most cases of the sampled files, which hindered the transparency, accountability and fairness.
3.	The Accounting Officer should ensure that contracts clearly identify the obligations of each party, correlate all payments by a Procuring and Disposing Entity with the corresponding inputs and the obligations or deliverables by a provider, in a specific identifiable and measurable manner and where required, include adequate and clear delivery, acceptance and handover among others in line with Regulation 9 of the PPDA (Contract) Regulations, 2023	Partially implemented	*Management stated that for all contracts signed, the obligations of each of the party were clearly stated in the contract agreement.* **Authority's Comment:** Noted the Entity's response; however, the inspection team observed cases of inadequate contracts with no delivery period specified in the contract and some provisions left blank.
4.	The Contracts Committee should confirm that the bidding documents submitted by the Procurement and Disposal Unit for approval are prepared in accordance with Regulation 10 of the PPDA (Procuring and Disposing Entities) Regulations, 2023	Partially implemented	*Management stated that all bidding documents were professionally prepared, reviewed and approved by the Contracts Committee.* **Authority's Comment:** Noted the Entity's response; however, there were still cases of inadequate solicitation documents identified during this inspection.

No.	Recommended Action	Implementation Status	Management Response
5.	The Head of Procurement and Disposal Unit should ensure that all procurements are conducted in a manner that promotes economy, efficient and Value for Money in line with Section 48 of the PPDA Act,2003	Partially implanted	*Management stated that it had aggregated procurements to achieve value for money.* **Authority's Comment:** Noted the Entity's response; however, delays were still observed in eight procurements, which adversely affected the efficiency and timely implementation of procurement activities.
6.	The Contract Manager should manage the obligations and duties of the Procuring and Disposing Entity specified in the contract; and make certain that the provider performs the contract in accordance with the terms and conditions specified in the contract in line with Regulation 52 (l) of the PPDA Regulations, 2023	Partially implemented	*Management stated that the contract management obligations were clearly stated in the contract.* **Authority's Comment:** Noted the Entity's response; however, Contract Managers were not appointed for some of the procurements and for the procurements where, Contract Managers, were appointed contract management records were not maintained.
7.	The Internal Auditor should prioritize auditing of the procurement function as required under Regulation 27 of the PPDA (Procuring and Disposing Entities) Regulations,2023	Not implemented	*Management stated that Internal Audit audited the Procurement function as required.* **Authority's Comment:** Noted the Entity's response; however, the Internal Auditor's reports were not provided for verification.

Implication

Non-implementation of recommendations hinders performance improvement of the Entity's procurement and disposal function and exposes the Entity to procurement risks of deliberate implementation of the Entity's future procurement budgets under known repeated irregularities.

Recommendations

The Accounting Officer should:

a) Task the Internal Auditor to follow up and ensure full implementation of the Authority's recommendations in accordance with Section 10 (1) (a) of the PPDA Act, Cap. 205.

b) Take immediate corrective action to close the outstanding recommendations by:
   i. Preparing a time-bound implementation action plan for the two not implemented and four partially implemented recommendations, assigning each action to a named responsible officer with clear deadlines;
   ii. Maintaining an implementation tracker with required evidence for each action; and
   iii. Conducting quarterly management reviews of progress until full implementation is achieved, and submitting the implementation status and supporting evidence to PPDA upon request.

2.1.2 Delays in Submission of Monthly Procurement and Disposal Reports

Regulation 15(1) of the PPDA (Procuring and Disposing Entities) Regulations, 2023 provides that "*a Procuring and Disposing Entity shall submit to the Authority monthly procurement and disposal reports by the 15th day of the month that immediately follows the months to be reported on*".

The Authority found that the Entity delayed by an average of 29 working days to submit each of the seven monthly procurement and disposal reports, while reports for three months were not submitted as detailed in Table 4 below:

Table 4: Delayed Submission of Procurement Reports to the Authority

No.	Month of Reporting	Date received by the Authority	Number of working days delayed
1.	July, 2024	14th October 2024	40
2.	August, 2024	14th October 2024	19
3.	October, 2024	Not submitted	N/A
4.	November, 2024	Not submitted	N/A
5.	December, 2024	Not submitted	N/A
6.	January, 2025	9th May 2025	56
7.	February, 2025	9th May 2025	36
8.	March, 2025	9th May 2025	14
9.	May, 2025	25th July 2025	29
10.	June, 2025	25th July 2025	7
	Average delay		**Av. 29**

Implication

Failure to submit procurement and disposal monthly reports to the Authority and other relevant Agencies timely hinders transparency in the procurement process and denies the Entity appropriate advice from the Authority which eventually raises uncertainty whether budget allocations satisfied the needs of the intended beneficiary on time.

Management Response

Management acknowledged the delays and attributed them to the transition from quarterly to monthly reporting requirements. Management stated that it has since complied with the monthly submission requirement.

Authority's Comment

The Authority noted Management's response. However, a review of the procurement records revealed that delays in submission of procurement and disposal reports existed even under the previous quarterly reporting arrangement, with some reporting periods not submitted as required. Therefore, the underlying issue had not been fully addressed, and the observation was maintained.

Recommendation

The Accounting Officer should strengthen compliance with reporting requirements by preparing and submitting procurement and disposal reports within the prescribed timelines in accordance with Regulation 15(1) of the PPDA (Procuring and Disposing Entities) Regulations, 2023 and through electronic submissions via the E- Reporting Link (https://ereports.ppda.go.ug/) as provided in Circular No. 5 of 2025.

2.1.3 Failure by the Internal Auditor to Audit the Procurement and Disposal Function

Regulation 27 (a) of the PPDA (Procuring and Disposing Entities) Regulations, 2023 provides that "*the Internal Audit Department of a Procuring and Disposing Entity shall audit the method used for a procurement and the payment made to establish whether the supplies, works or services are properly ordered, received, verified and paid for in accordance with the Public Finance Management Act, 2015 and the other applicable laws*".

The Authority found that the Internal Audit Department did not conduct any procurement audit throughout the Financial Year 2024/2025.

Implication

Failure to audit Procurement and Disposal procedures exposes the Entity to the risk of flouting procedures as required by the PPDA Act, Cap. 205, the attendant Regulations, 2023 and Guidelines which blocks the implementation of risk mitigation strategies to enable performance improvement.

Management Response

Management acknowledged the observation and attributed it to understaffing gap in the Internal Audit department which resulted in the audit exercise to covering only one quarter.

Authority's Comment:

The Authority noted the management response; however, no documentary evidence was provided for verification.

Recommendations

1. The Head of Internal Audit should conduct quarterly audits of the procurement and disposal function and submit the audit reports to the Accounting Officer in accordance with Regulation 27(a) of the PPDA (Procuring and Disposing Entities) Regulations, 2023.
2. The Accounting Officer should engage the Appointing Authority on the need to fill vacant positions in the Internal Audit Directorate to enable it effectively discharge its mandate and provide adequate oversight of the procurement and disposal function.

2.1.4 Failure to Implement 62% of the Procurement Plan

Section 60 (7) of the PPDA Act, Cap. 205 states that "*a Procuring and Disposing Entity shall, on a quarterly basis and in any other case, wherever necessary, review and update its procurement plan*".

The Authority found that the Entity's total procurement budget for the Financial Year 2024/2025 was UGX. 8,194,343,000 and the monthly reports submitted to the Authority indicated a total procurement spend of UGX. 3,091,523,457 (38 %), implying that the Entity did not implement planned procurements worth UGX. 5,102,819,543 (62%) as indicated in Table 5 below:

Table 5: Procurement Plan Implementation Rate

Total procurement plan value (UGX)	**8,194,343,000**
Actual procurement spend (UGX	3,091,523,457
Variance (UGX)	5,102,819,543
Implementation rate (%)	38%
Variance (%)	62%

NB: The information above was derived from the Entity's procurement plan and procurement and disposal reports submitted to the Authority for financial year 2024/2025.

This implementation rate excludes UGX 2,392,377,000 from expected revenues that was originally captured in the procurement plan.

Implication

Failure to fully implement the procurement plan hinders service delivery as the intended services are not procured and may also lead to budget cuts in the subsequent years due to low budget absorption. The intended beneficiaries were potentially denied the benefit from services worth UGX. 5,102,819,543 (62%).

Management Response

Management acknowledged the observation and attributed it to the fact that some procurements that include; construction of City Hall that was budged at UGX. 330,000,000 but not procured, rehabilitation of Masaka Recreation ground that was a multi-year project worth UGX. 4 billion never reported and the revenue collection not reported.

Recommendation

The Accounting Officer and Management should regularly carry out a review of 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.

2.1.5 Procuring Outside the Procurement Plan

Section 60 (10) of the PPDA Act, Cap. 205 provides that "*a procurement shall not be carried outside the procurement plan except in emergency situations*".

The Authority found that the Entity executed procurement for construction of facilities (2 Classroom Blocks) for St. Anthony Secondary School Kayunga worth UGX. 394,560,140 which was not on the approved procurement plan for the Financial Year 2024/2025.

Implication
Procuring outside the procurement plan exposes the Entity to the risk of failing to pay the providers and accumulating domestic arrears.

Management Response
Management stated that this procurement was planned for and it appeared in the procurement plan under reference 00011.

Authority's Comment: Authority noted management response; however, the procurement plan submitted for verification was not signed by Accounting Officer and had not been submitted to the Authority.

2.1.6 Failure to Shortlist the Minimum Required Number of Bidders
Regulation 20 (1) of the PPDA ((Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023 requires that procurement using the quotation method shall be by selection of bidders using a shortlist which shall have at least six providers.

The Authority found that the Entity invited an average of 3.6 bidders for each of the three procurement transactions worth UGX 268,844,096, contrary to Regulation 20 (1) of the PPDA ((Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023, as indicated in Table 6 below:

Table 6: Procurements Without the Minimum Required Number of Bidders

No.	Subject of Procurement	Amount (UGX)	Bidders shortlisted
1.	Supply of fifteen (15) Motorcycles	149,750,000	3
2.	Renovation of library building at Kako Primary School	90,800,646	5
3.	Supply of 85 classroom desks to selected schools in Nyenda Mukungwe city Division and Furniture for the Renovated Block-Kimaanya Kabonera city Division	28,293,450	3
	Total	**268,844,096**	**Av. 3.6**

Implication
Failure to shortlist the minimum required number of bidders limits competition to a few bidders who may either bid above estimated costs or lack adequate capacity to address the needs of the beneficiary thus fails achieving value for money.

Management Response
Management noted the Authority's observation and stated that with the exception of supply of classroom desks where the Entity had only three pre-qualified suppliers, the Entity invited a minimum of six bidders for procurement of works. Further stated that, the Entity followed the Presidential directive for the Supply of Motorcycles from only Simba Automotive Ltd.

Authority's Comment: Authority noted the Entity's response; however, the Contacts Committee records and the invitation notices indicated less than six bidders indicated in Table 6 above. Further to note, the Entity shortlisted three bidders for participation in the procurement of motor vehicles, contrary to the Presidential directive of 9th March 2021 that requires Entities to procure motorcycles from Simba Automotive Ltd to promote local investment.

Recommendations

1 The Accounting Officer should task the Contracts Committee to desist from approving shortlists with less than six bidders for restricted and quotation methods to maximize competition and realize value for money.

2 The Head, PDU should:

   i. Shortlist at least six providers to compete under quotation methods in accordance with Regulation 19 & 20 (1) of the PPDA ((Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023;

   ii. Develop shortlists of providers using the PPDA Register of Providers, the list of providers maintained by another Procuring and Disposing Entity, or market knowledge, in accordance with Regulation 53(3)(a), (b), and (c) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023

2.1.7 Failure to Approve Shortlist of Bidders by the Contracts Committee

Regulation 53 (6) of the PPDA ((Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023 requires the Procurement and Disposal Unit to make a submission to the Contracts Committee for approval of a shortlist of bidders using Part II of Form 5 in Schedule 1.

The Authority found that the Entity used shortlists of bidders which were not approved by the Contracts Committee in six procurement transactions worth UGX 608,234,712 as detailed in Table 7 below:

Table 7: Procurement without Contracts Committee's approval of the shortlist

No.	Subject of Procurement	Amount (UGX)
1.	Renovation of a four-classroom block at Kitenga Primary School	79,776,260
2.	Supply of fifteen (15) motorcycl	149,750,000
3.	Renovation of library building at Kako Primary School	90,800,646
4.	Supply of 85 classroom desks to selected schools in Nyenda Mukungwe city Division and Furniture for the Renovated Block-Kimaanya Kabonera city Division	28,293,450
5.	Renovation of the Town Yard Office Block	59,767,000
6.	Supply of a double Cabin Pick-Up	199,847,356
	Total	**608,234,712**

Implication

Use of unapproved shortlists of bidders bypasses the Contracts Committee's oversight, undermining competition, transparency, and fairness in bidder selection. This exposes the Entity to the risk of non-competitive procurements, potential favoritism, and selection of suboptimal bidders, ultimately leading to inefficient use of UGX 608,234,712.

Management Response
Management noted the Authority's observation and explained that the Contracts Committee had approved the pre-qualification of service providers for a three-year period.

Authority's Comment: Noted that, whereas prequalification establishes a pool of eligible providers for a specified period, Regulation 53 of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023 requires the Procurement and Disposal Unit to prepare and submit a shortlist of bidders for approval by the Contracts Committee prior to inviting bids for each specific procurement.

Recommendation
The Head, Procurement and Disposal Unit should prepare and submit a shortlist of bidders for approval by the Contracts Committee prior to bid invitation, in accordance with Regulation 53(6) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023

2.1.8 Inadequate Bidding Documents
Regulation 42 of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023 provides that "*a Procuring and Disposing Entity shall, when preparing each bidding document ascertain that; the most appropriate type of contract shall result from the procurement proceedings in terms of contractual protection to the Procuring and Disposing Entity, structure of payment, payment terms and method of payment*".

The Authority found that the Entity prepared inadequate bidding documents with no provisions for program of works and Performance Securing Declaration, among others in eight procurements worth UGX. 618,567,256 as detailed in Table 8 below:

Table 8: Procurements with Inadequate Bidding Documents

No.	Subject of procurement	Amount (UGX)	PPDA Findings
1.	Renovation of a four Classroom block at Kitenga primary school	79,776,260	• No provision for program of works • No provision for Performance Securing Declaration
2.	Supply of fifteen (15) motorcycles	149,750,000	• No provision for contract manager • No provision for Performance Securing Declaration • No Beneficial ownership form • No ESHS Requirement form
3.	Renovation of library building at Kako Primary School	90,800,646	• No Beneficial ownership form • No provision for program of works • No provision for Performance Securing Declaration
4.	Supply of 85 classroom desks to selected schools in Nyenda Mukungwe city Division and Furniture	28,293,450	• No provision for contract manager • No provision for Performance Securing Declaration • No Beneficial ownership form • No ESHS Requirement form

No.	Subject of procurement	Amount (UGX)	PPDA Findings
	for the Renovated Block-Kimaanya Kabonera city Division		
5.	Renovation of the Town Yard Office Block	59,767,000	• GCC 27 did not request for program of works • Bid securing declaration lacked bid validity period • GCC 51.3 did not provide for Performance Securing Declaration • No specification for the required equipment • No identification for the location
6.	Fencing, installation of agate and boundary opening at Nyendo Public Primary School	53,386,740	• GCC 27 does not provide for program of works • No specification for the required equipment
7.	Construction of a 2 classroom block at Kyamuyibwa P/S	63,793,160	No list of equipment required for construction. Instead, items like Trash cans, Waste management (solid medical & Hazardous Kit 1) and First aid box were stated
8.	Renovation of a 3 Classroom lock at Butale COU Primary School (Phase 1)	93,000,000	• No list of equipment required for construction • No ethical code of bidder • No bid securing declaration • No beneficial ownership form
	Total	**618,567,256**	

Implication
Bidders are exposed to the risk of preparing non-responsive bids and further the risk of procuring items that do not satisfy the needs of the intended beneficiary.

Management Response
Management noted the Authority's observation and explained that adequate contacts were executed, Contract Managers appointed and Performance Securing Declaration obtained where they were required.

Authority's Comment: Noted the Entity's response; however, the issue of inadequate bidding documents was not addressed.

Recommendations:
1. The Head, Procurement and Disposal Unit should prepare adequate solicitation documents in accordance with Regulations 33-40 of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023.

2. The Contracts Committee should critically review bidding documents submitted by the Procurement and Disposal Unit to check inconsistencies in accordance with Section 30 (2) of the PPDA Act, Cap. 205.

2.1.9 Low bidder participation

Regulation 20 (1) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023 provides that "*procurement using the quotation method shall be by selection of bidders using a shortlist which shall have at least six providers*".

The Authority found that an average of one bid was submitted to the Entity in each of the nine procurements worth UGX. 1,115,983,992 as indicated in the Table 9 below.

Table 9: Procurements with Low Bidder Participation

No.	Procurement Subject	Method of procurement	Amount (UGX	Number of bids submitted
1.	Renovation of a four-classroom block at Kitenga primary school	Request for quotations	79,776,260	2
2.	Supply of fifteen (15) motorcycles	Request for quotations	149,750,000	1
3.	Renovation of library building at Kako Primary School	Request for quotations	90,800,646	1
4.	Supply of 85 classroom desks to selected schools in Nyenda Mukungwe city Division and Furniture for the Renovated Block-Kimaanya Kabonera city Division	Request for quotations	28,293,450	1
5.	Renovation of the Town Yard Office Block	Request for quotations	59,767,000	1
6.	Construction of facilities (2 Classroom Blocks) for St. Anthony Secondary School Kayunga	Request for quotations	394,560,140	2
7.	Fencing, installation of a gate and boundary opening at Nyendo Public Primary School	Request for quotations	53,386,740	1
8.	Maintenance of Kidda-Kitengesa Road in Nyendo Mukungwe Division	Request for quotations	59,802,400	1
9.	Supply of a double Cabin Pick-Up	Request for quotations	199,847,356	1
	Total		**1,115,983,992**	**Av. 1.2**

Implication

Low bidder participation limits competition, increasing the risk of inflated prices, reduced transparency, and substandard procurement outcomes, thereby undermining efficient utilization of public funds and achievement of value for money.

Management Response

Management acknowledged the observation and stated that invitations had been extended to numerous bidders. Management further indicated that it had implemented strategies to attract potential bidders, including extending procurement advertisements to a wider audience.

Authority's Comment

Noted management's efforts to widen advertisement coverage and attract more bidders. However, the low level of bidder participation observed during the period under review remained a concern.

Recommendations

1. The Accounting Officer should direct the Head, Procurement and Disposal Unit to strengthen competition under the quotation method by:
   (i) Issuing RFQs to all providers on the approved shortlist and confirming their capacity/availability before invitation;
   (ii) Enabling the accessibility to invitations to bid to shortlisted bidders for a specific procurement, through possible means, including electronic means of transmission in accordance with Section 59 (1) of the PPDA Act, Cap. 205;
   (iii) Allowing adequate response time and ensuring requirements are clear and non-restrictive; and
   (iv) Where fewer than six bids are received, documenting the reasons and re-inviting or applying an alternative method where appropriate, to comply with Sections 48 and 49 of the PPDA Act, Cap. 205 and achieve value for money.
2. The Head of the Procurement and Disposal Unit should strengthen market outreach and bidder engagement strategies by conducting market research, maintaining an updated database of potential providers, and ensuring timely and wide dissemination of procurement opportunities to enhance competition and bidder participation in future procurements.

2.1.10 Wrongful Participation by the Bidder

Regulation 58 (b) of the PPDA ((Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023 provides that "*a bid shall be rejected during preliminary examinations of bids, if the bid is received from a bidder who is not included on the list approved by the Contracts Committee*".

The Authority found that the Entity considered the bid for Gmakoye Technologies Limited who was not on the approved shortlist of bidders and who turned out to be the Best evaluated bidder for the construction of a 2 classroom block at Kyamuyibwa Primary school worth UGX. 63,793,160.

Implication

Consideration and award to a non-shortlisted bidder undermine the integrity of the procurement process, distort fair competition, and expose the Entity to legal and financial risks, thereby compromising efficient utilization of public funds and attainment of value for money.

Management Response

Management stated that the bidder was invited because the company Gmakoye Technologies Limited was pre-qualified with Masaka City.

Authority's Comment; Noted that while Gmakoye Technologies Limited was pre-qualified, pre-qualification only establishes a pool of eligible providers. The Entity did not provide evidence that the bidder had been included on a shortlist approved by the Contracts Committee for this specific procurement, as required under the PPDA legal framework. Accordingly, the finding was maintained

Recommendation
The Head Procurement and Disposal Unit should strictly enforce compliance with approved shortlists by extending invitations to only bidders approved by the Contracts Committee. HPDU should equally reject bids from non-invited bidders at preliminary evaluation and strengthen internal controls and oversight to ensure only eligible bidders participate, thereby safeguarding fairness, transparency, and value for money as provided in Regulation 58 (b) of the PPDA ((Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023.

2.1.11 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 found delays in the procurement processes of eight procurement transactions worth UGX. 1,127,439,162 as detailed in Table 10 below:

Table 10: Delays in the procurement process

No.	Subject of procurement	Amount (UGX)	Findings
1.	Renovation of a four-classroom block at Kitenga primary school	79,776,260	Accounting Officer delayed by 14 working days to approve the Requisition. Head of User Department approved on 2nd October 2024 and Accounting Officer approved on 23rd October 2024
2.	Renovation of library building at Kako Primary School	90,800,646	Accounting Officer delayed by 14 working days to approve the Requisition. Head of User Department approved on 2nd October 2024 and Accounting Officer approved on 23rd October 2024
3.	Construction of Drainage at old Bukoba Road	397,085,000	Delayed by 17 working days to conduct evaluation. Bid opening was on 8th January 2025 and evaluation was conducted on to 31st January 2025
4.	Fencing, installation of agate and boundary opening at Nyendo Public Primary School	53,386,740	Accounting Officer delayed by 14 working days to approve the Requisition. Head of User Department approved on 2nd October 2024 and Accounting Officer approved on 23rd October 2024
5.	Supply of a double Cabin Pick-Up	199,847,356	The procured vehicle was delivered on 10th September 2025 after 67 working days from 5th June 2025 when the contract was signed

No.	Subject of procurement	Amount (UGX)	Findings
6.	Construction of a 2-classroom block at Kyamuyibwa Primary school	63,793,160	Accounting Officer delayed by 14 working days to approve the Requisition. Head of User Department approved on 2nd October 2024 and Accounting Officer approved on 23rd October 2024
			PDU delayed by 39 working days to submit to Contracts Committee. Accounting Officer approved on 23rd October 2024 and PDU summitted to Contracts Committee on 17th December 2024
7.	Renovation of a 3 Classroom lock at Butale COU Primary School (Phase 1)	93,000,000	Accounting Officer delayed by 14 working days to approve the Requisition. Head of User Department approved on 2nd October 2024 and Accounting Officer approved on 23rd October 2024
8.	Supply of fifteen (15) motorcycles	149,750,000	Motorcycles were delivered on 7th April 2025 which was delayed by 21 working days from 6th March 2025 when delivery was expected. GCC 12.1for delivery period was excluded from the contract signed on 13th February 2025 but the Bidding document stated delivery within 3weeks.
	Total	1,127,439,162	

Implication

Delays in the procurement processes deny the intended beneficiaries timely service delivery and leads to an overlap in the procurement budget implementation timelines which spills workload to the next financial year. This affects the payment schedule at the end of the financial year due to accumulation of financial encumbrances for paying-off spill over procurements.

Management Response

Management acknowledged the finding and attributed it to staffing gap with PDU having one staff which makes it hard to perform effectively.

Recommendations

The Accounting Officer should:

1. Adhere to Section 51 of the PPDA Act, Cap. 205 and follow the procurement lead times in order to achieve efficiency in the procurement process; and
2. Engage the Appointing Authority to ensure that the Procurement and Disposal Unit is fully staffed with qualified personnel to enable the efficient and effective execution of procurement and disposal functions. This will strengthen compliance with procurement regulations, improve service delivery, and enhance the overall efficiency of the procurement process in accordance with Section 32 of the Public Procurement and Disposal of Public Assets Act, Cap. 205.)

2.1.12 Irregularities at Bid Evaluation Stage

Regulations 5 (1) of the Public Procurement and Disposal Assets (Evaluation) Regulations, 2023 provides that "*the evaluation of bids shall be conducted in accordance with the evaluation criteria specified in the bidding documents*".

The Authority found irregularities at bid evaluation stage in all the 12 sampled procurement transactions worth UGX. 1,669,862,152 as indicated in Table 11 below:

Table 11: Procurement with Irregularities at Bid Evaluation stage

No.	Subject of Procurement	Amount (UGX)	Findings
1.	Renovation of a 3 Classroom lock at Butale COU Primary School (Phase 1)	93,000,000	Evaluation report lacked the first pages that included introduction, preliminary and commercial details evaluation
2.	Construction of a 2 classroom block at Kyamuyibwa P/S	63,793,160	• No signed Code of Ethical Conduct by the Evaluation Committee. • Evaluation report lacked the first pages for introduction and details about evaluation • Failing of two bidders i.e., D-muk u investment Ltd and Kyamulibwa Carpentry Workshop Limited for not submitting list of equipment yet there was no equipment required in Bidding document • Failing Kyamulibwa Carpentry Workshop Ltd for not availing preliminary document (NSSF) certification which could have been requested for
3.	Maintenance of Kidda-Kitengesa Road in Nyendo Mukungwe Division	59,802,400	Gordon Cris General Enterprises Limited was considered compliant without evidence of academic qualification and work experience for key personnel as required in the bidding document.
4.	Renovation of a four-classroom block at Kitenga primary school	79,776,260	• No signed Code of Ethical Conduct by the Evaluation Committee • Evaluation report lacked the first pages for introduction and for details about evaluation
5.	Supply of fifteen (15) motorcycles	149,750,000	
6.	Renovation of library building at Kako Primary School	90,800,646	

No.	Subject of Procurement	Amount (UGX)	Findings
7.	Supply of 85 classroom desks to selected schools in Nyenda Mukungwe city Division and Furniture for the Renovated Block-Kimaanya Kabonera city Division	28,293,450	
8.	Renovation of the Town Yard Office Block	59,767,000	
9.	Construction of facilities (2 Classroom Blocks) for St. Anthony Secondary School Kayunga	394,560,140	
10.	Construction of Drainage at old Bukoba Road	397,085,000	
11.	Fencing, installation of agate and boundary opening at Nyendo Public Primary School	53,386,740	
12.	Supply of a double Cabin Pick-Up	199,847,356	
	Total	**1,669,862,152**	

Implications

- Irregularities in evaluation exposed the Entity to the risks of awarding contracts to bidders without, sufficient technical and financial capacity which may result into shoddy work and financial loss to cover the damages.
- Failure to sign the Code of Ethical Conduct weakened assurance of integrity and confidentiality in the evaluation process, since the Evaluation Committee members did not formally declare commitment to ethical conduct and avoidance of conflicts of interest

Management Response

Management stated that evaluations were done jointly and there was no need for first pages of the different evaluation reports and that ethical done copies were attached for verification.

Authority's Comment; Noted management response of jointly evaluation of bids and observed that all procurement were unique and required evaluation process to be handled differently for each. Presenting only financial reports pages amounted to half evaluation done for all mentioned procurements. The Entity did not provide response on failure to sign Code of Ethical Conduct, and. all other observations in indicated in the Table 11 above, and therefore findings was maintained.

Recommendations

1. Evaluation Committees should:

i) strictly adhere to the evaluation criteria specified in the bidding document in accordance with Regulations 5 (1) of the Public Procurement and Disposal Assets (Evaluation) Regulations, 2023; and
ii) Use the evaluation report forms provided for in the PPDA (Evaluation) Regulations, 2023 such as Form 14 (Evaluation report under Technical Compliance Evaluation Method), Form 15 (combination of technical and financial evaluation report under Quality and Cost Based Evaluation Methodology); and Form 16 (technical evaluation report under Quality and Cost Based Evaluation Method).

2. The Head, Procurement and Disposal Unit should guide the Evaluation Committees to adhere to the criteria stated in the solicitation document in accordance with Regulation 24(1) of the PPDA (Evaluation) Regulations, 2023.

2.1.13 Lack of Evidence of Issuance of Best Evaluated Bidder Notices

Regulations 3 (4) and (5) of the PPDA (Contracts) Regulations, 2023 provides that "*a Procuring and Disposing Entity shall deliver a copy of the notice of best evaluated bidder to all the bidders and obtain proof of delivery*".

The Authority found that in seven procurements worth UGX 565,215,916, there was no evidence on file to prove that the notices of best evaluated bidders were delivered to all bidders who participated. The procurements are as indicated in Table 12 below:

Table 12: Procurements without proof of Issuance of Best Evaluated Bidder Notices

No.	Subject of Procurement	Amount (UGX)
1.	Renovation of a four classroom block at Kitenga primary school	79,776,260
2.	Supply of fifteen (15) motorcycles	149,750,000
3.	Renovation of library building at Kako Primary School	90,800,646
4.	Supply of 85 classroom desks to selected schools in Nyendo Mukungwe city Division and Furniture for the Renovated Block-Kimaanya Kabonera city Division	28,293,450
5.	Maintenance of Kidda-Kitengesa Road in Nyendo Mukungwe Division	59,802,400
6.	Construction of a 2 classroom block at Kyamuyibwa P/S	63,793,160
7.	Renovation of a 3 Classroom lock at Butale COU Primary School (Phase 1)	93,000,000
	Total	565,215,916

Implication

Failure to provide and retain proof of delivery of Best Evaluated Bidder (BEB) notices undermines transparency and fairness in the procurement process, exposes the Entity to potential complaints and litigation from aggrieved bidders.

Management Response

Management stated that all the Best Evaluated Bidders notices were displayed on the Entity's notice board.

Authority's Comment
Noted that display of the Best Evaluated Bidder (BEB) Notice alone does not satisfy the requirement. The Entity is required to deliver the notice to all participating bidders and retain evidence of delivery on the procurement file. Since no such evidence was provided, the finding was maintained.

Recommendation
The Head Procurement and Disposal unit should institute measures to ensure that all Best Evaluated Bidders Notices are delivered to all participating bidders and verifiable proof of delivery obtained in accordance with Regulations 3 (4) and (5) of the PPDA (Contracts) Regulations, 2023.

2.1.14 Change of Special Conditions of Contract at Contract Signing
Section 67 (2)(a) of PPDA Act Cap. 205 provides that "*all solicitation documents shall detail the terms and conditions, which shall apply to any resulting contract*".

The Authority found that the Entity changed the Special Conditions of Contract at the contact signing stage from the ones in the bidding documents for two procurements worth UGX 178,043,450 as indicated in Table 13 below:

Table 13: Procurements in which Special Conditions were changed at Contract Signing

No.	Subject of Procurement	Amount (UGX)	SCC in the bidding document	SCC in the contract document
3	Supply of fifteen (15) motorcycles	149,750,000	GCC 12.1 of bidding document was indicated as 'supplies to be delivered in 3weeks'	GCC 12.1 of the contract was indicated as 'shipping and other documents to be furnished'
4	Supply of 85 classroom desks to selected schools in Nyendo Mukungwe city Division and Furniture for the Renovated Block-Kimaanya Kabonera city Division	28,293,450	GCC 12.1 stated as 'the supplies are to be delivered within Three (3) weeks from the date of purchase order'.	GCC 12.1 of the contract stated as 'shipping and other documents to be furnished by the provider are N/A'
	Total	**178,043,450**		

Implication
Altering the Special Conditions of Contract at signing stage compromises the integrity and fairness of the procurement process by deviating from the terms on which bidders competed. This exposes the Entity to disputes, potential contract inefficiencies, and delivery uncertainties, which may lead to delays, additional costs, and diminished value for money.

Management Response
Management stated that there was no change of the contract condition in Standard Bidding Documents and Contract and that the evidence was availed for verification.

Authority's Comment: Noted the Entity's response; however, no documentary evidence was availed for verification.

Recommendation

The Contracts Committee should effectively perform its over sight role and, ensure that all contracts submitted for approval comply with the approved bidding documents and evaluation recommendations in accordance with Section 67(2)(a) of the PPDA Act, Cap. 205.

Signing of Inadequate Contracts

Regulation 9 (1) of the PPDA (Contracts) Regulations, 2023 provides the contents of a contract and the manner in which it should be prepared.

The Authority found that the Entity signed inadequate contracts with missing/incomplete provisions such as program for works, Performance Securing Declaration and delivery dates, among others in 10 procurements worth UGX. 1,179,777,152 as listed in Table 14 below:

Table 14: Procurements with Inadequate Contracts

No.	Subject of Procurement	Amount (UGX)	PPDA Findings
1.	Renovation of a four Classroom block at Kitenga primary school	79,776,260	• No provision for program of works • No provision for Performance Securing Declaration
2.	Supply of fifteen (15) motorcycles	149,750,000	• No provision for Contract Manager • No delivery date provided • No provision for Performance Securing Declaration
3.	Renovation of library building at Kako Primary School	90,800,646	• No provision for program of works • No provision for performance security/declaration
4.	Supply of 85 classroom desks to selected schools in Nyendo Mukungwe city Division and Furniture for the Renovated Block-Kimaanya Kabonera city Division	28,293,450	• No provision for Contract Manager • No provision for delivery date • No provision for Performance Securing Declaration
5.	Renovation of the Town Yard Office Block	59,767,000	• No provision for program of works • No provision for Performance Securing Declaration
6.	Construction of facilities (2 Classroom Blocks) for St. Anthony Secondary School Kayunga	394,560,140	• GCC 9.1 of the special conditions of works (The works consist of) was left blank • No provision for performance security or Performance Securing Declaration
7.	Fencing, installation of agate and boundary opening at Nyendo Public Primary School	53,386,740	• No provision for Performance Securing Declaration

No.	Subject of Procurement	Amount (UGX)	PPDA Findings
8.	Maintenance of Kidda-Kitengesa Road in Nyendo Mukungwe Division	59,802,400	• SCC: 27 stated" The contractor shall submit Work program in 14 days/ weeks of delivery of contracts, and no program updates shall be required. • No provision for defect liability period and percentage to reserve and indicate the period to attend to snag list • No provision for Performance Securing Declaration • No provision for ESHS
9.	Supply of a double Cabin Pick-Up	199,847,356	• No provision for requesting for Performance Security • No contract completion period • Only one page (3) of the contract was signed
10.	Construction of a 2 classroom block at Kyamuyibwa P/S	63,793,160	Ambiguity in GCC 52.1 which states that Performance security shall be required and the form shall N/A
	Total	**1,179,777,152**	

Implication
This makes contract management ineffective and inefficient which lead to insufficient contractual information to form a binding contract; hence the Entity stands a risk of paying penalties or losing a legal redress in case of a contractual breach.

Management Response
Management stated that there were no inadequate contracts signed and stated that the evidence was availed for verification.

Authority's Comment: Noted the Entity's response; however, no documentary evidence was availed for verification.

Recommendations:
1. The Accounting Officer should only sign a contract if it is comprehensive enough to spell out the obligations of each party in accordance with Regulation 9 of the PPDA (Contracts) Regulations, 2023.
2. Head of the Procurement and Disposal Unit should verify that all contract documents are properly prepared, reviewed, and contain all mandatory provisions prescribed under Regulation 9 of the PPDA (Contracts) Regulations, 2023 before submission to the Contracts Committee for approval and the Accounting Officer for signature.
3. The Contracts Committee should scrutinize all contracts prior to approval and satisfy itself that they are complete, consistent with the approved bidding documents and evaluation recommendations, and compliant with Regulation 9 of the PPDA (Contracts) Regulations, 2023.

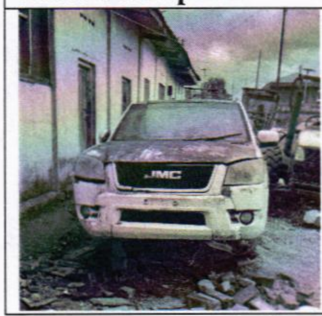
2.2 COMPLIANCE OF THE ENTITY' DISPOSAL PROCESS WITH THE PROVISIONS OF THE PPDA ACT, Cap. 205 AND PPDA REGULATIONS, 2023.

2.2.1 Failure to Dispose of Obsolete Items

Regulations 2 (1) and (2) of the PPDA (Disposal of Public Assets) Regulations, 2023 provide that ''*for the purposes of disposal planning, an Accounting Officer shall, in each financial year, cause the public assets of a Procuring and Disposing Entity to be reviewed, to identify the public assets to be disposed of in the following financial year. A Procuring and Disposing Entity may use the Board of Survey or a User Department to identify the public assets to be disposed of*''.

The Authority commended the Entity for disposing obsolete items in Financial Year 2024-2025, however, upon conducting a physical verification, some items with minimum acceptable value were not disposed of as indicated in Figure 1 below:

Figure 1: Obsolete Items due for Disposal

Asset description			**Condition**
			Redundant

Pictures taken on 14th April 2026 take from parking yard at Masaka City Council.

Implication

Failure to dispose of obsolete assets inhibits the achievement of value for money due to further loss of value caused by deterioration, and assets are exposed to the risk of theft and vandalism.

Management Response

Management stated that all movable items indicated were still in re-pairable condition and that an allocation for repair was attached for verification.

Authority's' Comment: Noted the Entity's response; however, no documentary evidence was availed for verification.

Recommendation

The Accounting Officer should expedite the process of Asset disposal in line with Regulation 2(1) of the PPDA (Disposal of Public Assets) Regulations, 2023 to avoid further loss of Asset value.

2.3 LEVEL OF 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 Appoint Contract Managers

Regulation 51 (1) of the PPDA (Contracts) Regulations, 2023 provides that "*a user department shall nominate an existing member of staff with appropriate skills and experience, or who is supervised by a member of staff with appropriate skills and experience, as a contract supervisor and inform the Accounting Officer in writing copied to the Internal Audit Department, secretary Contracts Committee and any other relevant stakeholders informing them of the designated contract supervisor, who shall take full responsibility*".

The Authority found that the Entity did not appoint Contract Managers in two procurements worth UGX. 178,043,450 indicated in Table 15 below:

Table 15: Procurements executed without appointing Contract Managers

No.	Subject of Procurement	Amount (UGX)
1.	Supply of fifteen (15) motorcycles	149,750,000
2.	Supply of 85 classroom desks to selected schools in Nyendo Mukungwe city Division and Furniture for the Renovated Block-Kimaanya Kabonera city Division	28,293,450
	Total	**178,043,450**

Implication

Failure to appoint Contract Managers may result into sub-standard deliverables or shoddy and delayed works which contradicts the principle of efficiency and effectiveness in service delivery.

Management Response

Management noted the Authority's observation and explained that by the time of inspection, all documents were in custody of the external auditors. These were retrieved and therefore available for verification.

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

Recommendation

User Departments should nominate Contract Managers with the appropriate skills and experience for appointment by the Accounting Officer in accordance with Regulation 51 (1) of the PPDA (Contracts) Regulations, 2023.

2.3.2 Missing Records on Procurement Action Files.

Section 44 of the PPDA Act, Cap. 205 provides that "*the Procuring and Disposing Entity shall maintain records on its procurement and disposal proceedings for a period of seven years from the date of a decision to terminate the procurement and disposal action, or the date of contract completion, whichever comes later*".

The Authority found that there were missing records on all the twelve sampled procurement action files worth UGX. 1,669,862,152 as indicated in the Table 16 below;

Table 16: Procurements with Missing Records

No.	Subject of Procurement	Amount (UGX)	Missing records
1.	Renovation of a four Classroom block at Kitenga primary school	79,776,260	Contract Management Plan
2.	Supply of fifteen (15) motorcycles	149,750,000	• Appointment letter for a Contract Manager • Contract Management Plan • Goods received note • EFT -payment record for full payment
3.	Renovation of library building at Kako Primary School	90,800,646	• Contract Management Plan • Work statements certified by Contract Manager as in GCC42.1 • Records of payment like invoice and EFT records • Completion certificate
4.	Supply of 85 classroom desks to selected schools in Nyendo Mukungwe city Division and Furniture for the Renovated Block-Kimaanya Kabonera city Division	28,293,450	• Appointment letter for Contract Manager • Contract Management Plan • Delivery note • Goods received note • Completion report • Payment records
5.	Renovation of the Town Yard Office Block	59,767,000	• Performance Securing Declaration • Contract Management Plan • Completion reports • Payment Records
6.	Construction of facilities (2 Classroom Blocks) for St. Anthony Secondary School Kayunga	394,560,140	• Contract Management Plan • Site possession letter • Payment records • Bidding document • Bidder's bid
7.	Construction of Drainage at old Bukoba Road	397,085,000	• Bidding Document • Performance Securing Declaration • Contract Management Plan • Site possession Letter • Interim payment certificate
8.	Fencing, installation of agate and boundary opening at Nyendo Public Primary School	53,386,740	• Performance Securing Declaration • Contract Management Plan • Progress Reports

No.	Subject of Procurement	Amount (UGX)	Missing records
			• Payment for defects liability worth UGX 2,668,275
9.	Maintenance of Kidda-Kitengesa Road in Nyendo Mukungwe Division	59,802,400	• Progress reports • Completion of works certificate • Contract Management Plan • Bidding document
10.	Supply of a double Cabin Pick-Up	199,847,356	• Contract Management Plan • Record of PS/ST clearance of 100% advance before delivery • ESHS form • Beneficial ownership form
11.	Construction of a 2 classroom block at Kyamuyibwa P/S	63,793,160	• Contract Management Plan • Site handover • Performance Securing Declaration
12.	Renovation of a 3 Classroom lock at Butale COU Primary School (Phase 1)	93,000,000	• Contract Management Plan • Progress reports
	Total	**1,669,862,152**	

Implication

Poor record keeping denies the stakeholders sufficient information on accountability for expenditure on procurements and disrupts the inspection trail which is an indicator for lack of transparency and accountability within the procurement function.

Management Response

Management noted the Authority's observation and explained that by the time of inspection, all documents were in custody of the external auditors. These were retrieved and therefore available for verification.

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

Recommendations

1. The Head, Procurement and Disposal Unit should liaise with User Departments, Engineering Department and Finance Department for copies of all documentation relating to a procurement and archive them in accordance with Section 33 (o) of the PPDA Act, Cap. 205.
2. The Contract Managers should:
   i. Keep and archive all contract management records and distribute copies to key stakeholders including the Procurement and Disposal Unit as required in accordance with Regulation 52 (3) (a) (vii) of the PPDA (Contracts) Regulations, 2023; and
   ii. Prepare Contract Management Plans using Form 49 and forward a copy to the Procurement and Disposal Unit for purposes of monitoring in accordance with Regulation 50 (3) of the PPDA (Contracts) Regulations, 2023.

CHAPTER 3: OVERVIEW OF THE PERFORMANCE OF THE ENTITY

3.1 Overall Inspection Conclusion

The performance of Masaka City Council for the Financial Year 2024/2025 was **Moderately Satisfactory** with an overall weighted average risk rating of **35.2%.**

3.2 Entity's Risk Assessment

The risk rating was weighted to determine the overall risk level of the Entity. The weighting was derived using the average weighted index as shown in Table 17 below:

Table 17: Risk Computation

Risk category	No.	%No	Value (UGX)	%Value	Weights	Total Weighted score	
						by value	by No.
High	01	8.3	394,560,140	23.6	0.6	14.16	4.9
Medium	01	8.3	397,085,000	23.8	0.3	7.14	2.49
Low	10	83.4	878,217,012	52.2	0.1	5.26	8.34
Satisfactory	00	00	00	00	1	00	00
Total	12	**100**	**1,669,862,152**	**100**	**1**	**26.56**	**15.73**

Weighted Average (By NO.) = $\frac{\sum \text{Weighted Score} \times 100}{60} = \frac{15.73 \times 100}{60} = 26.2\ \%$

Weighted Average (By Value) = $\frac{\sum \text{Weighted Score} \times 100}{60} = \frac{26.56 \times 100}{60} = 44.3\%$

Combined Weighted Average = $\frac{26.2\ \% + 44.3}{2}$ = **35.2%**

Since **35.2%** falls within the **31-70** risk range, the performance of the Entity is rated **Moderately Satisfactory** as detailed in Table 18 below:

Table 18: Risk rating Table

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

Figure 2: Graphical Representation of the Entity's Risk Assessment by Value

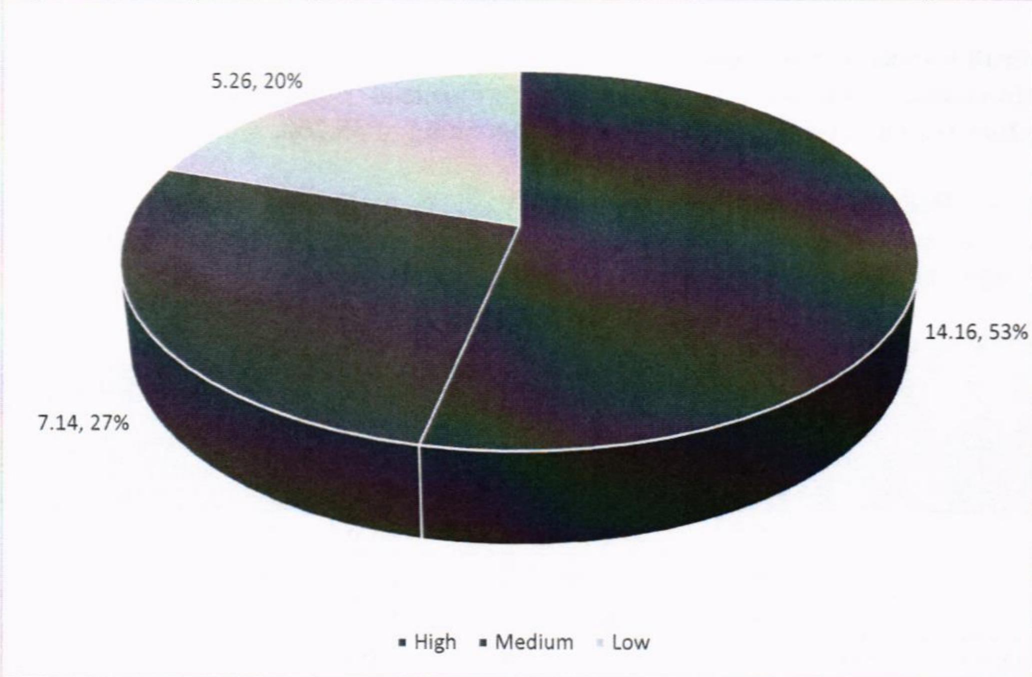
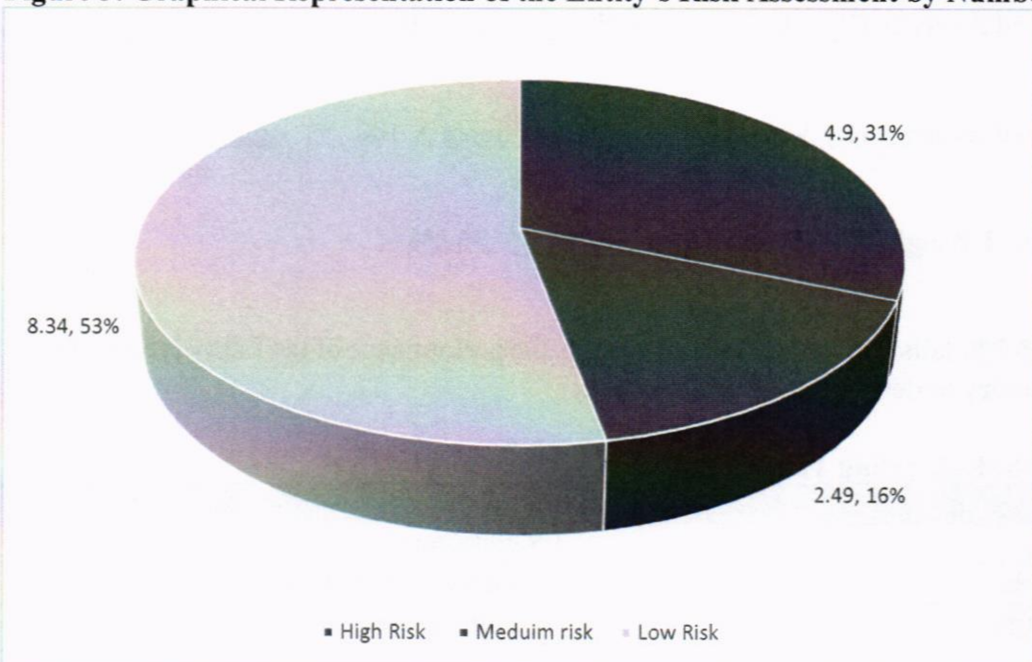


Figure 3: Graphical Representation of the Entity's Risk Assessment by Number



3.3 Audit Opinion/Conclusion

The Procurement and Disposal activities of Masaka City Council for the Financial Year 2024/2025 were generally conducted in compliance with the provisions of the PPDA Act, Cap. 205, the PPDA Regulations, 2023, and PPDA Guidelines, 2024. The Entity maintained the required procurement and disposal structures, and with the disposal activities yet to be conducted as recommended in the board of survey report.

However, the inspection identified several control and performance weaknesses requiring management attention. This included failure to implement previous audit recommendations, low procurement plan implementation, failure by the Internal Audit Unit to conduct procurement audits, execution of procurements outside the approved procurement plan, use of bidder shortlists that had not been approved by the Contracts Committee, delayed disposal of obsolete assets, and failure to appoint contract managers for some procurement contracts.

These weaknesses indicate deficiencies in procurement planning, contract management, internal controls, disposal management, and implementation monitoring mechanisms. If not addressed, they may adversely affect service delivery, value for money, transparency, accountability, and achievement of the Entity's objectives.

Accordingly, the procurement and disposal performance of Masaka City Council for FY 2024/2025 is assessed as **Moderately Satisfactory**, with an overall weighted average risk rating of **35%**, but requiring targeted management interventions to strengthen procurement planning, contract management, disposal management, internal audit oversight, and compliance with statutory and regulatory requirements.

3.4 Recommended Action Plan

Masaka City Council should implement the following recommendations in Table 19 below within the timeframe given in order to improve its performance in Procurement and Disposal.

Table 19: Action Plan

Finding	Action/Recommendation	Responsible Officer	Timelines
Failure to fully implement 58% of the Authority's previous recommendations	Establish audit recommendation audit register and quarterly monitoring	Accounting Officer	First Quarter of 2026/2027
Failure to fully implement (62%). of the 2024/2025 procurement plan	Conduct quarterly procurement plan reviews and update plan	Accounting Officer/ Head Procurement and Disposal Unit	December 2026
Internal Audit should audit the procurement and disposal function	Prepare and get approvals of the internal audit plan for entities activities which should include PDU quarter audits	Interna Auditor	Quarterly
Procuring outside the procurement plan	Review the procurement and disposal plan and update as required	Head Procurement and Disposal Unit	Quarterly
Use of shortlists of bidders which were not approved by the Contracts Committee	Submit shortlists of bidders to the Contracts Committee for approval prior to bid invitations	Head Procurement and Disposal Unit	First Quarter of 2026/2027
Failure to Asset disposal obsolete due for disposal	Expedite the process of Asset disposal	Accounting Officer	2026/2027 Financial year.
Failure to nominate a contract manager for approval to the Accounting Officer	For every contract placed, the User Department should recommend a competent person with required skills to manage the contract for Accounting Officer's approval.	Accounting Officer and User Department	First Quarter of 2026/2027

ANNEX 1: CASE BY CASE ANALYSIS

NO.	HIGH RISK CONTRACTS	REASONS FOR HIGH RISK
1.	Construction of facilities (2 Classroom Blocks) for St. Anthony Secondary School Kayunga MASA 607/ WRKS/ 2024-25/00011 UGX. 394,560,140	• Outside the procurement plan • No Reference number on the requisition • No Ethical code of conduct • Incomplete evaluation report • Low Bidder Participation • Inadequate Contract • No Contract Management Plan • No Site possession Letter • No Payment records
NO.	**MEDIUM RISK CONTRACTS**	**REASONS FOR MEDIUM RISK**
1.	Construction of Drainage at old Bukoba Road MASA 607/ WRKS/ 2024-25/00026 397,085,000	• No Reference number on the requisition Form • No Initiation Date on the requisition Form • No Confirmation by the Head of user department • No Ethical code of conduct • Incomplete evaluation report • Delayed to conduct evaluation • Failure to Incorporate Solicitor General's recommendations • Inadequate Contract • No Contract Management Plan • No Site possession Letter • No Interim payment certificate
No	**LOW RISK PROCUREMENTS**	**REASONS FOR LOW RISK**
1.	Fencing, installation of agate and boundary opening at Nyendo Public Primary School MASA 607/ WRKS/ 2024-2025/00014 UGX. 53,386,740	• Failure to include a Reference number on the requisition form • Delay to approve the requisition by Accounting Officer • Failure to sign an Ethical code of conduct by evaluators • Incomplete evaluation report • Inadequate Bidding Document • Low Bidder Participation • Signing of inadequate contract • No Contract Management Plan • No Progress Reports • No Payment for defects liability

2.	Renovation of a 3 Classroom lock at Butale COU Primary School (Phase 1) MASA607/WRKS/24/25/00021 UGX. 93,000,000	• Delay to approve the requisition by Accounting Officer • Inadequate bidding document • Incomplete evaluation report • No ethical code of bidder for evaluators • No bid securing declaration • No beneficial ownership form • No evidence that Notices of Best Evaluated Bidder were sent to participating bidders • No Contract Management Plan
3.	Renovation of Library Building at Kako Primary School MASA607/WRKS/24-25/00019 UGX. 90,800,646	• Failure to include Reference Number on the Requisition Form • Failure to complete funds availability Section of the procurement requisition • Delay by Accounting Officer to approve the requisition form • Failure to shortlist the required minimum bidders • Low Bidder participation • Inadequate bidding document • Failure to sign ethical code of conduct by evaluators • Incomplete evaluation report • No Contract Management Plan • No Completion certificate
4.	Supply of a double Cabin Pick-Up MASA607/SUPLS/2024-2025/00027 UGX. 199,847,356	• No Procurement reference number was allocated to this procurement on form 5 • Failure to fill the funds availability section of the requisition • Low bidder Participation • Incomplete evaluation report • No Ethical code of conduct for evaluators • Inadequate contract • No performance security /securing declaration • Delayed to deliver the double Cabin Pick-Up • No Contract Management Plan • No PSST clearance of 100% advance before delivery • No beneficial ownership form
5.	Supply of fifteen (15) motorcycles MASA607/SUPLS/24-25/00029	• Failure to complete funds availability Section of the procurement requisition form

	UGX. 149,750,000	• Failure to shortlist required minimum number of bidders • Failure to approve shortlist of bidders by Contracts Committee • Low Bidder participation • Inadequate bidding document • Failure to sign ethical code of conduct • Failure to deliver Notice of Best Evaluated Bidder to all bidders • Change of Special Conditions at contract signing stage • Failure to appoint a contract manager • No Contract Management Plan • No Goods received note • Delayed to deliver the motorcycles
6.	Maintenance of Kidda-Kitengesa Road in Nyendo Mukungwe Division MASA607/WRKS/2024-2025/00025 UGX. 59,802,400	• Failure to include a reference number on requisition form • Failure to fill funds availability section • Failure to sign on requisition Form by Head of user department • Low Bidder Participation • Incomplete Evaluation report • Awarding a non-qualifying bidder • No Ethical code of conduct for evaluators • Failure to request for a Performance Securing Declaration • No provision for ESHS • No evidence that Notices of Best Evaluated Bidder were sent to participating bidders • No Progress reports • No certificate for completion of works • No Contract Management Plan
7.	Construction of A2 classroom block at Kyamuyibwa Primary school MASA607/WRKS/2024/2025/00020 UGX. 63,793,160	• Failure to include a reference number on requisition form • Delay to approve the requisition by Accounting Officer • Wrong bidder Participation • Inadequate bidding document • Incomplete evaluation report • Un satisfactory failing of two bidders during evaluation • No record of signed ethical code for evaluators

		• No evidence that Notices of Best Evaluated Bidder were sent to participating bidders • Signing inadequate Contract • No Contract Management Plan • No record for site handover • No Performance Securing Declaration
8.	Supply of 85 classroom desks to selected schools in Nyenda Mukungwe city Division and Furniture for the Renovated Block-Kimaanya Kabonera city Division MASA607/SUPLS/24-25/00023 UGX. 28,293,450	• Failure to include Reference Number on the Requisition Form • Failure to complete funds availability Section of the procurement requisition • Failure to approve shortlist of bidders by Contracts Committee • Failure to shortlist minimum number of bidders • Low Bidder participation • Inadequate bidding document • Failure to sign ethical code of conduct • Incomplete evaluation report • Failure to deliver Notice of Best Evaluated Bidder to all bidders • Signing of inadequate contract • Change of Special Conditions at contract signing stage • Failure to appoint a contract manager • No Contract Management Plan • No Delivery note • No Goods received note • No completion report • No payment records
9.	Renovation of the Town Yard Office Block MASA 607/ WRKS/ 2024-25/00022 UGX. 59,767,000	• Failure to sign on the requisition form by the initiator, Head of Department and the Accounting Officer • Delayed to issue the bidding document • The shortlisted bidders were not approved by Contracts Committee • Incomplete Evaluation Report • No Ethical Code of conduct • Inadequate bidding document • Low Bidder Participation • Inadequate Contract • No Contract Management Plan • No completion reports • No Payment Records

10	Renovation of a four classroom block at Kitenga primary school MASA607/WRKS/2024-2025/00015 UGX. 79,776,260	• Failure to include Reference Number on the Requisition Form • Delay by Accounting Officer to approve the requisition • Failure to approve shortlist of bidders by Contracts Committee • Low Bidder participation • Inadequate bidding document • Failure to sign ethical code of conduct by evaluators • Incomplete evaluation report • Failure to deliver Notice of Best Evaluated Bidder to all bidders • Signing of inadequate contract • No Contract Management Plan

APPENDIX 2: SAMPLE LIST FOR THE COMPLIANCE INSPECTION OF MASAKA CITY COUNCIL FOR THE FY 2024-2025

No.	Reference Number	Subject of Procurement	Method of Procurement	Date of Award	Provider	Amount (UGX)
1.	MASA607/WRKS/ 2024-2025/00015	Renovation of a four classroom block at Kitenga Primary School	Request for quotations	17th January 2025	Gordon Chris General Enterprises	79,776,260
2.	MASA607/SUPLS/ 24-25/00029	Supply of fifteen (15) Motorcycles	Request for quotations	17th January 2025	Simba Automotives Limited	149,750,000
3.	MASA607/WRKS/ 24-25/00019	Renovation of library building at Kako Primary School	Request for quotations	17th January 2025	M/S Gordon Chris General Enterprises	90,800,646
4.	MASA607/SUPLS/ 24-25/00023	Supply of 85 classroom desks to selected schools in Nyendo Mukungwe city Division and Furniture for the Renovated Block-Kimaanya Kabonera city Division	Request for quotations	26th February 2025	Kawasa investments Limited	28,293,450
5.	MASA607/WRKS/ 2024-25/00022	Renovation of the Town Yard Office Block	Request for quotations	21st March 2025	Gordon Chris General Enterprises Ltd	59,767,000
6.	MASA 607/ WRKS/ 2024-25/00011	Construction of facilities (2 Classroom Blocks) for St. Anthony Secondary School Kayunga	Request for quotations	3rd February 2025	Mukeum (U) Ltd	394,560,140
7.	MASA607/WRKS/ 2024-25/00026	Construction of Drainage at old Bukoba Road	Request for quotations	3rd February 2025	GMakoye Technologies Ltd	397,085,000
8.	MASA607/WRKS/ 2024-25/00014	Fencing, installation of agate and boundary opening at Nyendo Public Primary School	Request for quotations	17th January 2025	Jumitech International Ltd	53,386,740
9.	MASA607/WRKS/ 24-25/00025	Maintenance of Kidda-Kitengesa Road in Nyendo Mukungwe Division	Request for quotations	19th March 2025	Gordon Cris General Enterprises Ltd	59,802,400
10.	MASA607/SUPLS/ 00027	Supply of a double Cabin Pick-Up	Request for quotations	19th May 2025	CFAO Mobility U Ltd	199,847,356
11.	MASA607/WRKS/ 24-25/00020	Construction of a 2 Classroom block at Kyamuyibwa Primary School	Request for quotations	17th January 2025	Gmakoye Technologies Ltd	63,793,160
12.	MASA607/WRKS/ 24/25/00021	Renovation of a 3 Classroom lock at Butale COU Primary School (Phase 1)	Request for quotations	15th January 2025	Kyamulibwa Carpentry Workshop and Construction Ltd	93,000,000
	Total					**1,669,862,152**

APPENDIX 3: RISK RATING CRITERIA

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

RISK	DESCRIPTION	AREA	IMPLICATION
	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.	**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 practice. Deviations from laid down detailed procedures would normally be graded "low" provided that there is sufficient evidence of	**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
	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.