PUBLIC PROCUREMENT AND DISPOSAL OF PUBLIC ASSETS AUTHORITY

"Regulating for Results"

REPORT ON PROCUREMENT AND DISPOSAL AUDIT FOR THE FINANCIAL YEAR 2024/2025 FOR MINISTRY OF INFORMATION, COMMUNICATIONS TECHNOLOGY AND NATIONAL GUIDANCE

JUNE 2026

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Acronyms

AO	Accounting Officer
CC	Contracts Committee
FY	Financial Year
HPDU	Head, Procurement and Disposal Unit
MOICT	Ministry of Information, Communications Technology and National Guidance
PDE	Procuring and Disposing Entity
PDU	Procurement and Disposal Unit
HPDU	Head Procurement and Disposal Unit
PPDA	Public Procurement and Disposal of Public Assets Authority
RFP	Request for Proposals
SBD	Standard Bidding Document
UGX	Uganda Shillings
GCC	General Conditions of Contract
SCC	Special Conditions of Contract
ESHS	Environmental Health Social and Safety
PPDA	Public Procurement and Disposal of Public Assets Authority
MOFPED	Ministry of Finance Planning and Economic Development
NCONS	Non-Consultancy
CONS	Consultancy
LTD	Limited
WRKS	Works
SVCS	Services

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EXECUTIVE SUMMARY

The Public Procurement and Disposal of Public Assets Authority carried out a procurement and disposal audit of Ministry of Information, Communications Technology and National Guidance (MOICT). The exercise covered a sample of 12 procurement transactions carried out during the Financial Year 2024/2025 as per Annex 2.

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

From the findings of the procurement and disposal audit, the performance of the Entity for the Financial Year 2024/2025 was **satisfactory** with an overall weighted average risk rating of **16 %.** The risk rating is detailed in Chapter 3 of the audit report.

The key positive findings observed during the audit include:

1. The Entity's performance had notably maintained a satisfactory performance i.e 14.5% in the FY 2022/23 and 16 % in FY 2024/25 demonstrating the effectiveness of its internal controls and a stronger institutional commitment to meeting procurement regulatory standards.

2. The procurement structures were in place and there is visible segregation of duties between the Accounting Officer, Contracts Committee, Evaluation Committees, User Departments and Procurement and Disposal Unit which enhances accountability in the procurement and disposal cycle.

Despite the Satisfactory performance, the following key exceptions were noted during the audit:

1. Failure to fully implement previous audit recommendations: Out of six recommendations made in FY 2023/24, four (67%) were fully implemented, while two (33%) were not fully implemented contrary to Section 10 of the PPDA Act, Cap. 205. Failure to fully implement audit recommendations affects the performance of the procurement and disposal function and perpetuates recurring irregularities.

2. Low procurement plan implementation: The Entity achieved only 50.3 % implementation of its procurement plan worth UGX 11,164,180,718 out of the planned UGX 22,193,032,132, with a budget variance of 49.7% of the procurements unimplemented worth UGX 11,028,851,414 contrary to Section 60(2)(d) of the PPDA Act Cap. 205. Low procurement plan implementation undermines service delivery, weakens fiscal discipline and delays achievement of planned outputs.

3. Non-implementation of reservation schemes: The Entity did not allocate 15% of its procurement budget to Special Interest Groups (Women, Youth, and Persons with Disabilities), contrary to Sections 53 and 63 of the PPDA Act Cap. 205 and PPDA Guideline No. 11 of 2024. This undermined inclusivity, equitable access to procurement opportunities, and compliance with national policy objectives.

4. The Authority noted delays averaging 52 days in obtaining approvals at different stages of the procurement cycle in three procurements worth UGX 116,840,231 i.e delayed confirmation of funding by the Accounting Officer in the repair of Motor Vehicle UG 0051N, delay by the Procurement and Disposal Unit to submit procurement requests to the Contracts Committee for approval and delayed approval by the Contracts Committee in the procurement for assorted stationery and toner for Quarter three contrary to Section 51 of the PPDA Act Cap. 205. Delays in the procurement processes risk occurrences of cost overruns and delayed service delivery to the intended beneficiaries.

5. Inadequate solicitation documents: The audit noted that the solicitation documents issued to bidders in two procurements for Consultancy services for business process outsourcing national awareness and publicity and procurement for short term consultancy to develop a comprehensive framework for the establishment and management of internet exchange points (XPS) in Uganda worth UGX 291,455,000 contained unclear Terms of Reference. Whereas the Terms of Reference for the Consultancy services for business process outsourcing national awareness and publicity sought to increase awareness and attract participation in the Business Process Outsourcing sector, they did not provide empirical evidence, baseline statistics, or analytical findings demonstrating the magnitude of the awareness gap that was to be addressed ; and whereas the Whereas the Terms of Reference for short term consultancy to develop a comprehensive framework for the establishment and management of internet exchange points (XPS) in Uganda required the Consultant to undertake consultative engagements, they did not specify the number of consultations to be conducted, categories of stakeholders to be engaged, regional representation requirements, minimum participation thresholds, documentation standards, or validation workshop requirements procurement; these were contrary to Regulations 42 (a) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023.

6. In four sampled procurements worth UGX 486,581,431, there was no evidence of the responsible Users or Contract Managers preparing and sharing performance/progress reports with the Procurement and Disposal Unit for monitoring purposes contrary to Regulation 52 (3) (f) & (g) of the PPDA (Contracts) Regulations, 2023.

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

1. The Accounting Officer, who has the overall responsibility for the execution of procurement function should:

i. Implement all previous audit recommendations in accordance with Section 10 of the Public Procurement and Disposal of Public Assets Act Cap. 205 and submit a status report to the Authority within four months of issue of the audit report.

ii. Execute his/her role of certifying the availability of funds to support the procurement or disposal activities expeditiously and in a timely manner in accordance with Section 51 of the PPDA Act Cap 205 and where there is a justifiable cause of a delay, documentary evidence should be maintained on the action file to substantiate the delay.

2. The Head, Procurement and Disposal Unit should:
   i. Review and update the procurement plan on quarterly basis in accordance with Section 60(7) and (8) of the PPDA Act Cap. 205, and introduce a procurement implementation dashboard reviewed monthly by Senior Management and the Contracts Committee to track progress and corrective actions.

   ii. Expedite the preparation of bidding documents, invitation of bidders and seeking of the Contracts Committee's approval for preliminary bidding submissions in a manner which promotes efficiency in accordance with Section 51 of the PPDA Act, Cap 205.

   iii. Integrate reservation schemes the Entity's procurement planning process, ensuring that at least 15% of the annual procurement budget is allocated to Special Interest Groups in line with Section 53 of the PPDA Act Cap. 205 and Guideline No. 11 of 2024.

   iv. Strengthen quality assurance reviews of solicitation documents before issue to bidders to ensure that all provisions are accurate, relevant, compliant with applicable PPDA requirements, and appropriate for the procurement being undertaken in accordance with Section 42(a) of the PPDA (Rules and Methods for Procurement of supplies, works and non-Consultancy services) Regulations, 2023.

3. Contract Managers should appraise the performance of providers and report on their performance to the Accounting Officer and Procurement and Disposal Unit in accordance with Regulation 52 (3) (f) & (g) of the PPDA (Contracts) Regulations, 2023.

This is to communicate to you the findings and recommendations of the Authority that are detailed in the Performance Audit Report attached hereto. As the Accounting Officer, you are responsible for the overall procurement function in your Entity and you are therefore required to ensure that the above recommendations and the specific actions listed under the action plan on pages **18-19** of the report are implemented by the responsible persons within the specified period.

CHAPTER ONE: INTRODUCTION

1.1 Background

The Public Procurement and Disposal of Public Assets Authority carried out a procurement and disposal audit of Ministry of Information, Communications Technology and National Guidance (MOICT) that covered a representative sample of 12 procurement and disposal transactions conducted in the Financial Year 2024/2025. The audit 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 and PPDA Regulations, 2023 and PPDA Guidelines.

1.2 Main Audit Objective

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

The specific objectives 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, PPDA Regulations, 2023 and PPDA Guidelines;
2. Establish the level of compliance with the PPDA Act Cap 205, Regulations, 2023 and PPDA Guidelines in the conduct of disposal activities; and
3. Assess the level of efficiency and effectiveness in contract implementation including application of Environmental, Social, Health and Social safeguards (ESHS) where applicable.

1.3 Structure of the Entity

Ministry of Information, Communications Technology and National Guidance (MOICT) is mandated to increase access and usage of ICT infrastructure and services throughout the country, ensure effective communication of government policies and programmes and promotion of a national ideology for social economic transformation.

According to Section 28 of the PPDA Act Cap. 205, the Accounting Officer has the overall responsibility for the successful execution of procurement, and disposal in a Procuring and Disposing Entity. During the period under review, the Accounting Officer of Ministry of Information, Communications Technology and National Guidance was Dr. Amina Zawedde, the Permanent Secretary.

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:Membership of the Contracts Committee

No.	Name	Position	Date Appointed
1.	Mr. Ambrose Ruyooka	Chairperson	23rd April 2025
2.	Ms. Flavia Opio	Secretary	23rd April 2025
3.	Mr. Yiiki Christopher	Member	23rd April 2025

No.	Name	Position	Date Appointed
4.	Ms. Elizabeth Namagembe	Member	2nd May 2025
5.	Ms. Doreen Gift Bujjingo	Member	23rd April 2025

Section 33 of the PPDA Act Cap. 205, states that "*all procurement or disposal activities of the Procuring and Disposing Entity except adjudication and the award of contract are to be managed by the Procurement and Disposal Unit*". The Procurement and Disposal Unit during the Financial Year under review was headed by Mr. Emmanuel Maguru Ahimbisibwe.

1.4 Audit Scope

The procurement and disposal audit involved a review of the procurement process, disposal process and general compliance issues and contract implementation of 12 transactions under Financial Year 2024/2025 worth UGX 4,414,291,048 (40 %) of the spend value under Annex 2. The sample was selected based on stratified random sampling using Contracts Committee minutes and monthly procurement and disposal reports as shown in Table 2 below:

Table 2:Sample analysis

Method of procurement	Population Value (UGX)	Sample Value (UGX)	% By Value	Population by No.	Sample by Number	% By Number
Direct	768,909,054	-	-	2	-	-
Open Bidding	16,820,884,283	3,414,930,277	20	97	2	2
Request for quotation	3,056,781,890	691,001,471	23	26	8	31
Restricted Bidding	836,781,890	291,455,000	35	2	1	50
Micro Procurements	708,675,015	-	-	21	-	-
Total	**22,193,032,132**	**4,397,386,748**		**148**		

1.5 Audit Methodology

On 22nd April 2026, the Entity was notified about the audit exercise. A sample of 12 procurement transactions conducted in the Financial Year 2024/2025 was selected based on stratified random sampling. An audit launch meeting was held on 28th April 2026 between the audit team and the Entity's officials.

Two officers conducted the exercise under the supervision of the Manager, Performance Monitoring. During the exercise, the team examined records and documents of the sampled procurement transactions. This involved a review of the Entity's procurement/disposal planning, initiation, bidding, evaluation, contract placement and processes. On completion of file review, the audit team met with various stakeholders to discuss and obtain clarifications on some of the preliminary findings.

A debrief meeting was held on 18th May 2026 between the audit team and the Entity's officials. A management letter was issued to the Entity for management's response on 12th June 2026 and the Entity's responses to the raised issues were received on 24th June 2026. The exit meeting was held on 24th June 2026 at PPDA Head Office, PPDA-URF Towers, Nakasero Road, Kampala.

On completion of data collection and before writing the report, the Audit Manager reviewed the working papers for completeness. The working papers contained a detailed chronology of findings on each of the sampled transactions. The audit report presents the key findings and conclusions arising from the audit.

1.6 Audit Limitation

The audit was limited to the sample of procurement and disposal transactions selected for review, as detailed in Annex 2 of the report. Whereas the sample represented a proportion of the procurement population by value, the findings may not necessarily reflect the full extent of compliance across all transactions undertaken by the Entity during the Financial Year 2024/25.

CHAPTER TWO: AUDIT FINDINGS

2.1 Compliance by the Entity with the general provisions of the PPDA Act Cap. 205, Regulations, 2023 and PPDA Guidelines

Procuring and Disposing Entities are required to apply the public procurement and disposal rules set out in the PPDA Act Cap. 205 and PPDA Regulations, 2023 and PPDA Guidelines. The following areas of non-compliance were noted during the audit:

2.1.1 Implementation of previous audit recommendations

Section 10 (1) (a) of the PPDA Act Cap. 205 provides for the Authority to direct the concerned Entity to take such corrective action to rectify the breach of the Act.

During the performance audit of FY 2022/23, the Authority made six recommendations to the Entity in an audit report issued on 24th March 2024. Out of six audit recommendations, four representing 67% were implemented while two representing 33% were not fully implemented as indicated in Table 3 below:

Table 3:Implementation of previous audit recommendations

No	Recommendation	Status	*Management response*
1.	The Head, Procurement and Disposal Unit should maintain and archive records of the procurement and Disposal process in line with Section 31 (o) of the PPDA Act. 2003.	The Authority noted incomplete action files and missing records as indicated in 3.1 of this Management Letter	*Action implemented; however, payment and procurement files are archived separately*
2.	The Accounting Officer should prevail over the Contract Managers to continuously archive contract management records in line with Regulation 53 (3) (vii) of the PPDA (Contracts) Regulations, 2023	The Authority observed that Contract Managers did not prepare contract management reports as shown in 2.3.2 of the Management Letter	*Contract management reports are available for verification, these were being filled by the contract managers on their contract files.*

Implication

Failure to implement audit recommendations results in the recurrence of procurement weaknesses, limits improvements in the procurement and disposal function, exposes the Entity to repeated non-compliance with the PPDA legal framework, and increases the risk of inefficiency, delays, and failure to achieve value for money.

Management response

Audit recommendations were noted and all implemented. See responses in Table 1 above

Authority's Comment

The Authority noted that, while the Entity made progress in implementing some of the recommendations from the FY 2023/2024 audit, two recommendations representing 33% remained partially implemented as indicated in Table 2 above where no documentary evidence (contract management reports and attendance sheets for Management for annual performance retreat) was availed for review thus the finding was maintained.

Recommendations

- The Accounting Officer should implement all previous audit recommendations in accordance with Section 10 of the PPDA Act Cap. 205.
- The Accounting Officer should develop and maintain an audit recommendation implementation tracker indicating the responsible officer, actions required, timelines, and implementation status for each recommendation.

2.1.2 Low Procurement plan implementation rate

The Authority noted that the Entity implemented only 50.30 % of the procurement plan for the FY 2024/2025 with an implementation variance of UGX 11,028,851,414 equivalent to 49.7%. Table 4 below summarizes information on the procurement plan and utilization of funds for the FY 2024/2025.

Table 4: Procurement plan implementation rate

Analysis of procurement spend	
Total procurement plan value inclusive VAT (UGX)	22,193,032,132
Total procurement spend value inclusive VAT (UGX)	11,164,180,718
Procurement plan implementation (%)	50.30 %
Variance (UGX)	11,028,851,414

Source: MOICT monthly reports and submitted consolidated procurement plan

Implication

Failure to implement planned procurement activities may delay the achievement of the Entity's strategic objectives, affect timely delivery of planned outputs, and reduce the effectiveness of resource utilization during the Financial Year.

Management Response

The difference between the planned and the actual implementation was as a result of lack of interface between e-GP and the Program Based Budgeting system in capturing multi-year procurements. However, following the upgrade of e-GP 2.0, this shall be resolved

Authority's Comment

The Authority notes the Entity's response; however, the Entity did not submit evidence of the multi-year procurements which covered the variance. Hence the finding was maintained.

Recommendation
The Head Procurement and Disposal Unit should review and update the Entity's procurement plan on quarterly basis and in any other case, wherever necessary, in the event certain items are not procured as planned in accordance with Section 60 (7) of the PPDA Act Cap. 205, an updated and approved plan should be submitted to the Authority in accordance with Section 60 (8) of the PPDA Act Cap. 205 where the e-GP system fails to accommodate such amendments like the inclusion of multi-year procurements.

2.1.3 Non-reservation of procurements to Special Interest Groups in the procurement plan

Paragraph 2.1 (ii) of Guideline No.11 of 2024 requires the Entity to reserve at least 15% of its annual procurement plan budget for award to registered associations of Women, Youth and Persons with Disabilities. The Authority did not find any reserved procurements for SIGs in the annual procurement plan for FY 2024/2025.

In addition, it was noted that whereas the Entity awarded all contracts worth UGX 11,164,180,718 to local providers, there was no specific contracts reported as having been awarded to Special Interest Groups contrary to the PPDA Guideline 11 of 2024 on reservation schemes to promote the participation of registered associations of Women, Youth and Persons with disabilities in public procurement.

Implication
Failure to implement the reservation schemes deprives the Special Interest Groups of the opportunity to participate in public procurement and defeats the purpose of social inclusion in public procurements as enshrined in PPDA Guideline No. 11 of 2024.

Management Response
During the FY the management made an effort to reserve some procurements for Special Interest Groups as per Annex11. However, there is a challenge of these Interest groups responding to bids when invited.

Authority's comment
The Authority noted the response but found no evidence of the summitted Annex II as adduced by the Entity to indicate that it had previously attempted to implement Guideline No. 11 of 2024 as alluded to in the Management response.

Recommendation
The Head, Procurement and Disposal Unit should integrate reservation schemes the Entity's procurement planning process, ensuring that at least 15% of the annual procurement budget is allocated to Special Interest Groups in line with Section 53 of the PPDA Act Cap. 205 and Guideline No. 11 of 2024.

2.1.4 Delays in obtaining approvals at different stages of the procurement cycle

The Authority analysed the ability of the Entity to execute procurement activities in a timely manner to ensure fast delivery of services in compliance with Section 51 of the PPDA Act, Cap

205 which states "*that all procurement and disposal shall be conducted in a manner which promotes economy, efficiency and value for money*".

Delays in obtaining approvals at different stages of the procurement cycle were observed averaging 40 days in the following three procurements worth UGX 116,840,231 as indicated in Table 5 below:

Table 5: procurements and the delays observed:

No.	Subject of procurement	Area of delay	Total working days observed as delay	*Responses*
1.	MOICT/NCONS/2024-2025/00043 Repair of Motor Vehicle UG 0051N Provider: Arrow Centre Limited UGX 11,853,100	Delayed confirmation of funding by Accounting Officer: The User Department initiated the procurement on 27th November 2024, the Head of Department approved it on 4th December 2024 and the Accounting Officer confirmed funding on 14th January 2025.	25	*This anomaly is regrettable*
2.	MOICT/SUPLS/2024-2025/00011 Procurement of Assorted Stationery and Toner for Q3 Provider: Touch Worth Uganda Limited UGX 59,944,000	Delay by the Procurement and Disposal Unit to submit the procurement request to the Contracts Committee for approval: Despite the Accounting Officer's confirmation of funding on 24th December 2024, the Procurement and Disposal Unit's submission to Contracts Committee for approval was made on 23rd January 2025.	20	*This anomaly is regrettable*
		Delayed approvals by the Contracts Committee: The Procurement and Disposal Unit submitted the procurement method, Evaluation Committee and the bidding document to Contracts Committee for approval on 23rd January 2025 and the Contracts	20	*This anomaly is regrettable*

No.	Subject of procurement	Area of delay	Total working days observed as delay	*Responses*
		Committee approved the submission on 6th March 2025 thus delaying by 20 working days beyond the regulated 10 working days without justification.		
3.	MOICT/WRKS/2024-2025/00036 Repair of Motor Vehicle UG 0060 N Provider: CFAO Mobility Uganda Limited UGX 45,043,131	Delay by the Procurement and Disposal Unit to submit the procurement request to Contracts Committee for approval: Despite the Accounting Officer's confirmation of funding on 30th October 2024, the PDU made a submission to the Contracts Committee for approval on 19th March 2025 thus creating an unnecessary delay of 97 working days.	97	*Although the procurement was initiated by the Ministry, the funding was under UCC and this therefore necessitated confirmation of availability of funds with the Agency which delayed.* *The procurement was eventually forwarded to UCC to conclude.*
		Average delay	**40**	

Implication
Delays in the procurement processes risk occurrences of cost overruns and delayed service delivery to the intended beneficiaries.

Authority's Comment:
Whereas the Authority noted the Entity response regarding the delay by Procurement and Disposal Unit to submit procurement request to Contracts Committee for approval, there was no documentary evidence availed to show that the procurement was forwarded to Uganda Communications Commission for conclusion to justify the delay.

Recommendations
- The Head Procurement and Disposal Unit should ensure timely submissions of solicitation documents to the Contracts Committee for approval in accordance with Section 51 of the PPDA Act, Cap 205; and
- Contracts Committee should adjudicate submissions of Procurement and Disposal Unit expeditiously in accordance with Section 30(e) of the PPDA Act Cap. 205.

2.1.5 Issuance of inadequate solicitation documents

Regulations 42 (a) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023 stipulates that the "*the statement of requirements defines the requirement precisely and in a manner that leaves no doubt or assumption by a bidder*".

The audit noted that the solicitation documents issued to bidders in two procurements worth UGX 291,455,000 contained unclear Terms of Reference as indicated in Table 6 below:

Table 6:Procurements where inadequate solicitation documents were issued

No.	Subject of procurement	Authority's Findings	*Management response*
1.	MOICT/CONS/2024-2025/00005 Consultancy services for business process outsourcing national awareness and publicity Contract Sum: 157,015,000	The Terms of Reference did not: • Adequately define the actual communication problem that the consultancy is intended to solve despite identifying low awareness and misconceptions regarding the Business Process Outsourcing industry. Whereas the Terms of Reference sought to increase awareness and attract participation in the Business Process Outsourcing sector, it did not provide empirical evidence, baseline statistics, or analytical findings demonstrating the magnitude of the awareness gap, the categories of misconceptions existing within the public, or the regions and demographics most affected by limited awareness. In absence of a clearly defined communication problem supported by baseline evidence, the consultancy risks adopting generalized publicity approaches that may not effectively address the specific barriers hindering the uptake of Business Process Outsourcing opportunities; • Provide a sufficiently detailed strategic communication framework to guide implementation of a nationwide awareness campaign. While the consultant was expected to develop and implement a Business Process Outsourcing awareness strategy using multimedia communication channels, the document did not specify the	*This is noted, the limitation in scope was due to the limited funding for the specific procurements.*

No.	Subject of procurement	Authority's Findings	*Management response*
		communication architecture, campaign phases, outreach sequencing, or engagement methodologies expected under the assignment. • Articulate communication performance indicators capable of measuring success of the publicity campaign. • Adequately address inclusivity and equitable access within implementation of the campaign. The document did not require the Consultant to develop communication materials in local languages or tailor messaging for populations with limited digital literacy. Similarly, there were no provisions requiring accessibility support for Persons with Disabilities (PWDs) such as sub-titles, sign language interpretation, audio narration, accessible website formats, or simplified informational materials.	
2.	MOICT/CONS/2024-2025/00010 Subject of Procurement: Short term consultancy to develop a comprehensive framework for the establishment and management of internet exchange points (XPS) in Uganda Contract Sum: 134,440,000	• The Terms of Reference required development of a Monitoring and Evaluation (M&E) tool to assess performance against the Digital Service Standard, the document did not define the methodology or criteria for assessing compliance. Specifically, the Terms of Reference did not establish compliance scoring mechanisms, performance indicators, reporting formats, assessment frequencies, compliance thresholds, or enforcement procedures. • Whereas the Terms of Reference generally required the Consultant to undertake consultative engagements, they did not specify the number of consultations to be conducted, categories of stakeholders to be engaged, regional representation requirements, minimum participation thresholds, documentation standards,	*This is noted, the limitation in scope was due to the limited funding for the specific procurements.*

No.	Subject of procurement	Authority's Findings	*Management response*
		or validation workshop requirements. • The Terms of Reference lacked clearly defined acceptance criteria for deliverables despite indicating that payments shall be made upon "submission and acceptance" of outputs but did not specify review timelines, approval procedures, quality benchmarks, rejection thresholds, validation requirements, or revision limits for submitted reports and guidelines. • Absence of provisions relating to risk management and sustainability of implementation of the Digital Service Standards. The Terms of Reference did not require the Consultant to identify and propose mitigation measures for risks such as cyber threats, data breaches, system failures, technology obsolescence, low user adoption, resistance to change, or sustainability challenges.	

Implication

Inadequate solicitation documents may result in bidder confusion, submission of non-responsive bids, reduced competition, increased procurement disputes, and delays in completion of procurement proceedings and ineffective contract implementation.

Recommendations

The Authority takes note of the Entity's response and recommends that:

- The Accounting Officer should seek for training of technical staff from the Authority to strengthen the drafting of Statements of Requirements (SRs), scope definition, specification writing, and deliverable clarity.
- The Contracts Committee and Head PDU should strengthen quality assurance reviews of solicitation documents before issue to bidders to ensure that all provisions are accurate, relevant, compliant with applicable PPDA requirements, and appropriate for the procurement being undertaken in accordance with Section 42(a) of the PPDA (Rules and Methods for Procurement of supplies, works and non-Consultancy services) Regulations, 2023.

2.2 Compliance with the PPDA Act, Cap 205, Regulations, 2023 and PPDA Guidelines in the conduct of disposal activities

The Authority reviewed the Entity's disposal planning and implementation for the Financial Year 2024/25 and established that the Entity disposed of assets for the FY 2023/2024 through the public bidding auction method in compliance with the PPDA (Disposal of Public Assets) Regulations, 2023. The following exception was noted:

2.2.1 Failure to plan for obsolete items

Regulation 2 of the PPDA (Disposal of Public Assets) Regulations, 2023 requires the Accounting Officer to review the public assets of a Procuring and Disposing Entity in each Financial Year to identify assets to be disposed of in the following year. The Entity may use the Board of Survey to identify the public assets to be disposed of.

The Authority noted that whereas the Entity last disposed of assets in December 2024 and had a Board of Survey report in place for FY 2024/25 which equally had items for disposal, the Ministry did not prepare and submit to the Authority a disposal plan for the FY 2024/2025.

Implication

Failure to plan for disposal of obsolete assets may result in continued maintenance and storage costs, deterioration in asset value, inefficient asset management, and loss of potential revenue from disposal.

Management response

It's true a copy was not submitted to the Authority; however, this was prepared and was the basis for disposal (See Annex111)

Authority's comment

The Authority noted the Entity's response; however, the Entity did not avail the mentioned Annex III for review to confirm that a disposal plan was prepared and submitted to the Authority. Therefore, the finding was maintained.

Recommendation

The Head Procurement and Disposal Unit should prepare and submit the disposal plan for FY 2026/2027 by 30th July 2026 in accordance with the PPDA (Disposal of Public Assets) Regulations, 2023.

2.3 Efficiency and effectiveness in contract implementation including application of Environmental, Social, Health and Social safeguards (ESHS) where applicable.

2.3.1 Incomplete contract management records

Section 44 (1) of the PPDA Act Cap. 205 requires that a 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 or disposal action, or the date of the contract completion, whichever comes later.

Contrary to the above section, the Authority observed that in two sampled contracts worth UGX 295,008,431, some contract management records were not accessed on file for the period under review. The details are shown in Table 7 below:

Table 7: Procurements with missing records

No.	Subject of procurement	Missing documents	Responses
1.	MOICT/SVCS/2024-2025/00098 Procurement of Event Management for annual performance retreat from 17-18 June 2025 And Call off No. MOICT/COO/00001 Provider: Aekon Media UGX 249,965,300	Attendance sheets of participants	*Action implemented; however, payment and procurement files are archived separately.* *Attendance sheets of participants are payment records under accounts.*
2.	MOICT/WRKS/2024-2025/00036 Repair of Motor Vehicle UG 0060 N Provider: CFAO Mobility Uganda Limited UGX 45,043,131	Payment records; SCC (GCC 16.3) stated that "Payments shall be made no later than 30 days after submission of an invoice and its certification by the Procuring and Disposing Entity." At the time of the audit, there were no payment records on file	*As noted above, the procurement was halted and forwarded to UCC for conclusion.*

Implication

Failure to maintain complete procurement and contract management records limits accountability, impairs effective contract monitoring, hinders audit verification, and increases the risk of disputes and loss of institutional knowledge.

Authority's Comment

The Authority takes note of the Entity's response; however, some supporting documents i.e attendance sheets of participants during management for annual performance retreat and evidence of the procurement for repair of Motor Vehicle UG 0060 N being halted and forwarded to Uganda Communications Commission for conclusion were not availed for verification. The finding is maintained.

Recommendation

The Head Procurement and Disposal Unit should maintain and archive all documents pertaining to a particular procurement on their respective files in accordance with Section 33 (o) of the PPDA Act Cap. 205; periodic file reviews should be conducted to confirm completeness and compliance with record-keeping requirements in accordance with Section 44 (1) of the PPDA Act Cap. 205.

2.3.2 No evidence of preparing and sharing performance/progress reports.

Regulation 52 (3) (f) and (g) of the PPDA (Contracts) Regulations, 2023 requires the Contract Manager to appraise the performance of the provider and report on the performance of the provider to the Accounting Officer and Procurement and Disposal Unit.

In four sampled procurements worth UGX 469,677,131, there was no evidence of the responsible Users or Contract Managers preparing and sharing performance/progress reports with the Accounting Officer and Procurement and Disposal Unit Procurement and Disposal Unit for monitoring purposes contrary to Regulation 52 (3) (f) & (g) of the PPDA (Contracts) Regulations, 2023. The procurements are listed in Table 8 below:

Table 8: Procurements without contract management reports

No.	Subject of Procurement	Contract sum (UGX)
1.	MOICT/WRKS/2024-2025/00036 Repair of Motor Vehicle UG 0060 N Provider: M/S CFAO Mobility Uganda Limited	45,043,131
2.	MOICT/NCONS/2024-2025/00081 Replacement of Tyres for Motor vehicle UG 00057N / UG 32 0003 (HON.MOS NG) Provider: M/S ARROW Centre Limited	11,800,000
3.	MOICT/SVCS/2024-2025/00098 Procurement of Event Management for annual performance retreat from 17th-18th June 2025 And Call off No. MOICT/COO/00001 Provider: M/S Aekon Media	233,061,000
4.	MOICT/CONS/2024-2025/00101 Consultancy Services for the scoping and use of AI Governance and Policy Strategy Provider: Technology Solutions	179,773,000
	Total	**469,677,131**

Implication

This may adversely impact contract performance since various stakeholders are not update on the contract progress and provide timely resolution of any implementation issues like deviation from the terms and conditions of the contract.

Management response

Contract management reports are available for verification, these were being filled by the Contract Managers on their contract files. Going forward, these shall be attached to respective procurement files.

Authority's Comment

The Authority noted that whereas the Entity submitted Contract Managers' appointments for the said procurements, contract management reports were not availed for review.

Recommendation

Contract Managers should always appraise the performance of providers and report on their performance to the Accounting Officer and Procurement and Disposal Unit in accordance with Regulation 52 (3) (f) & (g) of the PPDA (Contracts) Regulations, 2023.

CHAPTER THREE: OVERVIEW OF THE PERFORMANCE OF THE ENTITY

3.1. Overall Audit Conclusion

The Procurement and Disposal activities of Ministry of Information, Communications Technology and National Guidance (MOICT) 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. The Entity maintained the required procurement structures and all stakeholders worked independently.

However, the audit identified several control and performance weaknesses that require management's attention. These included failure to procure 48.7% of the procurement plan, non-implementation of 33% of the previous audit recommendations, non-implementation of reservation schemes especially on Special Interest Groups, issuance of inadequate solicitation documents; delays in obtaining approvals at different stages of the procurement cycle and no evidence of the responsible Users or Contract Managers preparing and sharing performance/progress reports with the Accounting Officer and the Procurement and Disposal Unit for monitoring purposes.

Accordingly, the performance of Ministry of Information, Communications Technology and National Guidance (MOICT)for FY 2024/2025 was assessed as **Satisfactory**, with an overall weighted average risk rating of **16%**, but requiring targeted management interventions to strengthen procurement efficiency and compliance with statutory and regulatory requirements

3.2. Entity's Performance

The risk rating was weighted to determine the overall risk level of the Entity. The weighting was derived using the average weighted index as shown in Table 9 below:

Table 9:Weighted score of Ministry of Information, Communications Technology and National Guidance (MOICT)

Risk category	No.	No. %	Value (UGX)	Value %	Weights	Total weighted Average	
						By No.	By Value
High	2	17	291,455,000	7	0.6	10.2	4.2
Medium	3	25	116,840,231	3	0.3	0.9	0.9
Low	1	8	233,061,000	5	0.1	0.5	2.5
Satisfactory	6	50	3,756,030,517	85	0	0	0
Total	12	100	4,397,386,748	100	1	11.6	7.6

$$\text{Weighted Average (By no.)} = \frac{\sum \text{Weighted Score} \times 100}{60} = \frac{11.6 \times 100}{60} = 19.33\ \%$$

$$\text{Weighted Average (By Value)} = \frac{\sum \text{Weighted Score} \times 100}{60} = \frac{7.6 \times 100}{60} = 12.66\ \%$$

The average weighted risk rating = $\frac{19.33 + 12.66}{2}$ = 16%

The performance of the Entity is rated satisfactory as detailed in Table 10 below:

Table 10:Risk rating criteria

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

GRAPHICAL REPRESENTATION OF THE ENTITY'S PERFORMANCE

Figure 1:Performance by Number of Contracts

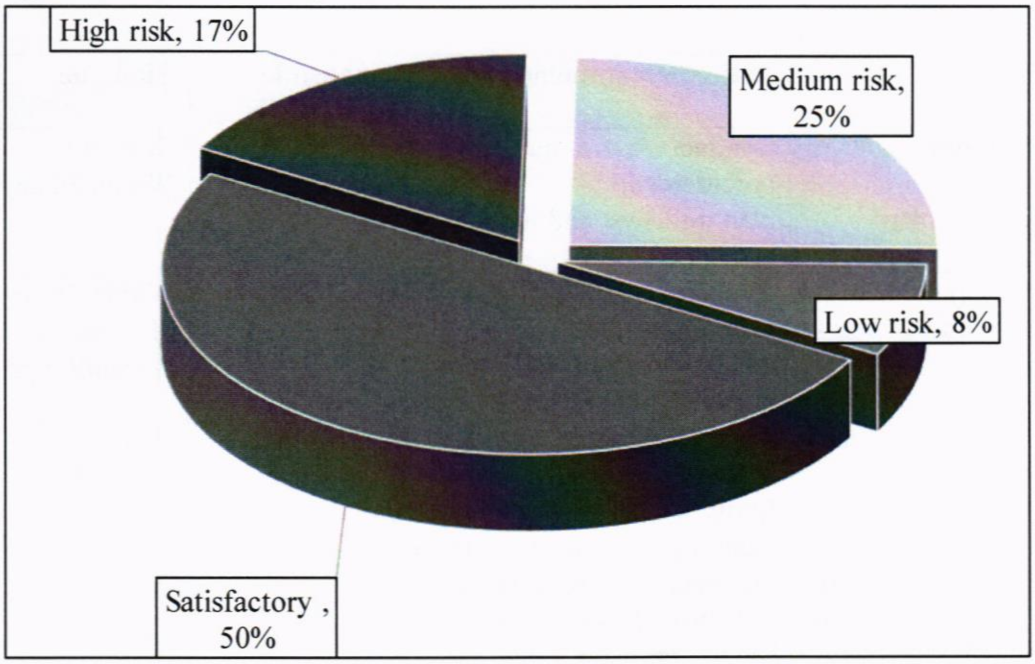
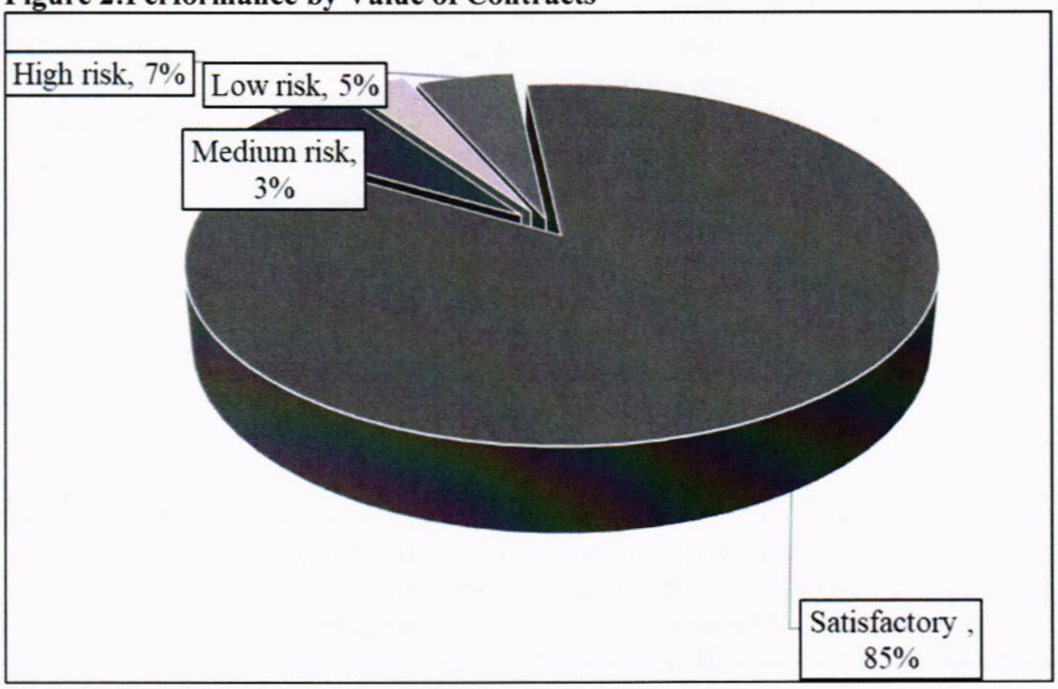


Figure 2:Performance by Value of Contracts



3.3. Recommended Action Plan

Ministry of Information, Communications Technology and National Guidance (MOICT) should implement the recommendations in Table 11 below within the stipulated timelines in order to improve its performance.

Table 11: Action Plan

No.	Finding	Action/Recommendation	Responsible Officer	Timeline
1	Failure to fully implement the procurement plan	Conduct quarterly procurement plan reviews and update plans	Head PDU	Quarterly Within 30 days
2	Failure to implement two previous audit recommendations	Establish audit recommendation audit register and quarterly monitoring	Accounting Officer	Within 30 days of receipt of the audit report
3	Non-implementation of reservation schemes: The Entity failed to allocate 15% of its procurement budget to Special Interest Groups (Women, Youth, and Persons with Disabilities	For the future, where necessary, revise the Entity's procurement planning process to integrate reservation schemes at the planning stage, ensuring that at least 15% of the annual procurement budget is allocated to Special Interest Groups	Accounting Officer/Head PDU	Quarter 1 FY 2025/26
4	Delays in obtaining approvals at different stages of the procurement cycle	Execute his/her role of certifying the availability of funds to support the procurement or disposal activities expeditiously and timely submissions of solicitation documents to Contracts Committee for approval ns in accordance with Section 51 of the PPDA Act Cap 205	Accounting Officer/Head PDU/	Continuously
5	Issuance of inadequate solicitation documents solicitation; documents issued to bidders in two procurements worth UGX 291,455,000 contained unclear Terms of Reference	Training of technical staff to strengthen the drafting of Statements of Requirements, scope definition, specification writing, and deliverable clarity	Accounting Officer/Head PDU/User Departments	Quarter 1 FY 2025/26

No.	Finding	Action/Recommendation	Responsible Officer	Timeline
6	No evidence in four sampled procurements worth UGX 486,581,431, of the responsible User Departments or Contract Managers preparing and sharing performance/progress reports with the Procurement and Disposal Unit for monitoring purposes	Contract Managers should always appraise the performance of providers and report on their performance to the Accounting Officer and Procurement and Disposal Unit in accordance with Regulation 52 (3) (f) & (g) of the PPDA (Contracts) Regulations, 2023.	Contract Managers	Continuously

ANNEX 1: FINDINGS AND RATING OF THE INDIVIDUAL PROCUREMENTS REVIEWED

No.	Details of the procurement	Exceptions /findings
	High Risk Procurements	**Reasons for High-Risk Rating**
1.	Moict/Cons/2024-2025/00010 Short Term Consultancy to Develop A Comprehensive Framework For The Establishment And Management Of Internet Exchange Points (Xps) In Uganda Contract Sum: 134,440,000	• The Terms of Reference required development of a Monitoring and Evaluation (M&E) tool to assess performance against the Digital Service Standard, the document did not define the methodology or criteria for assessing compliance. Specifically, the Terms of Reference did not establish compliance scoring mechanisms, performance indicators, reporting formats, assessment frequencies, compliance thresholds, or enforcement procedures. • Whereas the Terms of Reference generally required the Consultant to undertake consultative engagements, they did not specify the number of consultations to be conducted, categories of stakeholders to be engaged, regional representation requirements, minimum participation thresholds, documentation standards, or validation workshop requirements. • The Terms of Reference lacked clearly defined acceptance criteria for deliverables despite indicating that payments shall be made upon "submission and acceptance" of outputs but did not specify review timelines, approval procedures, quality benchmarks, rejection thresholds, validation requirements, or revision limits for submitted reports and guidelines. • Absence of provisions relating to risk management and sustainability of implementation of the Digital Service Standards. The Terms of Reference did not require the Consultant to identify and propose mitigation measures for risks such as cyber threats, data breaches, system failures, technology obsolescence, low user adoption, resistance to change, or sustainability challenges.
2.	MOICT/CONS/2024-2025/00005 Consultancy services for business process outsourcing national awareness and publicity Contract Sum: 157,015,000	The Terms of Reference did not adequately; • define the actual communication problem that the consultancy was intended to solve. Whereas the Terms of Reference sought to increase awareness and attract participation in the Business Process Outsourcing sector, it did not provide empirical evidence, baseline statistics, or analytical findings demonstrating the magnitude of the awareness gap, the categories of

No.	Details of the procurement	Exceptions /findings
		misconceptions existing within the public, or the regions and demographics most affected by limited awareness. • address inclusivity and equitable access within implementation of the campaign. The document did not require the consultant to develop communication materials in local languages or tailor messaging for populations with limited digital literacy. • Similarly, there were no provisions requiring accessibility; and support for Persons with Disabilities (PWDs) such as sub-titles, sign language interpretation, audio narration, accessible website formats, or simplified informational materials.
	Medium Risk Procurements	**Reasons for Medium-Risk Rating**
3.	MOICT/SUPLS/2024-2025/00011 Procurement of Assorted Stationery and Toner for Q3 Provider: Touch Worth Uganda Limited UGX 59,944,000	• Delay by Procurement and Disposal Unit to submit procurement request to Contracts Committee for approval; Accounting Officer's confirmation of funding was on 24th December 2024, the Procurement and Disposal Unit submission to Contracts Committee for approval was on 23rd January 2025 thus a delay of 20 days • Delayed approvals by Contracts Committee; The Procurement and Disposal Unit submitted the procurement method, evaluation committee and other details to Contracts Committee for approval on 23rd January 2025 and the Contracts Committee approved the submission on 6th March 2025 thus delaying by 20 working days beyond the regulated 10 working days.
4.	MOICT/WRKS/2024-2025/00036 Repair of Motor Vehicle UG 0060 N Provider: CFAO Mobility Uganda Limited UGX 45,033,647	• Delay by Procurement and Disposal Unit to submit procurement request to Contracts Committee for approval; Despite the Accounting Officer's confirmation of funding on 30th October 2024, the PDU made a submission to Contracts Committee for approval was on 19th March 2025 thus a delay of 97 days • No completion report
5.	MOICT/NCONS/2024-2025/00043 Repair of Motor Vehicle UG 0051N Provider: Arrow Centre Limited UGX 11,853,100	Delayed confirmation of funding by Accounting Officer; The User Department initiated the procurement on 27th November 2024 and the Accounting Officer confirmed funding on 14th January 2025

No.	Details of the procurement	Exceptions /findings
	Low Risk Procurements	**Reasons for Low -Risk Rating**
6.	MOICT/SVCS/2024-2025/00098 Procurement of Event Management for annual performance retreat from 17-18 June 2025 And Call off No. MOICT/COO/00001 Provider: Aekon Media UGX 233,061,000	Missing attendance sheets of participants and a completion report
	Satisfactory Procurements	
7.	MOICT/CONS/2023-2025/00037 Development of online business registration-system (OBRS)mobile application-and upgrade of OBRS Web Based System Provider: Govnet Services Ltd UGX 1,134,930,277	
8.	MOICT/NCONS/2024-2025/00081 Replacement of Tyres for Motor vehicle UG 00057N / UG 32 0003 (HON.MOS NG) Provider: M/S ARROW Centre Limited UGX 11,800,000	
9.	MOICT/CONS/2024-2025/00002 Consultancy Services for the Scoping and use cases for AI Government and policy strategy Provider: Technology Solutions UGX 179,773,000	
10.	MOICT/CONS/2024-2025/00009 Procurement for Support and Maintenance for PDMIS-Monitoring and Evaluation System Provider: Deron Limited UGX 2,280,000,000	
11.	MOICT/WRKS/2024-2025/00032 Repairs of Motor Vehicle UBK 108 P Provider: G.K Lexus Garage UGX 22,597,000	
12.	MOICT/SRVCS/2022-2023/00067 And Call off No. MOICT/COO/00004 Procurement of Event Management for BFP (Budget Framework Paper) Provider: Aekon Media UGX 126,930,240	

ANNEX 2: SAMPLE FOR MINISTRY OF ICT AND NATIONAL GUIDANCE (MOICT) PERFORMANCE AUDIT FY 2024/25

S/N	Reference Number	Particulars	Method	Provider	CONTRACT SUM (UGX)	Risk Rating
1.	MOICT/SRVCS/2022-2023/00067 And Call off No. MOICT/COO/00004	Procurement of Event Management for BFP (Budget Framework Paper)	Request for Quotations/Proposals	Aekon Media	126,930,240	Medium
2.	MOICT/CONS/2024-2025/00009	Procurement off Support and Maintenance for PDMIS-Monitoring and Evaluation System	Open Domestic Bidding Method	Deron Limited	2,280,000,000	Satisfactory
3.	MOICT/NCONS/2024-2025/00098	Events Management for performance review retreat	Request for Quotations/Proposals	AEKON Media Ltd	233,061,000	Low
4.	MOICT/SUPLS/2024-2025/00011	Procurement of Assorted Stationery and Tonner for Q3	Request for Quotations/Proposals	Touch Worth Uganda Limited	59,944,000	Medium
5.	MOICT/WRKS/2024-2025/00032	Repairs of Motor Vehicle UBK 108 P	Request for Quotations/Proposals	G.K Lexus Garage	22,597,000	Medium
6.	MOICT/WRKS/2024-2025/00036	Repair of Motor Vehicle UG0060 N	Request for Quotations/Proposals	CFAO (Mobility (Same vehicle)	45,033,647	Medium
7.	MOICT/CONS/2024-2025/00081	Replacement of Tyres for Motor vehicle UG 00057N / UG 32 0003	Request for Quotations/Proposals	ARROW Centre Limited	11,800,000	Medium
8.	MOICT/NCONS/2024-2025/00043	Repair of Motor Vehicle UG 0051N	Request for Quotations/Proposals	Arrow Centre Limited	11,853,100	Medium
9.	MOICT/CONS/2024-2025/00002	Consultancy Services for the Scoping and use cases for AI Gov't and policy strategy	Request for Quotations/Proposals	Technology Solutions	179,773,000	Medium
10.	MOICT/CONS/2023-	Development of online	Open Domestic	Govnet	1,134,930,277	Satisfactory

	2025/00037	business registration-system (OBRS)mobile application- and upgrade of OBRS Web Based System	Bidding	Services Ltd		
11.	MOICT/CONS/2024-2025/00005	Consultancy services for business process outsourcing national awareness and publicity	Request for Quotations/Proposals	Reabra Technologies Ltd	157,015,000	High
12.	MOICT/CONS/2024-2025/00010 Subject of	Short term consultancy to develop a comprehensive framework for the establishment and management of internet exchange points (XPS) in Uganda	Request for Quotations/Proposals	Spovo U Ltd	134,440,000	High
	TOTAL				**4,397,386,748**	

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 a risk to the regulatory system or the entity's reputation. Such cases warrant immediate attention by senior management. Significant deviations from established policies and principles and/or generally accepted industry standards will normally be rated "high".	**Planning:** Lack of or failure to procure within the approved plan	This implies emergencies and the use of the direct procurement method which affects competition and value for money.
		Bidding Process: Use of wrong/inappropriate procurement methods, failure to seek Contracts Committee approvals, and usurping the powers of the PDU.	This implies the use of less competitive methods which affects transparency, accountability, and value for money.
		Evaluation: Use of inappropriate evaluation methodologies or failure to conduct an evaluation.	This implies financial loss caused by awarding contracts at higher prices or shoddy work caused by failure to recommend an award to a responsive bidder.
		Record Keeping: Missing procurement files and missing key records on the files namely; solicitation documents, submitted bids, evaluation report, and contracts.	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,	**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	This implies lack of efficiency, standardisation and avoiding competition.

RISK	DESCRIPTION	AREA	IMPLICATION
	warrant timely management action using the existing 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.	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	**Planning:** Lack of procurement reference numbers.	This leads to failure to track the procurements which leads to poor record keeping.

RISK	DESCRIPTION	AREA	IMPLICATION
	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 management action to put in place and monitor compliance with detailed procedures.	**Bidding Process:** Not signing the Ethical Code of Conduct	This leads to failure to declare conflict of interest and a lack of transparency.

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.