

# **PROCUREMENT AND DISPOSAL AUDIT REPORT FOR THE FINANCIAL YEAR 2023/2024**

**UGANDA POLICE FORCE**

**JULY 2025**

## TABLE OF CONTENTS

Acronyms .....	ii
EXECUTIVE SUMMARY .....	1
CHAPTER 1: INTRODUCTION .....	3
1.1 The Entity .....	3
1.2 Background .....	3
1.3 Main Audit Objective .....	4
1.4 Audit Scope .....	4
1.5 Audit Methodology .....	4
CHAPTER TWO: AUDIT FINDINGS .....	6
2.1 Compliance with the general provisions of the PPDA Act, Cap. 205 and Regulations 2023 .....	6
2.2 Level of Compliance with the PPDA Act, Cap. 205 & Regulations, 2014 and 2023 in the conduct of procurement and disposal activities .....	10
2.3 Level of Efficiency and Effectiveness in Contract Implementation contract implementation, adherence to and implementation of Environmental, Social, Health and Safety safeguards in the procurement process and contract implementation .....	11
CHAPTER THREE: OVERVIEW OF THE PERFORMANCE OF THE ENTITY .....	15
3.1. Overall Audit Conclusion .....	15
3.2. Recommended Action Plan .....	17
Appendix 1: Physical Verification Pictorial .....	18
Appendix 2: Transaction list for Financial Year 2023/2024 .....	19
Appendix 3: Findings and Rating on the Individual Contracts reviewed .....	22
Appendix 4: Risk Rating Criteria .....	23

## **Acronyms**

AO	Accounting Officer
CC	Contracts Committee
FY	Financial Year
PS/ST	Permanent Secretary/Secretary to the Treasury
PDE	Procuring and Disposing Entity
PDU	Procurement and Disposal Unit
PPDA	Public Procurement and Disposal of Public Assets Authority
ODB	Open Domestic Bidding
RFP	Request for Proposals
RFQ	Request for Quotations
SBD	Standard Bidding Document
UPF	Uganda Police Force
UGX	Uganda Shillings

## EXECUTIVE SUMMARY

The Public Procurement and Disposal of Public Assets Authority carried out a procurement and disposal audit of Uganda Police Force. The exercise covered a sample of 17 procurement and disposal transactions carried out during the Financial Year 2023/2024. The overall objective of the audit was to assess the effectiveness and efficiency of procurement and disposal processes and the adherence of the Entity's systems to the PPDA Act, Cap. 205 and PPDA Regulations, 2014 and 2023.

From the findings of the procurement and disposal audit exercise, the performance of the Uganda Police Force for the Financial Year 2023/24 was **satisfactory** with an overall weighted average risk rating of **27.5 %**. The risk rating is detailed in Chapter 3 of the audit report.

The following were the key positive findings observed during the audit:

1. Increased efficiency in the procurement process as observed by few contracts that had delays at different stages of the procurement process;
2. The Authority observed no contracts signed after expiry of the bid validity period; and
3. Improvement in the Entity's rate of implementation of previous audit recommendations.

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

1. Failure to fully implement the procurement plan for FY 2023/2024 which created a variance of UGX 1,359,833,222 between the procurement plan and actual spending which directly impedes service delivery, depriving intended beneficiaries of essential support services and delaying the realization of key objectives;
2. Failure to fully implement two of the previous audit recommendations contrary to Section 10 (1) (a) of the PPDA Act, Cap. 205, which affects the performance of the procurement and disposal function in the Entity;
3. Award to a non-compliant bidder in the procurement of 80 sets of riding gear, gloves, elbow guards, and knee guards for force fleet management worth UGX 38,400,000, whereby the Best Evaluated Bidder provided an invalid Tax Clearance Certificate contrary to the requirement in the bidding document. Award to non-compliant bidder could result in contracting with a provider who fails to meet their contractual obligations hindering service delivery;
4. Failure to identify forgery of documents during evaluation in the procurement for works for upgrade of the Police lifts and refurbishment at Police Headquarters in Naguru, where the Best Evaluated Bidder, Uganda Elevator Company Ltd submitted a Tax Clearance Certificate which the Authority verified and established had been forged. This may result in award to a non-complaint bidder who fails to meet its contractual obligations hindering service delivery;
5. Delays at the evaluation stage averaging eight weeks in two procurements worth UGX. 8,909,350,744, contrary to Regulation 4 (1) of the PPDA (Evaluation) Regulations, 2023 which stipulates a maximum of ten working days from the date of opening of bids for evaluation of supplies. Delayed evaluation delays contract implementation and service delivery; and

6. Failure to enforce submission of performance securities in three procurements worth UGX 3,413,060,552, contrary to the requirement in the contracts under the Special Conditions of Contract 19.1 in the bidding document that required 5% performance security. Failure to enforce submission of performance securities leaves the Entity with no fallback position in the event that the provider does not meet their contractual obligations.

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

1. Management should conduct comprehensive reviews of the procurement plan and align it with the released and available funds and the Entity's core mandate. Any updates to the procurement plan, resulting from the reviews, should be done in adherence with Section 60 (7) of the PPDA Act Cap. 205;
2. The Accounting Officer should ensure that all audit recommendations are implemented in accordance with Section 10 (1) (a) of the PPDA Act, Cap. 205;
3. The Head Procurement and Disposal Unit should always ensure that the determination of a bid's compliance and responsiveness is based on the contents of the bid and a substantially compliant bid is one that conforms to all the set criteria in the bidding document without material deviation or omission in accordance with Regulation 5 of the PPDA (Evaluation) Regulations 2023;
4. The Head Procurement and Disposal Unit should apply a strict verification process during evaluation to ensure that information submitted by bidders is true and correct. The Entity should consider submitting Uganda Elevator Company Ltd to the Authority for blacklisting in accordance with Section 128 of the PPDA Act, Cap 205;
5. The Head Procurement and Disposal Unit should ensure that evaluation is concluded within the timeline specified for the type of procurement in accordance with Regulation 4 (1) of the PPDA (Evaluation) Regulations, 2023. Where the Evaluation Committee requires more time, the Committee should seek from the Accounting Officer an extension of the time period for the evaluation exercise; and
6. The Accounting Officer should ensure that where performance security is a requirement in the contract, providers submit this in accordance with Regulation 12 (1) (a) of the PPDA (Contracts) Regulations, 2023. As an alternative to performance security, the Entity should consider requiring bidders to provide Performance Securing Declarations as provided for under PPDA Guideline No. 3/2024 on Bid and Performance Securities.

## CHAPTER 1: INTRODUCTION

### 1.1 The Entity

The Uganda Police Force as provided in the constitution of the Republic of Uganda, and Uganda Police Force Act; is mandated to protect life and property, prevent and detect crime, keep law and order, and maintain the overall security and public safety in Uganda.

According to Section 28 of the Public Procurement and Disposal of Public Assets (PPDA) Act, Cap. 205, the Accounting Officer has the overall responsibility for the successful execution of procurement, disposal and contract management in a Procuring and Disposing Entity. The Accounting Officer of Uganda Police Force during the Financial Year 2023/24 was Mr. Aggrey Wunyi.

The Permanent Secretary / Secretary to the Treasury of Ministry of Finance, Planning and Economic Development approved members of the Contracts Committee listed in Table 1 below who also acted during the period under review:

**Table 1: List of Contracts Committee Members during the Financial Year 2023/2024**

No.	Name	Committee Position	Title/Position in the Entity
1.	Ms. Christine Nanding	Chairperson	Senior Commissioner of Police
2.	Mr. Erias Kassirabi	Member	Political Attaché, Nairobi
3.	Mr. Fred Mirondo	Member	Assistant Commissioner of Police
4.	Mr. Isaac Gale	Member	Finance
5.	Mr. Raymond Kyasanku	Member	Ag. Commissioner of Police/Construction

According to Section 33 (a) of the PPDA Act, Cap. 205 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 Ms. Margaret Basemera.

### 1.2 Background

The Public Procurement and Disposal of Public Assets Authority carried out the procurement and disposal audit that covered a representative sample of 17 procurement transactions under the Financial Year 2023/2024. 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, 2014 and 2023.

### 1.3 Main Audit Objective

The overall objective of the audit was to assess the effectiveness and efficiency of procurement and disposal processes and the adherence of the Entity's systems and processes to the PPDA Act, Cap.205, PPDA Regulations, 2014 and 2023 and PPDA Guidelines.

The specific objectives of the audit were to establish:

1. The level of compliance by the Entity with the general provisions of the PPDA Act, Cap. 205 and PPDA Regulations 2014 and 2023 with regard to the performance of the procurement structures and conduct of procurement processes;
2. The level of compliance with the PPDA Act, Cap. 205 and Regulations, 2014 and 2023 in the conduct of procurement and disposal activities; and
3. The level of efficiency and effectiveness in contract implementation including the application of Environmental, Social, Health and Safety (ESHS) requirements where applicable.

#### 1.4 Audit Scope

The audit involved a review of the procurement process, disposal process, general compliance issues and contract implementation of the 17 transactions under Financial Year 2023/24 contained in **Appendix 1**. The sample was selected based on stratified random sampling using Contracts Committee minutes and monthly procurement and disposal reports. The distribution of the transaction population and the sample is in Table 2 below:

**Table 2: Distribution of transaction's population and sample for Uganda Police Force for Financial Year 2023/24:**

Method of procurement	Pop. Value in UGX	Sample value (UGX)	% By val.	Pop No.	Sample No.	% By No.
Open Domestic Bidding	53,526,718,280	51,049,279,481	94	13	9	69
Request for Proposals	24,780,000	24,780,000	100	1	1	100
Request for Quotations	134,174,500	134,174,500	100	2	2	100
Restricted Domestic Bidding	478,891,200	478,891,200	100	3	3	100
Disposal	N/A	N/A		1	1	100
<b>TOTAL</b>	<b>54,164,563,980</b>	<b>51,687,125,181</b>	<b>95.4</b>	<b>19</b>	<b>15</b>	<b>80</b>

#### 1.5 Audit Methodology

On 27<sup>th</sup> February 2025, the Entity was notified about the audit exercise. An audit launch meeting was held on 7<sup>th</sup> March 2025 between the audit team and the Entity's officials.

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

During the audit, the auditors held interviews with the staff from the Procurement and Disposal Unit (PDU) and User Departments that were necessary in obtaining crucial qualitative information about the internal control system and processes in place.

On completion of data collection and before writing the report, the Audit Manager reviewed the working papers for completeness. The working papers contain detailed chronology of findings on

each of the sampled transactions. The audit report presents the key findings and conclusions arising from the audit.

A debrief meeting to clear all pending issues that arose during the audit was held with the Entity management and staff on 15<sup>th</sup> May 2025 before the auditors could embark on preparation of the management letter. The auditors prepared the management letter, which was sent to the Entity on 12<sup>th</sup> June 2025 with a request to submit a management response by 17<sup>th</sup> June 2025, which was submitted on 7<sup>th</sup> July 2025. The exit meeting was held on 8<sup>th</sup> July 2025 at the PPDA Head Office in Kampala.



## CHAPTER TWO: AUDIT FINDINGS

### 2.1 Compliance with the general provisions of the PPDA Act, Cap. 205 and PPDA Regulations 2014 and 2023 with regard to the performance of the procurement structures and conduct of procurement processes

The following exceptions were identified.

#### 2.1.1 Procurement Plan Implementation

The Entity had a procurement plan worth UGX 217,685,136,000 as shown in Table 3 below:

**Table 3: Breakdown of the Procurement Plan**

S/no	Category	Planned value (UGX)
1.	Supplies	133,720,706,000
2.	Services	36,234,492,000
3.	Works	47,729,938,000
	<b>TOTAL</b>	<b>217,685,136,000</b>

Assessment of the procurement plan and utilization of funds revealed that the procurement plan implementation rate of the Entity for FY 2023/2024 was 35% with a variance of UGX. 141,647,866,222. The procurement plan implementation was derived from the monthly reports and procurements identified to have been implemented that were not reported by the Entity. The implementation is summarised in Table 4 below:

**Table 4: Analysis of Procurement spend for FY 2023/24**

Total procurement plan value inclusive of VAT (UGX)	217,685,136,000
Total procurement spend value inclusive of VAT (UGX)	76,037,269,778
Procurement plan implementation rate (%)	35
Variance (UGX)	141,647,866,222

#### **Implication**

Failure to fully implement the procurement plan denies service delivery to the intended beneficiaries.

#### **Management Response**

Management stated that most of the UGX 141,647,866,222 was utilized through the various on-going framework contracts as indicated in Table 5 below:

**Table 5: Procurements undertaken under framework contracts**

S/No	Subject of Procurement	Estimated Cost (000) UGX
	<b>SUPPLIES</b>	
1.	Procurement of goods for duty free shop	2,000,000
2.	Procurement of assorted cartridges & toners	240,355

S/No	Subject of Procurement	Estimated Cost (000) UGX
3.	Procurement of Special Meals & drinks	16,622,887
4.	Procurement of Motor vehicle spare parts	6,629,107
5.	Procurement of fuel, lubricants & oils	44,224,022
6.	Procurement of assorted stationery	2,994,168
	<b>Sub Total</b>	<b>72,710,539</b>
	<b>SERVICES</b>	
7.	Procurement of Vehicle maintenance services	18,769,338
8.	Procurement of garbage collection services	2,555,200
9.	Procurement of Maintenance, repair & support for machinery & equipment	2,763,018
	<b>Sub Total</b>	<b>24,087,556</b>
	<b>WORKS</b>	
10.	Construction of 2 police apartment blocks, each block having 120 units in Katwe & Mbale	17,800,000
11.	Major renovations of Mbarara, Kitgum, Mubende, Jinja road, Mukono, Kagadi & Wandegaya Barracks	2,399,938
12.	Construction & Furnishing of District HQ in Nakaseke, Mitooma, Bukwo, Nabilatuk, Amudat, Buhweju, Namisindwa, Buwenge, Kitagwenda, Butebo, Obongi, Ngora and Kagadi	14,040,000
13.	Phased construction of a 300-bed police hospital in Nsambya	4,000,000
14.	Borehole drilling & Motorised pumping in Mbale, Jinja, Mbarara, Nsambya, Kireka, Arua, Gulu, PTS Ikaffe, Olilim, Kabalye	500,000
15.	Construction of 75 emptiable VIP Latrines (4-stance) in various locations countrywide	1,050,000
16.	Construction of 10 accommodation blocks (10 units per block) Rukiga, Mbarara District (Bwizi bwera), Iganga, Buvuma, Kalungu, Otuke, Kasangati, Serere, Kagadi & Manafwa	3,700,000
	<b>Sub Total</b>	<b>43,489,938</b>
	<b>Total (Supplies, Services &amp; Works)</b>	<b>140,288,033</b>



### **The Authority's Comment**

The Authority noted the Entity's response, however procurements worth UGX 1,359,833,222 were not implemented by the Entity and therefore the Authority maintains the finding. The procurement plan implementation is revised to reflect an implementation rate of 99.38%. Table 6 provides a summary of the procurement plan implementation:

**Table 6: Analysis of Procurement spend for FY 2023/24 (Revised after Management Response)**

Total procurement plan value inclusive of VAT (UGX)	217,685,136,000
Total procurement spend value inclusive of VAT (UGX)	216,325,302,778
Procurement plan implementation rate (%)	0.62
Variance (UGX)	1,359,833,222

### **Recommendations**

- Management should conduct comprehensive reviews of the procurement plan and align it with the released and available funds and the Entity's core mandate. Any updates to the procurement plan, resulting from the reviews, should be done in adherence with Section 60 (7) of the PPDA Act Cap. 205.
- Regulation 15 (1) of the Public Procurement and Disposal of Public Assets (Procuring and Disposing Entities) Regulations, 2023, requires Procuring and Disposing Entities to submit periodic reports on procurement activities undertaken to the Authority. The Head Procurement and Disposal Unit should ensure that all call-off orders undertaken under the respective framework contracts are included in the monthly reports submitted to the Authority.

#### **2.1.2 Implementation of Previous Audit Recommendations**

Section 10 (1) (a) of the PPDA Act, Cap. 205 requires a Procuring and Disposing Entity to implement audit recommendations made by the Authority. The Authority conducted an audit of the Entity for Financial Year 2022/2023 and the report was issued in August 2024. Out of the 9 recommendations made, seven were fully implemented and two were not fully implemented. Table 7 below lists the audit recommendations that were not fully implemented by the Entity:

**Table 7: Audit recommendations for FY 2022/23 that were not fully implemented**

No.	Recommended Action	Status of Implementation
1.	The Accounting Officer should ensure that delays in procurement at various stages are addressed in accordance with Section 51 of the PPDA Act, Cap. 205. The Evaluation Committee should ensure that evaluation is concluded within the timelines specified under Regulation 4 (1) of the PPDA (Evaluation) Regulations, 2023.	Partially Implemented.  Refer to section 2.2.2 where delays were identified at evaluation of bids.
2.	The Accounting Officer should ensure that where performance security is a requirement in the bidding document, providers submit it in	Not implemented.

No.	Recommended Action	Status of Implementation
	accordance with Regulation 12 (1) (a) of the PPDA (Contracts) Regulations, 2023.	Refer to Section 2.3.1 where the submission of performance security was not enforced.

### **Implication**

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

### **Management Response**

Management pledged to continue to emphasize the implementation of previous audit recommendations through training of the various stake holders in the procurement process.

### **Recommendation**

The Authority noted Management's response and recommends that the Entity should aim for 100% implementation of audit recommendations in accordance with Section 10 (1) (a) of the PPDA Act, Cap. 205.

#### **2.1.3 Award to a non-compliant bidder**

Regulation 5 (1) of the PPDA (Evaluation) Regulations, 2023 states that the evaluation of bids shall be conducted in accordance with the evaluation criteria specified in the bidding document. In the bidding document for 80 sets of riding gear, gloves, elbow guards, and knee guards for force fleet management worth UGX 38,400,000, part of the evaluation criteria required bidders to provide a valid Tax Clearance Certificate and also demonstrate experience in having provided similar supplies.

The Authority observed that Modest Associates Ltd, the Best Evaluated Bidder provided a Tax Clearance certificate with a validity ending 21<sup>st</sup> February 2023 and as such by bid closing on 15<sup>th</sup> January 2024, the Tax Clearance Certificate was no longer valid. The Authority further observed that the bidder did not provide relevant documentation showing experience in similar supplies.

### **Implication**

Acceptance of a non-compliant bid by the Entity could result in award to a provider who fails to meet their contractual obligations hindering service delivery.

### **Management Response**

Management noted the anomaly and pledged to ensure strict compliance going forward.

### **Recommendation**

Evaluation Committees should ensure that the determination of a bid's compliance and responsiveness is based on the contents of the bid and a substantially compliant bid is one that conforms to all the set criteria in the bidding document without material deviation or omission in accordance with Regulation 5 of the PPDA (Evaluation) Regulations 2023.

## **2.2 Level of Compliance with the PPDA Act, Cap. 205 & Regulations, 2014 and 2023 in the conduct of procurement and disposal activities**

The Authority noted the following irregularities:

### **2.2.1 Failure to identify forgery of documents during evaluation**

In the procurement for works towards upgrade of the Police lifts and refurbishment at Police Headquarters in Naguru, the Best Evaluated Bidder, Uganda Elevator Company Ltd. submitted a Tax Clearance Certificate which the Authority verified and established had been forged. The certificate reference number UGND240368107 belonged to Dansem Construction Company Limited but had been edited to indicate it belonged to Uganda Elevator Company Ltd.

#### **Implication**

The Entity may award to non-complaint which could result in award to a provider who fails to meet their contractual obligations hindering service delivery.

#### **Management Response**

Management noted the anomaly and pledged to ensure strict verification of such documents with the issuing Authority.

#### **Recommendation**

The Entity should consider submitting Uganda Elevator Company Ltd to the Authority for blacklisting in accordance with Section 128 of the PPDA Act, Cap 205.

### **2.2.2 Delays at Evaluation Stage**

Regulation 4 (1) of the PPDA (Evaluation) Regulations, 2023 provides for ten working days from the date of opening of bids for the procurement of supplies. However, The Authority noted that there were delays at evaluation averaging eight weeks in two procurements worth UGX. 8,909,350,744. The Authority also further noted that the Evaluation Committee did not request for extension of the evaluation period from the Accounting Officer, contrary to Regulation 4 (2) of the PPDA (Evaluation) Regulations, 2023 which states that where an Evaluation Committee is not able to complete an evaluation exercise within the time specified in sub regulation (1), the Evaluation Committee shall, in writing, explain to the Accounting Officer the reasons for this and request for extension of the time period for the evaluation exercise. Table 8 below lists the two procurements where delays were observed at evaluation:

**Table 8: Procurements where delays were observed at Evaluation**

<b>No.</b>	<b>Subject of Procurement</b>	<b>Amount (UGX)</b>	<b>Exceptions noted</b>	<b>Management Response</b>
1.	Procurement of fast-moving consumables and spares of the Police garments machines under framework contract.	100,000,000	Bid closing was on (27 <sup>th</sup> September 2023) and evaluation was concluded on 24 <sup>th</sup> October 2023. This was a delay of 9 working days.	Management noted the anomaly and addressed the delays that were caused by the evaluation methodology.

No.	Subject of Procurement	Amount (UGX)	Exceptions noted	Management Response
2.	Procurement of assorted spares, tyres, tubes, batteries acids, distilled water, panel beating/body repairs materials, crew seat materials & tarpaulins for UPF Motor vehicles and Motorcycles under a two-year framework contract	8,809,350,744	Bid closing was on 31 <sup>st</sup> August 2022, evaluation of bids was done on 5 <sup>th</sup> January 2023 which was after 4 months. The Contract was signed later on 10 <sup>th</sup> August 2023 after 7 months.	Management noted the anomaly and addressed the delays that were caused by the evaluation methodology.
	<b>TOTAL</b>	<b>8,909,350,744</b>		

### Implication

Delayed evaluation delays contract implementation and service delivery.

### Recommendation

The Evaluation Committee should ensure that evaluation is concluded within the timeline specified for the type of procurement in accordance with Regulation 4 (1) of the PPDA (Evaluation) Regulations, 2023. Where the Evaluation Committee requires more time, the Committee should seek from the Accounting Officer an extension of the time period for the evaluation exercise.

## 2.3 Level of Efficiency and Effectiveness in Contract Implementation, adherence to and implementation of Environmental, Social, Health and Safety safeguards in the procurement process and contract implementation

The Authority noted the following irregularities:

### 2.3.1 Enforcement of submission of Performance Security

Special Conditions of Contract 19.1 in the bidding document required 5% performance security. However, in the following three procurements worth UGX 3,413,060,552, the submission of performance security was not enforced by the Entity yet the bidding documents /contracts required bidders to submit them. Table 9 lists the procurements where submission of performance security was not enforced by the Entity.

**Table 9: Procurements where Performance Security was not enforced**

No.	Subject of Procurement	Exceptions noted	Management Response
1.	Procurement of assorted furniture for Police training school at Kabalye	Submission of 5% performance security as per the Special Conditions of Contract was not enforced.	Management noted the observation but stated that the contract was performed to the satisfaction of the end User. Management pledged to continue to sensitize

No.	Subject of Procurement	Exceptions noted	Management Response
	<p>Procurement Reference Number: UPF/SUPLS/22-23/00018</p> <p>Provider: Inspiring Interiors Ltd</p> <p>Contract sum: UGX.166,540,959</p>		Contract Managers to abide by the procurement legal framework.
2.	<p>Procurement of 80 sets of riding gear, gloves, elbow guards, and knee guards for force fleet management.</p> <p>Procurement Reference Number/SUPLS/23-24/00011</p> <p>Provider: Modest Associates Ltd</p> <p>Contract sum: UGX.38,400,000</p>	5% performance security as per the special conditions of contract was not enforced.	<p>The observation is noted however the activation of the clause was an oversight since the value of the procurement did not require a performance security.</p> <p><b><u>The Authority's Comment</u></b></p> <p>Management noted the Entity's response, but maintains the finding given that the submission of a performance security was a requirement in the contract and therefore the Entity should have required the Provider to submit it.</p>
3.	<p>Supply and installation of modular pre-fabricated housing units.</p> <p>Procurement Reference Number/SUPLS/22-23/00033</p> <p>Provider: Modul House Engineering &amp; Construction Company Ltd in joint venture with Effectus Contractors Limited</p> <p>Contract sum: UGX 2,849,110,000</p>	Performance Security of 5% was required but it was not submitted.	<p>This was enforced. Management commits to proper filing of records.</p> <p><b><u>The Authority's comment:</u></b></p> <p>There was no evidence of submission of the performance security and hence the finding is maintained.</p>

### Implication

Failure to enforce submission of performance securities leaves the Entity with no fallback position in the event that the provider does not meet their contractual obligations.



### Recommendation

The Accounting Officer should ensure that where performance security is a requirement in the contract, providers submit this in accordance with Regulation 12 (1) (a) of the PPDA (Contracts) Regulations, 2023. As an alternative to performance security, the Entity should consider requiring bidders to provide Performance Securing Declarations as provided for under PPDA Guideline No. 3/2024 on Bid and Performance Securities.

## 2.4 NDP III Project Implementation

Under the National Development Plan 2020-2024/25, under the objective of “Strengthen the capacity of security agencies to address emerging security threats” one of the initiatives is to enhance the welfare and housing of security sector personnel.

As part of monitoring implementation of NDP III projects, the Authority reviewed the status of implementation of recent construction projects and established the biggest challenge being delay in implementation majorly due to lack of funds. The Authority established as follows:

During the audit, the Authority observed significant delays in the implementation of construction projects. This was mainly as a result of no allocation of funds in the year of audit; for example for the Jinja and Entebbe projects. Table 10 below highlights the observations made on the respective projects:

**Table 10: Construction Projects where delays were noticed**

No.	Project Description	Status	Observation	Management Response
1.	Construction of Police Apartment Blocks at Entebbe. Estimate as per the Bills of Quantities was UGX 8,585,566,155 Revised value: UGX 9,835,566,155	Incomplete and there was no construction taking place at the time of audit in May 2025.	As at the time of audit in May 2025, physical progress on the construction was at 30%.  The Authority noted that the Entity had not defined the duration of this project, given that the scope and timing of the project could not be defined.	Funds were repurposed for other contract obligations as directed by the PSST and projects redirected for implementation this FY 2025/2026.
2.	Construction of Police apartment blocks at Jinja. Estimate as per the Bills of Quantities was UGX 8,585,566,155	Incomplete and there was no construction taking place at the time of audit in May 2025	As at the time of audit in May 2025, physical progress on the construction was at 25%  The Authority noted that the Entity had not defined the duration of	Funds were repurposed for other contract obligations as directed by the PSST and projects redirected for



No.	Project Description	Status	Observation	Management Response
			this project, given that the scope and timing of the project could not be defined.	implementation this FY 2025/2026.

### **Implication**

Delays in project completion may compromise their intended purpose and benefits.

### **Management Response**

Management stated that funds had been repurposed for other contract obligations as directed by the Permanent Secretary/Secretary to Treasury and projects redirected for implementation in the Financial Year 2025/2026.

### **Recommendations**

The Authority noted the Entity's response and recommends as follows:

- The Entity should ensure that when the funds referred to above are availed, the Entity expedites the construction in order to complete the unfinished projects; and
- The Entity should implement effective project management practices to avoid delays and ensure efficient use of resources.
- The Entity should develop a plan to complete the abandoned projects and ensure their timely completion.

## CHAPTER THREE: OVERVIEW OF THE PERFORMANCE OF THE ENTITY

### 3.1. Overall Audit Conclusion

The performance of the Uganda Police Force for the Financial Year 2023/24 was **satisfactory** with overall weighted average risk rating of **27.5%**.

**Table 11: Risk Rating Criteria**

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

### Entity's Performance

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

**Table 12: Weighted score of Uganda Police Force**

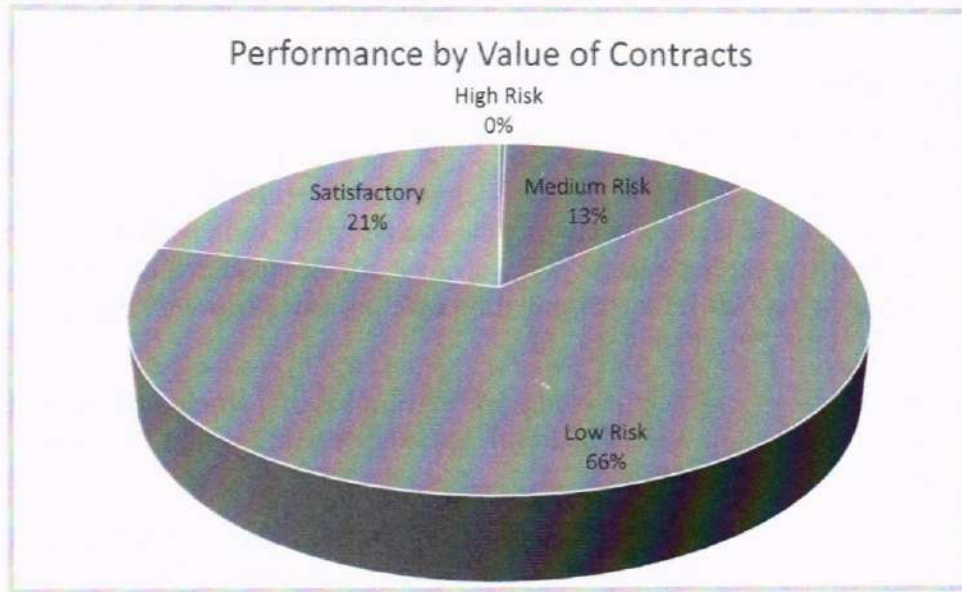
Risk category	No.	No. %	Value (UGX)	Value%	Weights	Total weighted Average	
						By No	By Value
High	2		160,884,000	12	0.6	7.2	0.6
Medium	5		7,208,750,794	29	0.3	8.7	3.9
Low	6		36,099,490,600	35	0.1	2.4	6.6
Satisfactory	4		11,189,594,286	24	0	0	0
<b>Total</b>	<b>17</b>		<b>54,658,719,680</b>	<b>100</b>	<b>1.0</b>	<b>18.3</b>	<b>12</b>

$$\text{Performance by Number} = \frac{18.3 \times 100}{60} = 32\%$$

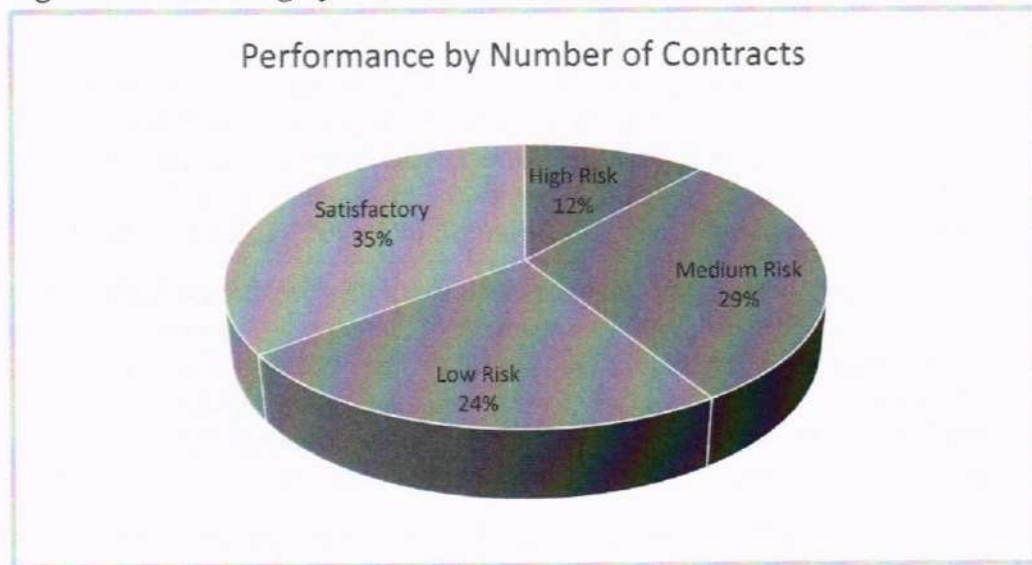
$$\text{Performance by Value} = \frac{12 \times 100}{60} = 23\%$$

$$\text{The average weighted risk rating} = \frac{32+23}{2} = 27.5\%$$

**Figure 1: Risk rating by Value of contracts**



**Figure 2: Risk rating by Number of contracts**



### 3.2 Recommended Action Plan

The Uganda Police Force should implement the following recommendations within the timeframe given in order to improve its performance in Procurement and Disposal.

**Table 13: Action Plan**

No.	Recommended Action	Target Date
1.	Management should conduct comprehensive reviews of the procurement plan and align it with the released and available funds and the Entity's core mandate. Any updates to the procurement plan, resulting from the reviews, should be done in adherence with Section 60 (7) of the PPDA Act Cap. 205;	
2.	The Accounting Officer should ensure that all audit recommendations are implemented in accordance with accordance with Section 10 (1) (a) of the PPDA Act, Cap. 205.	Continuous
3.	The Head Procurement and Disposal Unit should always ensure that the determination of a bid's compliance and responsiveness is based on the contents of the bid and a substantially compliant bid is one that conforms to all the set criteria in the bidding document without material deviation or omission in accordance with Regulation 5 of the PPDA (Evaluation) Regulations 2023.	Continuous
4.	The Head Procurement and Disposal Unit should apply a strict verification process during evaluation to ensure that information submitted by bidders is true and correct. The Entity should consider submitting Uganda Elevator Company Ltd to the Authority for blacklisting in accordance with Section 128 of the PPDA Act, Cap 205.	Continuous
5.	The Head Procurement and Disposal Unit should ensure that evaluation is concluded within the timeline specified for the type of procurement in accordance with Regulation 4 (1) of the PPDA (Evaluation) Regulations, 2023. Where the Evaluation Committee requires more time, the Committee should seek from the Accounting Officer an extension of the time period for the evaluation exercise.	Continuous
6.	The Accounting Officer should ensure that where performance security is a requirement in the contract, providers submit this in accordance with Regulation 12 (1) (a) of the PPDA (Contracts) Regulations, 2023. As an alternative to performance security, the Entity should consider requiring bidders to provide Performance Securing Declarations as provided for under PPDA Guideline No. 3/2024 on Bid and Performance Securities.	Continuous

Uganda Police Force should implement the recommended action plan on page 17.



**Appendix 1: Physical Verification photos for Construction of Entebbe Apartment Blocks and Modular Pre-fabricated Housing Units at Naguru**



**Appendix 2: Transaction List for Financial Year 2023 /24**

<b>No.</b>	<b>Procurement Reference</b>	<b>Subject of Procurement</b>	<b>Method of Procurement</b>	<b>Provider</b>	<b>Date of award of contract</b>	<b>Amount (UGX)</b>	<b>Risk Rating</b>
1.	UPF/SUPLS/22-23/00033	Procurement of Modular Fabricated Housing Units	Open Domestic Bidding	Modul Effectus Joint Venture Ltd	11 <sup>th</sup> July 2023	2,849,110,000	Medium
2.	UPF/SUPLS/22-23/00018	Procurement of Assorted Furniture for Police Training School Kabalye	Open Domestic Bidding	Lot 1:Seka & Charl Ltd Lot 2: inspiring Interiors Ltd. Lot 3: Kitimbirizo Contractors Ltd.	07 <sup>th</sup> March 2023	166,540,959	Medium
3.	UPF/SUPLS/22-23/00018	Procurement of Sports Uniform and Equipment for 17 <sup>th</sup> Edition Inter Forces	Request for Quotation	Real Sports Centre Ltd	14 <sup>th</sup> September 2023	95,774,500	Low
4.	UPF/SUPLS/22-23/00003	Procurement of Fuel, Oils and Lubricants (July, August and September 2023)	Open domestic bidding	Vivo Energy Ltd Total Energy Ltd Hared Ltd	11 <sup>th</sup> October 2023	24,541,112,500	Low
5.	UPF/SUPLS/22-23/00002	Procurement of maintenance of Vehicles (July, August and September 2023)	Open domestic bidding	Active Automotive Felexi motors Ltd Eagle Motors Ltd	11 <sup>th</sup> October 2023	3,601,339,742	Medium

No.	Procurement Reference	Subject of Procurement	Method of Procurement	Provider	Date of award of contract	Amount (UGX)	Risk Rating
6.	UPF/SUPLS/22-23/00032	Procurement of Food (July, August and September 2023)	Open domestic bidding	Various	11 <sup>th</sup> October 2023	11,116,462,400	Low
7.	UPF/SUPLS/22-23/00005	Procurement of uniforms and equipment for Police Football Club	Restricted Domestic bidding	Real Sports centre Ltd	14 <sup>th</sup> September 2023	132,750,000	Medium
8.	UPF/SUPLS/23-24/00011	Procurement of 80 sets of riding gears, gloves, elbow guards and knee guards for Force Fleet Management	Request for Quotation	Modest Associates Ltd	18 <sup>th</sup> September 2024	38,400,000	High
9.	UPF/SUPLS/23-24/00002	Procurement of stationery under framework contract	Open domestic bidding	Various	6 <sup>th</sup> December 2023	2,828,535,000	Satisfactory
10.	UPF/SUPLS/23-24/00003	Procurement of fast-moving consumables and spares of the Police garment machines under framework contract	Open domestic bidding	Various	6 <sup>th</sup> December 2023	100,000,000	Medium
11.	UPF/SUPLS/23-24/00031	Procurement of manufactured building materials under a framework contract	Open domestic bidding	various	6 <sup>th</sup> December 2023	6,336,279,286	Satisfactory
12.	UPF/SUPLS/22-23/00005	Procurement of customised calendars 2024	Restricted Domestic bidding	Caliber supplies Ltd	26 <sup>th</sup> October 2023	148,680,000	Satisfactory

No.	Procurement Reference	Subject of Procurement	Method of Procurement	Provider	Date of award of contract	Amount (UGX)	Risk Rating
13.	UPF/SUPLS/22-23/00006	Procurement of customised Diaries 2024	Restricted Domestic bidding	Kangaroo U Ltd	26 <sup>th</sup> October 2023	197,461,200	Satisfactory
14.	UPF/SUPLS/22-23/00005	Procurement of building materials for duty free scheme under framework contract	Open domestic bidding	Caliber Supplies Ltd	11 <sup>th</sup> October 2023	2,000,000,000	Satisfactory
15.	UPF/NCONS/2022-2023/00034	Procurement of consultancy services to the Senior Command & Staff College – Bwebajja	Request for Proposal	Kyarimpa Hope Kishaija	11 <sup>th</sup> October 2023	24,780,000	Satisfactory
16.	UPF/SUPLS/2023-2024/00020	Procurement of Police lifts upgrade and refurbishment at Police Headquarters, Naguru.	Request for Proposal	Uganda Elevator company ltd		122,484,000	High
17.	Disposal for 2023/2024						Low



### Appendix 3: Findings and Rating on the Individual Contracts Reviewed

No	HIGH RISK CONTRACTS	REASONS FOR HIGH RISK
1.	Procurement of 80 sets of riding gears, gloves, elbow guards and knee guards for Force Fleet Management	Award to a non-compliant bidder Enforcement of Performance Security
2.	procurement for works towards upgrade of the Police lifts and refurbishment at Police Headquarters in Naguru	Failure to identify forgery of documents during evaluation Low bidder participation
	<b>MEDIUM RISK CONTRACTS</b>	<b>REASONS FOR MEDIUM RISK</b>
3.	Procurement of fast-moving consumables and spares of the Police garments machines under framework contract	Delays at Evaluation Stage
4.	Procurement of assorted spares, tyres, tubes, batteries acids, distilled water, panel beating/body repairs materials, crew seat materials & tarpaulins for UPF Motor vehicles and Motorcycles under a two-year framework contract	Delays at Evaluation Stage
5.	Procurement of assorted furniture for Police training school at Kabalye	Enforcement of Performance Security
6.	Supply and installation of modular pre-fabricated housing units	Enforcement of Performance Security No progress reports availed
7.	Procurement of uniforms and equipment for Police Football Club	No copy of signed contract and payment
	<b>LOW RISK CONTRACTS</b>	<b>REASONS FOR LOW RISK</b>
8.	Procurement of Sports uniform and equipment for 17 <sup>th</sup> Edition Inter Forces	Shorter display of the NOBEB
9.	Procurement of fuel, oils and Lubricants (July, August and September 2023)	Records of payment not complete
10	Procurement of food (July, August and September 2023)	Records of payment not complete
11	Disposal for 2023/2024	

## SATISFACTORY CASES

No.	Subject of Procurement	
12.	Procurement of consultancy services to the Senior Command & Staff College, Bwebajja	
13.	Procurement of manufactured building materials under a framework contract	
14.	Procurement of building materials for duty free scheme under framework contract	
15.	Procurement of stationery under framework contract	
16.	Procurement of customized calendars for 2025	
17.	Procurement of customized calendars for 2024	

## Appendix 4: 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

<b>RISK</b>	<b>DESCRIPTION</b>	<b>AREA</b>	<b>IMPLICATION</b>
<b>MEDIUM</b>	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 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.	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.
		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.	

<b>RISK</b>	<b>DESCRIPTION</b>	<b>AREA</b>	<b>IMPLICATION</b>
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 management action to put in place and monitor compliance with detailed procedures.	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.

#### **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.