



**PUBLIC PROCUREMENT AND DISPOSAL
OF PUBLIC ASSETS AUTHORITY**

"Regulating for Results"

**REPORT ON THE COMPLIANCE INSPECTION OF MACKAY
MEMORIAL COLLEGE SCHOOL FOR THE CALENDAR YEAR 2024**

AUGUST 2025

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ACRONYMS

AO	Accounting Officer
BEB	Best Evaluated Bidder
CC	Contracts Committee
EC	Evaluation Committee
HPDU	Head, Procurement and Disposal Unit
LPO	Local Purchase Order
ODB	Open Domestic Bidding
PDE	Procuring and Disposing Entity
PDU	Procurement and Disposal Unit
PPDA	Public Procurement and Disposal of Public Assets Authority
RFQ	Request for Quotation

EXECUTIVE SUMMARY

The Public Procurement and Disposal of Public Assets Authority (PPDA) carried out a compliance inspection of Mackay Memorial College School that covered a representative sample of 14 sampled procurement and disposal transactions under calendar year 2024.

The overall objective of the inspection is to ensure that procurement and disposal activities have been conducted in accordance with the laid down public procurement procedures enshrined in the PPDA Act Cap. 205, the PPDA Regulations, 2023 and the Procurement and Disposal Guideline for Schools in Uganda No. 5 of 2014.

From the findings of the compliance inspection exercise, the summary performance of the School revealed an aggregate risk rating **61.8%** which is **Moderately Satisfactory** performance as per the ranking in Table 6 of the attached report.

The following exceptions were noted:

1. The Procurement and Disposal Unit was not staffed at an appropriate level to manage procurement and disposal activities of the School contrary to Paragraph 5.18.1 of the Procurement and Disposal Guideline for Schools in Uganda No. 5 of 2014. The Procurement and Disposal Unit was manned by one staff by the name of Ms. Christine Nabanoba Mayanja. Without a fully-fledged Procurement and Disposal Unit, the School experiences procurement inefficiencies and non-compliance with public procurement regulations in the conduct of procurement activities.
2. Whereas the School had a procurement plan for the calendar year 2024, the Contracts Committee did not approve the plan contrary to Paragraph 5.10.1 (a) of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda. This implies that the Contracts Committee was not playing their oversight role.
3. The School used inappropriate procurement methods in nine (9) procurements worth UGX 190,958,837 contrary to Clause 8.6.2 of the PPDA Procurement and Disposal Guideline 5/2014 for Schools in Uganda. Use of inappropriate procurement methods may limit the maximization of competition in the conduct of procurement processes.
4. The School issued contracts/Local Purchase Orders worth UGX 80,610,000 without Contracts Committee's approval contrary to Paragraph 5.10.1 of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda. This undermines the basic procurement principles of accountability, value for money, transparency and fairness.
5. The School did not submit quarterly procurement reports to the Authority for the Calendar Year 2024 contrary to Paragraph 5.2.2 of the Procurement and Disposal Guideline for Schools in Uganda No. 5 of 2014. This undermines the principles of transparency and accountability as well as the oversight role of PPDA in monitoring public procurement compliance of the School.
6. User Departments did not nominate Contract Managers for appointment by the Accounting Officers in all the 14 sampled procurements worth UGX 297,472,082, contrary to Paragraph 12.12.1 of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda. which adversely impacted efficient and effective execution of resultant contracts.

7. The School disposed of assets without a disposal plan contrary to clause 9.2.2 of the PPDA Guideline 5/2014 (Procurement and Disposal Guideline for Schools in Uganda). Disposing of assets without an approved Disposal Plan by the Board of Governors undermines the accountability, transparency and value for money principles.

In light of the above, the Authority recommends that the Accounting Officer should:

1. Consider staffing the Procurement and Disposal Unit to appropriate levels in accordance with Paragraph 5.18.1 of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda.
2. Ensure that the Contracts Committee approves the procurement plan and all the procurement processes in accordance with Paragraph 5.10.1 (a) of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda.
3. Ensure that the right procurement methods are used while conducting procurements in accordance with Clause 8.6.2 of the PPDA Procurement and Disposal Guideline 5/2014.
4. Task the Head, Procurement and Disposal Unit to always prepare and submit quarterly procurement reports to the Authority in accordance with Paragraph 5.2.2 of the Procurement and Disposal Guideline for Schools in Uganda No. 5 of 2014.
5. Task the Head, Procurement and Disposal Unit to ensure that User Departments nominate Contract Managers with appropriate skills for appointment by the Accounting Officer in accordance with Paragraph 12.12.1 of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda to always monitor the awarded contracts.
6. Task the Head, Procurement and Disposal Unit to ensure that disposals are conducted using the right procurement and disposal procedures in accordance with clause 9.2.2 of the PPDA Guideline 5/2014 (Procurement and Disposal Guideline for Schools in Uganda).

CHAPTER 1: INTRODUCTION

1.1 Structure of the Entity

Mackay Memorial College's mandate is to develop God fearing, responsible, creative and self-reliant citizens through intensive and interactive learning.

According to Section 28 of the PPDA Act Cap. 205, the Accounting Officer has the overall responsibility for the successful execution of procurement, disposal and contract management in a Procuring and Disposing Entity. The Accounting Officer of Mackay Memorial College during the Calendar Year 2024 was Mrs. Mary Mukasa Kalyango.

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

Table 1: List of the Contracts Committee Members

No:	Name	Committee Position	Position in the Entity
1.	Mr. James Wambi	Chairperson	Deputy Head Teacher
2.	Ms. Sarah Nabawanga	Member	Teacher
3.	Mr. Ssemugooma Francis	Member	Teacher

Section 33 of the PPDA Act Cap. 205, and paragraph 5.3.1 of the Procurement and Disposal Guideline for Schools in Uganda No. 5 of 2014, all procurement and 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 was manned by Ms. Christine Nabanoba Mayanja designated as a Procurement Officer.

1.2 Background

PPDA carried out the procurement and disposal inspection of Mackay Memorial College that covered a representative sample of 14 procurement transactions under calendar year 2024. The inspection involved a review of procurement structures, procurement and asset disposal processes, as well as contract performance following the provisions of the PPDA Act Cap, 205 and the Procurement and Disposal Guideline for Schools in Uganda No. 5 of 2014.

1.3 Objectives of the Compliance Inspection

The overall objective of the compliance inspection was to ensure that procurement and disposal activities have been conducted in accordance with the laid down public procurement procedures enshrined in the PPDA Act Cap. 205, the PPDA Regulations, 2023 and Guideline No.5 of 2014, the Procurement and Disposal Guideline for Schools in Uganda.

The specific objectives were to establish the:

1. Level of compliance by the School with the general provisions of the PPDA Act Cap, 205 and the PPDA Regulations, 2023 with regard to the performance of the procurement structures and conduct of procurement and disposal processes;
2. Degree of compliance of the School's disposal process with the provisions of the PPDA Act Cap. 205 and the PPDA Regulations, 2023; and

3. Level of efficiency and effectiveness in contract implementation including the application of Environmental, Social, Health and Safety (ESHS) Requirements in the procurement process.

1.4 Inspection Scope

The inspection involved a review of the procurement and disposal process, general compliance issues and contract implementation on sample basis. The inspection covered a representative sample of 14 procurement transactions under the calendar year 2024. The list of sampled transactions is contained in Annex A.

1.5 Methodology

Mackay Memorial College was notified about the upcoming inspection on **6th May, 2025** and commenced on **12th May 2025**. The auditors reviewed the School's budget, procurement plan and quarterly reports.

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

A debrief meeting was held with the School's management and staff on 16th May 2025, before the inspection team could embark on preparation of the Management Letter. The inspection team prepared the Management Letter, which was sent to the Entity on 11th June 2025, with a request to submit a management response by 13th June 2025, which was submitted on 12th May, 2025.

CHAPTER 2: COMPLIANCE INSPECTION FINDINGS

2.1. LEVEL OF COMPLIANCE BY THE SCHOOL WITH THE GENERAL PROVISIONS OF THE PPDA ACT CAP. 205 AND THE PROCUREMENT AND DISPOSAL GUIDELINE FOR SCHOOLS IN UGANDA NO. 5 OF 2014 WITH REGARD TO THE PERFORMANCE OF THE PROCUREMENT STRUCTURES AND CONDUCT OF PROCUREMENT PROCESSES

The Authority noted the following findings in regard to the level of compliance with the general provisions of the PPDA Act, 2003, PPDA Regulations, 2023 and the Procurement and Disposal Guideline No.5 of 2014 for Schools in Uganda with regard to the performance of the procurement structures and conduct of procurement processes of Mackay Memorial College.

2.1.1 Procurement Plan Implementation

Review of the School's Local Purchase Orders (LPOs) against the procurement plan for the calendar year 2024 revealed that the School implemented 98.22 % (UGX 635,778,741) of the procurement plan (UGX 647,328,600) which is a good performance as shown in Table 2 below:

Table 2: Procurement plan implementation rate

Total procurement plan for 2024 (UGX)	647,328,600
Total value of issued LPOs for procurement in 2024 (UGX)	635,778,741
Rate of procurements implemented (%)	98.22
Procurement plan implementation variance (UGX)	11,549,859

Implication

Failure to fully implement the budget implies that service delivery was denied to the intended beneficiaries.

Management Response

For purposes of updating the procurement plan and fully implementing the budget, the School promises to do the updates always.

Recommendation

The Accounting Officer should ensure that the budget and procurement plan is updated on a quarterly basis in accordance with Section 60 (7) of the PPDA Act Cap, 205.

2.1.2 Failure to establish a fully-fledged Procurement and Disposal Unit

The School lacked a fully-fledged Procurement and Disposal Unit despite having a budget of UGX 4,010,300,547. The Unit was manned by one staff at the level of Procurement Officer contrary to Clause 4.4 of the PPDA Guideline 5/2014 (Procurement and Disposal Guideline for Schools in Uganda) which provides that, educational institutions with budgets not exceeding UGX 45,000,000 must employ one Procurement Officer and two Procurement Officers for Schools with budgets exceeding UGX 150,000,000.

Implication

Without a fully-fledged Procurement and Disposal Unit, the School experiences procurement inefficiencies and non-compliance with public procurement regulations in the conduct of procurement activities

Management Response

Concerning failure to have a fully staffed PDU; Public Service has not facilitated the PDU with a Procurement Officer so the School can afford to employ and pay only one Procurement Officer.

Authority's Comment

The Authority takes note of the response but the Accounting Officer should make efforts with the respective Ministries to consider staffing the Procurement and Disposal Unit to the appropriate levels in accordance with Paragraph 5.18.1 of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda.

2.1.3 Use of wrong procurement methods

The Authority noted that the Procurement and Disposal Unit conducted nine (9) procurements worth UGX 190,958,837 using methods that are contrary with the thresholds provided for in Clause 8.6.2 of the PPDA Procurement and Disposal Guideline 5/2014 for Schools in Uganda without proper justification as seen in Table 3 below:

Table 3: List of procurements that were conducted using wrong procurement methods

No	Subject of Procurement	Procurement Method Used by the School.	Appropriate Procurement Methods	Contract Value (UGX)
1.	Printing and delivery of School magazine	Prequalified/Request for Quotation	Restricted Domestic Bidding	16,020,000
2.	Supply of students' uniforms -black shirts	Direct Procurement	Open Domestic Bidding	21,160,000
3.	Purchase of Students' uniforms -White shirts	Direct Procurement	Open Domestic Bidding	34,200,000
4	Purchase of School furniture	Direct Procurement	Restricted Domestic Bidding	14,910,000
5	Purchase of comprehensive insurance for double cabin	Request for Quotation	Restricted Domestic Bidding	7,299,788

No	Subject of Procurement	Procurement Method Used by the School.	Appropriate Procurement Methods	Contract Value (UGX)
6	Purchase and installation of air conditioning system	Request for Quotation	Restricted Domestic Bidding	10,500,000
7	Purchase of Stationery requirements	Direct Procurement	Restricted Domestic Bidding	7,470,000
8	Construction Hollow block fence on the Eastern side of the school; phase I)	Request for Quotation	Open Domestic Bidding	68,070,049
9	Purchase of O-level UNEB Science Lab requirements	Direct Procurement	Restricted Domestic Bidding	11,329,000
Total				190,958,837

Implication

Use of inappropriate procurement methods may limit the maximization of competition in the conduct of procurement processes thereby compromising the quality-of-service delivery and achievement of value for money.

Management Response

Please note that Mackay Memorial College as a Procuring and Disposing Entity is using PPDA, Regulations 2023 and NOT the PPDA Procurement and Disposal Guideline for Secondary Schools of 2014 because the procurement thresholds for Secondary Schools are very limiting.

Authority's Comment

The School is advised to adhere and apply the PPDA Procurement and Disposal Guideline No. 5 of 2014 for Secondary Schools in Uganda until such a time when in any case amendments are made to the above guideline by the Authority.

Recommendation

The Accounting Officer should ensure that the right procurement methods are used while conducting procurements in accordance with Clause 8.6.2 of the PPDA Procurement and Disposal Guideline 5/2014.

2.1.4 Execution of procurements without following the procurement processes

The School awarded contracts worth UGX 80,610,000 without following the appropriate procurement process contrary to the procedure of the PPDA (Procurement and Disposal Guidelines for Schools in Uganda) Guideline No.5, 2014 shown in Table 4 below:

Table 4: Procurements awarded without following the procurement process

No	Subject of Procurement	Contract Value (UGX)
1.	Supply of students' uniforms -black shirts	21,160,000
2.	Purchase of Students' uniforms -White shirts	34,200,000
3.	Purchase of 5000kg, Maize flour, Rice LPO.338, Purchase of 2000kgs of maize flour	25,250,000
TOTAL		80,610,000

Implication

Awarding contracts without going through the procurement process undermines the basic procurement principles of accountability, value for money, transparency and competition.

Management Response

For execution of procurements without following the procurement process, the providers of uniforms, food items, sanitary items among others were all prequalified for framework contracts for the calendar year 2024. These are repetitive procurements throughout the year.

Authority's Comment

There was no evidence of signed framework contracts provided by the School for the listed procurements in the table above. The Accounting Officer is advised to enter into proper contractual framework contracts with providers of common user items using the contract format provided under Annex 9 of PPDA Guideline No.5 of 2014.

Recommendation

The Accounting Officer should ensure that all procurements are conducted following the procurement process using the specified procurement methods provided for in the Procurement and Disposal Guidelines for Schools in Uganda of 2014 set forth in clauses 8.1, 8.2, 8.3, 8.4 & 8.5.

2.1.5 Signing Contracts without Contracts Committee's approval

In the procurement for supply of text books (Windows to Entrepreneurship) worth UGX 1,000,000, the Procurement Officer issued a contract to Mr. Okello Paul Hatuba without Contracts Committee's approval contrary to Paragraph 5.10.1 (d) of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda.

Implication

Executing procurements without appropriate procurement procedures contrary to the School guidelines undermines the basic procurement principles of accountability, value for money, transparency, fairness and competition.

Management Response

For the response on issuing contracts without Contracts Committee's approval, the User Department who are the Teachers for Entrepreneurship subject identified this book and needed it urgently. This book was not yet on open market by then so the Teachers contacted the Author directly and this book had been included on Form 5.

Authority's Comment

The User Departments are advised to always analyse their needs and plan accordingly to support proper consolidation of requirements into one procurement plan of the School. This will minimize cases of emergency procurements for common user items like text books.

Recommendation

The Accounting Officer should ensure that the Contracts Committee approves the procurement plan and all the procurement processes in accordance with Paragraph 5.10.1 (a) of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda.

2.1.6 Inadequate justification for use of the Direct Procurement Method

The Authority noted that in the procurement of School furniture, classroom desks, library chairs and library tables under MMCN/SUPLS/24/00014 worth UGX 13,210,000 was awarded to Gukiina Enterprises worth UGX 13,210,000 through the direct procurement method without proper justification contrary to Paragraph 8.5.1 of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda.

Implication

Use of the direct procurement method without adequate justification limits competition and value for money.

Management Response

The prequalification list for 2024 had only 2 suppliers of furniture. There was urgent need for classroom, library and staff room furniture due to increased student enrollment by January, 2024. Therefore, M/s Horisult Enterprises and M/s Gukiina Enterprises were awarded contracts for supply of furniture respectively. This was to allow for fairness of two suppliers.

Authority's Comment

The Head, Procurement and Disposal Unit should enrich the School's prequalified list of providers by using the PPDA prequalified lists and approved lists of other similar Entities where the School registers a low bidder turn up for some procurement requirements.

Recommendation

The Contracts Committee and Procurement Officer should ensure the use of competitive procurement methods to ensure competition and value for money. Where the Direct Procurement method is used, the School should adhere to the provisions spelt out in Paragraph 8.5.1 of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda.

2.1.7 No evidence of Quarterly Procurement Reports submission to PPDA and or to the line Ministry.

The School did not submit quarterly reports on procurement and disposal activities for the calendar year 2024 to PPDA and or to the line Ministry contrary to Paragraph 5.2.2 of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda.

Implication

This undermines the principles of transparency and accountability as well as the oversight role of PPDA in monitoring public procurement compliance of the School.

Management Response

Quarterly procurement reports were done but not submitted to PPDA and Ministry of Education and Sports. We promise to improve by 2025.

Recommendation

The Accounting Officer should task the Head, Procurement and Disposal Unit to always prepare and submit quarterly procurement reports to the Authority in accordance with Paragraph 5.2.2 of the Procurement and Disposal Guideline for Schools in Uganda No. 5 of 2014.

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

2.2.1 No evidence of nominating and appointing Contract Managers

In all sampled procurements worth UGX 297,472,082, there was no evidence of the User Departments nominating Contract Managers for appointment by the Accounting Officer with appropriate skills contrary to Paragraph 12.12.1 of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda as seen in Table 5 below:

Table 5: List of procurements executed without appointed contract managers

No	Subject of Procurement	Contract Value
1.	Printing and Delivery of school magazine	16,020,000
2.	Supply of students' uniforms -black shirts	21,160,000
3.	Purchase of Students' uniforms -White shirts	34,200,000
4	Purchase of school furniture	14,910,000
5	Purchase of comprehensive insurance for double cabin	7,299,788
6	Purchase and Installation of Air conditioning system	10,500,000
7	Purchase of Stationery requirements	7,470,000
8	Construction Hollow block fence on the Eastern side of the School; phase I)	68,070,049
9	Purchase of O-level UNEB Science Lab requirements	11,329,000
10	Construction Hollow block fence on the Eastern side of the School; (phase II)	38,443,196
11	Construction Hollow block fence on the Eastern side of the School; (phase I)	68,070,049
Total		297,472,082

Implication

This indicates laxity by the User Departments to take responsibility for the implementation of contracts in accordance with the contractual terms and conditions therein hence affecting both maximization of value for money and quality service delivery.

Management Response

For the list of procurements executed without a Contract Manager, the following were the appointed Contract Managers from the respective User Departments. Ms. Jalia Nakyanzi, Ms. Alice Babirye, Mr. Lule Simon, Mr. Lwanga Herbert, Mr. Mukunyu Stephen, Mr. Musiitwa Charles.

Authority's Comment

The Authority notes this response however, there was no evidence on record of appointment letters of the Contract Managers mentioned in the response above.

Recommendation

The Accounting Officer should task the Head, Procurement and Disposal Unit to ensure that User Departments nominate Contract Managers with appropriate skills for appointment in accordance with Paragraph 12.12.1 of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda to always monitor the awarded contracts.

2.2.2 No evidence of contract implementation reports

Despite the absence of Contract Managers, there was no effort made by the User Departments to prepare and share contract progress reports with the Accounting Officer copied contrary to Paragraph 5.20.1 (h) of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda.

Implication

This is an indication of a capacity gap among User Departments to effectively manage contract and reporting thus deterring the achievement of value for money.

Management Response

Since this is the second year of functionality of the Procurement and Disposal Unit, we promise to improve on the level of compliance to the PPDA Guidelines; The PDU has tried to sensitize and train staff on a one-on-one basis but there is need for more sensitization of all staff at Mackay Memorial College from PPDA.

Authority's Comment

The Accounting Officer should formally write to PPDA and request for a capacity building training for the School's staff so as to enhance their knowledge in the performance of the procurement and disposal activities.

Recommendation

The Accounting Officer should task User Departments/appointed Contract Managers to prepare Contract Implementation Plan for each contract in accordance with Paragraph 12.12.1 of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda.

CHAPTER 3: OVERVIEW OF THE PERFORMANCE OF THE SCHOOL

This section presents the scores per area assessed under different inspection questions.

3.1. Overall Compliance Inspection Conclusion

The performance of Mackay Memorial College School for the calendar year 2024 was **moderately satisfactory** with overall weighted average risk rating of **61.8%**.

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 6 below:

Table 6: Summary of performance of Mackay Memorial College School

Risk category	No	No.%	Value	Value %	Weights	Total weighted Average	
						By No.	By Value
High	6	46.1	17,545,600	4	0.6	27.6	2.4
Medium	2	15.3	55,360,000	12	0.3	9.18	3.6
Low	5	38.4	382,192,033	84	0.1	23	8.4
Satisfactory	0		0	0	0	0	0
Total	13	100	455,097,633	100	1	59.78	14.4

$$\text{Performance by Number} = \frac{59.78 \times 100}{60} = 99.6$$

$$\text{Performance by Value} = \frac{14.4 \times 100}{60} = 24\%$$

$$\text{The average weighted risk rating} = \frac{99.6 + 24}{2} = 61.8\%$$

Table 7: Risk rating is as follows:

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

3.3 Recommended Action Plan

Mackay Memorial College School should implement the following recommendations within the timeframe given in order to improve its performance in procurement and disposal listed in Table 8 below:

Table 8: Recommended Action Plan

Origin	Recommended Action Plan	Target Date
Accounting Officer	<ol style="list-style-type: none"> 1.The Accounting Officer should establish the Procurement and Disposal Unit and appropriately staff it in accordance with Paragraph 5.18.1 of the Procurement and Disposal Guideline for Schools in Uganda No. 5 of 2014. 2.The Accounting Officer should ensure that appropriate procurement methods are used in all procurements undertaken by the School in accordance with Paragraph 8.6.1 of the PPDA Guideline No.5 of the Procurement and Disposal Guideline for Schools in Uganda. 3.The Accounting Officer must ensure that Contracts Committee awards all contracts in accordance with Clause 5.10.1 of the Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda. 4.The Accounting Officer should task the Heads of User Departments to always nominate a member of their department with appropriate skills to be appointed as contract manager for all signed contracts or issued Local Purchase Orders in accordance with Paragraph 12.12.1 of the Procurement and Disposal Guideline for Schools in Uganda No. 5 of 2014. 5. The Accounting Officer should submit an approved copy of the School's procurement and Disposal plans for the Calendar Years in accordance with Section 60 (l) of the PPDA Act Cap.205. 6.The Accounting Officer should submit quarterly reports of procurement and disposal detailing contracts awarded and completed in accordance with Paragraph 5.3.1(d) of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda. 7.The Accounting Officer should task the Procurement and Disposal Unit to prequalify at least six providers per item from sources such as the Register of Providers of the PPDA and lists of pre-qualified providers of any other Schools in accordance with Paragraph 6.1.6 of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda. 	September 2025

Origin	Recommended Action Plan	Target Date
	<p>8.The Accounting Officer should consider signing framework contract agreements for regularly procured or common user items such as food and laboratory supplies needed on call where the quantity and timing cannot be defined in accordance with Paragraph 6.2 of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda.</p> <p>9.The Accounting Officer should task the Heads of User Departments to always nominate a member of their department with appropriate skills to be appointed as contract manager for all signed contracts or issued Local Purchase Orders in accordance with Paragraph 12.12.1 of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda.</p> <p>10. The Accounting Officer should task User Departments/appointed Contract Managers to prepare a contract implementation plan and forward a copy to the Procurement and Disposal Committee for monitoring purposes in accordance with Paragraph 12.12.1 of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda.</p> <p>11. The Accounting Officer should task the Heads of User Departments to prepare performance and/or progress reports and share them with the Procurement and Disposal unit for monitoring purposes and archiving in accordance with Paragraph 5.20.1 (h) of Guideline No.5 of 2014 on the Procurement and Disposal Guidelines for Schools in Uganda.</p>	
Procurement and Disposal Unit	<ol style="list-style-type: none"> 1. The Procurement and Disposal Unit should ensure that the before a bidding process begins, the Contracts Committee approves all procurement requirements 5.10.1 (a) of Guideline No.5 of 2014 on the Procurement and Disposal Guideline for Schools in Uganda 2. The Head, Procurement and Disposal Unit should ensure that a procurement plan is updated in accordance with Section 60 (7) of the PPDA Act Cap. 205. 3. The Head, Procurement and Disposal Unit should diligently consider the procurement thresholds when choosing the procurement method in accordance with Guideline 8.6.2 of the PPDA (Procurement and 	September 2025

Origin	Recommended Action Plan	Target Date
	Disposal Guidelines for Schools in Uganda) Guidelines, 2014.	
Contracts Committee	The Chairperson - Contracts Committee, the User Departments should adhere to Clause 16 of the PPDA Guideline 5/2014 (Procurement and Disposal Guideline for Schools in Uganda) in regards to the preparation of solicitation documents.	Immediately

Annex 1: Transaction list for the calendar year 2024

NO	REFERENCE NUMBER	SUBJECT OF PROCUREMENT	METHOD OF PROCUREMENT	PROVIDER	CONTRACT VALUE (UGX)	RISK RATING
1.	00021	Printing and Delivery of school magazine	Prequalified/RFQ	Blue Orchid Ltd	16,020,000	Medium Risk
2.	MMCN/SUPLS/24/00001	Supply of students' uniforms -black shirts	Direct Procurement	Ever Green Safaris Ltd	21,160,000	High Risk
3.	MMCN/SUPLS/24/00008	Procurement of Head Teacher's Double Cabin	Open Domestic Bidding	Sumabolt Logistics Ltd	182,900,000	Low risk
4	Nil	Purchase of School furniture	Direct procurement	Horisult Enterprises	14,910,000	Medium risk
5	Nil	Purchase of comprehensive insurance for Double Cabin	Request For Quotation	Sanlam (U) Ltd	7,299,788	Medium risk
6	MMCN/SUPLS/24/00015	Purchase and Installation of Air conditioning system	Request For Quotation	Coolmax Air conditioning system	10,500,000	Medium risk
7	MMCN/SUPLS/24/00018	Purchase of Stationery requirements	Direct Procurement	TK Vision Investments Ltd	7,470,000	Medium risk
8	MMCN/SUPLS/24/00016	Purchase of Library textbooks	Direct Procurement	Okello paul Hatuba, Nakitto Prisca, Baroque Publishers, Newvision Publishers, Citylane Bookstore, Gustro U Ltd	17,545,600	High risk
9	00033	Purchase of 5000kg, Maize flour, Rice LPO.338 and Purchase of 2000kgs of maize flour	Direct Procurement	Ziridamu maize millers	25,250,000	Medium risk
10	00021	Construction Hollow block fence on the Eastern side of the school; phase I)	Request For Quotation	Tericko construction company Ltd	68,070,049	Low risk

NO	REFERENCE NUMBER	SUBJECT OF PROCUREMENT	METHOD OF PROCUREMENT	PROVIDER	CONTRACT VALUE (UGX)	RISK RATING
11	00030	Purchase of O-level UNEB Science lab requirements	Direct Procurement	Rafik Provisional stores	11,329,000	Low risk
12	WRKS/00024	Construction Hollow block fence on the Eastern side of the school; phase II)	Direct Procurement	Tericko construction company Ltd	38,443,196	Low risk
13	MMCN/SUPLS/24/00001	Purchase of Students' uniforms -White shirts	Direct Procurement	Uganda Uniforms	34,200,000	Medium risk
Total					455,097,633	
Disposal						
1	MMCN/DSP/24/00001	Sale of Nadia Motor vehicle -UAS 448C	Public Bidding	Mutagubya Mathias Kakooza	8,000,000	Medium risk
Total					8,000,000	

Annex 2: 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.

RISK	DESCRIPTION	AREA	IMPLICATION
		Fraud/forgery: Falsification of Documents	This implies lack of transparency and value for money.
		Contract Management: Payment for shoddy work or work not delivered.	This implies financial loss since there has been no value for money for the funds spent and the services have not been received by the intended beneficiaries
MEDIUM	Procurements that were considered to have weaknesses which, although less likely to lead to material financial loss or to risk damaging the regulatory system or the entity's reputation, warrant timely management action using the existing management 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	

RISK	DESCRIPTION	AREA	IMPLICATION
		<p>solicitation document aspects of gender, social inclusion, environment, health and safety.</p> <p>Aspects of gender, social inclusion, environment, health and safety not covered by the contractor during contract implementation.</p>	
LOW	<p>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.</p>	<p>Planning: Lack of procurement reference numbers.</p>	<p>This leads to failure to track the procurements which leads to poor record keeping.</p>