



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

*"Procurement That Delivers"*

**COMPLIANCE INSPECTION REPORT FOR NTARE  
SCHOOL FOR THE ACADEMIC YEAR 2024**

**NOVEMBER 2025**

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## ACRONYMS

ESHS	Environmental, Social, Health, and Safety
PDU	Procurement and Disposal Unit
PPDA	Public Procurement and Disposal of Public Assets Authority
UGX	Uganda Shillings
VAT	Value Added Tax

## EXECUTIVE SUMMARY

The Public Procurement and Disposal of Public Assets Authority carried out a compliance inspection on the procurement and disposal activities of the Ntare School that covered a representative sample of ten procurement transactions worth UGX 5,120,538,154 under Academic Year 2024. The overall objective of the compliance inspection was to assess and establish the degree of compliance of Ntare School's procurement system and processes with the provisions of the PPDA Act, Cap. 205, the attendant PPDA Regulations, 2023, and the PPDA Guideline 5 of 2014 on Procurement and Disposal for Schools in Uganda, and assess the level of procurement performance over the inspection period.

From the findings of the compliance inspection exercise, the performance of Ntare School for the Academic Year 2024 was **satisfactory** with overall weighted average risk rating of **24.1%**. The risk rating was weighted to determine the overall risk level of the Entity as detailed in Chapter 3 of the report.

The following exceptions were noted despite the satisfactory performance:

1. The Entity signed five contracts worth UGX 360,172,000 with persons not ordained by Power of Attorney to represent the providers contrary to Regulation 10 (1) of the PPDA (Contracts) Regulations, 2023. The contract may be invalid, unenforceable or expose the Entity to financial or legal losses;
2. The Entity issued an inadequate framework bidding document with regard to eligibility requirements i.e. the Bid Data Sheet lacked a requirement for the bidders to submit Powers of Attorney with their bids contrary to Instructions to Bidders (ITB) 22.2 in the standard bidding document for framework contracts; the document was not requesting for submission of the beneficial ownership form by the bidders contrary to PPDA Circular No. 1 of 2021. Issuance of inadequate solicitation documents could lead to inadequate contracts that do not safeguard the rights and risk exposures of the Entity;
3. The Entity did not incorporate aspects of Environmental, Social, Health and Safety (ESHS) safeguards in the Terms of Reference for the provision of labour services for works projects worth UGX 149,651,276 contrary to Section 66 of the PPDA Act, Cap. 205. Consequently, ESHS aspects were not implemented by the contractors during contract implementation which could expose both the contractor and Entity staff, and the community where the project is undertaken to serious environmental, social, health and safety risks e.g. air and water pollution, child/forced labour, spread of HIV/AIDS, physical safety hazards etc; and
4. The Entity did not undertake a board of survey of the assets to identify those due for disposal in the Academic Year 2024 contrary to Paragraph 9.2 of the PPDA Guideline 5 of 2014 on Procurement and Disposal for Schools in Uganda. As a result, no disposal plan was prepared or submitted for the approval of the Board of Governors, and subsequently, no disposal was conducted in Academic Year 2024. Failure to undertake a board of survey of assets denies the Entity an opportunity to identify obsolete assets due for disposal which inhibits the achievement of value for money as funds are held up in obsolete assets and also further lost through continuous deterioration of the assets.

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

1. The Accounting Officer should:
  - i. Ensure that only the person ordained with Powers of Attorney handles correspondences on behalf of the bidder as well as sign contracts as a representative of the provider in accordance with Regulation 10 (1) of the PPDA (Contracts) Regulations, 2023;
  - ii. For each academic year, set up a board of survey to review the school's assets and identify those due for disposal in accordance with Regulation 2 of the PPDA (Disposal of Public Assets) Regulations, 2023.
2. The Procurement and Disposal Unit should:
  - i. Set an evaluation criteria that requires bidder's representatives to submit Powers of Attorney with their bids as a written confirmation of authorisation to sign on behalf of the bidder following ITB 22.2 of the Bid Data Sheet (BDS) in the standard bidding document for framework contracts;
  - ii. Require bidders to submit beneficial owner information through bidding forms and company Form 1.
3. The School Architect and Head PDU should ensure that the Terms of Reference for the provision of labour services for works projects are inclusive of Environmental, Social, Health and Safety Standards so as to safe guard the environment and the neighboring community from the negative impacts arising from the projects and to further safe guard the workers on site from the risk of injuries arising from accidents in accordance with Section 66 of the PPDA Act, Cap. 205.

A recommended action plan for Ntare School is on page 11 of this report.

## **CHAPTER 1: INTRODUCTION**

### **1.1 Structure of the Entity**

Section 26 of the PPDA Act, Cap. 205 gives the Accounting Officer the overall responsibility for the successful execution of procurement, disposal and contract management in the Procuring and Disposing Entity. The Headteacher, Mr. Saul Rwampororo was designated as the Accounting Officer of the Entity during the Academic Year 2024. The composition of the Contracts Committee and the PDU are detailed in Appendix 4.

### **1.2 Background**

The Public Procurement and Disposal of Public Assets Authority conducted a compliance inspection on the procurement and disposal activities of Ntare School that covered a representative sample of ten procurement transactions under Academic 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 Public Procurement and Disposal of Assets Act, Cap. 205, the attendant PPDA Regulations, 2023 and the PPDA Guideline 5 of 2014 on Procurement and Disposal for Schools in Uganda, 2014.

### **1.3 Objective of the compliance inspection**

The overall objective of the compliance inspection was to assess and establish the degree of compliance of Ntare School's procurement system and processes with the provisions of the PPDA Act, Cap. 205, the attendant PPDA Regulations, 2023, and the PPDA Guideline 5 of 2014 on Procurement and Disposal for Schools in Uganda and assess the level of procurement performance over the inspection period.

The specific objectives were to assess the:

1. Compliance of the Entity with the provisions of the PPDA Act, Cap. 205, attendant Regulations, 2023, and the Procurement and Disposal Guidelines for Schools in Uganda, 2014 with regard to the performance of the procurement structures and conduct of the procurement processes;
2. Compliance of the Entity's disposal processes with the provisions of the PPDA Act, Cap. 205, attendant Regulations, 2023, and the Procurement and Disposal Guidelines for Schools in Uganda, 2014; and
3. Efficiency and effectiveness in contract implementation including the application of Environmental, Social, Health and Safety (ESHS) requirements.

### **1.4 Scope of the Compliance Inspection**

The Authority carried out the procurement and disposal compliance inspection of Ntare School from 28<sup>th</sup> to 31<sup>st</sup> July 2025. The exercise covered a sample of ten procurement transactions worth **UGX 5,120,538,154** conducted during the Academic Year 2024, review of procurement structures and review of the procurement plan performance. The list of sampled transactions is contained under **Appendix 1**.

### **1.5 Methodology**

Ntare School was notified about the exercise on 21<sup>st</sup> July 2025. A sample of ten procurement transactions was selected based on stratified random sampling using Contracts Committee minutes, the contracts register, and quarterly procurement and disposal reports vide Appendix 1.

The exercise was conducted under the supervision of the Regional Manager. During the exercise, the team examined records and documents for each of the ten sampled procurement transactions. The team also reviewed the procurement plan for the Academic Year 2024.

During the inspection, the team met with staff from the Procurement and Disposal Unit, Contracts Committee and User Departments where necessary to discuss and get clarifications on some of the preliminary findings.

The Authority prepared a management letter, which was issued to the Entity on **4<sup>th</sup> September 2025** with a request to submit a management response by **12<sup>th</sup> September 2025**, which management response was submitted on **16<sup>th</sup> September 2025**. The Authority studied and considered the management response before preparing the compliance inspection report. The compliance inspection report presents the key findings and conclusions arising from the inspection.

#### **1.6. Reporting**

The findings are identified by exception, the level of risk and the recommendation. The procurements are rated in four categories according to the weakness identified namely; high risk, medium risk, low risk and satisfactory. The definition of the risk rating is in **Appendix 3**.

## CHAPTER TWO: FINDINGS AND RECOMMENDATIONS OF THE AUTHORITY

### 2.1.COMPLIANCE WITH THE GENERAL PROVISIONS OF THE PPDA ACT, CAP. 205, AND PPDA REGULATIONS CONCERNING THE PERFORMANCE OF THE PROCUREMENT STRUCTURES AND CONDUCT OF PROCUREMENT PROCESSES

#### 2.1.1. Status of implementation of previous PPDA inspection recommendations

The inspection found that out of the five previous compliance inspection recommendations for Academic Year 2019, Ntare School implemented four recommendations representing 80% thereby leaving 20% partially implemented contrary to Section 10 (1) (a) of the PPDA Act, Cap. 205. The status of implementation is given in Table 1 below:

**Table 1: Status of implementation of previous recommendations**

No.	Recommendation	Implementation status
1.	The Heads of User Departments and Procurement and Disposal Unit should ensure that statements of requirements, that is, specifications for supplies, terms of reference for services and bills of quantities for works, are prepared and attached to the procurement requisitions in accordance with Section 60 of the PPDA Act 2003	Implemented
2.	The Procurement and Disposal Unit should ensure that evaluation is undertaken by Evaluation Committee members approved by the Contracts Committee in accordance with Section 28 (1) (b) and 37 (2) of the PPDA Act, 2003.	Implemented
3.	The Head Procurement and Disposal Unit should provide for a longer bid validity period in the bidding document and request the bidders to extend the bid validity period in scenarios where the contracts cannot be signed in time	Implemented
4.	The Heads of User Departments should ensure that contract supervisors with the appropriate skills and experience are nominated and appointed in accordance with Guideline 5 of the Public Procurement and Disposal of Public Assets Guidelines 2014	Implemented
5.	The Accounting Officer should ensure that a board of survey is established annually and thereafter a disposal plan is developed and obsolete items sold off in accordance with Guideline 5 of the Public Procurement and Disposal of Public Assets Guidelines 2014 and Section 58 of the PPDA Act, 2003	Partially implemented

#### **Implication**

Failure to undertake a board of survey of the assets denies the Entity an opportunity to identify obsolete assets due for disposal which inhibits the achievement of value for money as funds are held up in obsolete assets and also further lost through continuous deterioration of the assets.

### Management response

Ntare School appreciates the fact that disposal of obsolete assets needs to be fully implemented. A Board of Survey was constituted on July 16<sup>th</sup> 2025. The report has been submitted and the disposal process has commenced. This requirement shall be fully implemented before the year ends.

### **Recommendation**

The Authority notes the Entity's response and recommends that going forward, the Accounting Officer should, for each academic year, undertake a board of survey to review the school's assets and identify those due for disposal in accordance with Regulation 2 of the PPDA (Disposal of Public Assets) Regulations, 2023.

#### **2.1.2. Procurement plan implementation rate**

A review of the Entity's procurement plan and quarterly reports for the Academic Year 2024 revealed that the Entity had a total procurement plan value of UGX 9,649,234,701. The Entity procured items worth UGX 9,539,737,892 which amounted to 99% of the planned procurement value as detailed in Table 2 below:

**Table 2: Procurement plan implementation rate**

Total procurement plan value inclusive of VAT (UGX)	9,649,234,701
Total procurement spend value inclusive of VAT (UGX)	9,539,737,892
Procurement plan implementation rate (%)	99%
<b>Procurement plan implementation variance (UGX)</b>	<b>109,496,809</b>

### **Recommendation**

The Authority commends the Entity on the rate of implementation of its procurement plan and recommends that the Entity should maintain the above performance going forward.

#### **2.1.3. Framework contracts**

The Authority found that the Entity entered into framework contracts with providers for supply of repetitively used items for the Academic Year under review. This was contrary to Section 100 of the PPDA Act, Cap. 205 and Paragraph 6.2 of the PPDA Guideline 5 of 2014 on Procurement and Disposal for Schools in Uganda which provides that, "A framework contract shall be used where a requirement is needed "on call", but where the quantity and timing of the requirement cannot be defined in advance." A review of the process leading up to the framework contracts and the issued call off orders revealed the following anomalies:

##### **a) Inadequate bidding document without provision for some eligibility requirements**

The framework bidding document for supplies issued on 2<sup>nd</sup> October 2023 was inadequate with regard to eligibility requirements as detailed below:

- i. The Bid Data Sheet (BDS) lacked a requirement for the bidders to submit Powers of Attorney with their bids as a written confirmation of authorisation to sign on behalf of the bidder contrary to Instructions to Bidders (ITB) 22.2 in the standard bidding document for framework contracts;
- ii. The document did not provide for submission of the beneficial ownership form by the bidders contrary to PPDA Circular No. 1 of 2021.

### Implications

- Inadequate bidding documents lacking a requirement for the bidders to submit Powers of Attorney could expose the Entity to the submission of unauthorised bids from bidders whose representatives lack authorisation to sign and submit bids on behalf of the bidders.
- Non-compliance with the requirement for submission of the beneficial ownership form by bidders increases the risk of corruption, fraud, and tax evasion by the ultimate beneficiaries of company proceeds.

### Management response

Management has taken note of the need to submit all eligibility documents including Powers of attorney and particulars of beneficial ownership form in accordance with Regulation 10 (1) of the PPDA (Contracts) Regulations, 2023. We shall request all bidders to submit these documents in the subsequent bidding processes.

### Recommendation

The Procurement and Disposal Unit should:

- i. Set an evaluation criteria that requires bidder's representatives to submit Powers of Attorney with their bids as a written confirmation of authorisation to sign on behalf of the bidder following ITB 22.2 of the Bid Data Sheet (BDS) in the standard bidding document for framework contracts.
- ii. Require bidders to submit beneficial owner information through bidding forms and company Form 1; and
- iii. Include particulars of beneficial owners in monthly reports in accordance with the PPDA Circular No. 1 of 2021.

### b) Signing contracts with persons not ordained by Powers of Attorney

The Entity signed framework contracts for supplies with persons not ordained by Powers of Attorney to represent the providers contrary to Regulation 10 (1) of the PPDA (Contracts) Regulations, 2023. This was noted in five sampled procurements worth UGX 360,172,000 as detailed in Table 3 below. Since this was not a requirement in the framework bidding document, consequently, the providers did not submit Powers of Attorney with their bids.

**Table 3: Procurements without Powers of Attorney**

No.	Procurement Subject	Provider	Amount (UGX)
1.	Supply and delivery of school sweaters	Olithur Holdings Ltd	61,000,000
2.	Supply and delivery of textbooks	Adit Book Centre Ltd	41,262,000
3.	Supply of examination tables	Footsteps Furniture Ltd	45,000,000
4.	Supply of posho	Arise Agencies Ltd	126,900,000
5.	Supply of ground nuts and beans	Phiron Naphi Enterprises	86,010,000
	<b>TOTAL</b>		<b>360,172,000</b>

### Implication

The contract may be invalid, unenforceable or expose the Entity to financial or legal losses.

**Management response**

Management has taken note of the need to submit all eligibility documents including Powers of attorney and particulars of beneficial ownership form in accordance with Regulation 10 (1) of the PPDA (Contracts) Regulations, 2023. We shall request all bidders to submit these documents in the subsequent bidding processes.

**Recommendation**

The Accounting Officer should ensure that only the person with Powers of Attorney handles correspondences on behalf of the bidder as well as sign contracts as a representative of the provider in accordance with Regulation 10 (1) of the PPDA (Contracts) Regulations, 2023.

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

The following anomaly was noted;

**2.2.1. Failure to undertake a board of survey of the assets to identify those due for disposal**

The Authority found that during the academic year 2024, the Entity did not assign User departments to conduct a board of survey so as to identify assets due for disposal. As a result, no disposal plan was prepared or submitted for the approval of the Board of Governors, and subsequently, no disposal was conducted in Academic Year 2024. This was contrary to Paragraph 9.2 of the PPDA Guideline 5 of 2014 on Procurement and Disposal for Schools in Uganda which provides for procedure for disposal of public assets of the Entity through the User department.

Despite the absence of a disposal plan, the school had various obsolete assets that could have been disposed of. A list of some items in the computer lab that should be disposed of is detailed in table 4 below:

**Table 4: Obsolete assets in the computer lab due for disposal**

No.	Item	Number
1.	Monitors	
	a) Dell	18
	b) Acer	74
	c) Samsung	18
	d) HP	06
	e) Vision Sonic	01
	f) IBM	01
2.	Keyboards	106
3.	CPU	
	a) Dell	09
	b) IBM	02
	c) Acer	05
	d) Unidentified	05
	e) HP	18
4.	Cartridges	12
5.	Printer	

	a) Big	01
	b) Small	08
6.	TV screens	01
7.	Stabilizer	04
8.	Kodak camera wires	07
9.	Wires	2 sacks

### **Implication**

Failure to undertake a board of survey of the assets denies the Entity an opportunity to identify obsolete assets due for disposal which inhibits the achievement of value for money as funds are held up in obsolete assets and also further lost through continuous deterioration of the assets.

### **Management Response**

*A Board of Survey was constituted on July 16<sup>th</sup> 2025. The report has been submitted and the disposal process has commenced. This requirement shall be fully implemented before the year ends.*

### **Recommendation**

The Authority notes the Entity's response and recommends that the Accounting Officer expedites the disposal process so as to ensure that the identified assets are disposed of within the ongoing Academic Year (2025) in accordance with the procedures stipulated under paragraph 9.0 of the PPDA Guideline 2 of 2025 on Procurement and Disposal for Schools in Uganda.

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

The following anomalies were noted:

### **2.3.1. Irregularities in implementation of ESHS aspects**

The Authority reviewed two procurements for provision of labour services for works projects worth UGX 149,651,276 and found the following anomalies as detailed in Table 5 below. This was contrary to Section 66 of the PPDA Act, Cap. 205 which provides that "A procuring and disposing Entity shall for each procurement take into account environmental protection, social inclusion and stimulating innovation, as may be prescribed".

**Table 5: Irregularities in implementation of ESHS aspects**

<b>No.</b>	<b>Subject of procurement</b>	<b>Amount (UGX)</b>	<b>PPDA findings</b>
1.	Procurement for labour for construction of the school bakery worth UGX 72,936,776 by Binary Home Consult Ltd	72,936,776	The Terms of Reference developed by the School Architect were not inclusive of any Environment, Social Health and Safety (ESHS) aspects to be considered during implementation of the contracts. i.e. Hoarding

No.	Subject of procurement	Amount (UGX)	PPDA findings
2.	Procurement for labour for construction of the perimeter wall phase 3 to cover a total distance of 720 metres spanning the distance from Andrews (20m from the small gate) to Fort Coleb Small Gate by Binary Home Consult Ltd	76,714,500	off of the site, PPEs for persons on site, availability of safe drinking water on site, HIV/AIDS prevention trainings or campaigns among the staff etc.
	<b>TOTAL</b>	<b>149,651,276</b>	

### Implication

Non-adherence to ESHS could expose both the contractor and Entity staff, and the community where the project is undertaken to serious environmental, social, health and safety risks e.g. air and water pollution, child/forced labour, spread of HIV/AIDS, physical safety hazards etc.

### Management response

*Management has taken note of the recommendation and will endeavor to ensure that the Terms of Reference for the provision of labour services are inclusive of Environmental, Social, Health and Safe Standards so as to safe guard the environment from the negative impacts arising from the project and also safe guard the workers on site from the risk of injuries arising from accidents.*

### Recommendation

The School Architect and Head, PDU should ensure that the Terms of Reference for the provision of labour services for works projects are inclusive of Environmental, Social, Health and Safety Standards so as to safe guard the environment and the neighboring community from the negative impacts arising from the projects and to further safe guard the workers on site from the risk of injuries arising from accidents in accordance with Section 66 of the PPDA Act, Cap. 205.

### 2.3.2. Delayed contract completion

In the construction of a 3 storeyed dormitory block at Ntare school worth UGX 4,382,282,286, the Authority found that Khalsa Developments (U) Ltd failed to complete the works within the initial contractual period stated in the contract contrary to Regulation 52(3)(i) of the PPDA (Contracts) Regulations, 2023. It was however noted that the contract was always extended before expiry of the contractual period as detailed in table 6 below.

**Table 6: Procurement with delayed contract completion**

No.	Procurement Subject	Contractor	Original Contract End Date	Actual Completion Date	Delay (Days)
1.	Construction of a 3 storeyed dormitory block at Ntare school worth UGX 4,382,282,286	Khalsa Developments (U) Ltd	24/3/2023	9/12/2024	626 days

**Implication**

Failure to complete the contract within the specified contract period led to delayed expansion of the school dormitories as the school could not put to use the much-needed dormitory block as earlier planned.

**Management response**

*Ntare School undertook all the possible contract management practices for timely completion of the project. The contractor was quite stubborn but we finally managed him and he completed the project as evidenced by the submissions attached.*

**Recommendation**

The Authority notes the Entity's response and recommends as follows;

1. Going forward, the Entity should recommend to the Authority for suspension of providers that fail to substantially perform the obligations specified in the contract in accordance with Section 128 (e) of the PPDA Act, Cap. 205.
2. Going forward, the Accounting Officer should ensure that contract managers enforce contractual clauses that would safeguard the Entity against non-performing providers as stipulated in the General Conditions of Contract e.g. clauses on liquidated damages and performance security.

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

This section will present graphically the scores per area assessed under different audit questions.

#### 3.1. Overall compliance inspection conclusion

The performance of Ntare School for the Academic Year 2024 was **satisfactory** with overall weighted average risk rating of **24.1%**.

#### 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 7 below:

**Table 7: Risk Score**

Risk Rating	No.	%No.	Value (UGX)	%Value	Weights	Total Weighted Score	
						By No.	By Value
High	0	-	0	-	0.6	-	-
Medium	5	50	360,172,000	7	0.3	15	2.1
Low	3	30	4,531,933,562	88.5	0.1	3	8.8
Satisfactory	2	20	228,432,592	4.5	0	-	-
<b>Total</b>	<b>10</b>	<b>100</b>	<b>5,120,538,154</b>	<b>100</b>	<b>1</b>	<b>18</b>	<b>10.9</b>

$$\text{Weighted Average (By no.)} = \frac{\sum \text{Weighted Score} \times 100}{60} = \frac{18 \times 100}{60} = 30\%$$

$$\text{Weighted Average (By Value)} = \frac{\sum \text{Weighted Score} \times 100}{60} = \frac{10.9 \times 100}{60} = 18.2\%$$

$$\text{Overall Weighted Average Risk Rating} = \frac{30 + 18.2}{2} = 24.1\%$$

Since 24.1% falls within the 0-30% risk range, the performance of the Entity is rated **Satisfactory** as detailed in Table 8 below:

**Table 8: Risk Rating**

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

### 3.3. Recommended Action Plan

Ntare School should implement the following recommendations in Table 9 below within the timeframe given in order to improve its performance:

**Table 9: Action Plan**

No.	Recommended Action	Target date
1.	<p>The Accounting Officer should:</p> <ul style="list-style-type: none"><li>i. Ensure that only the person ordained with Powers of Attorney handles correspondences on behalf of the bidder as well as sign contracts as a representative of the provider in accordance with Regulation 10 (1) of the PPDA (Contracts) Regulations, 2023;</li><li>ii. Expedites the disposal process so as to ensure that the identified assets are disposed of within the ongoing Academic Year (2025) in accordance with the procedures stipulated under paragraph 9.1 &amp; 9.2 of the PPDA Guideline 5 of 2014 on Procurement and Disposal for Schools in Uganda.</li><li>iii. Ensure that contract managers enforce contractual clauses that would safeguard the Entity against non-performing providers as stipulated in the General Conditions of the signed contract e.g. clauses on liquidated damages and performance security.</li></ul>	April 2026
2.	<p>The Procurement and Disposal Unit should:</p> <ul style="list-style-type: none"><li>i. Set an evaluation criteria that requires bidder's representatives to submit Powers of Attorney with their bids as a written confirmation of authorisation to sign on behalf of the bidder following ITB 22.2 of the Bid Data Sheet (BDS) in the standard bidding document for framework contracts.</li><li>ii. Require bidders to submit beneficial owner information through bidding forms and company Form 1; and</li><li>iii. Include particulars of beneficial owners in monthly reports in accordance with the PPDA Circular No. 1 of 2021.</li></ul>	April 2026
3.	<p>The School Architect and Head PDU should ensure that the Terms of Reference for the provision of labour services for works projects are inclusive of Environmental, Social, Health and Safety Standards so as to safe guard the environment and the neighboring community from the negative impacts arising from the projects and to further safe guard the workers on site from the risk of injuries arising from accidents in accordance with Section 66 of the PPDA Act, Cap. 205.</p>	April 2026

## APPENDICES

### Appendix 1: Ntare School compliance inspection sample list and risk rating per case

NO	SUBJECT OF PROCUREMENT	METHOD	PROVIDER	AMOUNT (UGX)	Risk rating
1.	Construction of a 3 storeyed dormitory block at Ntare school	Open bidding	Khalsa Developments (U) Ltd	4,382,282,286	Low risk
2.	Supply and delivery of one double cabin pick-up and its accessories	Open bidding	CFAO Motors Ltd	192,686,592	Satisfactory
3.	Procurement for labour for construction of the school bakery	Open bidding	Binary Home Consult Ltd	72,936,776	Low risk
4.	Procurement for labour for construction of the perimeter wall Phase 3 to cover a total distance of 720 metres spanning the distance from Andrews (20m from the small gate) to Fort Coleb Small Gate	Open bidding	Binary Home Consult Ltd	76,714,500	Low risk
5.	Supply and delivery of school sweaters	Open bidding-Framework	Olithur Holdings Ltd	61,000,000	Medium risk
6.	Supply and delivery of textbooks	Open bidding-Framework	Adit Book Centre Ltd	41,262,000	Medium risk
7.	Supply of examination tables	Open bidding-Framework	Footsteps Furniture Ltd	45,000,000	Medium risk
8.	Supply of posho	Open bidding-Framework	Arise Agencies Ltd	126,900,000	Medium risk
9.	Supply of ground nuts and beans	Open bidding-Framework	Phiron Naphi Enterprises	86,010,000	Medium risk
10.	Supply of material for repairs for golden and pearl houses	Open bidding-Framework	Rock Solid Transporters	35,746,000	Satisfactory
	<b>TOTAL</b>			<b>5,120,538,154</b>	

**Appendix 2: Reason for Medium Risk Cases**

No.	MEDIUM RISK CASES	REASON FOR MEDIUM RISK
1.	Supply and delivery of school sweaters worth UGX 61,000,000 Olithur Holdings Ltd	Signing contracts with persons without authority to represent the providers (persons without Powers of Attorney)
2.	Supply and delivery of textbooks worth UGX 41,262,000 Adit Book Centre Ltd	
3.	Supply of examination tables worth UGX 45,000,000 Footsteps Furniture Ltd	
4.	Supply of posho worth UGX 126,900,000 Arise Agencies Ltd	
5.	Supply of ground nuts and beans worth UGX 86,010,000 Phiron Naphi Enterprises	

	LOW RISK CASES	REASON FOR LOW RISK
6.	Procurement for labour for construction of the school bakery worth UGX 72,936,776	ESHS provisions not in the TORs.
7.	Procurement for labour for construction of the perimeter wall Phase 3 to cover a total distance of 720 metres spanning the distance from Andrews (20m from the small gate) to Fort Coleb Small Gate worth UGX 76,714,500	ESHS provisions not in the TORs.
8.	Construction of a 3 storeyed dormitory block at Ntare school worth UGX 4,382,282,286	Delay in contract implementation
<b>SATISFACTORY CASES</b>		
9.	Supply of material for repairs for golden and pearl houses worth UGX 35,746,000	
10	Supply and delivery of one double cabin pick-up and its accessories worth UGX 192,686,592	

**Appendix 3: Risk Rating Criteria**

<b>RISK</b>	<b>DESCRIPTION</b>	<b>AREA</b>	<b>IMPLICATION</b>
<b>HIGH</b>	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".	<b>Planning:</b> 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.
		<b>Bidding Process:</b> 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.
		<b>Evaluation:</b> 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.
		<b>Record Keeping:</b> 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.
		<b>Fraud/forgery:</b> Falsification of Documents	This implies lack of transparency and value for money.
		<b>Contract Management:</b> 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>MEDIUM</b>	Procurements that were considered to have weaknesses which, although less likely to	<b>Planning:</b> Lack of initiation of procurements and confirmation of funds.	This implies committing the Entity without funds thereby causing domestic arrears.

RISK	DESCRIPTION	AREA	IMPLICATION
	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	<b>Bidding Process:</b> Deviations from standard procedures namely bidding periods, standard formats, use of PP Forms and records of issue and receipts of bids, usage of non-qualified firms and splitting procurement requirements.	This implies lack of efficiency, standardisation and avoiding competition.
	would normally be graded "medium" provided that there is sufficient evidence of "hands on management control and oversight" at an appropriate level of seniority.	<b>Procurement Structures:</b> Lack of procurement structures	This implies lack of independence of functions and powers and interference in the procurement process.
		<b>Record Keeping:</b> 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.
		<b>Contract and Contract Management:</b> 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	

RISK	DESCRIPTION	AREA	IMPLICATION
		and safety not covered by the contractor during contract implementation.	
<b>LOW</b>	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.	<b>Planning:</b> Lack of procurement reference numbers.	This leads to failure to track the procurements which leads to poor record keeping.
		<b>Bidding Process:</b> 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.

#### Appendix 4: Composition of the Contracts Committee and PDU

Ntare School established the Contracts Committee in accordance with Paragraphs 5.7. and 5.8 of the PPDA Guideline 5 of 2014 on Procurement and Disposal Guidelines for Schools in Uganda and Section 28 (l) (a) and (b) of the PPDA Act, Cap. 205 and the composition is as detailed in Table 10 below:

**Table 10: Composition of the Contracts Committee**

No.	Name	Position	Job Title	Date of appointment	Tenure
1.	Mr. Wilson Ndeze	Chairperson	Deputy Head Teacher	01/09/2024	1 <sup>st</sup>
2.	Ms. Peruth Birungi	Secretary	Teacher	02/02/2024	2 <sup>nd</sup>
3.	Mr. Philbert Natuhwera	Member	Teacher	02/02/2024	2 <sup>nd</sup>
4.	Ms. Jackline Komugisha	Member	Teacher	04/01/2025	1 <sup>st</sup>
5.	Mr. Nickson Matsiko	Member	Teacher	04/01/2025	1 <sup>st</sup>

#### Staffing of the Procurement and Disposal Unit (PDU)

Paragraph 4.4 of the PPDA Guideline 5 of 2014 on Procurement and Disposal for Schools in Uganda states that “*PDEs in the medium and large categories shall employ two procurement personnel in the PDU to handle procurement activities*”. The Authority noted that the Entity’s PDU was fully staffed with two procurement personnel in accordance with the above Paragraph as detailed in Table 2 below:

**Table 11: Staffing of the PDU**

No.	Name	Position	Date of appointment
1.	Mr. Rodgers Tumwine	Head PDU	06/02/2016
2.	Rev. Jocus Kangume	PDU member	24/01/2023
3.	Ms. Diana Luwaga	Secretary	24/01/2023

### Appendix 5: Physical verification pictures as of 31<sup>st</sup> July 2025

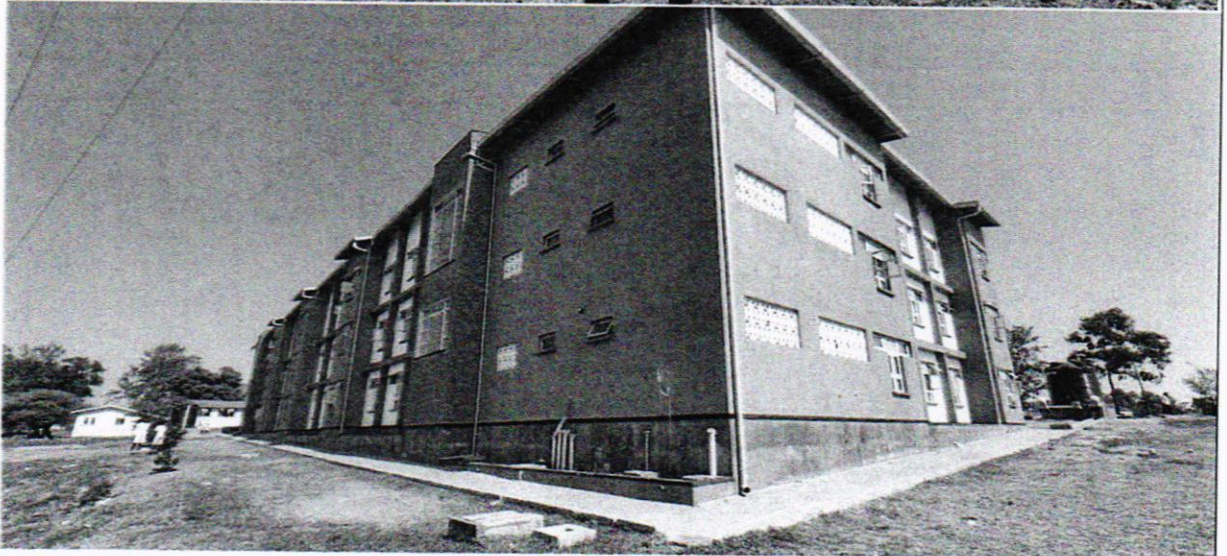
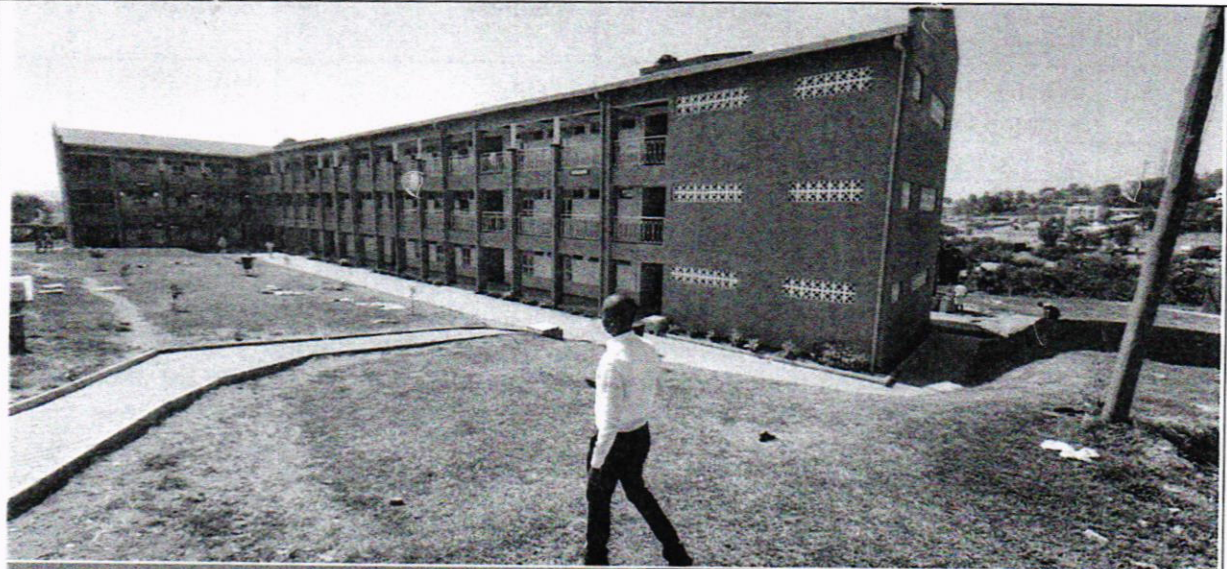
The Authority conducted a physical verification exercise on three of the 10 sampled procurements and the status of works as at 31<sup>st</sup> July 2025 is as detailed below:

**Contract:** Construction of a 3 storeyed dormitory block at Ntare school worth UGX 4,382,282,286

**Provider:** Khalsa Developments (U) Ltd

**Status of works:** The works were complete and the dormitory block was handed over and in use at the time of physical verification on 31<sup>st</sup> July 2025.

- Physical progress of works: 100%
- Financial progress:100%
- Issues noted during physical verification: None



Above: Pictures showing the front and back view of the completed 3 storeyed dormitory block at Ntare school.

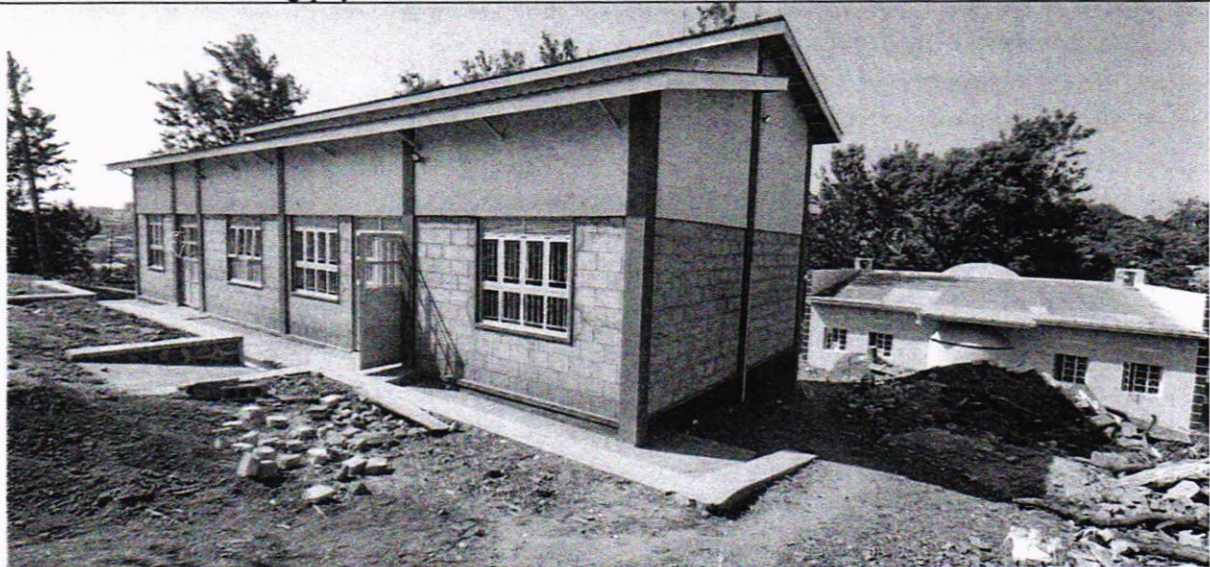
**Contract:** Construction of the school bakery worth UGX 72,936,776

**Provider:** Binary Home Consult Ltd

**Status of works:** The works were still ongoing with the contractor on site at the time of physical verification on 31<sup>st</sup> July 2025.

Physical progress of works:85%

- Financial progress:70%
- Time progress:90%
- Issues noted during physical verification: None



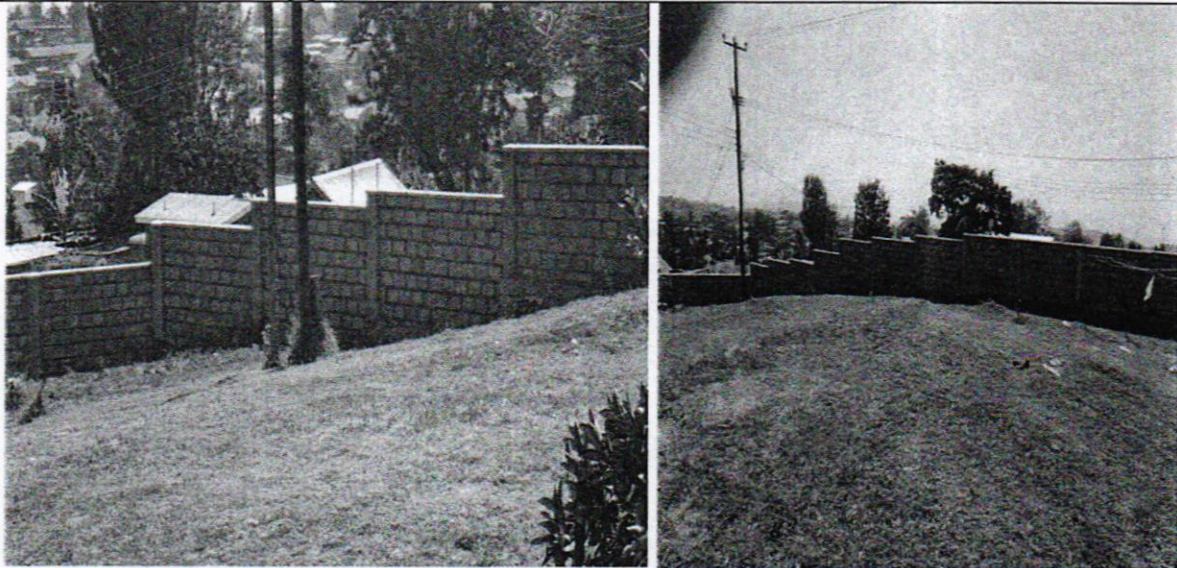
Above: Picture showing the front and back view of the school bakery with the contractor on site.

**Contract:** Procurement for labour for construction of the perimeter wall Phase 3 to cover a total distance of 720 metres spanning the distance from Andrews (20m from the small gate) to Fort Coleb Small

**Provider:** Binary Home Consult Ltd

**Status of works:** The works were complete and the fence was in use at the time of the inspection on 31<sup>st</sup> July 2025.

- Physical progress of works: 100%
- Financial progress: 100%
- Time progress: 100%
- Issues noted during physical verification: None



Above: Pictures showing different sections of the wall fence around Ntare school.