



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

"Regulating for Results"

**REPORT ON PROCUREMENT AND DISPOSAL AUDIT FOR SOROTI
CITY COUNCIL FOR FINANCIAL YEAR 2024/2025**

JUNE 2026

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ACRONYMS

BEB	Best Evaluated Bidder
BOQs	Bill of quantities
CC	Contracts Committee
CIPS	Chartered Institute of Purchasing and Supply
ESHS	Environmental, Social, Health and Safety
FY	Financial Year
LPO	Local Purchase Order
LTD	Limited
MDAs	Ministries, Departments and Agencies
PDE	Procuring and Disposing Entity
PDU	Procurement and Disposal Unit
PPDA	Public Procurement and Disposal of Public Assets Authority
RFQ	Request for Quotation
TCC	Tax Clearance Certificate
UGX	Uganda Shillings

EXECUTIVE SUMMARY

The Public Procurement and Disposal of Public Assets Authority conducted a procurement and disposal audit of your Entity, covering 21 sampled procurement transactions worth UGX 1,152,016,575 for the Financial Year 2024/2025.

The overall objective of the procurement and disposal audit was to assess and determine the degree of compliance of Soroti City Council's procurement and disposal system and processes with the provisions of the PPDA Act, Cap. 205, and the attendant PPDA Regulations, and to assess the level of procurement and disposal performance over the audit period.

The procurement and disposal activities of Soroti City Council for the Financial Year 2024/2025 were carried out with a significant level of non-compliance with the provisions of the PPDA Act, Cap. 205, and the attendant PPDA Regulations. Although the Entity maintained the required procurement structures, the audit identified notable weaknesses in procurement planning, implementation of previous audit recommendations, records and asset management, provider shortlisting, and contract award distribution and administration.

In addition, physical verification of selected projects revealed quality and performance deficiencies, including leaking and uncovered manholes, a deteriorated septic tank, a leaking roof, and cracked walls. These findings indicate weaknesses in contract supervision and quality assurance during implementation.

These weaknesses indicate deficiencies in key internal controls and accountability mechanisms. If not adequately addressed, they may compromise service delivery, undermine value for money, and adversely affect the Entity's strategic and operational performance.

Accordingly, the overall performance of Soroti City Council for the Financial Year 2024/2025 was assessed as **Moderately Satisfactory**, with an overall weighted average risk rating of **69.5%** as detailed in chapter 3 of this report.

The following key exceptions were noted:

1. Poor storage of procurement records. Section 33(o) of the PPDA Act, Cap. 205 requires the Procurement and Disposal Unit to maintain and archive records of the procurement and disposal process. However, the audit found that although the Entity had designated storage space for procurement records, the capacity was grossly inadequate. The archive was congested and full, with procurement files and bid documents piled on the floor. This exposed records to physical damage from moisture, dust, and pests and increased the likelihood of misplacement and retrieval challenges. Inadequate storage of procurement records exposes documents to physical damage, loss, and deterioration, compromising the completeness, integrity, and reliability of the procurement audit trail.
2. Failure to fully implement 78% of the previous audit recommendations. Section 10 of the PPDA Act, Cap. 205 requires Procuring and Disposing Entities to act on the Authority's recommendations. The Authority observed that the Entity received its previous audit report for the Financial Year 2022/2023 in July 2024. Of the 14 recommendations, three (21%) were fully implemented, three (21%) were partially implemented, and eight (57%) were not implemented. Failure to fully implement audit recommendations undermines the performance

of the procurement and disposal function and indicates a weak implementation mechanism within the Entity.

3. Failure to reserve at least 15% of the annual procurement plan for contracts awarded to Women, Youth, and Persons with Disabilities. Guideline 11 of 2024, Paragraph 2.1 (i), requires every Procuring and Disposing Entity to allocate at least 15% of its annual procurement plan budget to registered associations representing Women, Youth, and Persons with Disabilities. However, the audit found that the procurement plan was developed without provisions to reserve portions of procurement for these designated groups. Failure to include Women, Youth, and Persons with Disabilities undermines the Government of Uganda's efforts to increase their participation in public procurement.
4. Failure to implement 59% of the Procurement Plan. Section 60 (2) of the PPDA Act, Cap. 205 states that “*a Procuring and Disposing Entity shall rationally plan its procurement and disposal.*” The audit found that the Entity’s procurement plan absorption rate was 41%, with a variance of UGX 1,811,084,285, indicating that 59% of the procurement plan was not implemented for FY 2024/25. Procurements worth UGX 1,811,084,285 were not implemented, depriving intended beneficiaries of service delivery commensurate with the value.
5. Irregular shortlisting and uneven distribution of contract awards. Section 48 of the PPDA Act, Cap. 205 requires that all procurements be conducted in a manner that promotes fairness. The audit revealed significant inequities in the shortlisting of providers and in the distribution of contract awards among prequalified firms. Of the 33 prequalified providers for works, only 10 (30%) were awarded contracts in the 18 sampled works procurement cases. In contrast, nine prequalified providers were not shortlisted for any procurement throughout the entire financial year, effectively excluding them from participation. Furthermore, two providers, Jojohe Agencies Ltd and Ominya Enterprises Ltd, were awarded six contracts with a combined value of UGX 487,429,883, representing approximately 38% of the Entity’s total procurement expenditure for the period under review. This pattern suggests possible preferential treatment and inadequate rotation among prequalified providers, undermining the principle of fairness. The uneven distribution of contract awards and the exclusion of a significant number of prequalified providers undermine the principles of fairness, transparency, and competition in public procurement.
6. Inappropriate Use of Direct Procurement Method. Regulation 6 (3) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023, requires an entity to determine the procurement method based on the estimated value of the procurement, the circumstances surrounding the procurement requirements, and the type of procurement. Furthermore, Regulation 25 strictly limits direct procurement to exceptional circumstances, including emergencies, situations where goods, works, or services are available from a single provider, continuity requirements, or additional works or services. Contrary to this, the audit found that the Entity conducted six procurements worth UGX 176,602,738 through direct procurement, without justification under the conditions specified in Regulation 25. The unjustified use of direct procurement limits competition, which may lead to inflated prices and failure to achieve value for money.
7. Failure to conduct disposal. Regulation 2 of the PPDA (Disposal) Regulations, 2023 requires a Procuring and Disposing Entity to dispose of obsolete assets identified by the Board of

Survey. The audit identified obsolete assets that were due for disposal; however, the Entity did not dispose of any during Financial Year 2024/2025. Failure to dispose of items exposes them to theft and to further depreciation, resulting in loss of value

8. Irregularities during contracting and contract execution. Regulation 52 (1) of the PPDA (Contracts) Regulations, 2023 states that “(1) A contract manager shall (a) *manage the obligations and duties of the procuring and disposing entity specified in the contract*; and (b) *make certain that the provider performs the contract in accordance with the terms and conditions specified in the contract.*” The Authority observed irregularities in contracting and contract management across 10 procurements worth UGX 1,013,012,279. Failure to appoint contract supervisors exposes the Entity to the risk of poor contract management, which results in contracts not being implemented in accordance with the agreed terms and conditions of the contract

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

1. The Accounting Officer should:
 - i. Immediately direct the Administration Department to reorganise and optimise the available office space and provide the PDU with adequate shelves, lockable filing cabinets, and storage facilities to ensure safe custody and easy retrieval of procurement records in accordance with Section 33 (o) of the PPDA Act, Cap. 205;
 - ii. Establish an audit recommendations register and conduct quarterly monitoring to ensure the full implementation of the Authority’s recommendations to improve the Entity’s performance, in accordance with Section 10(1)(a) of the.
 - iii. Develop a list of Special interest group providers and preserve at least 15% of the entity’s procurements, in accordance with Guideline 11 of 2024, Section 2.1 (i), which mandates reserving at least 15% of the annual procurement budget for these groups
 - iv. Institute quarterly procurement plan reviews to align planned procurements with actual budget releases and revenue collection. Any significant changes should be formally approved and reflected in the updated procurement plan in accordance with Regulation 4 of the PPDA (Procurement Planning) Regulations, 2023.
 - v. Establish a transparent and equitable shortlisting mechanism that ensures fair rotation and participation by all prequalified providers in accordance with Section 48 of the PPDA Act, Cap. 205. This can be achieved by maintaining and regularly updating a shortlisting register to track provider participation and awards, and by enforcing clear selection criteria to prevent the concentration of contracts among a few providers.
 - vi. Ensure that competitive procurement methods remain the default approach and that any deviation is fully justified and approved in accordance with Regulation 6 (3) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy.
 - vii. Dispose of obsolete assets in accordance with the Board of Survey report's recommendations and with Regulation 2 of the PPDA (Disposal) Regulations, 2023, and Section 60 (2) of the PPDA Act, Cap. 205
 - viii. Task the contract managers to fulfil their roles and responsibilities in accordance with Regulation 52 (1) and (2) of the PPDA (Contracts) Regulations, 2023
2. The Head, Procurement and Disposal Unit, should show cause why disciplinary action should not be taken against them for failing to invite the nine prequalified providers to bid during the financial year.

3. The Heads of user departments should task contract supervisors with preparing monthly reports on the progress of each contract. A copy of each report should be submitted to the Accounting Officer and the Procurement and Disposal Unit for record-keeping, as required under Regulation 52 (3) (g) of the PPDA (Contracts) Regulations, 2023.

A recommended action plan for the Soroti City Council is on page 44 of this audit report

CHAPTER ONE: INTRODUCTION

1.1. Background

The Public Procurement and Disposal of Public Assets Authority conducted a procurement and disposal audit of Soroti City Council, covering 21 sampled procurement transactions worth UGX 1,152,016,575 for the Financial Year 2024/2025. The audit involved a review of procurement and disposal structures, systems, and processes, as well as contract performance, in accordance with the Public Procurement and Disposal of Assets Act, Cap. 205 and the attendant PPDA Regulations.

1.2 Objective of the procurement and disposal audit

The overall objective of the procurement and disposal audit was to assess and establish the degree of compliance of the Soroti City Council's procurement and disposal systems and processes with the provisions of the PPDA Act, Cap. 205, and the attendant PPDA Regulations, and to assess the level of procurement performance over the audit period.

The specific objectives of the audit were to:

- i. Establish the Entity's level of compliance with the general provisions of the PPDA Act, Cap. 205, and the PPDA Regulations 2014 and 2023 regarding the performance of the procurement structures and the conduct of procurement processes;
- ii. Assess the extent to which the Entity's disposal process complies with the provisions of the PPDA Act, Cap. 205, and the PPDA Regulations 2023; and
- iii. Assess the efficiency and effectiveness of contract implementation, including the application of Environmental, Social, Health and Safety (ESHS) Requirements in the procurement process.

1.3 Procurement Structure of the Entity

The key players in the procurement structure at Soroti City Council include the Town Clerk (Accounting Officer), the Contracts Committee, the Procurement and Disposal Unit, and the User Departments.

Section 28 of the PPDA Act, Cap. 205 gives the Accounting Officer overall responsibility for the successful execution of procurement, disposal, and contract management within the Procuring and Disposing Entity. During the period under review, the designated Accounting Officer was Ms Justine Barekye, who was subsequently replaced by Mr Paul Batanda, the Town Clerk.

Section 29 (1) of the PPDA Act, Cap. 205 states that “*a Contracts Committee shall be composed of the members specified in Schedule 4 to this Act.*” Schedule 4 of the PPDA Act, Cap. 205 requires the Contracts Committee of a Procuring and Disposing Entity to comprise five members: a chairperson, a secretary, and three other members. During the audit period, the Entity's Contracts Committee was fully constituted, as shown in Table 1 below:

Table 1: List of Contracts Committee Members

No.	NAME	POSITION	DATE OF APPOINTMENT	TITLE
1.	Mr. Patty Emokor	Chairperson	22 nd December 2023	Principal Education Officer
2.	Ms. Akello Stella	Member	1 st June 2023	Senior Probation & Welfare Officer
3.	Ms. Betty Ikiring	Member	22 nd December 2023	Senior Health Educator

4.	Ms. Rehema Mariam Nassolo	Secretary	22 nd December 2023	Senior Surveyor
5.	Ms. Hellen Muzaki	Member	1 st December 2024	Secretary City Land Board

Section 28 (1) (c) of the PPDA Act, Cap. 205 authorises the Accounting Officer to establish a Procurement and Disposal Unit staffed at an appropriate level. During the year under audit, the Entity's Procurement and Disposal Unit was fully staffed with two members at the levels of Principal Procurement Officer and Senior Procurement Officer, as shown in Table 2 below:

Table 2: Staffing of the Procurement and Disposal Unit

S/no	Name	Job Title	Academic Qualification
1.	Mr. Richard Etyau	Principal Procurement Officer	Master's in Business Administration, Post Graduate Diploma in Logistics & Transport Policy Mgt, Bachelor's Degree in Procurement & Logistics Mgt, Diploma in Stores & Supplies Management, Administrative Officers Law Course, CIPS – level 5
2.	Ms. Serida Alayo	Senior Procurement Officer	Post Graduate Diploma in Procurement & Logistics Management and Bachelor's Degree in Procurement & Logistics Management

1.4 Audit Scope

The Audit involved a sample-based review of procurement and disposal processes, general compliance issues, and contract implementation. The Audit covered a representative sample of 21 procurement transactions worth UGX 1,152,016,575 for the Financial Year 2024/25. The sample was selected using stratified random sampling, based on Contracts Committee minutes and monthly procurement and disposal reports. The list of sampled transactions is contained in Annex 2. Table 3 below details the distribution of the transaction population and sample.

Table 3: Analysis of the population and sample selected for the audit of FY 2024/25.

Procurement method	Popn Value (UGX)	Sample Value (UGX)	% Value	Popn no	Sample no	% no
Restricted Domestic Bidding	501,131,986	501,131,986	100	3	3	100
Framework	16,370,000	16,370,000	100	2	2	100
RFQ	443,051,851	443,051,851	100	10	10	100
Direct Procurement	191,462,738	191,462,738	100	6	6	100
Micro procurements	12,783,000	0	0	21	0	0
Total	1,164,799,575	1,152,016,575	99	42	21	50

1.5 Audit Methodology

An audit launch meeting was held on 13th April 2026. A sample of 21 procurement transactions was selected using stratified random sampling, based on the Contracts Committee minutes and monthly procurement and disposal reports. The Authority examined records and documents for each sampled procurement transaction and/or disposal and obtained the relevant evidence to form audit conclusions. This involved a review of the Entity's procurement and disposal planning, initiation, bidding, evaluation, contract placement, and related processes. At the end of the document review, a physical verification was conducted to assess the level of contractual delivery and fitness for purpose.

During the audit, the auditors engaged with the Procurement and Disposal Unit staff and User Departments to obtain clarifications and gather key qualitative information on the effectiveness of internal control systems and related procurement processes.

A debrief meeting to discuss preliminary audit findings was held with the Entity's management and staff on **22nd April 2026**. The Authority prepared the management letter, which was sent to the Entity on **7th May 2026**, requesting a management response by **13th May 2026**. The responses were submitted on **19th May 2026**, and the exit meeting was held the same day at the PPDA Eastern Regional Office.

After data collection and before writing the report, the Regional Manager reviewed the working papers for completeness. The working papers include a detailed chronology of findings for each sampled transaction. The audit report presents the key findings and conclusions.

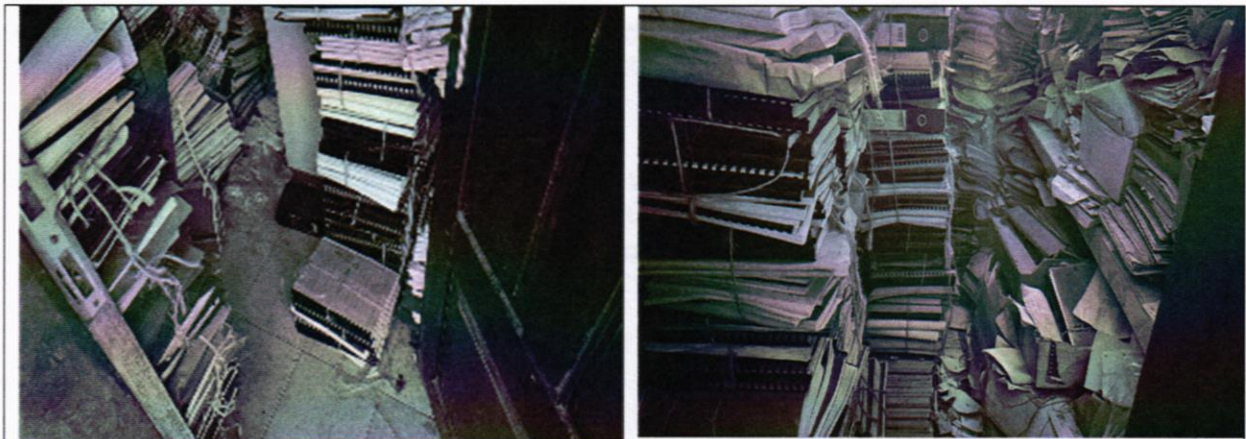
CHAPTER TWO: FINDINGS OF THE AUTHORITY

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

2.1.1 Poor storage of procurement records

Section 33 (o) of the PPDA Act, Cap. 205 requires the Procurement and Disposal Unit to maintain and archive records of the procurement and disposal process. However, the audit found that although the Entity had designated storage space for procurement records, the capacity was grossly inadequate. The archive was congested and full, with procurement files and bid documents piled on the floor. This exposed records to physical damage from moisture, dust, and pests and increased the likelihood of misplacement and retrieval challenges, as illustrated in Figure 1 below:

Figure 1: Evidence of poor storage of procurement records at the Procurement and Disposal Unit



Implication

Inadequate storage of procurement records exposes documents to physical damage, loss, and deterioration, compromising the completeness, integrity, and reliability of the procurement audit trail.

Management Response

Soroti City is one of the Municipal Councils that was elevated to City status in 2020. However, this has created pressure for office and storage space within the entity. Newly recruited staff also have inadequate space for office operations. The Government of Uganda is committed to providing start-up funds for the full operation of Cities, and once this is realised, construction of both office and storage space will remain on our priority list.

Authority's comment

The Authority noted the Entity's response; however, the Entity's constraints on office space and storage should be managed through interim measures, including reorganising and maximising the available space and utilising shelves and filing cabinets.

Recommendation

The Accounting Officer should;

1. Immediately direct the Administration Department to reorganise and optimise the available office space and provide the PDU with adequate shelves, lockable filing cabinets, and storage facilities to ensure safe custody and easy retrieval of procurement records in accordance with Section 33(o) of the PPDA Act, Cap. 205.
2. Develop a costed and phased plan for office accommodation and storage expansion within the next budget cycle and formally engage the responsible line Ministries and other relevant authorities to secure and fast-track funding for permanent office and records storage infrastructure.

2.1.2 Failure to fully implement 78% of the previous audit recommendations.

Section 10 of the PPDA Act, Cap. 205 requires Procuring and Disposing Entities to act on the Authority's recommendations. The Authority observed that the Entity had been issued its previous audit report for the Financial Year 2022/2023 in July 2024. Of the 14 recommendations, three (21%) were fully implemented, three (21%) were partially implemented, and eight (57%) were not implemented, as detailed in Table 4 below:

Table 4: Status of implementation of previous audit recommendations

No.	Recommendation	Status
1.	The Accounting Officer should confirm in writing that funds required for the proposed contract have been committed prior to the Procuring and Disposing Entity entering into a contract in accordance with Regulation 7 of the PPDA (Contracts) Regulations, 2023	Not Implemented
	<u>Management response</u> <i>We have taken note, but a specific case is not cited in this letter</i> <u>Authority's comment</u> The Authority noted the Entity's response; however, the observation is based on a review of three procurements identified in the audit on page 25 of this report, in which the contract prices exceeded the approved estimated costs, without evidence of prior confirmation of additional funding by the Accounting Officer. The concern, therefore, relates to a systemic issue affecting multiple procurements rather than a single isolated case	
2.	The Accounting Officer should ensure that the Entity, on a quarterly basis and in any other case, wherever necessary, review and updates its procurement plan in accordance with Section 58 (4) of the PPDA Act, 2003	Not implemented
	<u>Management response</u> <i>To be adhered to</i>	
3.	The Accounting Officer should implement a system to track procurement transactions and eliminate delays, including appointing a focal person or committee to oversee the process and holding regular management meetings to discuss progress.	Not implemented
	<u>Management response</u> <i>To be adhered to</i>	
4.	The Accounting Officer should ensure that all procurements are conducted in a fair, transparent, and competitive manner in accordance with Sections 45 and 46 of the PPDA Act, 2003, and anomalies in solicitation document preparation (such as inadequate	Partially implemented

No.	Recommendation	Status
	specifications) and also failure to evaluate bids appropriately should be addressed to rebuild the confidence that the bidders may have lost.	
	Management response <i>There is commitment, but also a need for Capacity building.</i>	
5.	Ensure that the disposal of obsolete assets is done as recommended by the board of survey report in accordance with Regulation 3 of the PPDA (Disposal of Public Assets) Regulations, 2023	Not implemented
	Management response <i>The disposal process is currently ongoing. The regulations were revised, but the bidding documents are still inadequate</i>	
	Authority's comment The Authority noted the Entity's response; however, while some obsolete items, such as iron sheets and hospital beds, have been disposed of, a significant portion of the identified obsolete assets, including tractors, motorcycles, ICT equipment, and motor vehicles, remains undisposed of. As a result, these assets continue to deteriorate in value and face heightened risks of theft, vandalism, and further depreciation. Regarding the inadequacy of the bidding documents, the Entity is advised to consistently liaise with and make effective use of the PPDA Eastern Regional Office for technical guidance and support on all procurement-related matters, particularly the review of bidding documents.	
6.	The User Departments should provide a statement of requirements at initiation, in accordance with Regulation 3 (2) (a) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services of Supplies, Works and non-consultancy services) Regulations, 2023	Partially Implemented
	Management response <i>There is still inadequate knowledge of specs. The authority should support and standardise.</i>	
	Authority's comment The Authority noted the Entity's response; however, Regulation 36 (1) (c) of the PPDA Act, Cap. 205 clearly assigns responsibility for preparing a statement of requirements to the User Departments. While capacity gaps in specification development may exist, they do not relieve the Entity of its obligation to ensure that procurement requirements are properly defined to guide the process.	
7.	The User Departments should ensure effective contract management in accordance with Regulation 52 of the PPDA (Contracts) Regulations, 2023.	Partially Implemented
	Management response <i>There are some positives with a commitment to improve</i>	
	Authority's comment The Authority noted the Entity's response; however, it does not directly address the audit observation. A general indication of commitment to improvement is insufficient without clear, documented actions that demonstrate how contract management weaknesses are being addressed and strengthened.	

No.	Recommendation	Status
8.	The Head, Procurement and Disposal Unit, should ensure that Evaluation Committees conduct evaluations in accordance with the criteria set out in the bidding document and Section 76(3) of the PPDA Act, Cap. 205	Not Implemented
	<u>Management response</u> <i>The system is designed with many role players with independent decisions; however, there is an effort.</i> Authority's comment The Authority noted the Entity's response; however, although the procurement system may involve multiple role players with defined responsibilities, all evaluation activities must be strictly guided by the criteria set out in the bidding document. The independence of individual roles does not supersede legal and procedural requirements.	
9.	The Head, Procurement and Disposal Unit, should maintain all procurement records in their respective procurement action files in accordance with Section 33(o) of the PPDA Act, Cap. 205	Not Implemented
	<u>Management response</u> <i>There is some effort and commitment</i> Authority's comment The Authority noted the Entity's response; however, it does not adequately address the audit observation. The incompleteness of procurement records remains a compliance gap that must be addressed through systematic, verifiable improvements to records management practices, such as a procurement file checklist and a file movement register.	
10.	The Contracts Committee should ensure that the principles of fairness and transparency are observed in the evaluation process in accordance with Section 48 of the PPDA Act, Cap. 205, before approving the evaluation reports	Not Implemented
	<u>Management response</u> <i>Though they exercise discretionary powers, they also need capacity building. Too many role players in the process.</i> Authority's comment The Authority noted the Entity's response; however, while the procurement process may involve multiple role players and the need for capacity building is acknowledged, these factors do not diminish the Contracts Committee's responsibility to independently satisfy itself that the evaluation process was conducted in compliance with the law and the approved bidding criteria prior to granting approval.	
11.	The Contracts Committee should ensure that the bidding documents are scrutinised for quality before approval in line with Regulation 10 of the PPDA (Procuring and Disposing Entities) Regulations, 2023.	Not Implemented
	<u>Management response</u> <i>There is some effort, but also a need for capacity building</i> Authority's comment The Authority noted the Entity's response; however, "some effort" is not sufficient without demonstrable evidence of consistent compliance and quality assurance in the approval process.	

Implication

Failure to fully implement audit recommendations undermines the performance of the procurement and disposal function and indicates a weak implementation mechanism within the Entity.

Recommendation

The Accounting Officer should establish an audit recommendations register and conduct quarterly monitoring to ensure the full implementation of the Authority's recommendations to improve the Entity's performance, in accordance with Section 10(1)(a) of the PPDA Act, Cap. 205.

2.1.3 Irrational Procurement Planning and Scheduling

Section 60 (2) of the PPDA Act, Cap. 205 requires a Procuring and Disposing Entity to plan its procurements rationally. The audit found that the Entity's Procurement Plan for the period under review set uniform invitation and contract award dates for all planned procurement transactions, regardless of the nature, value, or complexity of the procurements. This anomaly indicates inadequate planning and a non-analytical approach to preparing the procurement plan.

Implications

- The use of uniform, unrealistic timelines undermine the effectiveness of the Procurement Plan as a planning and control tool.
- It exposes the Entity to implementation delays, weak coordination of procurement activities, and the risk of noncompliance with established procurement procedures, which may ultimately affect timely service delivery and value for money.

Management Response

The Ministry of Finance has always released all development funds by the end of the third quarter, but over the last three years, funds have been released to some extent one or two months before the end of the financial year. This leaves the stakeholder speculating and hesitant to fully initiate and blow their work plans.

Authority's comment

The Authority noted the Entity's response. While procurement activities should align with anticipated funding flows, this does not justify uniform timelines across all procurements.

Recommendation

The Accounting Officer should task the Head, Procurement and Disposal Unit, with preparing realistic procurement plans that incorporate activity-specific timelines based on procurement methods, complexity, user department work plans, and statutory lead times, in accordance with Section 60(2) of the PPDA Act, Cap. 205.

2.1.5 Failure to reserve at least 15% of the annual procurement plan for awarding contracts to Women, Youth, and PWDs

Guideline 11 of 2024, Paragraph 2.1 (i), requires every Procuring and Disposing Entity to allocate at least 15% of its annual procurement plan budget to registered associations representing Women, Youth, and Persons with Disabilities. However, the audit found that the procurement plan was developed without provisions to reserve portions of procurement for these designated groups.

Implication

Failure to include women, youth, and Persons with Disabilities undermines the Government of Uganda's efforts to increase their participation in public procurement.

Management Response

True, these are new and positive government interventions. It is our commitment to implement the recommendations; however, we are making a concerted effort to educate and encourage stakeholders to register and apply. My office has also engaged local radio stations on this government initiative and has included it in the upcoming 2026-2027 procurement plan.

Authority's comment

The Authority noted the Entity's response and commends the initiatives undertaken to create awareness through stakeholder engagement and local radio sensitisation.

Recommendation

The Accounting Officer should develop a list of Special Interest Group providers and preserve at least 15% of the entity's procurements, in accordance with Guideline 11 of 2024, Section 2.1 (i).

2.1.6 Failure to implement 59% of the Procurement Plan

Section 60 (2) of the PPDA Act, Cap. 205 states that "*a Procuring and Disposing Entity shall rationally plan its procurement and disposal.*" The audit found that the Entity's procurement plan absorption rate was 41%, with a variance of UGX 1,811,084,285, indicating that 59% of the procurement plan was not implemented for FY 2024/25. Table 5 below details the plan and utilisation of funds.

Table 5: Procurement plan implementation

Analysis of procurement spend	
Total procurement plan value inclusive of VAT (UGX)	3,078,114,860
Total procurement spend value inclusive of VAT (UGX)	1,190,265,425
Procurement plan implementation rate (%)	41
Implementation variance (UGX)	1,811,084,285
Non-implementation rate (%)	59

Implication

Procurements worth UGX 1,811,084,285 were not implemented, depriving intended beneficiaries of service delivery commensurate with the value.

Management response

The Procurement for Construction of Otatai Health Centre worth UGX 1,562,565,060 was for FY 2023/24 contracted to the UPDF Engineers Brigade as per attached MOU with ministry of Defense. The procurement was reintroduced for 2024/25 because the city is yet to pay UPDF the outstanding amount of UGX 60m.

Authority's comment

The Authority noted the entity's response. However, upon review, the procurement for the Construction of Otatai Health Centre was not included in the Procurement plan for FY 2023/24 submitted to the Authority. In addition, the entity did not submit an updated procurement plan for FY 2024/25, reflecting only the outstanding UGX 60m.

Recommendation

The Accounting Officer should institute quarterly procurement plan reviews to align planned procurements with actual budget releases and revenue collection. Any significant changes should be formally approved and reflected in the updated procurement plan in accordance with Regulation 4 of the PPDA (Procurement Planning) Regulations, 2023.

2.1.7 Conducting procurements outside the Procurement Plan

Section 60 (10) of the PPDA Act, Cap. 205 states that “*a procurement shall not be carried out outside the procurement plan except in cases of emergencies.*” The Authority noted that four procurements worth UGX 341,848,155 were conducted outside the approved Procurement Plan submitted to the Authority. This indicates inadequate adherence to the approved Procurement Plan and possible lapses in budgetary control and coordination among user departments. Details of these procurements are outlined in Table 6 below:

Table 6: Procurements conducted outside the plan.

No	Subject of procurement	Contract value (UGX)
1.	Repair of solar street lights along Central Ave, the section of Serere Road, and Cemetery Road	189,918,150
2.	Completion of Admin- Block-Finance	96,397,268
3.	Construction of a five-stance latrine at Kichinjaji HC111	23,852,237
4.	Installation of Solar lighting System at Aminit Madera, Islamic, Owalei, 5 units of Otatai, and Acetgwen primary school	31,680,500
	TOTAL	341,848,155

Implication

Undertaking procurement outside the approved Procurement Plan undermines the integrity of the planning process and may lead to uncoordinated procurement activities, inefficient use of resources, and diversion from priority needs.

Management Response

In most cases, this is caused by delays and uncoordinated review and submission of work plans by the user departments. There is an effort to update the subsequent plans.

Authority's comment

The Authority noted the Entity's response; however, delays and uncoordinated submission of work plans by User Departments do not justify conducting procurements outside the approved Procurement Plan. Rather, these challenges indicate weaknesses in coordination, planning, and the timely consolidation of procurement requirements within the Entity.

Recommendations

1. The Heads of the User Department, the Procurement and Disposal Unit, and the Contracts Committee should refrain from initiating, undertaking, or approving procurements outside the Entity's approved procurement plan.
2. The Accounting Officer should, on a quarterly basis and whenever necessary, review and update the entity's procurement plan in accordance with Section 60(7) of the PPDA Act, Cap. 205.

2.1.8 Delays in the procurement process

Section 51 of the PPDA Act, Cap. 205 states that “*All procurement and disposal shall be conducted in a manner which promotes economy, efficiency, and value for money.*” The Authority noted significant delays of approximately four months in the procurement of supply and maintenance of computers, printers, photocopiers, and IT-related supplies under a framework contract. The procurement process was initiated on 6th May 2024; however, approval by the Accounting Officer was granted only on 15th July 2024, resulting in a delay of over two months at the initiation stage. Subsequently, the procurement was advertised on 15th August 2024, indicating a further delay between approval and the solicitation of bids.

Furthermore, the bid opening and closing were held on 6th September 2024, but the evaluation process was not concluded until 2nd October 2024. These delays across stages of the procurement cycle reflect weaknesses in procurement planning, coordination, and internal process management.

Implications

- Delays in the procurement process undermine the principles of efficiency and value for money and may lead to delayed delivery of goods and services, thereby affecting timely service provision.
- This leads to exposure to price fluctuations and rising procurement costs.

Management Response

Delays do arise at times due to technical and administrative challenges, especially when many bids are received. Departments sometimes initiate requisitions before projects are assessed and designed. Tenders for revenue collection often take a long time, delaying projects. Nevertheless, it is ideal to have speedy procurement.

Authority’s comment

The Authority noted the Entity’s response; however, the cited administrative and technical challenges, including high bid volumes and late initiation of requisitions before project assessments and designs are completed, reflect weaknesses in procurement planning and internal coordination rather than unavoidable constraints. These practices cause avoidable delays in procurement, undermine efficiency, and adversely affect timely service delivery, cost predictability, and value for money.

Recommendation

The Accounting Officer should conduct procurement in a manner that promotes economy, efficiency, and value for money in accordance with Section 51 of the PPDA Act, Cap. 205

2.1.9 Irregular shortlisting and uneven distribution of contract awards

Section 48 of the PPDA Act, Cap. 205 requires that all procurements be conducted in a manner that promotes fairness. The audit revealed significant inequities in the shortlisting of providers and in the distribution of contract awards among prequalified firms. Of the 33 prequalified providers for works, only 10 (30%) were awarded contracts in the 18 sampled works procurement cases. In contrast, nine prequalified providers were not shortlisted for any procurement throughout the entire financial year, effectively excluding them from participation.

Furthermore, two providers, Jojohe Agencies Ltd and Ominya Enterprises Ltd, were awarded six contracts with a combined value of UGX 487,429,883, representing approximately 38% of the Entity’s total procurement expenditure for the period under review. This pattern suggests possible

preferential treatment and inadequate rotation among prequalified providers, undermining the principle of fairness. The providers are listed in Table 7 below.

Table 7: List of Contracts awarded to Jojohe Agencies Ltd and Ominya Enterprises Ltd

No	Subject of Procurement	Contract Value (UGX)	Contractor
1.	Rehabilitation of a 3-classroom block at Rock View Primary School	55,339,520	Jojohe Agencies Ltd
2.	Construction of a 3-classroom block and 5-stance pit latrine with an incinerator at Soroti Demonstration Primary School	197,985,571	
3.	Completion of East Division Health Center 111 Maternity Block	113,228,265	
4.	Rehabilitation of 2 classroom blocks at Fr Hilders P/S	45,618,612	Ominya Enterprises Ltd
5.	Rehabilitation of 2 Classroom blocks at Rock View PS	48,341,815	
6.	Construction of a 5-stance VIP latrine at Madera Boys PS	26,916,100	
	TOTAL	487,429,883	

Implications

- The uneven distribution of contract awards and the exclusion of a significant number of prequalified providers undermine the principles of fairness, transparency, and competition in public procurement. This practice limits market participation, increases the risk of price inflation, and undermines value for money.
- It also exposes the Entity to risks of bias, preferential treatment, and potential collusion, which may erode public trust and attract regulatory sanctions from oversight bodies.

Management response

It is on record that all procurements were competitively bid; however, some providers have demonstrated greater capacity to prepare bids for works and, as a result, at times receive higher probabilities during invitations. While it is good practice to spread projects across bidders, we are aware that not all prequalified providers are performers; some are problematic. This is the essence of evaluation and the independence of roles.

Authority's comment

The Authority noted the Entity's response. However, the uneven distribution of contract awards and the repeated concentration of awards among a limited number of providers expose the Entity to significant procurement risks, including reduced competition, potential supplier dependency, diminished value for money, and increased vulnerability to collusive practices or perceptions of favouritism.

Recommendations

1. The Accounting Officer should establish a transparent and equitable shortlisting mechanism that ensures fair rotation and participation by all prequalified providers in accordance with Section 48 of the PPDA Act, Cap. 205. This can be achieved by maintaining and regularly updating a shortlisting register to track provider participation and awards, and by enforcing clear selection criteria to prevent the concentration of contracts among a few providers.

2. The Head, Procurement and Disposal Unit, should show cause why disciplinary action should not be taken against them for failing to invite the nine prequalified providers to bid during the financial year.

2.1.10 Inappropriate Use of Direct Procurement Method

Regulation 6 (3) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023, requires an entity to determine the procurement method based on the estimated value of the procurement, the circumstances surrounding the procurement requirements, and the type of procurement

Furthermore, Regulation 25 of the same Regulations strictly limits direct procurement to exceptional circumstances, including emergencies, situations where goods, works, or services are available from a single provider, continuity requirements, or additional works or services. Contrary to this, the audit found that the Entity conducted six procurements worth UGX 176,602,738 through direct procurement, without justification for the conditions specified in Regulation 25. There was no evidence of emergencies, exclusive-sourcing conditions, continuity of existing contracts, or additional requirements that would warrant direct procurement. A summary of the affected procurements is presented in Table 8 below:

Table 8: Procurements Conducted Using the Direct Procurement Method

No	Subject of procurement	Contract value (UGX)
1	Supply of Office Furniture	20,340,000
2	Rehabilitation of 2 Classroom blocks at Rock View PS	48,341,815
3	Construction of a 5-stance VIP latrine at Madera Boys PS	26,916,100
4	Construction of a 5-stance VIP latrine at Amen PS	27,002,412
5	Construction of a 5-stance VIP latrine at Moruapesur PS	27,002,412
6	Construction of a 5-stance VIP latrine at Swaria PS	26,999,999
	TOTAL	176,602,738

Implication

The unjustified use of direct procurement limits competition, which may lead to inflated prices and failure to achieve value for money. It also increases the risk of favoritism and abuse of the procurement process, undermining fairness in accordance with Section 48 of the PPDA Act, Cap. 205.

Management Response

As we may be aware, the mandate to review and approve procurement methods rests with the contracts committee. The process at the moment involves a chain of role players who perform their duties independently, without interference from the Accounting Officer. For education projects, funds were released late, and there was pressure to design the projects. The department was also understaffed, with only one officer. This occurred one month before the close of the financial year, and the contracts committee identified a risk that funds would be returned to the treasury at the expense of the wananchi. Approval was given to existing contractors with related ongoing contracts to directly implement these works, which is how some providers ended up with more than one project in that financial year. Office furniture was supplied by Uganda Prisons

Industries, a government entity with an outstanding reputation for local furniture. Procurement should be seen as a means to deliver, not an obstacle to service delivery.

Authority's comment

The Authority noted the Entity's response; however, no evidence was provided that the funds were released late or that the contractors had ongoing contracts to implement the works directly

Recommendation

The Accounting Officer should ensure that competitive procurement methods remain the default approach and that any deviation is fully justified and approved in accordance with Regulation 6 (3) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023.

2.1.11 Issuance of inadequate bidding documents

Regulation 42 of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services of Supplies, Works and Non-Consultancy Services) Regulations, 2023 requires that the bidding document be prepared so that the requirements are clearly defined and leave no room for doubt or assumption by a bidder.

Furthermore, Regulation 38 of the same Regulations prohibits Entities from issuing specifications that reference a particular trademark, brand name, patent, design, type, specific origin, producer, manufacturer, catalogue, or numbered item, except where a competent authority adopts a standardised policy. The Authority noted that the Entity issued bidding documents in contravention of the above Regulations in 15 procurements worth UGX 1,028,527,089. The bidding documents contained inadequate and restrictive specifications, including brand-name references and ambiguous terms, which were likely to limit competition and lead to inconsistent interpretations of the requirements by bidders. Details of the affected procurements are presented in Table 9 below.

Table 9: Details of Procurements with Inadequate Bidding Documents

No	Subject of Procurement	Contract Value (UGX)	Findings
1.	Supply and maintenance of computers, printers, photocopiers, and IT-related supplies under a framework contract.	230,880,766	• Use of brand names like Dell, Kaspersky, HP, Nikon • Failure to require the basic qualifications for bidders like NSSF • Ambiguous specifications, i.e., two bidders who participated in the same procurement transactions submitted bids containing different lists of items and different quantities
2.	Supply of Office Furniture	35,200,000	• Failure to require the basic qualifications for bidders like NSSF • Ambiguous specifications, i.e., two bidders who participated in the same procurement transactions submitted bids containing different

No	Subject of Procurement	Contract Value (UGX)	Findings
			lists of items and different quantities
3.	Construction of a 5-stance VIP latrine at Moruapesur Primary School	27,002,412	• The invitation to bid on the procurement action file dated 10th June 2025 included the budget estimate of UGX 27,000,000 for the project (under item 7), which could have prevented objectivity during pricing for the contractor. • The bidding document stated that “The Intended Completion Date for the whole of the works shall be: As per Commencement Order” instead of providing for a completion time period in days, weeks, or months • Evaluation criteria did not have any technical criteria concerning the works, that is, personnel (CVs), equipment, or experience
4.	Rehabilitation of a two-classroom block at Rock-View Primary School	48,341,815	• The bidding document stated that “The Intended Completion Date for the whole of the works shall be: As per Commencement Order” instead of providing for a completion time period in days, weeks, or months • Evaluation criteria did not have any technical criteria concerning the works, that is, personnel (CVs), equipment, or experience
5.	Rehabilitation of a two-classroom block at FR. Hilders Primary School	45,618,612	
6.	Completion of East Division Health Center	113,228,265	
7.	Construction of a 5-stance drainable pit latrine at Onyakai Primary School	26,525,811	
8.	Construction of a 3-classroom block and a 5-stance pit latrine with an incinerator at Soroti Demonstration Primary School	197,985,571	
9.	Rehabilitation of a 3-classroom block at Rock View Primary School	55,339,520	
10.	Construction of a 5-stance VIP latrine at Amen Primary School	27,002,412	
11.	Construction of a 5-stance VIP latrine at Madera Boys Primary School	26,916,100	

No	Subject of Procurement	Contract Value (UGX)	Findings
12.	Construction of a 5-stance VIP latrine at Swaria Primary School	26,999,999	
13.	Construction of a 5-stance drainable latrine at Omadira Arapai Primary School	22,815,809	
14.	Construction of a 4 Stance Water-bone toilet and 4 washrooms at the proposed Taxi Terminal	48,272,729	
15.	Completion of Admin- Block-Finance	96,397,268	
		1,028,527,089	

Implications

- Poor-quality solicitation documents may lead to ambiguous interpretations by bidders, resulting in non-responsive bids, inconsistent pricing structures, and eventual award of contracts that do not fully meet the Entity's needs;
- Use of brand names disadvantages potential bidders, thereby undermining the principles of effective competition and fairness.

Management Response

True, we accept that the bidding documents and the Regulations were recently harmonised. The bidding documents were also recently issued, and the local government entities are making every effort to customise and enhance them, especially the RFQ, which was designed on the assumption that the invited bidders had already met the preliminary and technical requirements at prequalification. It's a lesson learned, and efforts are underway to improve the quality of the bidding documents and the process. There is also a request that your office review certain standard bidding documents, particularly the technical criteria in RFQs. It should also be made clear who is required to meet NSSF requirements at the time of invitation. We request that your office accept our commitment to improve in line with the recommendations.

Authority's comment

The Authority noted the Entity's request to review the Standard Bidding Documents, particularly the technical criteria. However, the technical criteria are derived from the Statement of Requirements, which is tailored to each Entity's operational needs, context, and approved budget and therefore cannot be fully standardised by the Authority.

Notwithstanding the foregoing, the Entity remains responsible for ensuring that all Statements of Requirements and resulting solicitation documents are clear and objective, free of references to specific brands, and that solicitation methods promote open and effective competition.

Furthermore, there was no evidence that the technical requirements were already met at prequalification.

Recommendations

1. The Head, Procurement and Disposal Unit, should ascertain that the statement of requirements in the prepared bidding documents precisely defines the requirements and leaves no room for doubt or assumption by a bidder, in accordance with Regulation 42(a) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services of Supplies, Works and Non-Consultancy Services) Regulations, 2023.
2. The Contracts Committee should critically review the bidding documents submitted by the Procurement and Disposal Unit to ensure there are no omissions that could lead to misunderstandings between the Entity and the bidders, in accordance with Regulation 10 of the PPDA (PDE) Regulations 2023.
3. The User Department should develop specifications based on functional and performance requirements rather than brand names to ensure effective and fair competition.

2.1.12 Failure to invite at least six bidders

Regulation 53(1) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services of Supplies, Works and Non-Consultancy Services) Regulations, 2023 states that *“A shortlist shall have at least six bidders, except for micro procurement, which shall have three bidders.”*

Section 49 of the PPDA Act, Cap. 205 states that *“all procurement and disposal shall be conducted in a manner to maximise competition and achieve value for money.”* The Authority noted that the Entity failed to invite at least six bidders in three procurements worth UGX 264,031,303. The Head, Procurement and Disposal Unit, invited an average of two bidders, which is significantly below the prescribed threshold, as summarised in Table 10 below:

Table 10: Procurements where the entity failed to invite at least six bidders

No.	Procurement	Contract value (UGX)	Number of bidders invited	Bids received
1.	Installation of 5 units of Solar lighting System at Aminit Madera, Islamic, Owalei, Otatai, and Acetgwen primary school.	31,680,500	2	2
2.	Repair of solar street lights along Central Ave, a section of Serere Road, and Cemetery Road	189,918,150	2	1
3.	Rehabilitation of City Yard	42,432,653	2	1
	Total/Average	264,031,303	2	1.3

Implication

Shortlisting fewer firms than the required minimum of six encumbers competition, increases the risk of inflated prices, and thus leads to failure to achieve value for money.

Management response

The entity has two prequalified firms for solar installation and repair work. More recently, two additional firms were co-opted from the PPDA Register. Solar installation providers are few and should be isolated or merged into the prequalification for electrical installation work. Projects No. 4-8 were approved by the contracts committee for direct contracting due to late fund releases from the Ministry of Finance. Still on Education projects for the year, there were capacity gaps in the department, with only one officer, the “Principal Education Officer,” managing the entire

department. This impaired the department's ability to coordinate with other functions, especially during the early stages of design preparation. So far, the department has recruited a substantive head and three other inspectors. For procurement No. 3 on the table, six firms were invited, and 2 showed interest.

Authority's comment

The Authority noted the Entity's response, and accordingly the five projects (4-8) have been dropped. However, the explanation does not adequately address the three procurements in which only 2 bidders were invited. The limited number of prequalified firms does not exempt the Entity from taking appropriate measures to enhance competition, such as using another PDE's prequalification list, market knowledge, or the PPDA Register of Providers.

Recommendation

The Head, Procurement and Disposal Unit should;

1. Shortlist at least six bidders in accordance with Regulation 53 (1) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services of Supplies, Works, and Non-Consultancy Services) Regulations, 2023. Where the entity has a limited number of prequalified providers, it may use the Authority's register of providers, the list of prequalified providers of another Procuring and Disposing Entity, or the entity's knowledge of the market, in accordance with Regulations 53(3)(a), (b), and (c) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services of Supplies, Works, and Non-Consultancy Services) Regulations, 2023.
2. Strengthen market outreach and ensure that procurement categories are appropriately structured to achieve adequate competition across all procurement processes

2.1.14 Low bidder participation

Section 49 of the PPDA Act, Cap. 205 states that "all procurement and disposal shall be conducted in a manner that maximises *competition and achieves value for money*." The audit found that, of the 21 sampled procurements, only three attracted more than two bids, indicating that approximately 90% of the Entity's procurement transactions had low bidder participation.

Further analysis showed that the Entity had invited an average of 4.6 bidders across ten procurements with a cumulative value of UGX 610,680,401; however, only an average of 2.6 bidders acknowledged receipt of the bid invitations. This low level of engagement resulted in an average of only 1.3 bids per procurement. The persistently low acknowledgement and response rates indicate weaknesses in the Entity's solicitation and market engagement practices. Table 11 below details the procurements affected by low bidder participation.

Table 11: Procurements with low bidder participation

No	Subject of procurement	Contract value (UGX)	No of bidders invited	No of bids received
1.	Completion of Admin- Block-Finance.	96,397,268	6 shortlisted, but 3 acknowledged receipt	1
2.	Provision of Catering Services	Not stated	Advert	1
3.	Installation of 5 units of Solar lighting System at Aminit Madera, Islamic, Owalei, Otatai, and Acetgwen primary school.	31,680,500	2	2

No	Subject of procurement	Contract value (UGX)	No of bidders invited	No of bids received
4.	Repair of solar street lights along Central Ave, the section of Serere Road, and Cemetery Road	189,918,150	2	1
5.	Rehabilitation of a two-classroom block at FR. Hilders Primary School	45,618,612	6 shortlisted, but only 4 acknowledged receipts	1
6.	Construction of a 5-stance drainable pit latrine at Onyakai Primary School	26,525,811		2
7.	Construction of a five-stance latrine at Kichinjaji HC111	23,852,237		1
8.	Rehabilitation of a 3-classroom block at Rock View Primary School	55,339,520		1
9.	Construction of a 3-classroom block and 5-stance pit latrine with an incinerator at Soroti Demonstration Primary School	197,985,571		2
10.	Supply of classroom desks for Soroti Demonstration, Otatai, and Moruapesur Primary School (300)	39,760,000	6 shortlisted, but only 1 acknowledged receipt	1
	Total /Average	610,680,401	2.6	1.3

Implication

Low bidder participation prevents the Entity from achieving competitive prices. It may also indicate that bidders lack confidence in the Entity or that the Entity is undesirable to them.

Management Response

It is true that participation from bidders in some projects has been low. However, the underlying factors are numerous. Even bidders themselves can collude. A recent finding has also shown that, despite most of our bidders being prequalified and invited to participate, there is a high rate of tax defaults. Most companies are not tax compliant with the Uganda Revenue Authority. A reasonable number of providers have now resorted to forging URA Tax Clearance Certificates. It is also not possible to know whether a prequalified bidder is tax compliant unless the bidder is subjected to the due process of evaluation. As an entity, we also send emails, along with the invitation letter and bidding documents, to all invited bidders, free of charge. We take note of your recommendations.

Authority's comment

The Authority noted the Entity's response; however, no evidence of the emails sent to invited bidders was provided for verification. Furthermore, the failure of invited bidders to acknowledge receipt of the invitation letters raises concerns about whether the invitations were effectively issued, beyond what is documented in the records.

Recommendations

The Head, Procurement and Disposal Unit should;

1. Improve engagement with bidders to encourage them to participate in the Entity's procurement and disposal processes.
2. Institute measures to strengthen competition in procurement, including broadening the pool of potential bidders, improving the quality and timeliness of bid invitations, and periodically reviewing the causes of low bidder participation, in accordance with Section 49 of the PPDA Act, Cap. 205

2.1.15 Irregularities during Evaluation

Regulation 5(2) of the PPDA (Evaluation) Regulations, 2023 provides that an Evaluation Committee shall not, during an evaluation, make any amendment or addition to the evaluation criteria stated in the bidding document, and shall not use any criteria other than those stated therein.

The Authority noted that the Evaluation Committees recommended awarding contracts to bidders who did not meet the criteria outlined in the bidding documents for eight procurements worth UGX 343,513,908, as detailed in Table 12 below:

Table 12: Procurements with irregularities during evaluation

No	Subject of the procurement	Contracts Value (UGX)	Irregularities noted
1.	Supply and maintenance of computers, printers, photocopiers, and IT-related supplies	137,909,550	The evaluation committee did not conduct a thorough and detailed technical evaluation of bids. Bids with differing technical specifications and varying types were assessed on an equal basis without adequately determining their responsiveness to the stated requirement
Management response No response was provided			
2.	Construction of a 5-stance VIP latrine at Moruapesur Primary School	27,002,412	• The bidding document required a completion period. However, the bid for the BEB Nivo Investments Limited did not include the completion period, but was still considered compliant at evaluation • The bidding document required bidders to submit Powers of Attorney. However, the bid for BEB Nivo Investments Limited did not include the Powers of Attorney, yet it was still considered compliant during evaluation. • The technical evaluation was not undertaken • No evidence of submission of beneficial ownership information in the bid for Nivo Investments Limited, although it was required.

<u>Management response</u> <i>No Power of Attorney and beneficial ownership. This is an already prequalified company; true, the POA was not in the bid, though in the prequalification document.</i>			
<u>Authority's comment</u> The Authority noted the Entity's response; however, no documentary evidence was provided to verify the claims. In addition, the Entity did not address the findings regarding the failure to conduct a technical evaluation and the omission of the completion period from the Best Evaluated Bidder notice.			
3.	Construction of a 5-stance drainable pit latrine at Onyakai Primary School	26,525,811	The bidding document required evidence of compliance with tax obligations. However, the BEB Ebaca Enterprises Ltd submitted a falsified Tax Clearance Certificate (certificate ref No. UGND220011728)
<u>Management response</u> <i>For the case of TCC, this might have been an oversight by the committee; at times, there is a system failure at URA that may not give an immediate response to online validations. The procurement process is generally overcrowded with a chain of role players who, at times, lack sufficient capacity to handle procurement issues. The entity shall continue to emphasise thorough validation of documents through training and meetings</i>			
<u>Authority's comment</u> The Authority noted the Entity's response; however, the submission of a falsified Tax Clearance Certificate reflects inadequate due diligence and a breach of bidding requirements. Failure to detect such forgery exposes the Entity to the risk of awarding contracts based on false documentation, thereby undermining the integrity of the procurement process. The Entity is advised to strengthen verification of bidder documents to prevent recurrence.			
4.	Rehabilitation of a two-classroom block at Rock-View Primary School	48,341,815	• The technical evaluation was not undertaken • No evidence of submission of beneficial ownership information in the bid for the BEB • The bid for the BEB did not include the Powers of Attorney, but was still considered compliant at evaluation
5.	Construction of a 5-stance VIP latrine at Amen Primary School	27,002,412	
6.	Construction of a 5-stance VIP latrine at Madera Boys Primary School	26,916,100	
7.	Construction of a 5-stance VIP latrine at Swaria Primary School	26,999,999	
<u>Management response</u> <i>The firms mentioned are all prequalified by the entity, and most of their traditional documents are in their prequalification submission, and records to that effect can easily be verified. They also had other running contracts with the entity within the same financial year. Your advice and further discussion on this matter are welcome. This gives us a big debate between practice and compliance.</i>			

	Authority's comment The Authority noted the Entity's response; however, no documentary evidence was provided to substantiate the claims. In addition, the Entity failed to address the finding regarding the failure to conduct a technical evaluation.		
8.	Construction of a 5-stance drainable latrine at Omadira Arapai Primary School	22,815,809	• The technical evaluation was not undertaken • No evidence of submission of beneficial ownership information in the bid for the BEB • Failure to ensure transparency in the correction of arithmetic errors to all participating bidders. The bid for Owalei Emorikikinos Enterprises was corrected, increasing the price by UGX 1,229,845 from the initial bid price of UGX 24,596,864 to an evaluated total of UGX 25,826,707, the bid for Fesa Harvest Limited was corrected, increasing the price by UGX 4,470,417 from the initial bid price of UGX 24,835,650 to an evaluated total of UGX 29,306,067, the bid for Jedaa and Sons Company Limited was corrected, increasing the price by UGX 175,098 from the initial bid price of UGX 23,946,255 to an evaluated total of UGX 24,121,353, but there was no communication on file communicating the changes thereby contravening the principle of transparency
	Management response <i>Technically, the bid was evaluated, except that the criteria had inadequate requirements as issued by the Authority, especially under the Request for Quotation method. The communication of arithmetical errors was clearly spelt out in the previous Regulation and bidding documents. Kindly, which law or part of the bidding should be used as a reference for communication of arithmetical errors?</i> Authority's comment The Authority noted the Entity's response; however, for transparency and fairness, bidders' quoted prices should not be altered without proper communication to all bidders who responded.		
	TOTAL	343,513,908	

Implications

- Unfair evaluation of bids can result in biased selection, potentially causing bidder dissatisfaction and diminished trust in the Entity's procurement systems, which can lead to legal disputes and low bidder participation.
- Failure to detect falsified documents exposes the Entity to criticism for inadequate due diligence. It increases the risk of awarding contracts based on forged documentation, thereby undermining the integrity and credibility of the procurement process.

Recommendations

1. The Head, Procurement and Disposal Unit should direct the Evaluation Committee members to strictly adhere to the evaluation criteria in the bidding document in accordance with Section 76 (3) of the PPDA Act, Cap. 205.
2. The Contracts Committee should scrutinise the evaluation reports and ensure that the principles of fairness and transparency are observed in the evaluation process, in accordance with Section 48 of the PPDA Act, Cap. 205, before approving the evaluation reports.

2.1.16 Non-Compliance with Reporting Requirements

Regulation 15(1) of the PPDA (Procuring and Disposing Entities) Regulations, 2023 requires every Procuring and Disposing Entity to submit monthly reports (using Form 2 of the Schedule) by the 15th day of the following month. The audit identified instances of noncompliance with the above Regulation, as detailed below:

i. Late submission of reports

The Authority noted that the Entity submitted the monthly procurement reports for March, April, and May 2025 after the prescribed deadline of the 15th day of the following month. All three reports were submitted on 29th July 2025, indicating delays of two to four months.

ii. Unreported procurements

The Authority noted that the Entity failed to report eight procurements worth UGX 702,559,242, indicating incomplete disclosure of procurement activities.

The unreported procurements are shown in Table 13 below.

Table 13: Unreported procurements

No	Subject of procurement	Contract value (UGX)
1.	Construction and rehabilitation of the Teachers' house at Aminit Madera PS	99,378,777
2.	Rehabilitation of the stormwater drainage channel along Cemetery Road	369,917,727
3.	Design, review, and supervision of drainage works at Cemetery Road	77,000,000
4.	Rehabilitation of 2 Classroom blocks at Rock View PS	48,341,815
5.	Construction of a 5-stance VIP latrine at Madera Boys PS	26,916,100
6.	Construction of a 5-stance VIP latrine at Amen PS	27,002,412
7.	Construction of a 5-stance VIP latrine at Moruapesur PS	27,002,412
8.	Construction of a 5-stance VIP latrine at Swaria PS	26,999,999
	TOTAL	702,559,242

Implication

Failure to submit, delayed submissions, and omissions of procurement transactions from reports create information gaps that may conceal irregularities, weaken audit trails, and impair the Authority's ability to monitor performance and enforce compliance. This exposes the Entity to heightened risks of mismanagement of public resources, undetected noncompliant procurements, and potential regulatory sanctions.

Management response

This arose because, during the periods mentioned, the Procurement Unit was understaffed, with one officer handling all roles. This was due to a staff member being on maternity leave. All other statutory reports were submitted later. Consideration and commitment are in place to ensure that late or non-submission of reports does not undermine our performance in any way. Unless otherwise advised, some procurement processes conclude early but are not implemented immediately, pending the release of funds. Kindly advise whether this procurement can be reported even when it has not yet been launched. Over time, determining the reporting period can become confusing.

Authority's comment

The Authority noted the Entity's response; however, understaffing and staff leave do not absolve the Entity of its statutory reporting obligations. Delays and late submission of procurement reports undermine transparency, auditability, and effective regulatory oversight. The Authority further clarifies that procurement reporting should be based on planned and undertaken procurement activities, not on the release of funds. All initiated, planned, and concluded procurement transactions must be accurately and in a timely manner reflected in the prescribed report.

Recommendation

The Accounting Officer should implement robust internal controls to ensure the timely, complete, and accurate preparation and submission of monthly procurement reports in accordance with Regulation 15(1) of the PPDA (Procuring and Disposing Entities) Regulations, 2023. This should include establishing a strict reporting calendar, assigning clear responsibilities to accountable officers, and implementing supervisory review mechanisms to verify the completeness and accuracy of all procurement data prior to submission.

2.1.17 Contracting above approved estimates

Regulation 7(1) of the PPDA (Contracts) Regulations, 2023, prohibits Procuring and Disposing Entities from entering into contracts until the Accounting Officer confirms in writing that the funds required for the proposed contract have been committed. Regulation 8 of the same Regulations requires the Accounting Officer to confirm that the total cost of acquiring the procurement requirement is fully committed before the contract is awarded. The Authority noted that in three procurements worth UGX 183,417,288, the Entity awarded contracts exceeding the approved cost estimates. The cumulative excess amounted to UGX 56,666,788. This was attributed to weaknesses in cost estimation and inadequate adherence to approved budget controls during procurement. Details of contracts awarded above the approved estimate are shown in Table 14 below:

Table 14: Contracts awarded above the approved estimated cost

No	Subject of procurement	Contract value (UGX)	Estimated cost (UGX)	Variance (UGX)
1.	Installation of Solar Lights for Acetgwen, Otatai, Aminit, Madera, Islamic, and Owalei P/S	31,680,500	25,000,000	6,680,000
2.	Completion of Admin Finance Block	96,397,268	56,000,000	40,397,268
3.	Rehabilitation of a 3-classroom block at Rock View Primary School	55,339,520	45,750,000	9,589,520
	Total	183,417,288	126,750,000	56,666,788

Implication

Awarding contracts above the approved estimates exposes the Entity to unplanned expenditures, budget overruns, and potential reallocation of funds from other planned activities.

Management Response

The total aggregate variance in the letter is UGX: 56,666,788. However, the entity has always made it a practice to bring this variance to the attention of the user department before any commitment of funds is made for advice. It can result from poor budgeting and assessment. Where such instances arise, the deficit is always re-planned, and at times, there are savings from other projects. In most cases, when a total budget analysis is carried out, you find that there are savings in some projects to meet the variance.

Authority's comment

The Authority noted the Entity's response; however, consulting user departments after identifying budget variances does not address the core issue of awarding contracts above approved cost estimates. In addition, no evidence was provided to demonstrate that the Accounting Officer approved the additional funds. Budget overruns of UGX 56,666,788 indicate weaknesses in procurement planning and cost estimation. While reallocation and savings from other projects may offer temporary mitigation, this approach undermines budget discipline and may adversely affect the implementation of planned activities.

Recommendations

The Accounting Officer should;

1. Enforce strict adherence to approved cost estimates and budget provisions during contract award and, when the need arises, confirm in writing that the funds required for the proposed contract have been committed before the Procuring and Disposing Entity enters into a contract, in accordance with Regulation 7 of the PPDA (Contracts), Regulations, 2023
2. Strengthen market price assessments to ensure realistic estimates and establish controls to prevent awarding contracts above approved amounts without proper justification and approval.

2.1.18 Missing records

Section 33 (o) of the PPDA Act, Cap. 205 requires the Procurement and Disposal Unit to maintain and archive records of the procurement and disposal process. However, the audit found that seven procurements worth UGX 214,278,547 lacked certain records. Details of the procurements with missing records are presented in Table 15 below.

Table 15: Procurements with missing records

No	Subject of Procurement	Contract Value (UGX)	Missing records
1.	Supply of Office Furniture	20,340,000	• Form 5 part 11 • Form 8 • Form 11 • Form 12 • Bidding document • Delivery note
		14,860,000	

No	Subject of Procurement	Contract Value (UGX)	Missing records
			• Goods received notes • Contract documents
2.	Construction of a 5-stance VIP latrine at Moruapesur Primary School	27,002,412	• Completion certificate • Handover certificate
3.	Rehabilitation of a two-classroom block at Rock-View Primary School	48,341,815	
4.	Construction of a 5-stance VIP latrine at Amen Primary School	27,002,412	
5.	Construction of a 5-stance VIP latrine at Madera Boys Primary School	26,916,100	
6.	Construction of a 5-stance VIP latrine at Swaria Primary School	26,999,999	
7.	Construction of a 5-stance drainable latrine at Omadira Arapai Primary School	22,815,809	
	Total	214,278,547	

Implication

Missing procurement records limit transparency, accountability, and the audit trail in the procurement process.

Management response

- *The lack of contracts for the supply of office furniture stems from the design of the procurement system. When procuring furniture from state enterprises such as Uganda Prisons Industries, it has been standard practice to receive quotations and issue LPOs. In this case, delivery notes and goods received notes were documented. In most cases, engaging inter-agency procurement makes it difficult to get Under Secretaries to sign these contracts. It has been our practice to ensure that invoices, delivery notes, goods received notes, and finally payment receipts are filed and available. This is an area for discussion.*
- *The lack of completion and handover certificates for projects No. 2-7, executed and completed in the year 2024/2025, is an observation. My office has already tasked the supervising Engineer with concluding and documenting.*

Authority's comment

The Authority notes the Entity's response; however, the explanation is not supported by documentary evidence for verification. In particular, neither the LPO for the furniture nor the completion and handover certificates for the six projects listed in Table 15 above were provided for verification.

Recommendation

The Head, Procurement and Disposal Unit, should maintain complete procurement records for all transactions and establish a records management and archiving system to support retrieval and accountability, in accordance with Section 33(o) of the PPDA Act, Cap. 205

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

2.2.1 Failure to conduct disposal

Regulation 2 of the PPDA (Disposal) Regulations, 2023 requires a Procuring and Disposing Entity to dispose of obsolete assets identified by the Board of Survey. The audit found that the entity last disposed of obsolete assets in FY 2021/2022. The images in Table 16 below illustrate some of the obsolete assets that were not disposed of:

Table 16: Pictures of assets due for disposal taken on the 16th of April 2026

	
Motor Grader	Ground Compactor
	
Farm tractor	Single cabin pick up
	
Tractor	Double cabin pick up

Pictures of assets due for disposal taken on the 16th of April 2026



Fabricated metal frames and manual transport equipment



Old steel filing cabinets



Grounded TATA truck



Metallic trailer bed and old solar panels



Heavily rusted waste bins

Implication

Failure to dispose of items exposes them to theft and to further depreciation, resulting in loss of value.

Management response

It is true that the entity still has several items to dispose of. Recently, a disposal advertisement was published for a few items, and the disposal process is concluded as attached. However, the entity also has several assets registered under other MDAs, and efforts to secure clearance are underway.

Authority's comment

The Authority noted the Entity's response; however, although some obsolete items, such as iron sheets and hospital beds, have been disposed of, a significant portion of the identified assets, including tractors, motorcycles, ICT equipment, and motor vehicles, remain undisposed of. These assets continue to deteriorate in value and remain exposed to risks of theft, vandalism, and further depreciation, thereby undermining effective asset management and value for money.

Recommendation

The Accounting Officer should;

1. Dispose of obsolete assets in accordance with the Board of Survey report's recommendations and with Regulation 2 of the PPDA (Disposal) Regulations, 2023, and Section 60 (2) of the PPDA Act, Cap. 205.
2. Urgently engage the respective MDAs to obtain the necessary authorisations for disposal or, where applicable, facilitate their formal transfer to the responsible MDAs to ensure proper custody and accountability of public assets.

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

2.3.1 Irregularities during contracting and contract execution

Regulation 52 (1) of the PPDA (Contracts) Regulations, 2023 states that "(1) A contract manager shall (a) *manage the obligations and duties of the procuring and disposing entity specified in the contract*; and (b) *make certain that the provider performs the contract in accordance with the terms and conditions specified in the contract*." The Authority observed irregularities in contracting and contract management across 10 procurements worth UGX 1,013,012,279, as indicated in Table 17 below:

Table 17: Transactions with irregularities at contracting and contract management.

No	Subject of Procurement	Contract value (UGX)	Findings
1.	Supply and maintenance of computers, printers, photocopiers, and IT-related supplies	137,909,550	• Inadequate contract document: the contract did not include the Special Conditions of the Contract, General Conditions of the Contract, Price Schedule, Powers of Attorney, and Activity Schedule. • No contract management plan contrary to Regulation 50 (3) of the PPDA (Contracts) Regulations, 2023 • No Performance Securing Declaration contrary to Regulation 12 (1) (a) of the PPDA (Contracts) Regulations, 2023
		92,971,216	
2.	Completion of East Division Health Center	113,228,265	• No contract management plan contrary to Regulation 50 (3) of the PPDA (Contracts) Regulations, 2023 • No Performance Securing Declaration contrary to Regulation 12 (1) (a) of the PPDA (Contracts) Regulations, 2023

No	Subject of Procurement	Contract value (UGX)	Findings
			Failure by the Entity to require the contractor to provide an insurance cover contrary to Regulation 36 (1) (a) of the PPDA (Contracts) Regulations, 2023
3.	Repair of solar street lights along Central Ave, the section of Serere Road, and Cemetery Road	189,918,150	- No appointment of a Contract manager contrary to Regulation 50 (1) of the PPDA (Contracts) Regulations, 2023 - No contract management plan contrary to Regulation 50 (3) of the PPDA (Contracts) Regulations, 2023
4.	Completion of Admin-Block-Finance	96,397,268	No Performance Securing Declaration contrary to Regulation 12 (1) (a) of the PPDA (Contracts) Regulations, 2023
5.	Construction of a 3-classroom block and 5-stance pit latrine with an incinerator at Soroti Demonstration Primary School	197,985,571	- No contract management plan contrary to Regulation 50 (3) of the PPDA (Contracts) Regulations, 2023 - Failure by the Entity to require the contractor to provide an insurance cover contrary to Regulation 36 (1) (a) of the PPDA (Contracts) Regulations, 2023 - Payment of 10% contingencies without evidence of contingencies addressed
6.	Rehabilitation of a 3-classroom block at Rock View Primary School	55,339,520	- Failure by the Entity to require the contractor to provide an insurance cover contrary to Regulation 36 (1) (a) of the PPDA (Contracts) Regulations, 2023 - Payment of 10% contingencies without evidence of contingencies addressed
7.	Construction of a 5-stance VIP latrine at Moruapesur Primary School	27,002,412	- No evidence that the contractor submitted the program for works within seven days of delivery of the contract, contrary to GCC 27 of the contract - Inconsistencies in contract documentation. The Accounting Officer appointed the Senior Engineer (Mr. Oranit Samuel) as the contract manager on 17th June 2025, contrary to GCC 1.1 (y) of the Special Conditions of Contract in the bidding document approved on 5th June 2025, which provided for the Contract Manager as the City Education Officer
8.	Construction of a 5-stance VIP latrine at Amen Primary School	27,002,412	
9.	Construction of a 5-stance VIP latrine at Madera Boys Primary School	26,916,100	

No	Subject of Procurement	Contract value (UGX)	Findings
			• Inadequate contract. The contract agreement signed on 18th June 2025 was brief and did not include (attached) the Special Conditions of Contract, General Conditions of Contract, although they were mentioned in the main body of the contract • No contract management plan contrary to Regulation 50 (3) of the PPDA (Contracts) Regulations, 2023
10.	Rehabilitation of a two-classroom block at Rock-View Primary School	48,341,815	• No evidence on file to confirm that a signpost was installed, and yet Item F for the preliminaries in the Bills of Quantities offered UGX 300,000 for the signpost for works. • Contingency fee worth 5%, that is; UGX 1,950,840 was paid without evidence of contingencies addressed. • There was no evidence on file to confirm that the contractor submitted the program for works within seven days of delivery of the contract, contrary to GCC 27 of the contract. • Inconsistencies in contract documentation. The Accounting Officer appointed the Senior Engineer (Mr. Oranit Samuel) as the contract manager on 17th June 2025, contrary to GCC 1.1 (y) of the Special Conditions of Contract in the bidding document approved on 5th June 2025, which provided for the Contract Manager as the City Education Officer • Inadequate contract. The contract agreement signed on 18th June 2025 was brief and did not include (attached) the Special Conditions of Contract, General Conditions of Contract, although they were mentioned in the main body of the contract • No contract management plan contrary to Regulation 50 (3) of the PPDA (Contracts) Regulations, 2023
	Total	1,013,012,279	

Implications

- Failure to appoint contract supervisors exposes the Entity to the risk of poor contract management, which results in contracts not being implemented in accordance with the agreed terms and conditions of the contract.
- Without contract management records, auditors could not verify whether the delivered works, items, or services met the specified requirements.
- The absence of Special Conditions of the Contract limits the contract's enforceability and increases the risk of disputes and poor accountability.

Management Response

The year under review had some staffing challenges across all departments. There is also a need for capacity building because the procurement process has brought on board many role players who, at times, take the procurement function as not forming part of their core duties.

Authority's comment

The Authority noted the Entity's response; however, staffing constraints and capacity gaps do not justify non-compliance with contract management requirements. The failure to appoint contract supervisors, maintain contract management records, and include Special Conditions of Contract weakens accountability, enforceability, and oversight of contract implementation.

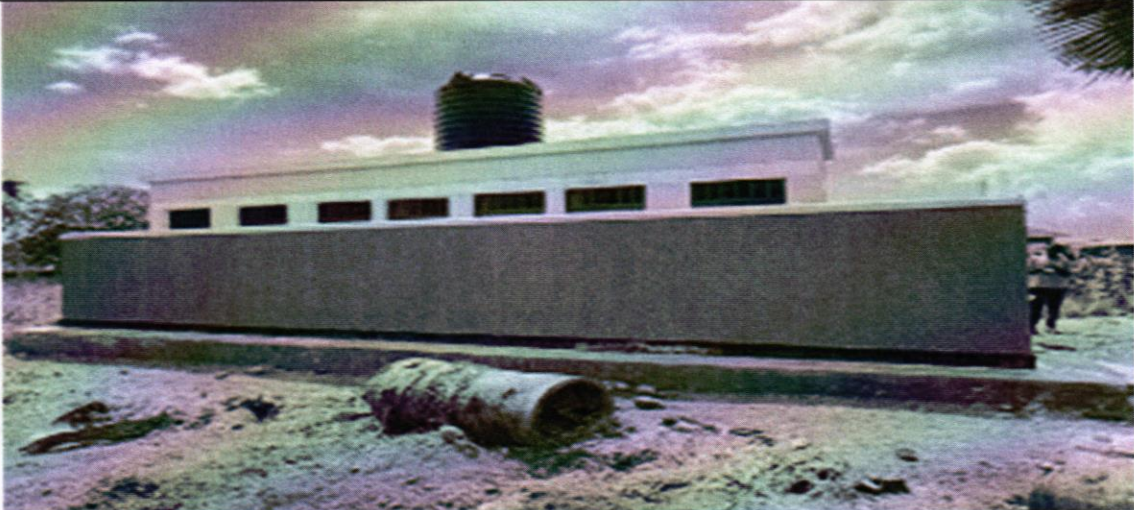
Recommendations

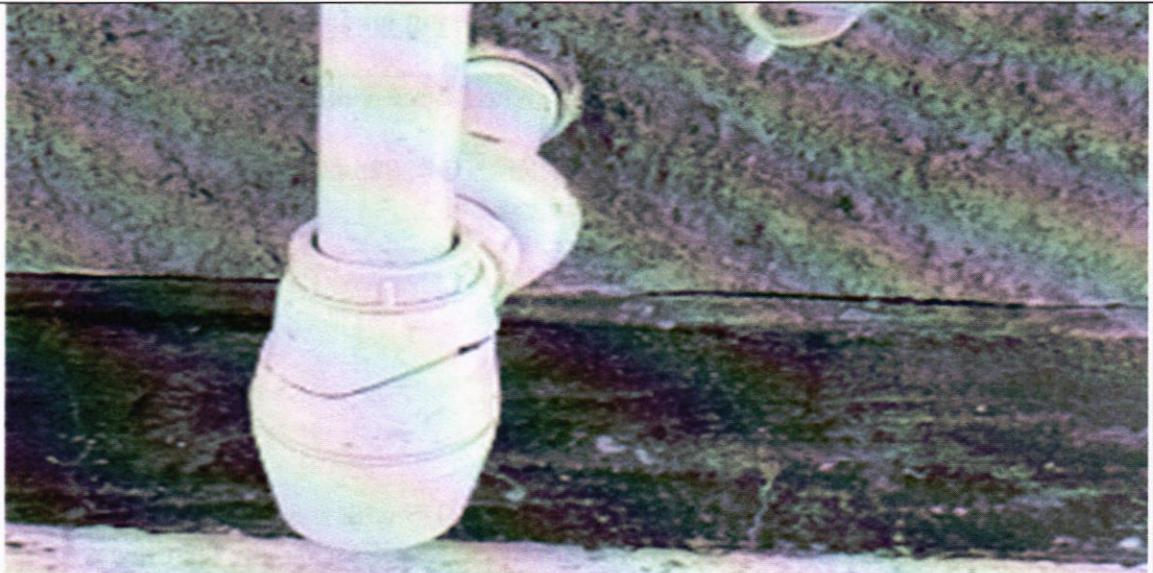
1. The Accounting Officer should:
 - i) Task the contract managers to fulfil their roles and responsibilities in accordance with Regulation 52 (1) and (2) of the PPDA (Contracts) Regulations 2023, as highlighted in Table 11 above; and
 - ii) Include clearly defined Special Conditions of Contract in all future contracts to strengthen enforceability, enhance accountability, and protect the Entity's interests.
2. Heads of User Departments should:
 - i) Nominate Contract Managers for appointment by the Accounting Officer for all contracts in accordance with Regulation 50(1) of the PPDA (Contracts) Regulations, 2023; and
 - ii) Task contract supervisors with preparing progress reports for each contract and submitting a copy to the Accounting Officer and the Procurement and Disposal Unit for record-keeping, as required under Regulation 52 (3) (g) of the PPDA (Contracts) Regulations, 2023.

2.3.2 Physical verification

On 16th April 2026, the Authority conducted physical verification on 8 procurement transactions worth UGX 741,137,315 and noted that five of the sampled procurements worth UGX 450,261,033 had anomalies for management attention as indicated in Table 18 below:

Table 18: Issues noted during physical verification on 16th April 2026

NO	ISSUES NOTED
1.	Subject: Construction of a 4 Stance Water Bone Toilet and 4 Washrooms at the proposed Taxi Terminal Reference Number: SORO610/WRKS/2024/2025/00047 Contractor: Yaweh Technical Services Ltd Contract value: UGX 48,272,729 The following issues were noted; • Open manhole. • Broken pipes for the wash hand sink • Cracks on the verandah. • Gaps between tiles in the washroom. • The contract was signed on 4th March 2025 with a stipulated duration of three (3) months. However, at the time of physical verification, the facilities were not yet operational and had not been formally handed over, as the contractor remained in possession of the keys  Four-stance toilet and four washrooms at the proposed Taxi Terminal as of 16th April 2026



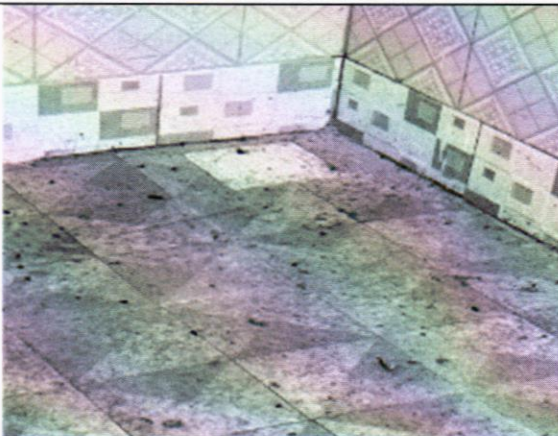
Broken pipe at the wash hand sink as of 16th April 2026



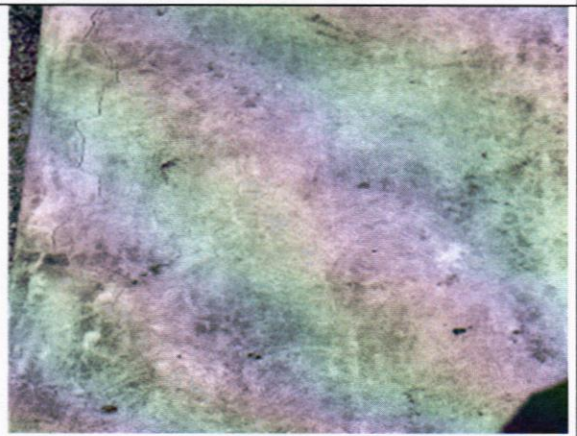
Open manhole



Cracked splash apron



Gaps between tiles in the washroom



Cracks on the verandah

Management response

Indeed, this project is yet to be commissioned. This office will follow up with the user department, the West Division, and the contract supervisor regarding the likely on-the-ground challenges.

	Authority's comment The Authority noted the Entity's response; however, the project's non-commissioning and the contractor's retention of the keys indicate incomplete contract closure and weak contract supervision. The identified defects reflect deficiencies in workmanship and non-compliance with contractual specifications. The Entity is therefore advised to urgently enforce contract completion procedures, including the recovery of site possession, the contractor's rectification of all defects, and the formal inspection and handover of the works, to ensure timely operationalisation, safety, and value for money.
2.	Subject: Repair of solar street lights along Central Ave, section of Serere Road, and Cemetery Road. Reference Number: SORO610/WRKS/24/25/00054 Contractor: Reliefline Uganda Ltd. Contract value: UGX 189,918,150 VAT Inclusive No issues were noted. Solar street lights along Central Ave as of 16th April 2026
3.	Subject: Rehabilitation of a two-classroom block at FR. Hilders Primary School Reference Number: SORO610/WRKS/24/25/00043 Contractor: Ominya Enterprises Ltd. Contract value: UGX 45,618,612 No issues were noted.

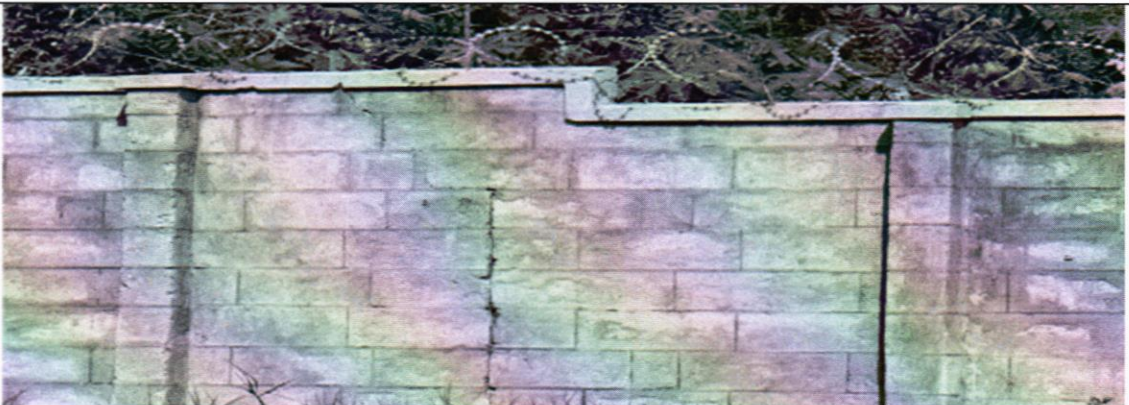


Two classroom blocks as of 16th April 2026

4. **Subject:** Rehabilitation of City Yard.
Reference Number: SORO610/WRKS/2024-2025/00050
Contractor: Kassam Service Center Limited
Contract value: UGX 42,432,653

The following issues were noted;

- Cracks on the wall fence



Cracked wall fence as of 16th April 2026

Management response

My top management team visited the project and confirmed the existence of cracks. An arrangement is being made to have the contractor rectify the cracks

Authority's comment

The Authority noted the Entity's response; however, confirmation of defects by top management and the intention to engage the contractor do not constitute timely corrective action. If not urgently rectified, the observed cracks may worsen over time, leading to progressive structural deterioration, reduced durability of the works, and increased future repair costs, thereby undermining value for money. The Entity is therefore advised to urgently direct the contractor to rectify the defects.

5. **Subject:** Rehabilitation of a 3-classroom block at Rock View Primary School
Reference Number: SORO610/WRKS/24/25/00041
Contractor: Jojohe Agencies Ltd

Contract value: UGX 55,339,520 VAT Inclusive
No issues were noted.



Three Classroom blocks as of 16th April 2026

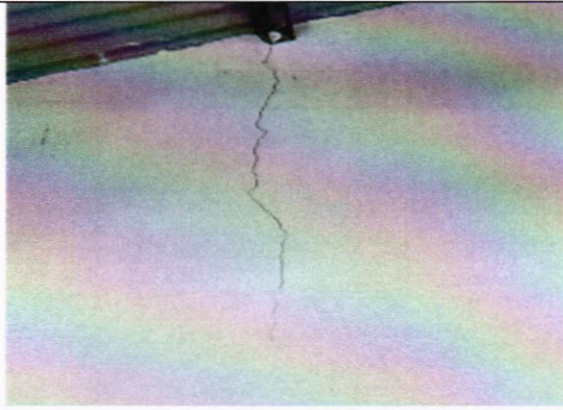
6. **Subject:** Rehabilitation of a two-classroom block at Rock-View Primary School.
Reference Number: SORO610/WRKS/2024-2025/00055
Contractor: Ominya Enterprises Limited.
Contract value: UGX 48,341,815 VAT Inclusive

The following issues were noted;

- Cracks on the wall
- Not yet commissioned.



Two classroom blocks as of 16th April 2026



Cracked wall as of 16th April 2026

Management response

The cracks were indeed visible. The contractor was immediately, after the debrief, informed to rectify the defect, and this has been corrected

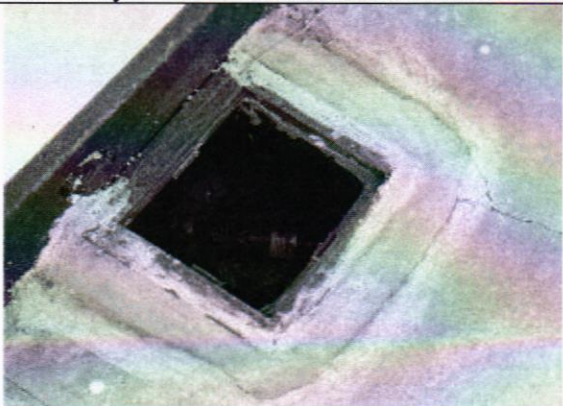
Authority's comment

No evidence was provided.

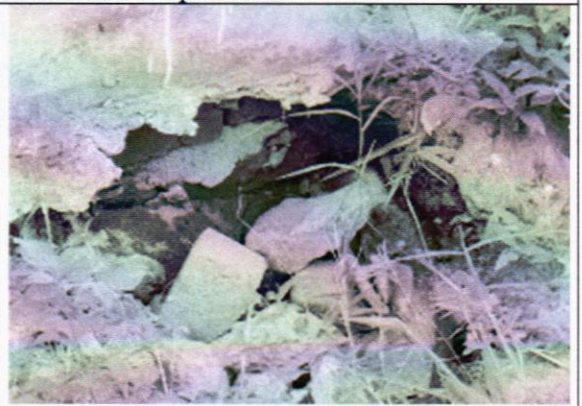
7. **Subject:** Completion of East Division Maternity Health Center
Reference Number: SORO610/WRKS/24/25/00046.
Contractor: Jojohe Agencies Ltd.
Contract value: UGX 113,228,265 VAT Inclusive
 The following issues were noted;
- Open manhole.
 - Deteriorating sockpit.



Maternity ward at Health Center East Division as of 16th April 2026

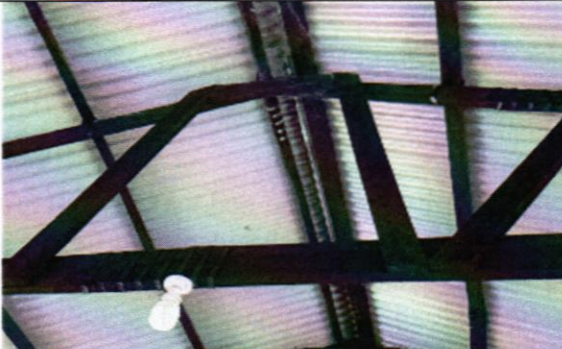
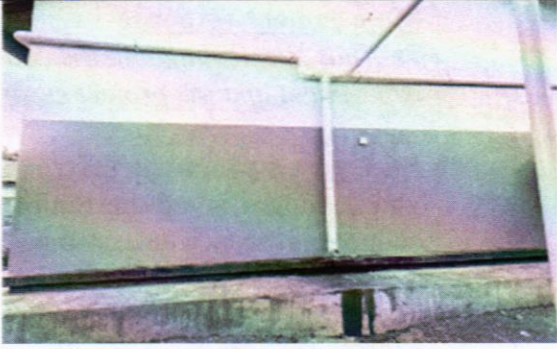
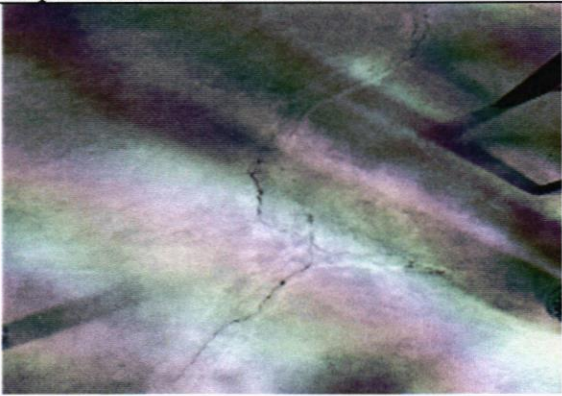
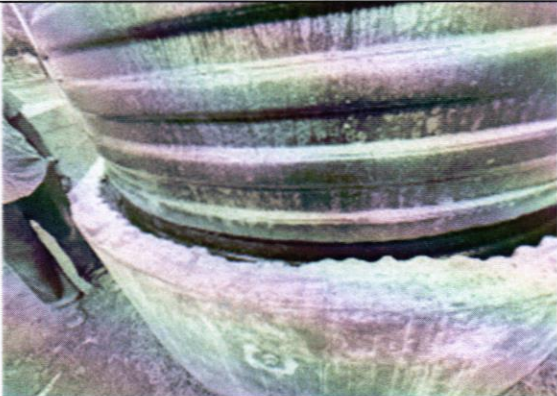
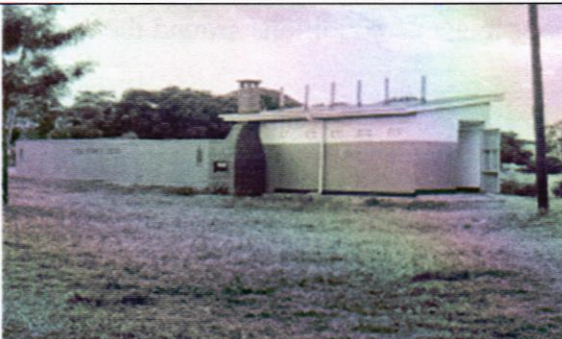
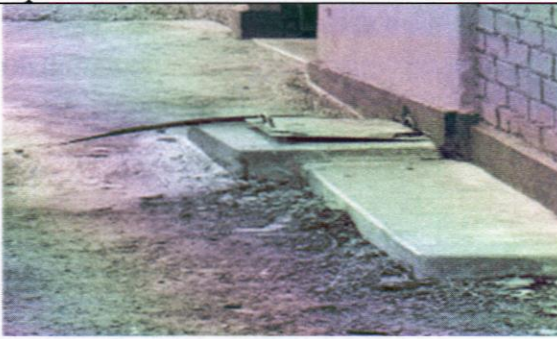


Open manhole



Deteriorating sockpit

	Management response <i>This has been brought to the contractor's attention. This office, together with the user department and the project supervisor, will follow up on the findings</i> Authority's comment The Authority noted the Entity's response; however, the actions outlined are not time-bound and do not demonstrate urgency in addressing the identified defects. The open manhole and deteriorating soak pit pose immediate safety, environmental, and public health risks, including potential accidents and contamination. The Entity is therefore advised to urgently engage the contractor to rectify the defects.
8.	Subject: Construction of a 3-classroom block with desks and a 5-stance pit latrine with an incinerator at Soroti Demonstration Primary School Reference number: SORO610/WRKS/24/25/00040 Contractor: Jojohe Agencies Ltd Contract value: UGX 197,985,571 VAT Inclusive The following issues were noted; • Leakages in the roofs of two classrooms • Cracks on the floor • Gaps between iron sheets • Leaking gutters affecting the verandah • No support for the gutter. • Open tank stand, creating poor hygienic conditions around the tank and posing a risk of water contamination • Leaking manhole  Three classroom blocks as of 16th April 2026 Defects at the 3-classroom block at Soroti Demonstration Primary School as of 16th April 2026

	
Gaps between iron sheets	Leaking gutters affecting the verandah
	
Cracks on the floor	Open tank stand
	
Five-stance pit latrine with an incinerator	Leaking manhole
<u>Management response</u> <i>This project was commissioned by the State Minister of Teso Affairs. The contract is still under the defect liability period, and this will be brought to the attention of the contractor</i> <u>Authority's comment</u> The Authority noted the Entity's response; however, commissioning the project and its status under the defect liability period do not address the identified defects. If not urgently rectified, these defects may lead to accelerated deterioration of the facilities, compromised structural integrity, water damage, and heightened health and safety risks to users, including potential contamination and unsafe learning and sanitation conditions. The Entity is therefore advised to urgently notify the contractor to rectify all defects within the defect liability period and to ensure close supervision and proper documentation of remedial works to safeguard value for money and protect public assets.	

CHAPTER THREE: OVERVIEW OF THE PERFORMANCE OF THE ENTITY

This Section presents the procurement and disposal audit scores graphically.

3.1. Overall Procurement and Disposal Audit Conclusion

The performance of Soroti City Council for the Financial Year 2024/25 was **moderately satisfactory** with an overall weighted average risk rating of **69.5%**.

3.2. Entity's Performance

The risk rating was weighted to determine the Entity's overall risk level. The weighting was derived using the average weighted index as detailed in Table 19 below:

Table 19: Risk Score

Risk Rating	No.	%No	Value (UGX)	%Value	Weights	Total Weighted Score	
						By No.	By Value
High	10	48	533,310,893	46	0.6	28.8	27.6
Medium	8	38	514,544,341	45	0.3	11.4	13.5
Low	3	14	104,161,341	09	0.1	1.4	0.9
Satisfactory	0	0	0	0	0	0	0
Total	21	100	1,152,016,575	100	1	41.6	42

$$\text{Performance by Number} = \frac{41.6 \times 100}{60} = 69\%$$

$$\text{Performance by Value} = \frac{42 \times 100}{60} = 70\%$$

$$\text{The average weighted risk rating} = \frac{69 + 70}{2} = 69.5\%$$

Since 69.5% falls within the 31% - 70% risk range, the performance of the Entity is rated **Moderately satisfactory** based on the 21 sampled procurement transactions as detailed in Table 20 below:

Table 20: Risk Rating

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

GRAPHICAL REPRESENTATION OF THE ENTITY'S PERFORMANCE

Figure 2: Showing performance by number of contracts

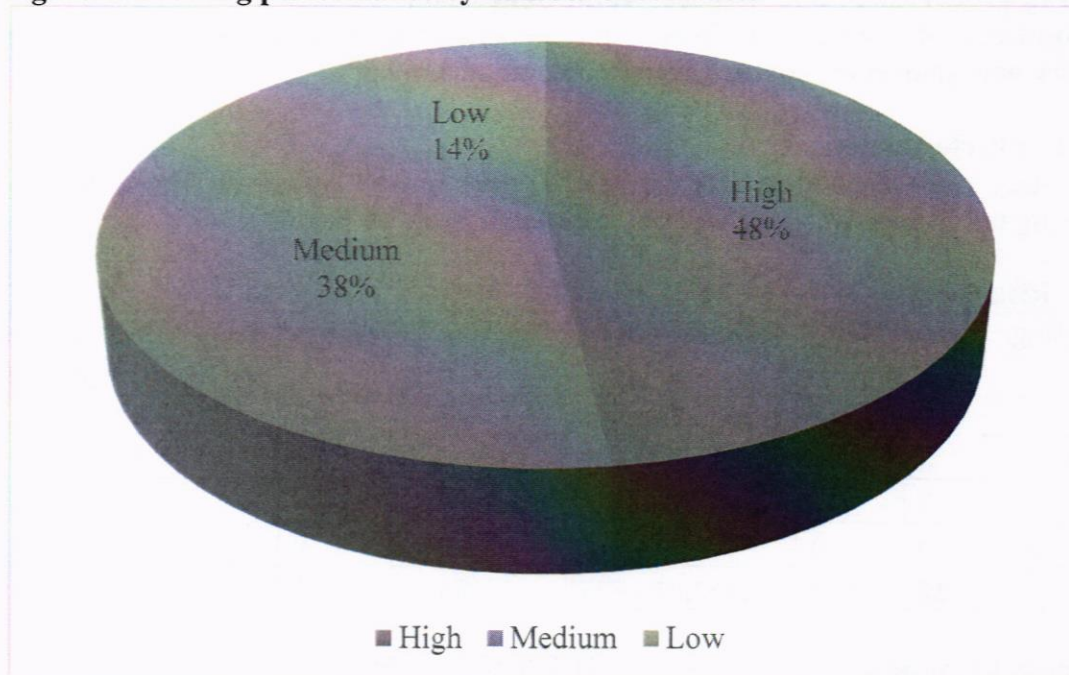
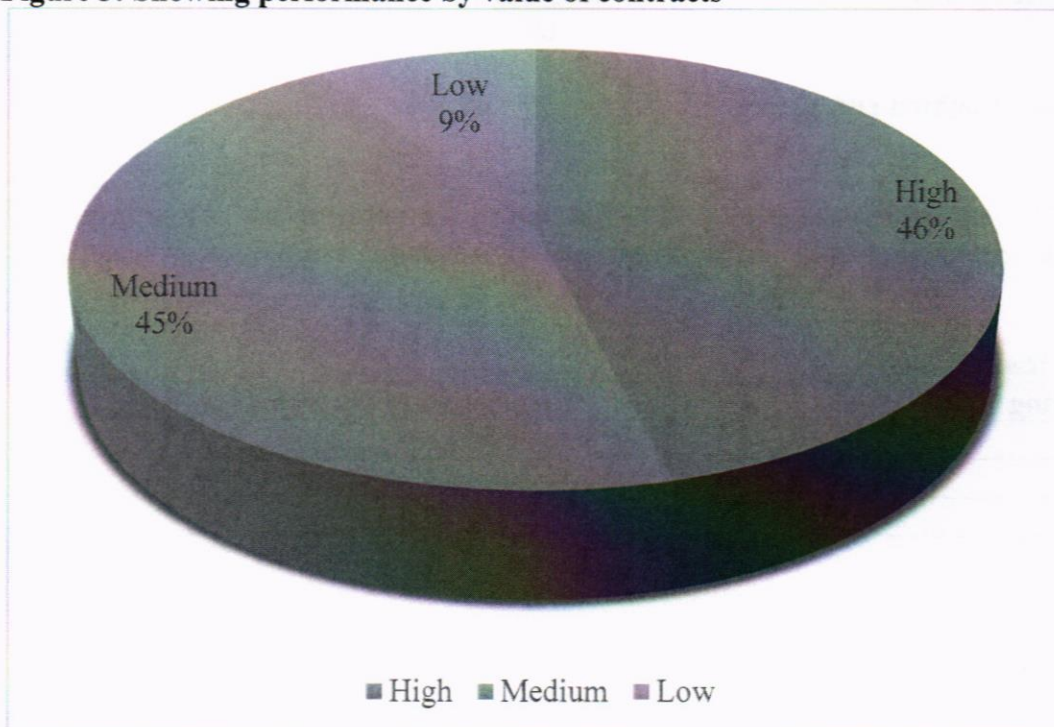


Figure 3: Showing performance by value of contracts



Audit conclusion

The procurement and disposal activities of Soroti City Council for the Financial Year 2024/2025 were carried out with a significant level of non-compliance with the provisions of the PPDA Act, Cap. 205, and the attendant PPDA Regulations. Although the Entity maintained the required procurement structures, the audit identified notable weaknesses in procurement planning, implementation of previous audit recommendations, records and asset management, provider shortlisting, and contract award distribution and administration.

In addition, physical verification of selected projects revealed quality and performance deficiencies, including leaking and uncovered manholes, a deteriorated septic tank, a leaking roof, and cracked walls. These findings indicate weaknesses in contract supervision and quality assurance during implementation.

These weaknesses indicate deficiencies in key internal controls and accountability mechanisms. If not adequately addressed, they may compromise service delivery, undermine value for money, and adversely affect the Entity's strategic and operational performance.

Accordingly, the overall performance of Soroti City Council for the Financial Year 2024/2025 was assessed as Moderately Satisfactory, with an overall weighted average risk rating of 69.5%. Management is required to implement targeted corrective measures to strengthen procurement planning, enhance records and asset management systems, and improve contract management and supervision to achieve value for money.

3.3. Recommended Action Plan

Soroti City Council should implement the recommendations in Table 21 below within the given time frame to improve its performance in Procurement and Disposal.

Table 21: Recommended Action Plan

Finding	Recommended Action	Responsible officer	Timeline
Poor storage of procurement records	Provide the PDU with adequate shelves, lockable filing cabinets, and storage facilities	Accounting Officer	Within 30 days
Failure to fully implement the previous audit recommendations	Establish an audit recommendation register and conduct quarterly monitoring	Accounting Officer	Within 30 days
Reservation scheme	Develop a list of Special interest group providers and preserve at least 15% of the entity's procurements	Head PDU	Within 30 days
Failure to fully implement the Procurement Plan	Institute quarterly procurement plan reviews to align planned procurements with actual budget releases and revenue collection	Accounting Officer/ Head PDU	Quarterly
Irregular shortlisting and contract award distribution	Establish and regularly update a shortlisting register to track provider participation and contract awards	Head PDU	Within 30 days
Failure to conduct disposal	Dispose of obsolete assets	Accounting Officer	
Inappropriate Use of Direct Procurement Method	Ensure that competitive procurement methods remain the default approach in all procurement and disposal activities, and any deviation should be justified	Head PDU	Immediate
Irregularities during contracting and contract execution	Implement contract monitoring and escalation mechanisms	Contract managers	Monthly

Annex 1: Findings and rating on the individual procurements reviewed
HIGH RISK CONTRACTS

NO	HIGH RISK CONTRACT	REASONS FOR HIGH RISK.
1.	Subject: Installation of Solar Lights for Acetgwen, Otatai, Aminit, Madera, Islamic, and Owalei P/S Ref no: SORO 610/WRKS/2024/2025/00053 Proc method: RFQ Contract value: UGX 31,680,500	✓ Conducted outside the procurement plan ✓ Contracts awarded above the approved estimated cost
2.	Subject: Repair of solar street lights along Central Ave, section of Serere Road, and Cemetery Road. Reference Number: SORO610/WRKS/24/25/00054 Contractor: Reliefline Uganda Ltd. Contract value: UGX 189,918,150 VAT Inclusive	✓ Conducted outside the procurement plan ✓ The BEB Ebaca Enterprises Ltd submitted a falsified Tax Clearance Certificate (certificate ref No. UGND220011728)
3.	Subject: Completion of Admin- Block-Finance Ref no: SORO 610/WRKS/2024/2025/00052 Contractor: Letsom Investments Ltd Contract value: UGX 96,397,268	• Conducted outside the Procurement Plan • Inadequate bidding document • Low bidder participation • Irregularities during contracting and contract implementation
4.	Subject: Construction of 5 Stance Latrine at Kichinjaji HC111 Reference no: SORO 610WRKSS/2024/2025/00048 Contractor: Obutei Enterprises Ltd Contract value: UGX 23,852,237	• Conducted outside the Procurement Plan • Low bidder participation
5.	Subject: Purchase of Health Office Furniture Reference no: SORO 610/SUPLS/2024/2025/00051 Provider: Uganda Prisons Industries Contract value: UGX 20,340,000	Use of the wrong/inappropriate procurement method - direct
6.	Subject: Rehabilitation of 2 Classroom block at Rock View PS Reference no: SORO 610/WRKS/2024/2025/00055 Contractor: Omiya Enterprises Ltd Contract value: UGX 48,341,815	• Use of wrong/inappropriate procurement method – direct • Contracted above the approved estimated cost
7.	Subject: Construction of a 5-stance VIP latrine at Madera Boys PS Reference no: SORO 610/WRKS/24/25/00056 Contractor: Omiya Enterprises Ltd Contract value: UGX 26,916,100	Use of the wrong/inappropriate procurement method - direct
8	Subject: Construction of a 5-stance VIP latrine at Amen PS	Use of the wrong/inappropriate procurement method - direct

NO	HIGH RISK CONTRACT	REASONS FOR HIGH RISK.
	Reference no: SORO 610/WRKS/24/25/00057 Contractor: Kassam Services Ltd Contract value: UGX 27,002,412	
9	Subject: Construction of a 5-stance VIP latrine at Moruapesur PS Reference no: SORO 610/WRKS/2024/2025/00058 Contractor: Nivo Investments Ltd Contract value: UGX 27,002,412	• Use of wrong/inappropriate procurement method – direct • BOQs not attached • Form 5 not signed by the Initiator • The availability of funds section was not filled out
10	Subject: Construction of a 5-stance VIP latrine at Swaria PS Reference no: SORO 610/WRKS/2024/2025/00059 Contractor: Osma General Enterprises Contract value: UGX 26,999,999	• Form 5 part II not signed by the CC chairperson and secretary • The invitation to bid on the procurement action file dated 10th June 2026 included the budget estimate of UGX 27,000,000 for the project (under item 7), which could have prevented objectivity during pricing for the contractor. • Inadequate bidding document • Irregularities during evaluation • No evidence of submission of beneficial ownership information in the bid for Nivo Investments Limited, although it was required. • Lacked ESHS aspects • Low bidder participation

MEDIUM RISK

NO	MEDIUM RISK	REASONS FOR MEDIUM RISK
11.	Subject: Supply of classroom Desks for Otatai, Soroti Dem and Moruapesur P/S Reference no: SORO 610/SUPLS/2024/2025/00044 Provider: Archo Investments Ltd Contract value: UGX 39,760,000	• No confirmation of funds. • No appointment of a contract manager • No contract management plan • Part II of Form 5 was not signed by the CC chairperson and secretary
12.	Subject: Rehabilitation of a 3-classroom block at Rock View Primary School Reference no: SORO 610/WRKS/2024/2025/00041 Contractor: Jojohe Agencies Ltd Contract value: UGX 55,339,520	• Low bidder participation • Contracting above the approved estimates • Inadequate bidding document • Falsified NSSF Clearance certificate • Irregularities during contracting and contract implementation
13.	Subject: Completion of East Division Health Center 111 Maternity Block Reference no: SORO 610/WRKS/24/25/00052 Contractor: Letsom Investments Ltd Contract value: UGX 96,397,268	• Issuance of an inadequate bidding document • Irregularities during evaluation • Falsified NSSF Clearance certificate • Lack of ESHS aspects

		• Irregularities during contracting and contract implementation
14.	Subject: Construction of a 3-classroom block and 5-stance pit latrine with an incinerator at Soroti Demonstration Primary School Reference no: SORO 610/WRKS/24/25/00040 Contractor: Jojohe Agencies Ltd Contract value: UGX 197,985,571	• Issuance of an inadequate bidding document • Irregularities during evaluation • Irregularities during contracting and contract implementation • Low bidder participation • Lacked ESHS aspects
15.	Subject: Construction of a 5-stance drainable pit latrine at Onyakai Primary School Reference no: SORO 610/WRKS/2024/2025/00005 Contractor: Ebaca Enterprises Ltd Contract value: UGX 26,807,624	
16.	Subject: Construction of a 5-stance drainable latrine at Omadira Arapai Primary School Reference: SORO610/WRKS/2024-2025/00049 Contractor: Nivo Investments Limited Contract value: UGX 22,815,809	• Irregularities at initiation • Inadequate bidding document • Lack of ESHS aspects • Social Management Plan (ESMP). • The technical evaluation was not undertaken.
17.	Subject: Rehabilitation of City Yard Reference: SORO610/WRKS/2024-2025/00050 Contractor: Kassam Service Center Limited Contract Value: UGX 42,432,653	• Failure to communicate the correction of arithmetic errors to all participating bidders. • No evidence of submission of beneficial ownership information in the bid for Nivo Investments Limited. • No appointment of a Contract Manager. • Inconsistencies in contract documentation • No contract management plan • Missing records: No progress report, completion certificate, and Handover report
18.	Subject: Supply and maintenance of computers, printers, photocopiers, and IT-related supplies under a framework contract. Reference: SORO610/SUPLS/24/25/00004 Providers: Alexis Business Solutions Ltd and Explore IT Technologies Ltd Contract Value: UGX 92,971,216 and UGX 137,909,550	• Use of brand names like Dell, Kaspersky, HP, Nikon • Failure to require the basic qualifications for bidders like NSSF • Ambiguous specifications, i.e., two bidders who participated in the same procurement transactions submitted bids containing different lists of items and different quantities • Irregularities during evaluation • Irregularities during contracting and contract implementation

LOW RISK

19.	Subject: Rehabilitation of 2 classroom block at Fr Hilders P/S	Contracting above the approved estimates
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	Reference no: SORO 610/WRKS/24/25/00043 Contractor: Ominya Enterprises Ltd Contract value: UGX 45,618,612	
20.	Subject: Construction of 4-stance waterborne toilet and washroom at Taxi Park Terminal Reference no: SORO 610/WRKSS/2024/2025/00047 Contractor: Yaweh Technical Services Ltd Contract value: UGX 48,272,729	• Failure to submit the Program of Works by the contractor • Failure to submit a performance security
21.	Subject: Hotel and Catering Services Reference: SORO 610/SRVCS/2024/2025/00014 Provider: UGX 10,270,000	• No call-off order • Low bidder participation • Falsified tax clearance certificate

Annex 2: Soroti City Council audit sample list for the Financial Year 2024/2025

S/No.	Procurement Ref. No.	Procurement subject	Procurement Method	Provider	Contract value (UGX)	Risk rating
1.	SORO610/WRKS/2024/2025/00053	Installation of Solar Lights for Acetgwen, Otatai, Aminit, Madera, Islamic, and Owalei P/S	Request for Quotation	Osma General Enterprises	31,680,500	High
2.	SORO610/WRKS/2024/2025/00054	Repair of solar street lights along Central Ave, a section of Serere Road, and Cemetery Road.	Restricted bidding	Reliefline Uganda Ltd	189,918,150	High
3.	SORO610/SUPLS/2024/2025/00044	Supply of classroom Desks for Otatai, Soroti Dem, and Moruapesur P/S	Request for Quotation	Archo Investments Ltd	39,760,000	Medium
4.	SORO610/WRKS/2024/2025/00052	Completion of Admin Finance Block	Request for Quotation	Letsom Investments Ltd	96,397,268	High
5.	SORO610/WRKS/2024/2025/00041	Rehabilitation of a 3-classroom block at Rock View Primary School	Request for Quotation	Jojohe Agencies Ltd	55,339,520	Medium
6.	SORO610/WRKS/2024/2025/00043	Rehabilitation of 2 classroom blocks at Fr Hilders P/S	Request for Quotation	Ominya Enterprises Ltd	45,618,612	Low
7.	SORO610/WRKS/2024/2025/00045	Construction of a 5-stance drainable latrine at Omadira Arapai Primary School	Request for Quotation	Nivo Investments Ltd	26,525,811	Medium
8.	SORO610/WRKS/2024/2025/00046	Completion of East Division Health Center 111 Maternity Block	Restricted bidding	Jojohe Agencies Ltd	113,228,265	Medium
9.	SORO610/WRKS/2024/2025/00005	Construction of a 5-stance drainable pit latrine at Onyakai Primary School	Request for Quotation	Ebaca Enterprises Ltd	26,807,624	Medium
10.	SORO610WRKSS/2024/2025/00048	Construction of a 5-stance Latrine at Kichijaji Health Center 111	Request for Quotation	Obutei Enterprises Ltd	23,852,237	High
11.	SORO610/WRKSS/2024/2025/00047	Construction of a 4-stance waterborne toilet and washroom at Taxi Park Terminal	Request for Quotation	Yaweh Technical Services Ltd	48,272,729	Low

12.	SORO610/WRKS/ 2024/2025/00050	Renovation works at City Yard	Request for Quotation	Kassam Services Ltd	48,797,550	Medium
13.	SORO610/SUPLS/ 2024/2025/00004	Supply and maintenance of computers, printers, photocopiers, and IT-related supplies	Framework contract	Explore IT Technologies Ltd	6,100,000	Medium
				Alexus Business Solutions	0	
14.	SORO610/SRVCS/ 2024/2025/00014	Hotel and Catering Services	Framework contract	Plains Country Investments	10,270,000	Low
15.	SORO610/SUPLS/ 2024/2025/00051	Purchase of Health Office Furniture	Direct	Uganda Prisons Industries	20,340,000	High
				Footsteps Furniture Co. Ltd	14,860,000	High
16.	SORO610/WRKS/ 2024/2025/00040	Construction of a 3-classroom block and a 5- stance pit latrine with an incinerator at Soroti Demonstration Primary School	Restricted bidding	Jojohe Agencies Ltd	197,985,571	Medium
17.	SORO610/WRKS/ 2024/2025/00055	Rehabilitation of 2 Classroom blocks at Rock View PS	Direct	Omiya Enterprises Ltd	48,341,815	High
18.	SORO610/WRKS/ 2024/2025/00056	Construction of a 5-stance VIP latrine at Madera Boys PS	Direct	Omiya Enterprises Ltd	26,916,100	High
19.	SORO610/WRKS/ 2024/2025/00057	Construction of a 5-stance VIP latrine at Amen PS	Direct	Kassam Services Ltd	27,002,412	High
20.	SORO610/WRKS/ 2024/2025/00058	Construction of a 5-stance VIP latrine at Moruapesur PS	Direct	Nivo Investments Ltd	27,002,412	High
21.	SORO610/WRKS/ 2024/2025/00059	Construction of a 5-stance VIP latrine at Swaria PS	Direct	Osma General Enterprises	26,999,999	High
	TOTAL				1,152,016,575	

Annex 3: Risk Rating Criteria

RISK	DESCRIPTION	AREA	IMPLICATION
HIGH	Such procurements were considered to have serious weaknesses, which could cause material financial loss or carry a risk to the regulatory system or the entity's reputation. Such cases warrant immediate attention by senior management. Significant deviations from established policies and principles and/or generally accepted industry standards will normally be rated "high".	Planning: Lack of or failure to procure within the approved plan	This implies emergencies and the use of the direct procurement method which affects competition and value for money.
		Bidding Process: Use of wrong/inappropriate procurement methods, failure to seek Contracts Committee approvals, and usurping the powers of the PDU.	This implies the use of less competitive methods which affects transparency, accountability, and value for money.
		Evaluation: Use of inappropriate evaluation methodologies or failure to conduct an evaluation.	This implies financial loss caused by awarding contracts at higher prices or shoddy work caused by failure to recommend an award to a responsive bidder.
		Record Keeping: Missing procurement files and missing key records on the files namely; solicitation documents, submitted bids, evaluation reports, and contracts.	This implies that one cannot ascertain the audit trail namely; whether there was competition and fairness in the procurement process.
		Fraud/forgery: Falsification of Documents	This implies a 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

RISK	DESCRIPTION	AREA	IMPLICATION
MEDIUM	Procurements that were considered to have weaknesses, 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 a lack of efficiency, standardization, and avoiding competition.
		Procurement Structures: Lack of procurement structures	This implies a 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 amendments and variations which lead to unjustified delayed contract completion and lack of value for money. Bidders are not given the right of appeal.

RISK	DESCRIPTION	AREA	IMPLICATION
		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 are not covered by the contractor during contract implementation.	
LOW	Procurements with weaknesses where resolution within the normal management framework is considered desirable to improve efficiency or to ensure that the business matches current market best practices. 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 a conflict of interest and a lack of transparency.
SATISFACTORY	Relates to following laid down procurement procedures and guidelines and no significant deviation is identified during the conduct of the procurement process based on the records available at the time.		