PUBLIC PROCUREMENT AND DISPOSAL
OF PUBLIC ASSETS AUTHORITY
"Regulating for Results"

REPORT ON PROCUREMENT AND DISPOSAL AUDIT OF BUSITEMA UNIVERSITY FOR FINANCIAL YEAR 2024/2025

JULY 2026

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ACRONYMS

CC	Contracts Committee
EC	Evaluation Committee
ESHS	Environment, Social, Health, Safety
FY	Financial Year
GCC	General Conditions of Contract
LTD	Limited
PDE	Procuring and Disposing Entity
PDU	Procurement and Disposal Unit
PPDA	Public Procurement and Disposal of Public Assets Authority
RFQ	Request for Quotations
SCC	Special Conditions of Contract
UGX	Uganda Shillings

EXECUTIVE SUMMARY

The Public Procurement and Disposal of Public Assets Authority (PPDA) carried out a procurement and disposal audit of Busitema University that covered 21 sampled procurement transactions worth UGX 4,738,170,938 under the Financial Year 2024/2025.

The overall objective of the procurement and disposal audit was to assess and establish the degree of compliance of Busitema University's procurement and disposal system and process in accordance with the provisions of the PPDA Act, Cap. 205 and PPDA Regulations, 2023 and assess the level of procurement and disposal performance.

From the findings of the procurement and disposal audit exercise, the performance of Busitema University for the Financial Year 2024/2025 was **Unsatisfactory** with a weighted average risk rating of **85.6%** as detailed in Chapter 3 of this report.

The following key exceptions were noted:

1. Failure to fully implement 80% of the previous audit recommendations. Section 10 (1) (a) of the PPDA Act, Cap. 205 requires an Entity to take corrective action on recommendations by the Authority, as may be necessary in the circumstances to rectify the breach. The Authority found that the Entity was issued its previous audit report for the Financial Year 2022/2023 in September 2024. Out of 20 recommendations made, four (20%) were fully implemented, 15 (75%) were partially implemented and one (5%) was not implemented. This was partly attributed to the absence of a strong internal mechanism for tracking and coordinating the implementation of the Authority's recommendations. Failure to fully implement audit recommendations affects performance of the procurement function and is an indicator of a weak implementation mechanism by the Entity.

2. Failure to fully implement the procurement plan. Section 60 (7) of the PPDA Act, Cap. 205 states that, '*A procuring and disposing entity shall, on a quarterly basis and in any other case, wherever necessary, review and update its procurement plan.*'. Assessment of the procurement plan and utilization of funds revealed that the procurement plan implementation rate of the Entity for FY 2024/25 was 65%. Whereas, the Entity planned to spend UGX 10,492,391,184 on procurement, the Authority noted that the Entity carried out procurements worth UGX 6,777,112,093 (65%) creating an implementation variance of UGX 3,715,279,091 (35%). Low procurement plan implementation rate denies delivery of services to the intended beneficiaries and also exposes the Entity to risks of budgetary cuts for subsequent periods due to non-performance thus failure to meet planned objectives.

3. Failure to reserve procurements for Women, Youth and PWDs. According to Guideline 11 of 2024, Clause 2.1 (i), every Procuring and Disposing Entity is required to allocate a minimum of 15% of its annual procurement plan budget to registered associations representing Women, Youth, and Persons with Disabilities. The audit found that the procurement plan was developed without incorporating provisions to reserve portions of procurement for these designated groups. Failure to include the Women, Youth and Persons with Disabilities frustrates efforts by the Government of Uganda aimed at increasing their participation in public procurement.

4. Procuring 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 emergency situations. The Authority found that five procurements worth UGX 502,589,616 were conducted outside the procurement plan for financial year 2024-2025. This was attributed to changes in priorities and introduction of new activities during the course of the financial year. Conducting procurements outside the procurement plan hinders the implementation of planned procurements thus affecting service delivery and also increases the risk of domestic arrears.

5. Misreporting of procurements. Section 48 of the PPDA Act, Cap. 205 requires all procurement and disposal activities to be conducted in a manner that promotes transparency and accountability. The Authority found that two procurements worth UGX 147,804,611 were inaccurately reported, one with an incorrect contract value and another with a wrong procurement method disclosed. This was attributed to a failure to exercise due diligence in the review and verification of information prior to report submission. Inaccurate reporting may misinform the Authority and other relevant stakeholders who rely on such reports for decision making and is an indicator of lack of transparency and accountability in the conduct of public procurements.

6. Irregularities at bid evaluation. Section 76 (3) of the PPDA Act, Cap. 205 states that *'no evaluation criteria, other than that stated in the bidding documents, shall be taken into account'*. The Authority found irregularities at evaluation in two procurements worth UGX 182,345,000 in which the evaluation criteria was altered during bid evaluation. This was attributed to a knowledge gap about evaluation procedures among evaluation committee members. Changing the evaluation criteria during the evaluation process undermines procurement integrity, and increases the risk of contracts being awarded to non-compliant bidders.

7. Inefficiencies in the procurement process. Section 51 of the PPDA Act, Cap. 205 requires all procurements to be conducted in a manner which promotes efficiency. The Authority found that in eleven procurements worth UGX 957,258,086, there was an average delay of 48 working days at different stages of the procurement process. These delays were caused by User Departments failing to submit the statements of requirements in time, absence of evaluation committee members at the time of bid evaluation, delay by the Accounting Officer to approve procurements and possible administrative interferences among others. Inefficiencies in the procurement process delay service delivery. Delays in evaluation of bids or in making an award decision constitute offences under Section 129 (1) (f) of the PPDA Act, Cap 205 and may attract penalties against the responsible officers. They also cause delays in service delivery.

8. Weak contract management. Regulation 52 of the PPDA (Contracts) Regulations, 2023 requires contract managers to fully handle all their responsibilities. The Authority noted that there were deficiencies in contract management in ten procurements worth UGX 3,016,312,696. This was evidenced by the absence of contract implementation plans, program of works, monthly reports, delayed contract execution among others. These weaknesses undermine effective oversight and may compromise the achievement of value for money by limiting the ability of the Entity to monitor contractor performance, track deliverables, and enforce contractual obligations. This weakness was due to a knowledge gap by Contract Managers about their responsibilities and laxity in contract monitoring by

the Procurement and Disposal Unit. Weakness in contract management lead to under performance of contracts by service providers.

9. Failure to have provisions regarding Environment, Social, Health and Safety issues in the statement of requirements. Regulation 34 (5) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023 states that *'a statement of requirements, shall where applicable, be environmentally and socially responsive.'* The Authority found that in three procurements worth UGX 286,899,299, ESHS aspects were not stated in the bidding document and the resulting contracts. This exposes the Entity to issues of environmental degradation, occupational health hazards, and threatens public safety, and may result in delays in contract implementation where contractors are required to halt works or the delivery of supplies to address ESHS concerns not anticipated at the time of contracting.

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

1. The Accounting Officer should;
   i. Establish and appoint a dedicated task force to effectively monitor and implement all audit recommendations. The task force should develop a suitable workplan to systematically implement all the Authority's recommendations in accordance with Section 10 (1) (a) of the PPDA Act, Cap. 205;
   ii. Together with the Head, Procurement and Disposal Unit, upon updating the procurement plan, promptly notify the Secretary to the Treasury and the Authority of all changes made, in accordance with Section 60 (8) of the PPDA Act, Cap. 205;
   iii. Desist from approving any procurement requisition if the requirement is not in the procurement plan;
   iv. Task the Contract Management Team to provide accountability for UGX 82,000,000 supervisory fees in the procurement of Construction of 3 level teaching facility at Pallisa Campus worth UGX 518,683,131 and
   v. Task Heads of User Departments to prepare statements of requirements that are inclusive of ESHS aspects in accordance with Regulation 34 (5) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023.

2. The Contracts Committee should:
   i. Scrutinize all bidding documents for quality before approval in line with Regulation 10 of the PPDA (Procuring and Disposing Entities) Regulations, 2023
   ii. Only approve procurements that are provided for in the procurement plan in accordance with Section 30 (d) of the PPDA Act, Cap. 205 and
   iii. Within ten working days issue a decision on any matter or request submitted by the Procurement and Disposal Unit in accordance with Regulation 7 (3) of the (PDE) Regulations, 2023.

3. The Head, Procurement and Disposal Unit should:
   i. Exercise due diligence in the reporting of monthly procurements to ensure accuracy in accordance with Section 48 of the PPDA Act, Cap. 205;
   ii. Develop a list of Special interest group providers and preserve at least 15% of the annual procurement budget for these groups

iii. Verify that contracts contain clear contract details in accordance to Regulation 9 (1) of the PPDA (Contracts) Regulations, 2023.

4. Evaluation Committees should;
   i. Strictly adhere to the criteria set out in the bidding document in accordance with Section 76 (3) of the PPDA Act, Cap. 205 and
   ii. Conduct timely evaluation in accordance with Regulation 4 (1) (a) (b) (c) and (d) of the PPDA (Evaluation) Regulation, 2023.

Busitema University should implement the recommended action plan on pages 32 and 33 of this report.

CHAPTER ONE: INTRODUCTION

1.1 Background

The Public Procurement and Disposal of Public Assets Authority carried out the procurement and disposal audit of Busitema University that covered 21 sampled procurement transactions worth UGX 4,738,170,938 under the Financial Year 2024/2025. The audit involved a review of the procurement structures, procurement and asset disposal processes, as well as contract performance in accordance with the provisions of the Public Procurement and Disposal of Assets Act Cap 205 and the attendant PPDA Regulations.

1.2 Overall Objective

The overall objective of the audit was to assess and establish the degree of compliance of Busitema University's procurement system, process and disposal process with the provisions of the Public Procurement and Disposal of Public Assets Act, Cap 205, and the PPDA Regulations, 2023, and assess the level of procurement performance over the audit period.

The specific objectives were to:

1. Establish the level of compliance by the Entity with the general provisions of the PPDA Act, Cap. 205, and attendant PPDA Regulations with regard to the performance of the procurement structures and the conduct of the procurement process;
2. Assess the degree of compliance of the Entity's disposal process with the provisions of the PPDA Act, Cap. 205 and the PPDA (Disposal of Public Assets) Regulations 2023; and
3. Assess the level of efficiency and effectiveness in contract implementation including the application of Environmental, Social, Health and Safety (ESHS) Requirements in the procurement process.

1.3 Structure of the Entity

Busitema University is a multi-campus model public University located in the Eastern Region of Uganda. The main campus is in Tororo and other campuses at Nagongera, Namasagali, Arapai, Mbale, Pallisa and Kaliro. It was established by statutory Instrument in 2007, the University focuses on relevant and critical study programs in Engineering, Science Education, Health Sciences, Natural Resources and Environmental Sciences, Agriculture and Animal Sciences, Management Sciences and Vocational Education. The key players in the procurement structure at Busitema University include the University Secretary, the Contracts Committee, the Procurement and Disposal Unit, and the User Departments.

Section 28 1 (c) of the PPDA Act, Cap. 205 requires an Accounting Officer to cause the establishment of the procurement and disposal unit staffed at an appropriate level. During the Audit period, the Procurement and Disposal Unit was fully staff, headed by the Deputy Chief, Procurement and Disposal.

The Permanent Secretary/Secretary to the Treasury of Ministry of Finance approved the members of the Contracts Committee listed in Table 1 below:

Table 1: Contracts Committee membership

No.	Name	Position	Date of Appointment	Job Title
1.	Dr. Lillian Gimuguni	Chairperson	3rd October 2023	Academic Registrar
2.	Ms Nyirivu Topachu Juliet	Member	25th October 2023	Senior State Attorney
3.	Dr. Ochwo Richard Oriko	Member	27th August 2024	Senior Lecturer

4.	Ms. Gloria Asiimwe	Secretary	27th August 2024	Librarian
5.	Associate Professor Yahya Gavamukulya	Member	13th March 2025	Associate Professor

1.4 Procurement and Audit Scope

The audit involved a review of the procurement and disposal processes, general compliance issues, and contract implementation of 21 procurement transactions under Financial Year 2024/2025. The list of sampled transactions is contained in Annex 2. Table 2 below details the distribution of the transaction population and the sample

Table 2: Distribution of the Transaction Population and Sample

No	Procurement method	Popn Value (UGX)	Popn No	Sample Value (UGX)	Sample No.	% No	% Value
1.	Open Domestic Bidding	1,347,997,077	13	1,228,098,985	3	23.1	91.2
2.	Request for Quotation	2,124,823,256	36	1,738,489,034	13	36	81.82
3.	Direct	2,336,345,444	23	1,771,582,919	5	22	75.83
4.	Micro	967,946,316	446	-	0	-	-
	Total	**6,777,112,093**	**518**	**4,738,170,938**	**21**	**4.05**	**69.91**

1.5 Methodology

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 undertaken to assess the level of contractual delivery and fitness for purpose.

Three officers conducted the exercise under the supervision of the Regional Manager. During the audit exercise, the team examined records of sampled procurements and held interviews with the staff from the Procurement and Disposal Unit and other User Departments to obtain crucial qualitative information about the internal control systems and processes in place.

The audit commenced on **21st April 2026**. A debrief meeting to clear all pending issues that arose during the audit was held with the Entity management and staff on **30th April 2026**. The Authority prepared the management letter, which was sent to the Entity on **7th May 2026** with a request to submit a management response by **14th May 2026**. During the exit meeting held on **14th May 2026**, the Entity was guided to refine their management responses to reflect what was being explained. The adjusted responses were submitted to the Authority on **11th June 2026.**

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

CHAPTER TWO: KEY FINDINGS AND RECOMMENDATIONS

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

2.1.1 Failure to fully implement 80% of the previous audit recommendations

Section 10 (1) (a) of the PPDA Act, Cap. 205 requires an Entity to take corrective action on recommendations by the Authority, as may be necessary in the circumstances to rectify the breach. The Authority found that the Entity had been issued its previous audit report for the Financial Year 2022/2023 in September 2024. Out of 20 recommendations made, four (20%) fully implemented, 15 (75%) were partially implemented and one (5%) was not implemented. This was partly attributed to the absence of a strong internal mechanism for tracking and coordinating the implementation of the Authority's recommendations. The recommendations are detailed in Table 3 below:

Table 3: Implementation of previous audit recommendations

No.	Recommendation	Status
The Accounting Officer should:		
i.	With the support of the Internal Audit department, establish a robust mechanism to ensure that all audit recommendations are regularly monitored and fully implemented to improve the Entity's performance. This could be through quarterly reviews of procurement and disposal procedures by the Internal Audit to document finding and identify areas for improvement and implement corrective measures as well enforcing implementation of previous audit recommendations in line with Regulation 27 of the PPDA (Procuring and Disposing Entities) Regulations, 2023	Partially Implemented
ii.	Ensure that the procurement plan reflects actual market conditions and realistic cost projections by involving subject matter experts and cost engineers for major projects. Additionally, the procurement plan must be reviewed and updated quarterly, or as needed, to align with current circumstances in accordance with Section 60 (7) of the PPDA Act, Cap 205. For procurements spanning more than one financial year, the Entity should prepare a multi-year procurement plan using the guidelines provided by the Authority, as per Regulation 3 of the PPDA (Procurement Planning) Regulations. 2023	Partially implemented
iii.	Task the Head Procurement and Disposal Unit to always guide Evaluation Committee members to adhere to set evaluation criteria so that evaluation is done objectively and fairly in line with Regulation 5 of the PPDA (Evaluation) Regulations, 2023 which may in turn improve on bidder participation at the entity. Where delays are unavoidable, the PDU should request a formal extension of the bid validity in line with Regulation 62 of the PPDA (Rules and Methods Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023.	Partially implemented
iv.	Ensure that all procurements and disposals are conducted in a manner that upholds public procurement and disposal basic principles of non-discrimination, transparency, accountability, fairness, maximization of competition and ensuring value for money, confidentiality,	Partially implemented

No.	Recommendation	Status
	economy, efficiency, and promotion of ethics in accordance with Sections 46 of the PPDA Act, Cap 205.	
v.	Ensure that the disposal of public assets is conducted in compliance with Regulation 2 of the PPDA (Disposal) Regulations, 2023. A comprehensive review of the public assets should be carried out each financial year to identify assets to be disposed of in the following year.	Not implemented
vi.	Caution the Procurement and Disposal Unit and Contracts Committee for committing offences relating to open bids and have the evaluation reports approved in time which is contrary to Section 129 of the PPDA Act, Cap 205.	Partially implemented
vii.	Strengthen contract management by ensuring regular monitoring and supervision of contracts by the Contract Managers against well prepared contract implementation plans, with the their respective monitoring and supervision reports, enforcing clauses that safe guard the entity such as obtaining Performance Securities or Performance Securing Declarations , advance payment securities ,liquidated damages and penalties while also ensuring that payments to contractors are made in line with the payment terms and conditions in with Regulations 52 (l),(2) and (3) (g) of the PPDA (Contracts) Regulations 2023 so as to improve the success of contract execution.	Partially implemented
viii.	Ensure that all University assets are engraved, e.g., the armrest chairs to prevent potential theft, ensuring that all future assets are labelled upon delivery and in future, engraving could form part of the entity's Statement of Requirements to avoid delays.	Partially implemented
ix.	Should ensure that all payments are made in line with terms and conditions of payments as stipulated in the contracts and in line with Regulation 52(3) (a) (i) of the (PPDA) Regulations, 2023 and where advance payment is to be made, this should be done in line with Regulations 43(2) and 43(3) of the PPDA (Contracts) Regulations, 2023 and accompanied with advance payment securities.	Partially implemented
2. The Contracts Committee should execute all its oversight functions in time and in line with Section 30 of the PPDA Act, Cap 205. Eg, desisting from handling procurements not on the Entity's procurement plan and approving inadequate solicitation documents.		Partially implemented
3. The Accounting Officer should be held responsible for irregularly effecting 100% payment to service providers in three procurements worth UGX 699,491,979 where contractors were paid the full contract amounts prior to execution of contracts, consequently, works were not done and deliveries were not made as per contractual terms, which was contrary to Regulation 46 and 47 (l) of the PPDA (Contracts) Regulations, 2023		Partially implemented
4. The Head, Procurement and Disposal Unit should;		
i.	Comply with Regulation 53 (l) of the PPDA (Rules and Methods for Procurement of Supplies, Works, and Non-Consultancy Services) Regulations, 2023, which requires that a shortlist must include at least six bidders, except in cases of micro procurement	Partially implemented
ii.	Be held fully accountable for issuing poor-quality Standard Bidding Documents with omissions and inconsistencies that risk awarding contracts to non-responsive bidders. The HPDU must ensure all	Partially implemented

No.	Recommendation	Status
	future bidding documents are accurate, comprehensive, and fully compliant with Regulation 42(a) of the PPDA Regulations, 2023	
iii.	Ensure that all shortlisted bidders are issued with bid invitation notices and maintain evidence of receipt by the invited bidders.	Partially implemented
5. Heads of User Departments should;		
i.	Conduct thorough market assessments to ensure that budget estimates accurately reflect current costs and market dynamics in line with Regulation 3 (3) (a) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023. This proactive approach will help mitigate the risk of budget overruns, minimize the need for scope reductions or additional funding requests, and support effective project planning and execution.	Partially implemented
ii.	Prepare contract management plans using Form 49 in schedule 2, and forward a copy of the contract management plan to the PDU for monitoring in accordance with Regulation 50 (3) of the PPDA (Contracts) Regulations, 2023	Partially implemented

Implication

Failure to fully implement audit recommendations affects performance of the procurement function and is an indicator of a weak implementation mechanism by the Entity and leads to repeated non-compliance with the PPDA Act, Cap 205.

Management Response

Management has taken a deliberate plan in implementing the audit recommendations with ultimate objective of improving performance in the procurement and disposal process.

Authority's comment

The Authority noted the Entity's response. While the deliberate plan to implement audit recommendations is acknowledged, the Authority urges that implementation be expedited with clear timelines, measurable targets, and designated responsible officers to ensure tangible improvement in the procurement and disposal process.

Recommendation

The Accounting Officer should establish and appoint a dedicated task force to effectively monitor and implement all audit recommendations. The task force should develop a suitable workplan to systematically implement all the Authority's recommendations in accordance with Section 10 (1) (a) of the PPDA Act, Cap. 205.

2.1.2 Failure to fully implement the Procurement Plan

Section 60 (7) of the PPDA Act, Cap. 205 states that, '*A procuring and disposing entity shall, on a quarterly basis and in any other case, wherever necessary, review and update its procurement plan.*'. Assessment of the procurement plan and utilization of funds revealed that the procurement plan implementation rate of the Entity for FY 2024/25 was 65%. Whereas, the Entity planned to spend UGX 10,492,391,184 on procurement, the Authority noted that the Entity carried out procurements worth UGX 6,777,112,093 (65%) creating an implementation variance of UGX 3,715,279,091 (35%). The low implementation rate was attributed to delayed release of funds, changing institutional priorities and inadequate procurement plan reviews. Table 4 below summarizes information about the procurement plan, budget and utilization of funds.

Table 4: Procurement Plan Implementation

Analysis of Procurement spend	
Total procurement plan value inclusive of VAT (UGX)	10,492,391,184
Procurement spend value inclusive of VAT (UGX)	6,777,112,093
Procurement plan Implementation Rate (%)	65
Budget variance (UGX)	3,715,279,091
Budget variance (%)	35

Implication

Low procurement plan implementation rate denies delivery of services to the intended beneficiaries and also exposes the Entity to risks of budgetary cuts for subsequent periods due to non-performance thus failure to meet planned objectives.

Management Response

Management takes note of the issues raised, however, in the course of the year some priorities changed and some of the new activities had to be introduced and resulted into the Entity changing and updating the plan later on (see copy of updated plan annex 1)

Authority's comment

The Authority noted the Entity's response. Whereas it is acknowledged that there were changes in some priorities during the year which led to updating the procurement plan, The Entity did not provide evidence of formal procurement plan revisions to reflect the changes.

Recommendations

The Accounting Officer should;

1. Always notify the Secretary to the Treasury and the Authority of any changes made to its procurement plan and submit the updated and approved procurement plan to the Authority in accordance with Section 60 (8) of the PPDA Act, Cap. 205.
2. Make sure the procurement plan is realistic, reviewed and updated periodically, and implemented subject to funds availability.

2.1.3 Failure to reserve procurements for Women, Youth and PWDs

According to Guideline 11 of 2024, Clause 2.1 (i), every Procuring and Disposing Entity is required to allocate a minimum of 15% of its annual procurement plan budget to registered associations representing Women, Youth, and Persons with Disabilities. The audit found that the procurement plan was developed without incorporating provisions to reserve portions of procurement for these designated groups.

Implication

Failure to include the Women, Youth and Persons with Disabilities frustrates efforts by the Government of Uganda aimed at increasing their participation in public procurement.

Management Response

Management notes that some procurements were reserved for special interest groups in the procurement plan, however, most of these groups were not organized. Management has embarked on re organizing these groups. Bakobme Association Group has been identified and the university plans to engage them in the next financial year 2026/2027.

Authority's comment

The Authority noted the Entity's response. However, a review of the procurement plan for the Financial Year 2024/2025 did not reflect any reservations made for Special Interest Groups. Beyond the already identified Bakobme Association Group, the Entity is encouraged to widen its scope by identifying and engaging multiple special interest groups, ensuring that the reservation scheme fulfills its intended purpose of promoting inclusive participation in public procurement.

Recommendation

The Procurement and Disposal Unit should develop a list of Special Interest Group providers and reserve at least 15% of the annual procurement budget for these groups.

2.1.4 Procuring 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 emergency situations*." The Authority found that four procurements worth UGX 502,589,616 were conducted outside the procurement plan for financial year 2024-2025. This was attributed to changes in priorities and introduction of new activities during the course of the financial year. The procurements are indicated in Table 5 below:

Table 5: Procurements outside the Procurement Plan

S/No	Subject of procurement	Contract Amount (UGX)
1.	Supply and Installation of the high-end server at Busitema Main Campus	198,325,154
2.	Additional works for the Technology, Business& Innovations Incubation Center (TBIIC) at Busitema Campus.	148,511,063
3.	Renovation of the workshop structure and portioning of office space at Arapai campus	128,099,399
4.	Supply and Delivery of Assorted Medical Supplies/Human Drugs under Framework Contract	27,654,000
Total		**502,589,616**

Implication

Conducting procurements outside the plan hinders the implementation of planned procurements thus affecting service delivery and also increases the risk of domestic arrears.

Management Response

Management notes that as a result of change in priorities, new activities were introduced and were subsequently captured in the updated plan (see attached copy annex 1)

Authority's comment

The Authority noted the Entity's response; however, the Entity did not notify the Secretary to the Treasury and the Authority of any amendments made to the Procurement Plan, Consequently, the Authority could not verify whether the updated plan was approved and submitted.

Recommendations

The Accounting Officer should;

1. Together with the Head, Procurement and Disposal Unit, upon updating the procurement plan, promptly notify the Secretary to the Treasury and the Authority of all changes made, in accordance with Section 60 (8) of the PPDA Act, Cap. 205.
2. Desist from approving any procurement requisition if the requirement is not in the procurement plan.

2.1.5 Failure to statement of requirements at initiation

Regulation 3 (2) (a) of the PPDA (Rules and methods for Procurement of Supplies, Works and Non-Consultancy services) Regulations, 2023 requires that initiation for a procurement requirement shall include a description of the supplies, works or non-consultancy services required. Two procurements worth UGX 85,786,520 lacked statements of requirements at initiation as indicated in Table 6 below:

Table 6: Procurements without specifications at initiation

S/No	Subject of Procurement	Contract Value (UGX)
1.	Repair of Arapai Bus	49,485,000
2.	Supply of Graduation Booklets, Transcripts and Certificates for the 15th Graduation Ceremony in November 2024.	36,301,520
	Total	**85,786,520**

Implication

Failure to attach specifications at initiation can lead to repeated clarifications on user requirements, causing delays and increasing the risk of procuring incorrect items.

Management Response

For repair of bus, the user provided an assessment report detailing the scope of repairs and material specifications (see copy attached).

The specifications for the graduation booklets were with the end user since the time of inspection, however all these documents are available.

Authority's comment

The Authority noted the Entity's response regarding the assessment report for the repair of the bus and the specifications for the graduation booklets. However, none of the referenced documents were physically availed for verification.

Recommendation

User Departments should always attach a description of the supplies, works or non-consultancy services required during procurement initiation in accordance with Regulation 3 (2) (a) of the PPDA (Rules and methods for Procurement of Supplies, Works and Non-Consultancy services) Regulations, 2023.

2.1.6 Opening of bids without representation of the Contracts Committee or User Department

Regulation 75 (1) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023 requires opening of bids to be managed by the Procurement and Disposal Unit and witnessed by a member of the Contracts Committee or a person authorised by the User Department. The Authority noted that in the procurement of Construction of 3 level teaching facility at Pallisa Campus worth UGX 518,683,131, bid opening was done without the presence of a member of the Contracts Committee or a member of the User Department, the Senior Procurement Officer, Mr. Joshua Omella received and opened the bid on 21st March 2025 without the presence of a member of the Contracts Committee or User Department.

Implication

Failure to open bids in the presence of the Contracts Committee or a person authorised by the User Department may encourage tampering with bids prior to/ or during bid opening.

Management Response

Management noted that the representatives attended the bid opening, it was an error for them to forget to sign record of bid opening.

Authority's comment

The Authority noted the Entity's response. Participation in bid opening can only be validated by the signatures of the respective members appended on the bid opening form. The absence of the requisite signatures renders any assertion of participation unsubstantiated.

Recommendation

The Head, Procurement and Disposal Unit should have bids opened in the presence of either a Contracts Committee member or a person authorised by the User Department, and the record of the same is filled in accordance with Regulation 75 (1) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023.

2.1.7 Misreporting of procurements

Section 48 of the PPDA Act, Cap. 205 requires all procurement and disposal activities to be conducted in a manner that promotes transparency and accountability. The Authority found that two procurements worth UGX 147,804,611 were inaccurately reported, one with an incorrect contract value and another with a wrong procurement method disclosed. This was attributed to a failure to exercise due diligence in the review and verification of information prior to report submission. The procurements are indicated in Table 7 below.

Table 7: Procurements with inaccuracies at reporting

S/No	Subject of procurement	Contract Value (UGX)	Inaccuracy at reporting
1.	Supply and delivery of assorted equipment for the BPL project at Nagongera Campus	127,805,900	The reported contract value was UGX 102,850,000 yet the actual value was UGX 127,805,900 **Management Response** *Management notes that this was a result of capturing wrong figures by the responsible officers and the officers have been asked exercise due care going forward.*
2.	Audit software for internal audit/automation of the audit process	19,998,711	Reported method of procurement was Direct Procurement yet the Request for Quotations method is what was used. **Management Response** *Again, this was an error in capturing the reports, the method of procurement approved by Contracts*

			Committee and used was request for quotation.
	Total	**147,804,611**	

Implications

- Inaccurate reporting may misinform the Authority in its monitoring and performance assessment and other relevant stakeholders who rely on such reports for decision making.
- Inaccurate reporting shows lack of transparency and accountability in the conduct of public procurements.

Recommendation

The Head, Procurement and Disposal Unit should exercise due diligence in the reporting of monthly procurements to ensure accuracy in accordance with Section 48 of the PPDA Act, Cap. 205.

2.1.8 Irregularities at bid evaluation

Section 76 (3) of the PPDA Act, Cap. 205 states that *'no evaluation criteria, other than that stated in the bidding documents, shall be taken into account'*. The Authority found irregularities at evaluation in two procurements worth UGX 182,345,000 in which the evaluation criteria was altered during bid evaluation. This was attributed to a knowledge gap about evaluation procedures among evaluation committee members. The procurements are indicated in Table 8 below:

Table 8: Procurements with irregularities at bid evaluation

S/No	Details of procurements	Contract Amount (UGX)	Issue	Management Response
1.	Supply and delivery of assorted equipment for the BPL project at Nagongera Campus.	102,850,000	Unjustified change in evaluation criteria where the Evaluation Committee considered only four items out of the required six procurements items during evaluation. The six procurement requirements included; i. Conical stainless steel fermentation unit ii. High pressure reactor iii. Benchtop chemical fumehood iv. Low temperature circulator v. Ice making machine vi. Alcohol distribution unit The items that were considered at financial	**Management Response** *On supply of BPI Machines and renovation of workshop structures, the committees have been advised to stick to the evaluation criteria going forward.*

S/No	Details of procurements	Contract Amount (UGX)	Issue	Management Response
			evaluation included; High pressure reactor, Benchtop chemical fumehood, Low temperature circulator and the ice making machine.	
2.	Renovation of the workshop of the ceiling boards and framing at Arapai Campus.	79,495,000	Change of evaluation criteria in which the Evaluation Committee reduced the scope of works instead of suggesting negotiation since the bid price was higher than the estimated price. The best evaluated bid price was UGX 93,417,031 however it was reduced to UGX 79,495,000 by the evaluation committee.	
Total		**182,345,000**		

Implication
Changing the evaluation criteria during the evaluation process undermines procurement integrity, and increases the risk of contracts being awarded to non-compliant bidders.

Recommendations
1. The Accounting Officer should task the Chairpersons of the Evaluation Committees to explain why the evaluation criteria was changed during bid evaluation in the procurement of Supply and delivery of assorted equipment for the BPL project at Nagongera Campus and in the procurement of Renovation of the workshop of the ceiling boards and framing at Arapai Campus, and take appropriate administrative action where responsibility is established.
2. Evaluation Committees should strictly adhere to the evaluation criteria stated in the bidding document in accordance with Section 76 (3) of the PPDA Act, Cap. 205.

2.1.9 Inadequately drafted 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. The Authority found that there were weaknesses and inadequacies in the bidding documents for eight procurements worth UGX 2,437,801,488. These included, capturing the wrong delivery location, irregular request for performance securities, contradicting requirements in the bidding documents, lack of payment schedules among others. Some inadequacies were caused by failure to exercise due diligence

in the review and verification of the bidding documents by the Head, Procurement and Disposal Unit and the Contracts Committee. The procurements are indicated in Table 9 below:

Table 9: Procurements with inadequacies in the bidding documents

S/No	Details of procurements	Contract Amount (UGX)	Inadequacies in the bidding document
1.	Supply of battery equipment and standard material for for MESIC project.	1,101,324,985	• Under ITB 1.1, the minimum and maximum number of Lots a bidder may bid for was not stated. • Irregular request for a performance security under GCC 19.1 • Failure to state the period of validity of the Advance Payment Guarantee, it was captured as 'shall be after delivery period' under GCC 17.1 • GCC 26 did not state the INCOTERM to be used, it was captured as 2020. • Use of two different reference numbers, the section containing the agreement has reference number BU/SUPLS/2022-23/00134
2.	Procurement of Construction of 3 level teaching facility at Pallisa Campus.	518,683,131	• GCC 1.1 (cc) stated that the site is located at Arapai Campus Soroti, yet GCC 9.1 stated that the works consist of 3 -level teaching facility at Pallisa campus. • Irregular request for a performance security of 10%, GCC 61.1 a performance securing declaration should have been requested.
3.	Medical insurance services.	449,194,625	• The reference number under ITB 1.2 is captured as BU/SRVCS/24-25/00255 yet the cover page has reference number BU/SRVCS/25-26/00012. • Unclear requirements of payment schedule under GCC 24.2, its captured as payment schedule shall be lumpsum. • Bidding document lacked contractual duration.
4.	Supply and installation of the high-end server at Busitema Main Campus.	198,325,154	Bidding document lacked Special Conditions of Contract.
5.	Renovation of the workshop of the ceiling boards and framing at Arapai Campus.	79,495,000	• Contradicting requirements in the bidding document, contract start date will be 3 days after signing contract (GCC 1.1), yet site possession will be

S/No	Details of procurements	Contract Amount (UGX)	Inadequacies in the bidding document
			7 days after signing the contract (GCC 21.1) • Lacked the request for a bid securing declaration.
6.	Supply of Graduation Booklets, Transcripts and Certificates for the 15th Graduation Ceremony in November 2024.	36,301,520	Bidding document lacked specifications in the bidding document
7.	Supply and delivery of assorted recess materials.	34,478,362	• Unclear requirement in the evaluation criteria under technical evaluation i.e, 'single contract of at least seven million (30M) for supply and delivery of related supplies.' • Lacked delivery period in the Special Conditions of Contract.
8.	Audit software for internal audit/automation	19,998,711	• Inclusion of irregular clauses: such as GCC 20.1 which stated that 'the service shall be completed by/shall be performed for a period of 12 months renewable on satisfactory performance.' • GCC 22.3 did not state the payment schedule. • The working hours of the provider under GCC 33.1 were not stated. • Failure to request for a bid securing declaration • Failure to request for a performance securing declaration.
Total		**2,437,801,488**	

Implication

Inadequate and inaccurate information in the bidding document may lead to bidders misunderstanding the Entity's requirements and thereafter submitting non responsive bids. Similarly, it may confuse bidders and may become a source of potential conflicts with the Entity.

Management Response

Observations have been noted and quality controls will be put in place to ensure accuracy of the document.

Recommendations

1. The Head, Procurement and Disposal Unit should prepare and issue bidding documents that have all the relevant required information and in a matter which leaves no room for

doubt or assumption by a bidder in accordance with Regulations 42 of the PPDA (Rules and Methods for the Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023 and Section 67 (2) (a) (b) of the PPDA Act, Cap. 205; and should further establish an internal assurance checklist for reviewing all solicitation documents prior to their submission to the Contracts Committee.

2. The Contracts Committee should scrutinize all bidding documents for quality before approval in line with Regulation 10 of the PPDA (Procuring and Disposing Entities) Regulations, 2023.

2.1.10 Inefficiencies in the procurement process

Section 51 of the PPDA Act, Cap. 205 requires all procurements to be conducted in a manner which promotes efficiency. The Authority found that in eleven procurements worth UGX 957,258,086, there was an average delay of 48 working days at different stages of the procurement process. These delays were caused by User Departments failing to submit the statements of requirements in time, absence of evaluation committee members at the time of bid evaluation and delay by the Accounting Officer to approve procurements. The procurements are indicated in Table 10 below:

Table 10: Delays in the procurement process

S/No	Details of procurements	Contract Amount (UGX)	Period of delay
1.	Supply and Installation of the high-end server at Busitema Main Campus.	198,325,154	• 20 working days delay by the Accounting Officer to approve the procurement. Whereas the procurement requirement was initiated by the user department and Head, User Department on 30th October 2024, the Accounting Officer approved the procurement on 26th November 2024. • 24 working days delay at bid evaluation. Bid opening was on 5th February 2025, evaluation was concluded on 10th March 2025.
2.	Renovation of the workshop structure and portioning of office space at Arapai campus.	128,099,399	42 working days delay at contract signing. Whereas the Best Evaluated Bidder Notice expired on 24th January 2025, contract signing was on 23rd April 2025.
3.	Renovation and construction works for lecture block, goats' unit/ animal department.	127,287,560	51 working days for the Head, User Department to approve the procurement. Whereas the initiation was on 18th November 2024, the Head, User department signed the PP Form 5 on 30th January 2025.
4.	Supply and delivery of assorted equipment for BPL project.	127,805,900	8 working days delay at bid evaluation. Whereas bid opening was on 25th September 2024, evaluation was concluded on 21st October 2024.

S/No	Details of procurements	Contract Amount (UGX)	Period of delay
5.	Supply of laptops at Busitema main campus.	99,120,000	• 17 working days delay at bid evaluation. Whereas bid opening was on 5th January 2025, evaluation was concluded on 13th March 2025. • 18 working days delay at contract signing. Whereas the Best Evaluated Bidder Notice expired on 27th March 2025, contract signing was on 21st April 2025.
6.	Renovation of Laboratories and Washrooms at Kabwangasi Study Center.	84,000,000	128 working days delay by the Accounting Officer to approve the procurement. Whereas the procurement requirement was initiated by the user department and Head, User Department on 18th August 2024, the Accounting Officer approved the procurement on 18th February 2025.
7.	Renovation of the workshop of the ceiling boards and framing at Arapai Campus.	79,495,000	• 36 working days delay by the Procurement and Disposal Unit to submit procurement to Contracts Committee for consideration, the Accounting Officer approved the document on 17th December, 2024, submission to Contracts Committee was on 11th February 2025. • 13 working days delay to open bids, bids were received on 20th February 2025, bid opening was on 11th March 2025.
8.	Supply and delivery of assorted recess materials.	34,478,362	43 working days delay by the Contracts Committee to approve the procurement method, shortlist and Evaluation Committee. Whereas the Accounting Officer approved the procurement on 11th March, 2025, the Contracts Committee approved the procurement on 14th May 2025.
9.	Supply and delivery of street lights.	30,994,000	20 working days delay at bid evaluation. Whereas bid opening was on 28th January 2025, evaluation was concluded on 11th March 2025.
10.	Supply and Delivery of Assorted Medical Supplies/Human Drugs under Framework Contract.	27,654,000	• 30 working days delay at bid evaluation. Whereas bid opening was on 5th February 2025, evaluation was concluded on 2nd April 2025. • 57 working days delay at contract signing. The Contracts Committee award decision was on 14th May 2025,

S/No	Details of procurements	Contract Amount (UGX)	Period of delay
			contract signing was on 5th August 2025.
11.	Audit software for Internal Audit/automation of the audit process	19,998,711	25 working days delay to sign the contract. Whereas the Best Evaluated Bidder Notice expired on 18th April 2025, the contract was signed on 28th May 2025
Total		**957,258,086**	

Implications

- Delays in evaluation of bids or in making an award decision constitute offences under Section 129 (1) (f) of the PPDA Act, Cap 205 and may attract penalties against the responsible officers.
- Inefficiencies in the procurement process delay service delivery.

Management Response

Management noted the issues and recommendations therein and interventions including training of the different stakeholders will be done to ensure that they appreciate the dangers of delaying procurement.

Recommendations

1. The Accounting Officer should desist from approving requisition forms without statements of requirements in accordance with Regulations 3 (2) (a) of the PPDA (Rules and Methods for the Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023.
2. The Head, Procurement and Disposal Unit should;
    - Prepare bidding documents and submit them to the Contracts Committee in a timely manner, in accordance with Section 51 of the PPDA Act, Cap. 205.
    - Have bid opening done immediately after bid closing in accordance with Regulation 72 (3) of the PPDA (Rules and Methods for the Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023.
3. The Heads of User Departments should prepare statements of requirements and have procurement requirements approved in a timely manner, in accordance with Section 51 of the PPDA Act, Cap. 205.
4. The Contracts Committee should within ten working days issue a decision on any matter or request submitted by the Procurement and Disposal Unit in accordance with Regulation 7 (3) of the (PDE) Regulations, 2023.
5. Evaluation Committees should conduct timely evaluation in accordance with Regulation 4 (1) (a) (b) (c) and (d) of the PPDA (Evaluation) Regulation, 2023.

2.1.11 Insufficient Best Evaluated Bidder Notice display period

Regulation 3 (1) of the PPDA (Contracts) Regulations, 2023 requires a procuring and disposing entity after the award decision of the Contracts Committee to display a notice of best evaluated bidder on the notice board of the procuring and disposing entity for ten working days. The Authority found that in three procurements worth UGX 300,755,922, best evaluated bidder notices were displayed for an average of five working days. The procurements are indicated in Table 11 below:

Table 11: Procurements with insufficient best evaluated bidder display period

S/No	Details of procurements	Contract Amount (UGX)	Display period
1.	Procurement and delivery of Computers, Printer and Phones for SWEWT project.	138,990,000	Display was for only 6 working days, from 4th April 2025 to 11th April 2025.
2.	Renovation and construction work for lecture block, goats' unit, animal department	127,287,560	Display was for only 5 working days, from 5th April 2025 to 12th April 2025, it should be noted that 5th April was a weekend.
3.	Supply and delivery of assorted recess materials.	34,478,362	Display was for only 5 working days, from 23rd May 2025 to 29th May 2025.
Total/Average		**300,755,922**	

Implication
Displaying the Best Evaluated Bidder Notice for an insufficient period may deny the bidders opportunity to lodge complaints in the event that they are dissatisfied with the outcome of the evaluation process results.

Management Response
There was an oversight in computing the periods and improvements will be made in this regard.

Recommendation
The Head, Procurement and Disposal Unit should display the Best Evaluated Bidder Notices for ten working days as required under Regulation 3 (1) of the PPDA (Contracts) Regulations, 2023.

2.1.12 Low bidder invitation
Regulation 53 (1) of the PPDA (Rules and Methods for procurement of Supplies, Works and Non-Consultancy Services) Regulations), 2023 requires a shortlist to have at least six bidders, except for micro procurement which shall have three bidders. The Authority found that four firms were invited instead of the required minimum number of six in the procurement of hire of tents, chairs and mobile toilets for the 15th Graduation ceremony worth UGX 41,659,900.

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.

Authority's comment
Despite being afforded the opportunity, the Entity did not provide a response.

Recommendation
The Head, Procurement and Disposal should always invite a minimum of six bidders in accordance with Regulation 53 (1) of the PPDA (Rules and Methods for procurement of Supplies, Works and Non-Consultancy Services) Regulations), 2023.

2.1.13 Low bidder participation

Section 49 of the PPDA Act, Cap. 205 requires all procurements and disposals to be conducted in a manner that maximises competition and achieves value for money. The Authority found that the Entity had low bidder participation in 11 procurements worth UGX 1,011,133,986 with only 1.6 bids received on average. The low response rates might have been due to the inadequately drafted bidding documents and weaknesses market engagement practices by the Entity. Procurements with low bidder participation are indicated in Table 12 below:

Table 12: Procurements with low bidder participation

S/No	Details of procurements	Contract Amount (UGX)	Method used	Number of bidders who responded
1.	Supply and Installation of the high-end server at Busitema Main Campus.	198,325,154	RFQ	2
2.	Procurement and delivery of Computers, Printer and Phones for SWEWT project.	138,990,000	RFQ	2
3.	Renovation of the workshop structure and portioning of office space at Arapai campus.	128,099,399	RFQ	2
4.	Renovation and construction work for lecture block, goats' unit/ animal department.	127,287,560	RFQ	2
5.	Supply and delivery of assorted equipment for the BPL project.	127,805,900	RFQ	2
6.	Renovation of Laboratories and Washrooms at Kabwangasi Study Center.	84,000,000	RFQ	1
7.	Renovation of the workshop of the ceiling boards and framing at Arapai Campus.	79,495,000	RFQ	2
8.	Hire of tents, chairs and mobile toilets for the 15th Graduation ceremony	41,659,900	RFQ	1
9.	Supply and delivery of assorted recess materials.	34,478,362	RFQ	2
10.	Supply and delivery and installation of street lights at Arapai campus.	30,994,000	RFQ	1
11.	Procurement of Audit software for internal audit/automation of the audit process.	19,998,711	RFQ	1
Total/Average		**1,011,133,986**		1.6

Implication

Low bidder participation denies 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

While there are mechanisms afforded for all the bidders to comparatively participate in the process, the geographical location of the University is a challenge to many bidders.

Authority's comment

The Authority noted the Entity's response. Whereas geographical challenges are acknowledged, they do not constitute a sufficient basis for limited participation. The Entity is advised to leverage digital platforms and wider advertisement channels to ensure that all prospective bidders, regardless of location, are afforded a meaningful opportunity to participate in future procurements.

Recommendation

The Head of the Procurement and Disposal Unit should strengthen engagements with bidders to actively encourage their participation in the Entity's procurement and disposal processes to promote competitive bidding in accordance with Section 49 of the PPDA Act, Cap. 205. This can be achieved through conducting regular bidder sensitization workshops, transparent communication of procurement opportunities, timely publication of bidding documents, and the establishment of feedback mechanisms to address bidder concerns.

2.1.14 Poorly drafted contracts

Regulation 9 (1) of the PPDA (Contracts) Regulations, 2023 requires contracts to contain clear contract details. The Authority found that the Entity poorly drafted five contracts worth UGX 845,396,241. The deficiencies in some contracts included misalignment between the Special Conditions of Contract in the contracts and those in the issued bidding documents, unclear payment schedules, among others. This may be attributed to failure to exercise due diligence in reviewing the contract documents. The procurements are indicated in Table 13 below:

Table 13: Procurements with poorly drafted contracts

<table>
<tr><th>S/No</th><th>Procurement</th><th>Contract Amount (UGX)</th><th>Issues noted</th></tr>
<tr><td>1.</td><td>Renovation of the workshop of the ceiling boards and framing at Arapai Campus</td><td>79,495,000</td><td>Misalignment between the Special Conditions of Contract in the contract and those in the bidding document.
<table>
<tr><th>Contract</th><th>Bidding document</th></tr>
<tr><td>GCC 36.1 Contractor shall submit a program of works within 7 days of contract signing</td><td>GCC 27 Contractor shall submit a program of works within 3 days after contract signing</td></tr>
<tr><td>GCC 44.1 defects liability period shall be 180 days extendable for as long as the defects remain to be corrected</td><td>GCC 35.1 defects liability period is 6 months</td></tr>
<tr><td>GCC 48.1 proportion of payments retained will be 5%</td><td>GCC 48.1 proportion of payments retained will be 0%</td></tr>
</table></td></tr>
</table>

<table>
<tr><th>S/No</th><th>Procurement</th><th>Contract Amount (UGX)</th><th>Issues noted</th></tr>
<tr><td>2.</td><td>Construction of 3 level teaching facility at Pallisa Campus</td><td>518,683,131</td><td>Misalignment between the Special Conditions of Contract in the Contract and those in the bidding document
<table>
<tr><th>Contract</th><th>Bidding document</th></tr>
<tr><td>GCC 22.1 intended completion date-within 6 months from start date</td><td>Intended completion (GCC22.1) within 4 months</td></tr>
<tr><td>GCC 36.3 period between program updates 28 days</td><td>Period between program updates 30 days</td></tr>
<tr><td>defects liability period shall be 6 months extendable for as long as the defects keep re-occurring</td><td>defects liability period of 365 days from the date of contract completion</td></tr>
</table></td></tr>
<tr><td>3.</td><td>Renovation of the workshop structure and portioning of office space at Arapai campus</td><td>128,099,399</td><td>Misalignment between the Special Conditions of Contract in the Contract and those in the bidding document.
<table>
<tr><th>Contract</th><th>Bidding document</th></tr>
<tr><td>GCC 36.3states the period between program updates is 30days</td><td>GCC 27 states no program updates shall be required</td></tr>
<tr><td>GCC48.1 of the special conditions of a contract states proportion of payments retained is 5%</td><td>48.1 states 0% proportion of any payments shall be retained</td></tr>
</table></td></tr>
<tr><td>4.</td><td>Supply of laptops at Busitema main campus</td><td>99,120,000</td><td>Misalignment between the Special Condition of Contract in the Contract and that in the bidding document.
<table>
<tr><th>Contract</th><th>Bidding document</th></tr>
<tr><td>GCC18.1states a performance security shall not be required</td><td>GCC19.1 states that a performance security shall be required (10%) of the contract value</td></tr>
</table></td></tr>
<tr><td>5.</td><td>Audit software for internal audit/automation</td><td>19,998,711</td><td>Unclear payment schedule, captured as lumpsum under GCC 22.3
Failure to include liquidated damages under GCC 18.1 yet they were provided for in the bidding document as 0.5 % per week.</td></tr>
</table>

S/No	Procurement	Contract Amount (UGX)	Issues noted
	of the audit process.		
Total		**845,396,241**	

Implication
Lack of clear information in the contract may result into unnecessary conflicts between the service provider and the Entity, which may ultimately lead to litigation.

Management Response
Management noted these errors and going forward the Legal Officer shall review all contracts prior to their issue.

Recommendation
The Head, Procurement and Disposal Unit should verify that contracts contain clear contract details in accordance to Regulation 9 (1) of the PPDA (Contracts) Regulations, 2023.

2.1.15 Missing documents
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. The Authority found missing documents in six procurements worth UGX 1,514,859,516 shown in Table 14 below:

Table 14: Procurements with missing documents

No.	Subject of Procurement	Contract Value (UGX)	Missing documents
1.	Design and Building of Auditorium at Nagongera Campus	1,117,577,000	• Initiation form • Bidding document • Bid from National Housing and Construction Co Ltd • Approved design by the contractor • Drawings • Bills of quantities • Contract
2.	Supply and Installation of the high-end server at Busitema Main Campus	198,325,154	• PP Form Part II • Best Evaluated Bidder Notice • PP Form 8
3.	Renovation of Laboratories and Washrooms at Kabwangasi Study Center.	84,000,000	• PP Form Part II • Best Evaluated Bidder Notice
4.	Repair of Arapai Bus	49,485,000	• Failure to attach specifications at initiation. • PP form 5 part II • Best Evaluated Bidder Notice • Contract

No.	Subject of Procurement	Contract Value (UGX)	Missing documents
5.	Supply and delivery and installation of street lights at Arapai campus	30,994,000	Contract document
6.	Supply and delivery of assorted recess materials	34,478,362	Contract document
Total		**1,514,859,516**	

Implications

- Failure to provide information or produce requested documents, records, or reports constitutes an offence under Section 129 (1) (a) of the PPDA Act, Cap. 205 and may attract penalties.
- Missing procurement records limit transparency, accountability, and negatively affect the audit trail in the procurement process and raises concerns regarding the transparent and competitive utilisation of public resources.

Management Response

Most of these documents were disintegrated with different stakeholders, however the documents have been retrieved back and are available for the audit team to verify.

Authority's comment

The Authority noted the Entity's response; however, out of all the missing documents, only the site inspection report for the procurement of the auditorium design and construction at Nagongera Campus was availed. No other documents were presented for verification as claimed by the Entity.

Recommendations

1. The Accounting Officer should institute an investigation into the absence of procurement records and hold responsible officers accountable where negligence is established.
2. The Head Procurement and Disposal Unit should maintain procurement and disposal records and reports on their respective action files in accordance with Section 33 (o) of the PPDA Act, Cap. 205.
3. The Heads of User Departments should task all Contract managers to submit progress reports/contract management reports and all contract implementation documentation in accordance with Regulation 52 (3) (a) (vii) of the PPDA (Contracts) Regulations 2023.

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

2.2.1 Brief on disposal

On 23rd May 2024, the University Secretary, Busitema University, wrote to the Ministry of Works and Transport requesting technical services from the Office of the Chief Mechanical Engineer for the inspection and boarding off of obsolete assets.

Following this request, the Adhoc Board of Survey Committee, constituted by Busitema University and chaired by Mrs. Erumbi Juliet, Principal Accountant, convened on 25th March 2025 and conducted a physical inspection of assets recommended for boarding off

The inspection identified several categories of assets recommended for disposal, including six (6) motor vehicles, one (1) motor cycle, one (1) tractor, workshop machines, ICT equipment, assorted vehicle tyres, and various other obsolete items spread across the University's campuses.

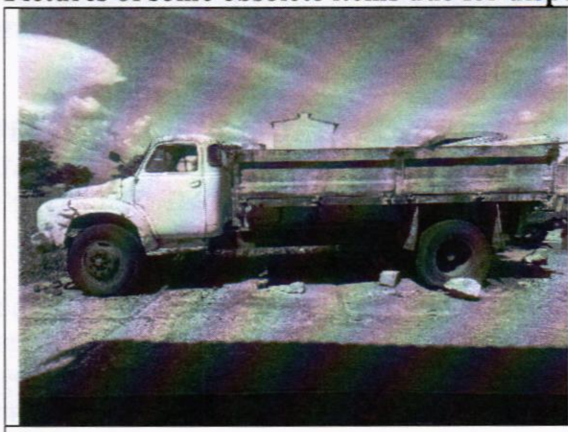
At the time of audit, the Board of Survey report had been duly completed and signed, reserve prices had been established, and the Entity had taken the necessary preliminary steps toward disposal. The process was therefore at an advanced preparatory stage, with formal disposal proceedings yet to be concluded.

The board of survey report recommended several items for disposal including motor vehicles, motor cycles, laptops, among other items. Some items due for disposal are indicated in Table 15 below:

Table 15: List of obsolete items recommended for disposal

S/No	Item	Engraved Code/ Reg. No.
1.	Pick up-Ford ranger	UAJ 325X
2.	Pickup Isuzu D-Max	UG 1781E
3.	Tipper lorry-Bedford	UG 0568E
4.	Fiat Saloon	20S-364147
5.	Mini bus	N/A
6.	Tractor head	N/A
7.	Deutz agricultural tractor	N/A
8.	Honda motor cycle	UG 0085E
9.	Nissan Uravan micro bus	UG 0170E
10.	Ford ranger pickup D/C	UAR 038Y
11.	Renault sonalika Solis tractor	UG 1739E
12.	Transmission assembly for old tractor	N/A
13.	Toyota pickup D/Cabin	N/A
14.	Bedford lorry scrap	N/A
15.	Bedford bucket lorry scrap	N/A
16.	Scrap fuel pump	N/A
17.	Scrap fuel pump tokheim	N/A
18.	3 Gas cylinders-355Kgs	N/A
19.	Fiat Iveco bus	UG 0532E
20.	Television 40 LG 43LM6370PVA	N/A
21.	Television 40 LED TV Euro ken	N/A
22.	Laptop hp Intel inside	N/A
23.	Laptop hp	N/A
24.	Assorted vehicle tyres	N/A
25.	Printer hp LaserJet P2055d	N/A
26.	Scanner hp desk jet 2050	N/A
27.	Photocopier canon R2270	N/A
28.	Monitors (35)	N/A
29.	Printers (2)	N/A
30.	Fan standalone	N/A
31.	Water dispenser	N/A

Pictures of some obsolete items due for disposal as of 14th May 2026

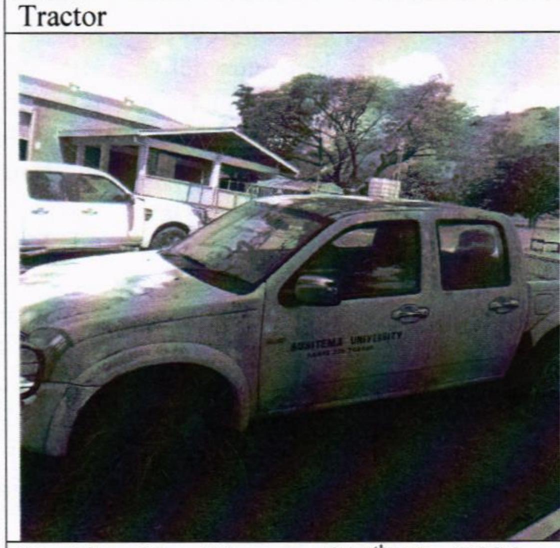


Lorry

Mini-van

Tractor

Double cabin pickup



Double cabin pickup as of 14th May 2026

Assorted vehicle tyres as of 14th May 2026

Recommendation

Given that the Board of Survey report had identified and recommended assets for disposal, the Entity should expedite the disposal process without further delay. The relevant User Departments, or the department responsible for the management of public assets, should formally initiate the disposal process by submitting a request for disposal to the Accounting Officer in accordance with Regulation 3 (2) of the PPDA (Disposal of Public Assets) Regulations, 2023.

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 Weak contract management

Regulation 52 of the PPDA (Contracts) Regulations, 2023 requires contract managers to fully handle all their responsibilities. The Authority noted that there were deficiencies in contract management in ten procurements worth UGX 3,016,312,696. This was evidenced by the absence of contract implementation plans, program of works, monthly reports, delayed contract execution among others. These weaknesses undermine effective oversight and may compromise the achievement of value for money by limiting the ability of the Entity to monitor contractor performance, track deliverables, and enforce contractual obligations. This weakness was due to a knowledge gap by Contract Managers about their responsibilities and laxity in contract monitoring by the Procurement and Disposal Unit. The procurements are indicated in Table 16 below:

Table 16: Weak contract management

S/No.	Subject of Procurement	Contract Amount (UGX)	Issues at contract management
1.	Supply of battery equipment and standard material for the MESIC project	1,101,324,985	• Delayed submission of advance payment guarantee by the contractor, the contract was signed on 28th April 2025, the Advance Payment Guarantee was submitted on 24th July 2025. • Delayed delivery of items under Lot 1. Delivery was to be effected by 24th July 2025, however, at the time of audit on 23rd April 2026, no delivery had been effected. • Delayed delivery of items under Lot 2 and 3, whereas delivery was effected on 8th December 2025, it should have been effected on 24th July 2025.
2.	Construction of 3 level teaching facility at Pallisa Campus.	518,683,131	• Lacked contract implementation plan • Lacked program of works • Unexplained of UGX 82,000,000 for construction supervision
3.	Medical insurance services	499,194,625	Lacked monthly reports for the running duration of the contract.

S/No.	Subject of Procurement	Contract Amount (UGX)	Issues at contract management
4.	Supply and Installation of the high-end server at Busitema Main Campus.	198,325,154	Lacked Contract Management Plan
5.	Completion of the main gate at Arapai Campus.	179,185,628	No evidence for submission of program of works by the contractor as this was required in the SCC under GCC 36.1, Furthermore, no evidence for submission of the program updates to the Entity as this was required in the SCC under GCC 36.3
6.	Additional works for the Technology, Business& Innovations Incubation Center (TBIIC) at Busitema Campus.	148,511,063	• Lacked contract management plan • Lacked program of works as required under GCC 36.3 • Failure to withhold UGX 1,000,000 for failure to submit program updates as per GCC 36.1
7.	Procurement and delivery of Computers, Printer and Phones for SWEWT project.	138,990,000	Lacked contract management plan
8.	Renovation of the workshop structure and portioning of office space at Arapai campus.	128,099,399	• Lacked contract management plan. • Lacked program of works from the contractor as required under GCC 36.3
9.	Renovation of Laboratories and Washrooms at Kabwangasi Study Center.	84,000,000	• Lacked contract management plan. • Delayed contract start by Bulobi Engineering & Construction Co. Ltd. GCC 1.1(ee) in the Special Conditions of Contract stated that the contract start date shall be 7 days after contract signing, the Contract was signed on 11th April 2025, contract execution should have started by 21st April 2025, however, the Contract Manager report indicated that the Contractor reported on site on 5th May 2025 implying an 8-day delay in contract implementation. • Failure to submit program of works by the Contractor. GCC

S/No.	Subject of Procurement	Contract Amount (UGX)	Issues at contract management
			36.1 required the contractor to submit a program of works within 7 days of contract signature, however there was no evidence of submission of the program of works. • Failure to withhold UGX 1,000,000 for late submission of the updated program of works as per GCC 36.3. • Lacked site inspection reports as required under GCC 2.1
10.	Procurement of Audit software for internal audit/automation of the audit process.	19,998,711	Lacked contract management reports
	Total	**3,016,312,696**	

Implication
Weakness in contract management lead to under performance of contracts by service providers by limiting the ability of the Entity to monitor contractor performance, track deliverables, and enforce contractual obligations.

Management Response

- *The contract management plans, work programs and other related contract documents are usually kept by the contract management teams however, they have been advised to always file copies with the procurement unit.*
- *A communication has been raised to the contractor to give a clear justification for the figure of UGX 82,000,000.*

Authority's comment
The Authority noted the Entity's response, however;

- Regarding the contract management plans, work programs, and other related contract documents, none of these documents was submitted to the Authority for verification.
- Regarding the UGX 82,000,000 supervision fees, no accountability was availed to the Authority for verification. Important to note is that the supervision fee requirement was introduced by the Entity and not the contractor and as such the Contract Management Team should be able to account for the supervision fees. The Entity should therefore be in position to provide this accountability without recourse to the contractor.

Recommendations
The Accounting Officer should:

1. Task Contract Managers to perform their roles and responsibilities as provided for in Regulation 52 of the PPDA (Contracts) Regulations, 2023.
2. Task the Contract Management Team to provide accountability for UGX 82,000,000 supervisory fees in the procurement of Construction of 3 level teaching facility at Pallisa Campus worth UGX 518,683,131.

2.3.2 Failure to incorporate provisions regarding Environment, Social, Health and Safety issues in the statement of requirements

Regulation 34 (5) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023 states that *'a statement of requirements, shall where applicable, be environmentally and socially responsive.'* The Authority found that in three procurements worth UGX 286,899,299, ESHS aspects were not stated in the bidding documents. The procurements are indicated in Table 17 below:

Table 17: Procurements that lacked ESHS aspects in the bidding document.

No.	Subject of Procurement	Contract Amount (UGX)
1.	Renovation of the workshop structure and portioning of office space at Arapai campus	128,099,399
2.	Supply and delivery of assorted equipment for BPL project	127,805,900
3.	Supply and delivery and installation of street lights at Arapai campus	30,994,000
Total		**286,899,299**

Implications

- Failure to incorporate environmental, social, health, and safety requirements in bidding documents and subsequent contracts exposes the Entity to the risk of environmental degradation, occupational health hazards, and threats to public safety.
- The absence of such provisions may result in delays in contract implementation, as contractors may be required to halt works or deliveries to address ESHS concerns that were not considered at the time of contracting.

Management Response

Management takes note of the recommendation and hopes to improve

Recommendation

The Accounting Officer should task Heads of User Departments to prepare statements of requirements that are inclusive of ESHS aspects in accordance with Regulation 34 (5) of the PPDA (Rules and Methods for Procurement of Supplies, Works and Non-Consultancy Services) Regulations, 2023.

CHAPTER THREE: OVERVIEW OF THE PERFORMANCE OF THE ENTITY

3.1 Overall Audit Conclusion

The performance of Busitema University for the Financial Year 2024/25 was moderately satisfactory with an overall weighted average risk rating of **85.6%**

3.2 Entity's Performance

The risk rating was weighted to determine the overall risk level of the Entity. The weighting was derived using the average weighted index as shown in Table 18 below:

Table 18: Summary of performance of Busitema University

Risk Category	Number of Sampled Procurements	% No	Value (UGX)	% Value	Weights	Total weighted average	
						By No.	By Value
High	16	76	3,171,384,054	67	0.6	45.7	40.1
Medium	5	24	1,566,786,884	33	0.3	7.14	9.9
Low	0	0	0	0	0.1	0	0
Satisfactory	0	0	0	0	0	0	0
Total	21	100	4,738,170,938	100	1	52.8	50

Weighted Average (By no.) = $\frac{\sum \text{Weighted Score}}{60} \times 100 = \frac{52.8}{60} \times 100 = 88\%$

Weighted Average (By Value) = $\frac{\sum \text{Weighted Score}}{60} \times 100 = \frac{50}{60} \times 100 = 83.3\%$

The average weighted risk rating = $\frac{88 + 83.3}{2}$ = **85.6%**

Table 19: The risk rating

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

3.3 Chart representation of risk rating

Figure 1: Chart performance by value of contracts

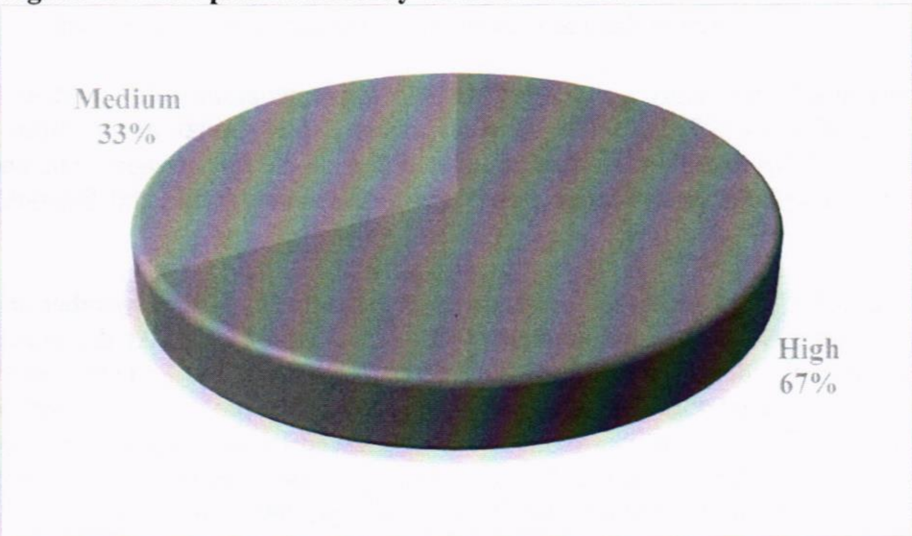
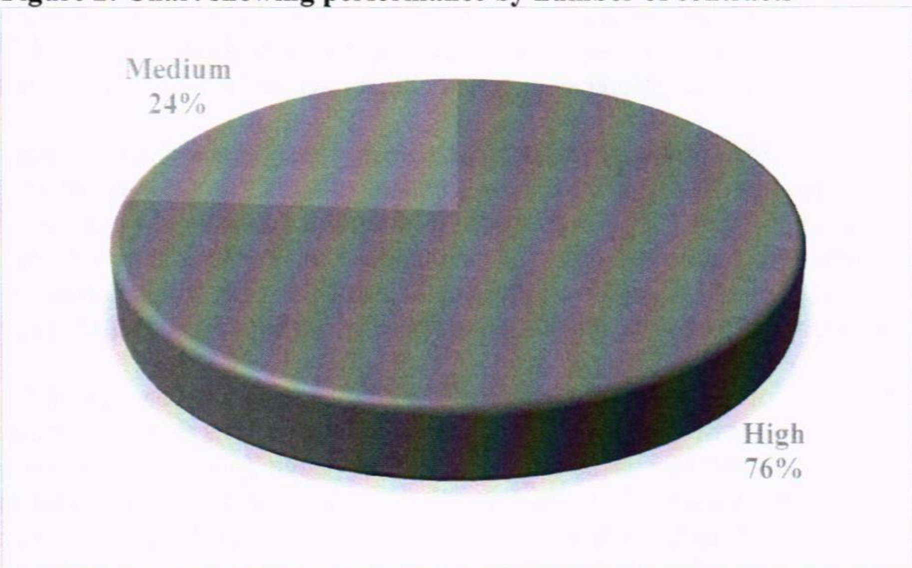


Figure 2: Chart showing performance by number of contracts



3.4 Auditor's opinion/Conclusion

The audit of Busitema University's procurement and disposal function for the Financial Year 2024/2025 revealed systemic weaknesses across all key stages of the procurement cycle, pointing to a procurement function that requires significant operational improvement.

At the planning stage, the Entity's procurement plan implementation rate stood at 65%, reflecting a gap of UGX 3,715,279,091 between planned and actual expenditure. Five procurements worth UGX 502,589,616 were conducted outside the procurement plan, and the plan was developed without incorporating provisions for Women, Youth, and Persons with Disabilities.

Bid opening was conducted without the presence of a Contracts Committee member or User Department representative in one procurement worth UGX 518,683,131. At the evaluation stage, irregularities were identified in two procurements worth UGX 182,345,000, where the evaluation criteria got altered during the evaluation process. In three procurements worth UGX 300,755,922 the Best Evaluated Bidder Notices were displayed for less than the required ten working days. These irregularities expose the procurement process to the risk of non-compliant contract awards and deny bidders the opportunity to lodge legitimate complaints.

At contract management, deficiencies were noted in ten procurements worth UGX 3,016,312,696, evidenced by the absence of contract implementation plans, programs of works, and monthly monitoring reports. These weaknesses collectively limit the Entity's ability to monitor contractor performance, enforce contractual obligations, and ensure value for money.

Of critical concern were the missing procurement documents in six procurements worth UGX 1,514,859,516. The absence of procurement records not only undermines the integrity and audit trail of the procurement process but also raises serious questions regarding the transparent and competitive utilisation of public resources. It is important to note that failure to produce requested documents, records, or reports upon demand constitutes an offence under Section 129 (1) (a) of the PPDA Act, Cap. 205 and may attract penalties against the responsible officers.

Overall, performance of Busitema University for the Financial Year 2024/25 was **Unsatisfactory** with overall weighted average risk rating of **85.6%.** The findings indicate that the Entity's procurement function is undermined by knowledge gaps among procurement stakeholders, laxity in the exercise of due diligence, insufficient internal oversight mechanisms and possible internal interferences evidenced by delays at various stages of the procurement process that cannot be entirely attributed to procedural or capacity related factors. Such interferences, if not addressed, pose a significant threat to the independence, integrity, and credibility of the procurement function, and may expose the Entity to the risk of irregular and non-transparent procurement outcomes.

3.5 Recommended Action Plan

Busitema University should implement the following recommendations in Table 20 within the timeframe given in order to improve its performance in Procurement and Disposal.

Table 20: Recommended Action plan

Finding	Recommended Action	Responsible officer	Timeline
Failure to fully implement 80% of the previous audit recommendations	Establish and appoint a dedicated task force to effectively monitor and implement all audit recommendations. The task force should develop a suitable workplan to systematically implement all the Authority's recommendations	Accounting Officer	Within 30 days
Failure to fully implement the procurement plan Procuring outside the procurement plan	Together with the Head, Procurement and Disposal Unit, upon updating the procurement plan, promptly notify the Secretary to the Treasury and the Authority of all changes made	Accounting Officer	Quarterly
Failure to reserve to reserve procurements for Women, Youth and PWDs	Develop a list of Special interest group providers and preserve at least 15% of the entity's procurements for these groups	Head PDU	Within 90 days
Misreporting of procurements	Exercise due diligence while reporting monthly procurements	Head, PDU	Immediate
Irregularities at bid evaluation	Task the Chairpersons of the Evaluation Committees to explain why the evaluation criteria was changed during evaluation in the procurement of Supply and delivery of assorted equipment for the BPL project at Nagongera Campus and in the procurement of Renovation of the workshop of the ceiling boards and framing at Arapai Campus	Accounting Officer	Within 30 days
	Strictly adhere to the criteria set out in the bidding document in accordance with Section 76 (3) of the PPDA Act, Cap. 205 and	Evaluation Committee	Immediate
	Conduct timely evaluation in accordance with Regulation 4 (1) (a) (b) (c) and (d) of the PPDA (Evaluation) Regulation, 2023		Immediate
Inefficiencies in the procurement process	Have all procurements conducted in a manner which	Accounting Officer	Immediate

	promotes economy, efficiency and value for money		
	Within ten working days issue a decision on any matter or request submitted by the Procurement and Disposal Unit	Contracts Committee	Immediate
	Conduct timely evaluation	Evaluation Committees	Immediate
	Always maintain procurement and disposal records and reports on their respective action files in accordance with Section 33 (o) of the PPDA Act, Cap. 205.	Head, PDU	Immediate
	Task all Contract managers to submit progress reports/contract management reports and all contract implementation documentation	Heads of User Departments	
Weak contract management	Task Contract Managers to perform their roles and responsibilities	Accounting Officer	Within 30 days
	Task the Contract Management Team to provide accountability for UGX 82,000,000 supervisory fees in the procurement of Construction of 3 level teaching facility at Pallisa Campus worth UGX 518,683,131	Accounting Officer	Within 30 days
Failure to have provisions regarding Environment, Social, Health and Safety issues in the statement of requirements	Task Heads of User Departments to prepare statements of requirements that are inclusive of ESHS aspects.	Accounting Officer	Immediate

ANNEXES

Annex 1: RISK RATING PER CASE

No	HIGH RISK CONTRACTS	REASONS FOR HIGH RISK
1.	**Subject:** Design and build of Auditorium & laboratory block at Nagongera campus **Ref. No:** Bu/Wrks/2024-2025/00250 **Method:** Direct **Contractor:** National Housing and Constructions Co Ltd **Value**: UGX 1,117,577,000	• Missing records (such as the initiation form and the contract) • Weak Contract Management (lacked contract management reports)
2.	Subject: Construction of 3-level teaching facility at Pallisa Campus Ref. No: Bu/Wrks/2024-2025/00364 **Contractor**: Build Luuka Initiatives (U) Ltd **Method RFQ** **Value:** 518,683,131	• Opening of bids without representation of the Contracts Committee or User Department • Inadequately drafted bidding documents • Poorly drafted contract • Weak contract Management
3.	**Subject:** Provision of Medical insurance services to the University staff **Ref. No** Bu/Ncons/24-2025/00255 **Contractor**: UAP Old Mutual Insurance (U) Ltd **Method: Direct** Value: UGX 449,194,625	• Inadequately drafted bidding document • Weak contract management • Extension of an expired contract
4.	**Subject**: Supply and installation of high-end server to Busitema campus **Ref. No**: Bu/Supls/2024-2025/00267 **Method**: RFQ **Value**: UGX 198,325,154 **Contractor**: Ayebale Tech Company Limited	• Misreporting • Outside the procurement plan • Inadequately drafted bidding document • Delays at different stages • Low bidder participation • Missing documents • Weak contract management
5.	**Subject**: Additional external works at TBIIC, Busitema campus **Ref No**. Bu/Wrks/2024-2025/00156 **Method:** Direct **Contractor**: Bresco Consulting & Constructing Services Ltd **Value:** UGX 148,511,063	• Outside the procurement plan • Weak contract management
6.	**Subject:** Renovation of workshop structures and partitioning of office space at Arapai Campus **Ref. No**: Bu/Wrks/2024-2025/00249 **Method: RFQ** **Contractor**: Joda Contractors Ltd **Value:** UGX 128,099,399	• Outside the procurement plan • Delays • Low bidder participation • Poorly drafted contracts • Weak contract management • Lacked ESHS aspects in the bidding document.
7.	Subject: Supply and delivery of assorted equipment for the BPL project at Nagongera Campus Ref. No. Bu/Supls/2024-2025/00041 Method: RFQ Contractor: Chemmart (U) Ltd Value: UGX 127,805,900	• Inaccurate reporting • Irregularities at bid evaluation • Delays • Low bidder participation • Lacked ESHS aspects in the bidding document

No	HIGH RISK CONTRACTS	REASONS FOR HIGH RISK
8.	**Subject:** Supply and delivery of 21 laptops for council members, one laptop and three desktop computers for Maritime **Ref No:** Bu/Supls/2024-2025/00218 **Method**: ODB **Contractor**: Baga Tech Co. Ltd **Value**: UGX 99,120,000	• Delays at bid evaluation and contract signing. • Poorly drafted contract
9.	**Subject:** Renovation of laboratories and wash rooms at Kabwangasi study centre **Ref No:** Bu/Wrks/2024-2025/00334 **Method**: RFQ **Contractor**: Bulobi Engineering and Construction Co. Ltd **Value**: UGX 84,000,000	• Delays • Low bidder participation • Missing documents • Weak contract management
10.	**Subject**: Renovation of workshop of the ceiling boards and framing at Arapai campus **Ref No**: Bu/wrks/2024-2025/00289R **Method**: RFQ **Value**: UGX 79,495,000 **Contractor**: Sajjo General Stores Ltd	• Irregularities at bid evaluation • Inadequately drafted bidding document • Delays • Low bidder participation • Irregularities at bid evaluation • Poorly drafted contract
11.	**Subject**: Repair of Arapai Campus bus **Ref. No**: Bu/Ncons/24-2025/00282 **Method**: RFQ **Contractor**: Medsim Tec Limited Value: UGX 49,485,000	• Lacked statement of requirements at initiation • Missing documents
12.	**Subject:** Hire of tents, chairs and PA system for the 15th graduation ceremony **Ref. No**: Bu/Ncons/2024-2025/00107 **Method:** RFQ **Contractor**: Fotogenix Ltd **Value**: UGX 41,659,900	• Low bidder invitation • Low bidder participation • Lacked a contract
13.	**Subject:** supply and delivery of graduation booklets, transcripts, certificates and jackets for the 15th graduation ceremony **Ref. No**: Bu/Supls/2024-2025/00115/116 **Method**: Direct **Contractor:** Uganda Printing and Publishing Corporation **Value:** UGX 36,301,520	• Lacked specifications at initiation • Inadequately drafted bidding document which lacked adequate specifications
14.	**Ref. No:** Bu/Supls/2024-2025/00248 **Subject**: Supply and delivery of street lights at Arapai Campus **Method**: RFQ **Contractor**: Ayebale Tech Co. Ltd **Value:** UGX 30,994,000	• Delays • Low bidder participation • Missing contract document • Bidding document lacked ESHS aspects

No	MEDIUM RISK CONTRACTS	REASONS FOR MEDIUM RISK
15.	**Subject**: Supply, Delivery and installation of assorted equipment and standard materials for MESIC Project **Ref. No**: Bu/Supls/2024-2025/00265	• Inadequately drafted bidding document • Low bidder participation

No	MEDIUM RISK CONTRACTS	REASONS FOR MEDIUM RISK
	Method: Open Domestic Bidding **Contractor:** Techford Contractors & Supplies Ltd **Value:** UGX 1,101,324,985	• Weaknesses in contract management
16.	**Subject**: Completion of the main gate at Arapai Campus **Ref. No**: Bu/Wrks/2024-2025/00370 **Contractor**: Bresco Consulting & Constructing Services Ltd **Method** RFQ **Value**: UGX 179,185,628	Weak contract management
17.	**Subject**: supply and delivery of computers, printers, and smart phones for space science project at Nagongera campus **Ref. No**: Bu/Supls/2024-2025/0029 **Method:** RFQ **Contractor:** PC World Computers Ltd **Value** UGX 138,990,000	• Inaccurate reporting • Insufficient Best Evaluated Bidder Notice display period • Low bidder participation • Weak contract management
18.	**Subject**: Renovation of lecture block, store unit/Construction of modern goats' unit at Arapai Campus **Ref No.** Bu/Wrks/2024-2025/00296/0297 & 0298 **Method:** RFQ **Contractor**: Merkunder Holdings Ltd **Value:** UGX 127,287,560	• Delays • Insufficient Best Evaluated Bidder Notice display period • Low bidder participation
19.	**Subject:** Supply and delivery of assorted recess materials for year one students of AMI, MEB, WAR, PTI, APE, DAGE& DGI **Ref. No**: Bu/Supls/2024-2025/00407 **Method**: RFQ **Contractor**: Phinen investments (U) Ltd **Value**: UGX 34,478,362	• Inadequacies in the bidding document • Delays • Insufficient best evaluated bidder display period
20.	**Subject** Supply and delivery of assorted human drugs **Ref. No** Bu/Supls/2024-2025/00057 **Method**: Open Bidding/FW **Contractor**: Main pharmacy Ltd **Value:** UGX 27,654,000	• Outside the procurement plan • Failure to issue call off order(s) • Delays
21.	**Subject:** Audit software for Internal Audit **Ref. No:** Bu/Ncons/2024-2025/00027 **Method:** RFQ **Contractor** KPMG **Value:** UGX 19,998,711	• Lacked contract Management reports • Poorly drafted contract • Low bidder participation

Annex 2: Transaction list and rating per case

No.	Reference Number	Subject of Procurement	Method of Procurement	Provider	Contract Amount (UGX)	Risk rating
1.	Bu/Wrks/2024-2025/00250	Design and build of Auditorium & laboratory block at Nagongera campus	Direct	National Housing and Construction Company	1,117,577,000	H
2.	Bu/Supls/2024-2025/00265	Supply, Delivery and installation of assorted equipment and standard materials for MESIC Project	ODB	Techford Contractors & Supplies Ltd	1,101,324,985	M
3.	Bu/Wrks/2024-2025/00364	Construction of 3-level teaching facility at Pallisa Campus	RFQ	Build Luuka Initiatives (U) Ltd	518,683,131	H
4.	Bu/Ncons/24-2025/00255	Provision of Medical insurance services to the University staff	Direct	UAP Old Mutual Insurance (U) Ltd	449,194,625	H
5.	Bu/Supls/2024-2025/00267	Supply and installation of high-end server to Busitema campus	RFQ	Ayebale Tech Company Limited	198,325,154	H
6.	Bu/Wrks/2024-2025/00370	Completion of the main gate at Arapai Campus	RFQ	Bresco Consulting & Constructing Services Ltd	179,185,628	M
7.	Bu/Wrks/2024-2025/00156	Additional external works at TBIIC, Busitema campus	Direct	Bresco Consulting & Constructing Services Ltd	148,511,063	H
8.	Bu/Supls/2024-2025/0029	Supply and delivery of computers, printers, and smart phones for space science project at Nagongera campus	RFQ	PC-World Computers Ltd	138,990,000	M
9.	Bu/Wrks/2024-2025/00249	Rennovation of workshop structures and partitioning of office space at Arapai Campus	RFQ	Joda Contractors Ltd	128,099,399	H
10.	Bu/Wrks/2024-2025/00296/0297 & 0298	Renovation of lecture block, store unit/Construction of modern goats' unit at Arapai Campus	RFQ	Merkunder Holdings Ltd	127,287,560	M

No.	Reference Number	Subject of Procurement	Method of Procurement	Provider	Contract Amount (UGX)	Risk rating
11.	Bu/Supls/2024-2025/00041	Supply and delivery of assorted equipment for the BPL project at Nagongera Campus	RFQ	Chemmart (U) Ltd	127,805,900	H
12.	Bu/Supls/2024-2025/00218	Supply and delivery of 21 laptops for council members, one laptop and three desktop computers for Maritime	ODB	Baga Tech Co. Ltd	99,120,000	H
13.	Bu/Wrks/2024-2025/00334	Renovation of laboratories and wash rooms at Kabwangasi study centre	RFQ	Bulobi Engineering and Construction Co. Ltd	84,000,000	H
14.	Bu/wrks/2024-2025/00289R	Renovation of workshop of the ceiling boards and framing at Arapai campus	RFQ	Sajjo General Stores Ltd	79,495,000	H
15.	Bu/Ncons/24-2025/00282	Repair of Arapai Campus bus	RFQ	Medsim Tec Limited	49,485,000	H
16.	Bu/Ncons/2024-2025/00107	Hire of tents, chairs and PA system for the 15th graduation ceremony	RFQ	Fotogenix Ltd	41,659,900	H
17.	Bu/Supls/2024-2025/00115/116	supply and delivery of graduation booklets, transcripts, certificates and jackets for the 15th graduation ceremony	Direct	Uganda Printing and Publishing Corporation	36,301,520	H
18.	Bu/Supls/2024-2025/00248	Supply and delivery of street lights at Arapai Campus	RFQ	Ayebale Tech Company Limited	30,994,000	H
19.	Bu/Supls/2024-2025/00407	Supply and delivery of assorted recess materials for year one students of AMI, MEB, WAR, PTI, APE, DAGE& DGI	RFQ	Phinen investments (U) Ltd	34,478,362	H
20.	Bu/Supls/2024-2025/00057	Supply and delivery of assorted human drugs	Open Bidding/FW	Main Pharmacy Ltd	27,654,000	H
21.	Bu/Ncons/2024-2025/00027	Audit software for Internal Audit	Direct	KPMG	19,998,711	M
				Total	**4,738,170,938**	

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 risk for the regulatory system or the entity's reputation. Such cases warrant immediate attention by senior management. Significant deviations from established policies and principles and/or generally accepted industry standards will normally be rated "high".	**Planning:** Lack of or failure to procure within the approved plan	This implies emergencies and use of the direct procurement method which affects competition and value for money.
		Bidding Process: Use of wrong/inappropriate procurement methods, failure to seek Contracts Committee approvals and usurping the powers of the PDU.	This implies use of less competitive methods which affects transparency, accountability and value for money.
		Evaluation: Use of inappropriate evaluation methodologies or failure to conduct evaluation.	This implies financial loss caused by awarding contracts at higher prices or shoddy work caused by failure to recommend award to a responsive bidder.
		Record Keeping: Missing procurement files and missing key records on the files namely; solicitation document, submitted bids, evaluation report and contract.	This implies that one cannot ascertain the audit trail namely; whether there was competition and fairness in the procurement process.
		Fraud/forgery: Falsification of Documents	This implies lack of transparency and value for money.
		Contract Management: Payment for shoddy work or work not delivered.	This implies financial loss since there has been no value for money for the funds spent and the services have not been received by the intended beneficiaries
MEDIUM	Procurements that were considered to have weaknesses which, although less likely to lead to material financial loss or to risk damaging the regulatory system or the entity's reputation, warrant timely management action using the existing	**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	This implies lack of efficiency, standardisation and avoiding competition.

RISK	DESCRIPTION	AREA	IMPLICATION
	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.	issue and receipts of bids, usage of non-pre-qualified firms and splitting procurement requirements.	
		Procurement Structures: Lack of procurement structures	This implies lack of independence of functions and powers and interference in the procurement process.
		Record Keeping: Missing Contracts Committee records and incomplete contract management records.	This implies that one cannot ascertain the audit trail namely; whether the necessary approvals were obtained in a procurement process.
		Contract and Contract Management: Failure to appoint Contract Supervisors, failure to seek the Solicitor General's approval for contracts above UGX. 200 million and lack of notices of Best Evaluated Bidders.	This leads to unjustified contract amendment and variations which lead to unjustified delayed contract completion and lack of value for money. Bidders are not given the right of appeal.
		Failure by the Entity to incorporate in the solicitation document aspects of gender, social inclusion, environment, health and safety. Aspects of gender, social inclusion, environment, health and safety not covered by the contractor during contract implementation.	
LOW	Procurements with weaknesses where resolution within the normal management framework is considered desirable to improve efficiency or to ensure that the business matches	**Planning:** Lack of procurement reference numbers.	This leads to failure to track the procurements which leads to poor record keeping.
		Bidding Process: Not signing the Ethical Code of Conduct	This leads to failure to declare conflict of interest and lack of transparency.

RISK	DESCRIPTION	AREA	IMPLICATION
	current market best practice. Deviations from laid down detailed procedures would normally be graded "low" provided that there is sufficient evidence of management action to put in place and monitor compliance with detailed procedures.		

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.