

**INTERNAL AUDIT DIVISION** 

## **REPORT 2024/064**

Audit of local procurement in the United Nations Mission in the Republic of South Sudan

UNMISS developed a strategic approach to its procurement activities; however, the Mission needed to improve timeliness and documentation of bid technical and financial evaluation activities and performance monitoring in the procurement process

16 December 2024 Assignment No. AP2023-633-05

### Audit of local procurement in the United Nations Mission in the Republic of South Sudan

## **EXECUTIVE SUMMARY**

The Office of Internal Oversight Services (OIOS) conducted an audit of local procurement in the United Nations Mission in the Republic of South Sudan (UNMISS). The objective of the audit was to assess how efficiently and effectively UNMISS managed its local procurement activities. The audit covered the period from 1 July 2021 to 30 June 2024 and included planning of procurement, solicitations, and oversight and monitoring of procurement activities.

UNMISS developed a strategic approach to its procurement activities, ensured completion of mandatory training courses for procurement and requisitioning staff, and had a functional Local Committee on Contracts. However, the Mission did not conduct the technical and financial evaluations of the bids in a timely manner and the documentation of the evaluation was inadequate. Furthermore, Mission did not establish key performance indicators for monitoring the performance of the procurement process.

UNMISS did not establish adequate controls to efficiently handle warranty-related matters, which resulted in failure to promptly identify defective or faulty items for remedy during the warranty period. However, UNMISS was taking action to enhance the coordination and communication channels between relevant units to streamline the process.

OIOS made two recommendations. To address issues identified in the audit, UNMISS needed to:

- Ensure adequate documentation is prepared and maintained in the bid evaluation file and, where delays are unavoidable, justifications for such delays are also documented; and
- Harmonize the existing local procurement monitoring processes and finalize the ongoing initiative of developing key performance indicators for local procurement activities.

UNMISS accepted the recommendations and has initiated action to implement them. Actions required to close the recommendations are indicated in Annex I.

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## Audit of procurement in the United Nations Mission in the Republic of South Sudan

## I. BACKGROUND

1. The Office of Internal Oversight Services (OIOS) conducted an audit of local procurement in the United Nations Mission in the Republic of South Sudan (UNMISS).

2. Procurement is a critical support function to ensure UNMISS meets its operational needs for mandate implementation. The procurement process is detailed in the following chart:



3. The Procurement of goods and services in UNMISS is primarily governed by the United Nations Financial Regulations and Rules, Procurement Manual and various instructions and memoranda issued by the Procurement Division at United Nations Headquarters and UNMISS.

4. The Headquarters Committee on Contracts (HCC) and the Local Committee on Contracts (LCC) established at United Nations Headquarters and the Mission respectively provided oversight over the Mission's procurement activities to ensure the effective implementation of United Nations procurement policies, procedures and operational guidance within their respective financial thresholds.

5. The UNMISS Procurement Section is responsible for conducting solicitations and procuring goods and services. The Section is headed by a Chief Procurement Officer (CPO) at the P-5 level who reports to the Director of Mission Support (DMS) through the Chief of Supply Chain Management Service (CSCM). The Procurement Section had 25 authorized posts comprising 12 international staff, 6 national staff, and 7 United Nations Volunteers (UNVs). The Acquisition and Requisition Unit is the entry point for all UNMISS procurement of goods and services and is responsible for requisitioning (raising of shopping carts) in accordance with the Mission's demand plans. This Unit reports to the CSCM through the Chief of the Property and Inventory Management Section.

6. Procurement activities are performed through the different procurement modules within Umoja, including the Electronic Committee on Contracts (eCC). Hard copies of tenders were kept in a safe that was only accessible to the Tender Opening Committee (TOC) and summaries were kept in a spreadsheet for which access was limited to the TOC.

7. The Procurement Section raised 963 local purchase orders overall, valued at US \$153.6 million for the period from 1 July 2021 to 30 June 2024, as shown in table 1 below. For the period under review, services accounted for 86 per cent of local procurement, while goods and materials accounted for the remaining 14 per cent. Services procured were primarily for engineering and safety and security operations, accounting for 46 and 28 per cent, respectively. The purchase of materials comprised items such as equipment, accommodation furniture, earth and stone, and concrete.

	2021/22		20	22/23	2023/24	
	Number	Value (\$)	Number	Value (\$)	Number	Value (\$)
Local contracts	169	33,494,568	227	48,974,145	244	44,242,800
One time purchase orders	138	9,238,350	99	11,474,411	86	6,162,108
Total local purchase orders	307	42,732,918	326	60,448,556	330	50,404,908

### Table 1: Local purchase orders per fiscal year from 1 July 2021 to 30 June 2024

Source: Procurement records Umoja

## II. AUDIT OBJECTIVE, SCOPE AND METHODOLOGY

8. The objective of the audit was to assess how efficiently and effectively UNMISS managed its local procurement activities.

9. The audit was included in the 2023 risk-based work plan of OIOS due to financial, operational, and reputational risks relating to UNMISS local procurement of goods and services. Additionally, the General Assembly requested OIOS to monitor United Nations procurement due to the high level of risk inherent in United Nations procurement activities, and report thereon biennially in conjunction with the related report of the Secretary-General on procurement.

10. OIOS conducted this audit from February to June 2024. The audit covered the period from 1 July 2021 to 30 June 2024. Based on an activity-level risk assessment, the audit covered higher and medium risks areas in local procurement, which included: procurement planning; solicitations; and oversight and monitoring of procurement activities. The audit did not cover the use of low-value acquisitions as this had been subject to other OIOS audit in 2023<sup>1</sup>.

11. The audit methodology included: (a) interviews with key personnel to gain a better understanding of the procurement process; (b) desk review of relevant documents, including solicitation documents, evaluation, training records, key performance indicators (KPIs) reports, and LCC meeting minutes; (c) analytical review of Umoja procurement data to identify procurement trends and exceptions; and (d) random and judgement sampling of 60 (valued at \$33 million) out of 310 solicitations (valued at \$293 million) to assess compliance with the solicitation process.

12. The audit was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing.

## III. AUDIT RESULTS

### A. Procurement Planning

### UNMISS developed a draft procurement plan in 2024

13. The Procurement Manual requires Missions to develop a strategic approach to procurement. This involves an understanding of the nature of the requirements, capacity of vendors, complexity of the operating environment, risks involved, and available internal United Nations capacities and resources.

14. The Procurement Section drafted its 2024 procurement strategic plan that presented nine areas of procurement activities with corresponding guiding principles for each one of them. For example: (a) for

<sup>&</sup>lt;sup>1</sup> OIOS report 2023/010

compliance and transparency activity, the corresponding strategy was "to maintain transparency in the procurement process to build trust and accountability, and ensure the integrity of solicitation, transparency of the acquisition process and timely procurement of goods/services"; and (b) for flexibility and adaptability, the strategy consisted of "adjusting each procurement based on evolving circumstances, including changes in the security environment, weather patterns and Mission objectives".

15. The procurement strategic plan appropriately documented strategic actions to be taken, including the conduct of thorough market analysis to identify reliable suppliers and establish local system contracts, promoting supplier diversity by engaging with a range of suppliers, including women-owned businesses, and the conduct of annual business seminars to build local capacity of vendors. The plan also detailed training and capacity building for procurement staff.

16. The plan has guided development of the annual procurement plan, which set out procurement actions for the year. In addition, UNMISS had identified procurement risks with mitigating actions, which were included in the Mission risk register. The budget preparation guide, DMS budget instructions, the operations and supply chain management business guidance, and the supply chain planning tool all provided additional guidance on procurement planning.

## **B.** Solicitations

### Procurement and requisitioning staff completed mandatory training courses

17. Provision 2.3 of the Procurement Manual prescribes that as of 1 January 2021, all procurement staff are required to be professionally certified by an internationally recognized procurement certification authority (such as the Chartered Institute of Purchasing and Supply - CIPS) to the required level. Furthermore, all requisitioners must complete the mandatory Umoja training courses designed for this role.

18. OIOS review of the training documentation/records from the Procurement Section, Acquisition and Requisition Unit and Integrated Mission Training Centre, showed that 14 requisitioners mapped to Umoja Role SA.02 (i.e., requisition function) and 24 procurement staff had completed all nine mandatory online training courses required to perform the related functions. Twenty of 24 procurement staff were professionally certified by an internationally recognized procurement certification authority and 4 were preparing their CIPS Level 4. UNMISS explained that the professional certification is monitored by the Procurement Division at United Nations Headquarters and the remaining staff are currently carrying out the training.

### The function of Tender Opening Committee has been enhanced

19. Provisions 7.1 and 7.2 of the Procurement Manual prescribe that a Tender Opening Committee (TOC) is responsible for handling submissions in response to formal solicitation exercises. A TOC must consist of a minimum of two appointed staff members who are not otherwise involved in the procurement process. Their responsibilities include the receiving, recording, and safeguarding of submissions, as well as conducting formal tender opening meetings.

20. The UNMISS TOC, which was appropriately composed, received 156 bids submissions from the vendors during the audit period. OIOS review of minutes of the LCC and review of TOC files noted the following shortcomings in the management and preparation of documents supporting the submissions/solicitations, which were attributed to a high turnover of TOC secretaries:

- The LCC noted that the bid submission and opening processes were not adequately managed and had resulted in some errors, such as the mixing up of documentation at the TOC level or requests by the LCC for additional clarifications. For example, LCC highlighted instances where the bid submissions from 10 vendors were missing or misplaced by the TOC secretary and could not be presented to the TOC during the bid opening date and time.
- For eight of 19 TOC files reviewed, OIOS observed that, due to inadequate filing practices, documents such as the solicitation abstract sheets, internal office memorandum between the TOC and the Procurement Section requesting the bid opening meeting with the list of bidders, and the date of the opening of the bids were missing, which were found later.

21. However, OIOS noted a significant improvement and effective functioning in the work of the TOC during the recent period. The review of subsequent LCC meeting minutes in 2024 noted that the LCC did not identify any errors of mixing up of documentation, or missing documentation. The TOC ensured the completeness of bids and where bids were non-compliant, they were duly rejected. The TOC duly recorded time of receipt of all submissions. All hard copies of tenders were recorded with a date and time stamp. The Mission had a secured filing cabinet in the TOC office to safeguard bids and proposals received prior to their opening dates. This indicated that the measures put in place by UNMISS were effective in addressing the earlier shortcomings.

### Need to complete technical and financial evaluations timely and improve the documentation

22. Provision 8.2 of the Procurement Manual prescribes that the evaluation committees are divided into a technical evaluation committee, responsible for the technical evaluation, and a financial evaluation committee (or procurement staff), responsible for the financial evaluation. The technical evaluation committee should be composed of at least two members from the requisitioning unit and a qualified staff (excluding Procurement Section staff) to ensure segregation of duties. In addition, the evaluation criteria must be discrete, reliable, practical, fair and balanced. Upon receipt of the technical evaluation report, the financial evaluation committee shall conduct and review the financial evaluation, make a final comparison of the competing proposals in accordance with the terms of the solicitation documents, record its findings, and advise the evaluation committee of the recommendation of award.

23. OIOS reviewed a sample of 30 (valued at \$19.3 million) out of 208 (valued at \$144,6 million) cases to assess the regularity of technical and financial evaluations and recommendations of award. For 16 cases (or 53 per cent), technical and financial evaluations were carried out based on the criteria and methodology defined in the solicitation documents. In addition, the composition of the committees was adequate and met the requirements for segregating duties. However, as indicated in table 2 below, adequate documentation, including technical or financial evaluations reports, were not provided for the remaining 14 cases (or 47 per cent), and therefore, OIOS was unable to assess that they were properly processed.

24. Furthermore, the evaluation process - from the date of the evaluation request submitted by the Procurement Section to the date on the evaluation report - took a considerable amount of time in some instances, ranging from 10 to 106 days for the technical evaluation and from 1 to 60 days for the financial evaluation (following the submission of the technical report). While the Procurement Manual does not provide a target number of days, this reflected that in some cases the overall duration of the selection process was unduly extended. The breakdown by time elapsed for completion of the technical and financial evaluations is presented in table 2 below.

	Cases reviewed					
Time elapsed in days	<b>Technical evaluation</b>	Financial evaluation				
0 - 30	12	16				
31- 60	6	2				
61-90	5	0				
90 - 106	5	0				
No information	2*	12*				
Total	30	30				

### Table 2 – Time elapsed for technical and financial evaluations

\*Reports were not found in the file or information was missing

25. UNMISS explained that it used a procurement tracking tool to monitor the timeliness of the evaluation process, provided guidance on timelines to the Technical Units for their technical evaluations, and followed up with the sections through meetings and emails. UNMISS further explained that there will always be matters that can delay the process. This includes the complexity of the solicitation, the departures of some technical teams working on the evaluations and responses to procurement reviews of the evaluations, and other operational challenges and priorities that delay the evaluation completion. Other factors include follow-ups with vendors for additional information or clarifications, and reports received in the Procurement Section that are returned to the Technical Units for re-evaluations due to inconsistencies and/or are not in accordance with the predetermined criteria in the source selection plans.

26. However, OIOS noted these control interventions had neither effectively improved the timeliness of the technical evaluations nor addressed the documentation issues. UNMISS indicated that while it considers that most of the acquisition processes were completed within a reasonable timeframe, the Mission will ensure adequate documentation is prepared and maintained in the evaluation files and any justifications for delays in the evaluation process would be put on record in the files.

### (1) UNMISS should enforce the requirement to ensure adequate documentation is prepared and maintained in the bid evaluation file and, where delays are unavoidable, justifications for such delays are also documented.

UNMISS accepted recommendation 1 and stated that it would update the present table of contents/checklist found in every physical and digital case file to include the date when the relevant document was placed in the case file and the signatures of the buyer/supervisor. Any delays in the evaluations will be explained in a Note-to-File to be placed in the case file.

## Recommendations by the appropriate committee and approval by an authorized officer were obtained for solicitations

27. Provision 9.1 of the Procurement Manual prescribes that in accordance with the Financial Regulations and Rules, the recommendation of the LCC and the approval of the relevant authorized officers based on UNMISS procurement delegation of authority matrix (for the CPO up to \$500,000 and for the DMS, unlimited) and committee recommendations (LCC for amounts between \$500,000 and \$1.5 million and HCC for amounts over \$1.5 million) shall be obtained prior to any contractual commitment being made.

28. A review of a sample of 60 out of 319 solicitations, valued at \$33 million, and distributed as set out in table 3, indicated that proper approvals were received from officers with the appropriate delegation of authority and where required, recommendations by the appropriate committee were obtained and documented.

Value base on DOA in USD	Number cases	Cumulative amounts
Below 500,000	43	\$13 million
500,000 - 1,500,000	14	\$12 million
1,500,000 and above	3	\$8 million
Total	60	\$33 million

### Table 3 - Distribution of 60 solicitations based on Delegation of Authority

### C. Oversight and monitoring of procurement activities

The Local Committee on Contract was working effectively, and members completed the required training

29. Local Committee on Contracts (LCC) are required to render written advice on proposed Mission procurement activities to ensure compliance with relevant United Nations Regulations and Rules and the Procurement Manual. To maintain their independence to the extent possible, LCC members should be composed of staff members at the P-4 level and above, and they should have commercial, financial, or legal academic training and experience or other relevant qualifications, including procurement training. Additionally, the LCC members are required to complete the basic mandatory training administered by the HCC secretariat.

30. UNMISS established the LCC, with members from various sections and units, including Budget and Finance and Legal. The LCC composition from 1 July 2021 to 30 June 2024 indicated 31 members cumulatively<sup>2</sup>. Only 20 out of these 31 LCC members were at the P-4 level and above, including FS-7 and FS-6 levels. The rest included 10 P-3 level and one P-2 level. The summary of LCC composition from 2021 to 2023 is shown in Table 4 below.

Year	P-5	P-4	P-3	P-2	<b>FS-7</b>	FS-6	Total
2021/22	2	7	4	0	1	3	17
2022/23	3	6	6	0	1	3	19
2023/24	2	9	7	1	1	3	23

### Table 4: Summary of LCC composition from 2021 to 2023

Source: Inter-office memos for LCC members nomination

31. UNMISS explained that it had ensured the Committee had members at the P-4 level and above to the extent possible. Additionally, all the Committee's members, including those at the P-3 level and below, have extensive experience and training on LCC as evidenced during OIOS review. There was therefore no need to change the composition. OIOS further analysis of the eight LCC meeting minutes held from February 2022 to June 2023 indicated that three out four members present during the deliberation of the Committee were staff members at P-4 level and above. The review of the minutes of the meetings noted that the Committee conducted adequate reviews of the cases presented, and raised relevant observations and recommendations, which were addressed and subsequently approved by the DMS. Therefore, OIOS did not make a recommendation.

### Need to timely report defective or faulty items for remedy during the warranty period

32. As per United Nations general conditions of contract, all warranties will remain fully valid following any delivery of the goods and for a period of not less than one year following acceptance of the goods by the United Nations in accordance with the contract. During any period in which the contractor's warranties are effective, upon notice by the United Nations that the goods do not conform to the

<sup>&</sup>lt;sup>2</sup> LCC members that appear several times were considered once.

requirements of the contract, the contractor shall promptly and at its own expense correct such non-conformities.

33. OIOS noted that UNMISS did not obtain remediation or compensation from the suppliers for some items (such as televisions and cookers) identified as faulty by end users and reported or returned to the Technical Units. OIOS noted that: (a) some of these cases were not reported timely to the Procurement Section for actions with the vendors, (b) even for the ones reported, the actions undertaken by the Procurement Section with the vendors did not always fully resolve the matter. This included, for example:

- Forty-eight televisions (32-55 inches, 1080p) purchased March 2023 (18 pieces) and March 2024 (30 pieces) allocated to accommodations were found to be defective by end users and returned to the Accommodation Management Unit and handed over for disposal after being declared defective beyond repair. The Procurement Section has initiated remediation actions from the supplier, but full resolution had not been attained at the time of the audit.
- During the OIOS field visit to Kuajok in May 2024 for the audit of accommodation management, fifteen cookers were observed in the Property Disposal Unit (PDU) in Kuajok. Further inquiry revealed that end users returned these cookers to the Accommodation Management Unit only a few days after they were supplied because they were not functional and were declared unserviceable by the technician. Twelve were later disposed of through PDU and another three was planned to be disposed.
- The inspection of 32 newly constructed and occupied accommodations with attached kitchenettes, each equipped with a 2-plate stove noted that many of these stoves were not working. This occurred during a period ranging from three to eight months after the occupants moved in. Sixteen stoves were replaced after they were deemed unserviceable and the remaining 16 stoves were functional after replacement of cables and repair, even though the users were complaining that they were not working efficiently.
- Other defective goods purchased included safety shoes purchased on 29 June 2023 (purchase order no. 2200253953) and fire extinguishers purchased on 20 June 2023 (purchase order no. 2200252911). Despite the reports of faulty goods by the Technical Units, General Supply Unit, and Supply Warehouse to the Procurement Section, the remediation from the supplier was still ongoing. The Mission explained that delivery was rejected and replaced for the initial fire extinguishers. The replacement was also rejected, and therefore, the vendor issued a credit note. The same facts applied to the safety shoes and the mission was still awaiting the delivery of appropriate boots.

34. This situation arose from inadequate communication and coordination among the Technical Units, the Receipt and Inspection Unit, the Centralized Warehouse Unit and the Procurement Section. UNMISS was reviewing the coordination and the communication channels to streamline this process to ensure efficient handling of all warranty-related matters. Therefore, OIOS did not make a recommendation.

### Need to enhance the monitoring of procurement activities

35. The Business Transformation and Accountability Division (BTAD) developed six procurement KPIs to monitor the performance of procurement activities. This includes: (a) the stand-alone purchases ratio indicating the percentage of stand-alone purchases versus purchases from long-term contracts; (b) exceptions to formal methods of solicitation; (c) the rate of proper reference to financial regulations and rules in purchases; (d) the staff's completion rate of the mandatory training courses on procurement; (e)

staff with Umoja role requiring procurement delegation; and (f) number of multiple purchases from the same vendor.

36. While these KPIs reports were prepared by BTAD and available to UNMISS, they were not systematically reviewed by the Mission nor used to monitor the procurement process. After the audit fieldwork, UNMISS provided the quarterly reports for Quarters 3 and 4 of 2023, and Quarter 1 of 2024, indicating a few shortfalls against the KPIs.

37. The Mission indicated that there were other procurement monitoring processes within the Mission. For example, the different technical sections maintained a "procurement monitoring tool" in the form of a spreadsheet that captured information on their annual procurement activities, such as bid type and number, open and closing date of expression of interest, the tender opening date, the technical review date, the LCC and HCC dates, when applicable. OIOS noted that these spreadsheets were inconsistently maintained, lacked specific targets or performance goals, and did not demonstrate effective follow-up actions.

38. In addition, Misson explained that the CPO directly supervises the work of procurement staff on a day-to-day basis and holds periodic meetings with the Engineering Section to discuss operational matters related to procurement. Furthermore, the Procurement Section was developing some specific KPIs for procurement categorization timelines applicable to request for quotation, invitation to bid, and request for proposal. OIOS was not able to assess this initiative's progress since the Procurement Section had not established the completion and implementation timelines of this initiative.

39. The Mission also indicated that the Procurement Section could not establish KPIs covering the entire procurement process because of the number of different actors in a single procurement process who were not controlled by the Procurement Section. For example, the time taken to vet Local Procurement Authority cases requested from the United Nations Procurement Division in New York, or to obtain the final LCC/HCC minutes approvals were not under the control of the Section.

40. Having clearly defined KPIs helps to identify bottlenecks and allocate responsibilities for addressing them among the stakeholders involved in the procurement process.

# (2) UNMISS should harmonize the existing local procurement monitoring processes and finalize the ongoing initiative of developing key performance indicators for local procurement activities.

UNMISS accepted recommendation 2 and stated it would harmonize and upgrade the existing procurement monitoring tools to include the key performance indicators and the ones in progress would be finalized and adopted soon.

## IV. ACKNOWLEDGEMENT

OIOS wishes to express its appreciation to the Management and staff of UNMISS for the assistance and cooperation extended to the auditors during this assignment.

Internal Audit Division Office of Internal Oversight Services

### STATUS OF AUDIT RECOMMENDATIONS

### Audit of Audit of local procurement in the United Nations Mission in the Republic of South Sudan

Rec. no.	Recommendation	Critical <sup>3</sup> / Important <sup>4</sup>	C/ O <sup>5</sup>	Actions needed to close recommendation	Implementation date <sup>6</sup>
1	UNMISS should enforce the requirement to ensure adequate documentation is prepared and maintained in the bid evaluation file and, where delays are unavoidable, justifications for such delays are also documented.	Important	0	Receipt of evidence that relevant document is placed in the case file, including explanation of unavoidable delays and the signatures of the buyer/supervisor.	15 August 2025
2	UNMISS should harmonize the existing local procurement monitoring processes and finalize the ongoing initiative of developing key performance indicators for local procurement activities	Important	0	Receipt of evidence that procurement monitoring tools is harmonized and upgraded to include newly developed key performance indicators.	15 August 2025

<sup>&</sup>lt;sup>3</sup> Critical recommendations address those risk issues that require immediate management attention. Failure to take action could have a critical or significant adverse impact on the Organization.

<sup>&</sup>lt;sup>4</sup> Important recommendations address those risk issues that require timely management attention. Failure to take action could have a high or moderate adverse impact on the Organization.

<sup>&</sup>lt;sup>5</sup> Please note the value C denotes closed recommendations whereas O refers to open recommendations.

<sup>&</sup>lt;sup>6</sup> Date provided by UNMISS in response to recommendations.

## **APPENDIX I**

## **Management Response**

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### Audit of local procurement in the United Nations Mission in the Republic of South Sudan

Rec. no.	Recommendation	Critical <sup>1</sup> / Important <sup>2</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
1	UNMISS should enforce the requirement to ensure adequate documentation is prepared and maintained in the bid evaluation file and where delays are unavoidable, include justifications for such delays.	Important	Yes	Chief, Procurement Section	15 August 2025	The existing Table of Contents/Check List found in every case file shall be upgraded to include the date the relevant document is placed in the case file, and signatures of the buyer/supervisor. The same update will be maintained in the online case file. Any delays in the evaluations will be explained in a Note to File to be placed in the case file.
2	Harmonize the existing local procurement monitoring processes and finalize the ongoing initiative of developing key performance indicators for local procurement activities.	Important	Yes	Chief, Procurement Section	15 August 2025	The existing Procurement Monitoring Tools will be harmonized and upgraded to include the KPIs. The KPIs which are work in progress will be finalized and adopted soon.

<sup>&</sup>lt;sup>1</sup> Critical recommendations address those risk issues that require immediate management attention. Failure to take action could have a critical or significant adverse impact on the Organization.

 $<sup>^{2}</sup>$  Important recommendations address those risk issues that require timely management attention. Failure to take action could have a high or moderate adverse impact on the Organization.