

Procurement Strategy (including a Local Procurement Code)

Cabinet Member for Finance, Procurement, Revenues & Benefits and Customer Services

Date:	19 November 2020
Agenda Item:	6
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Key Decision?	YES
Local Ward Members	Full Council



Strategic (Overview and Scrutiny) Committee

1. Executive Summary

- 1.1 The Council procures and commissions significant levels of goods, works and services from third parties and the aim is to achieve best value for money.
- 1.2 This means that procurement decisions need to take account, as appropriate, of quality and all of the costs whilst also remaining compliant with all legal, regulatory and constitutional requirements.
- 1.3 The Procurement Strategy is intended to move the Council from where it currently is to where it wants to be in terms of Procurement. The strategy takes account of the new Strategic Plan, latest regulations and provides greater clarity regarding the role of the procurement process.

2. Recommendations

- 2.1 The Committee is requested to provide their views on the Draft Procurement Strategy.

3. Background

What is Procurement?

- 3.1. Procurement is the process of acquiring goods, works and services from third parties. In other words, it covers the purchasing of everything from paperclips to major infrastructure schemes.
- 3.2. Commissioning is usually about securing services (rather than acquisition of goods or works) and is a cycle of activities that includes procurement and contract management.
- 3.3. The aim is to achieve best value for money. In the HM Treasury publication Managing Public Money value for money is defined in the following way:

‘It means securing the best mix of quality and effectiveness for the least outlay over the period of use of the goods or services bought. It is not about minimising upfront prices.’
- 3.4. This means that procurement and commissioning decisions need to take account, as appropriate, of quality and all of the costs that will be incurred by the Council throughout the life of the asset or contract period not simply the initial price.
- 3.5. The best results are obtained by engaging with the market before advertising an opportunity (to be sure the Council’s approach will get a good response from suppliers) and focusing on contract management to ensure the Council gets what it is paying for.
- 3.6. There are also compliance issues which cannot be ignored and every Council adopts Contract Procedure Rules. These are the council’s own procurement rules and they form part of a broader set of arrangements the Council makes locally for procurement and project management, including measures to prevent fraud and corruption.

- 3.7. Procurement and commissioning must be carried out in compliance with the public contract regulations 2015 and including currently EU procurement directives, related case law and other legal requirements including the best value duty and requirements relating to staff transfers (TUPE, pensions), health and safety, equalities and social value etc.
- 3.8. The UK also has rules on lower value procurements including an obligation on councils to publicise advertised opportunities and awards worth **£25,000** or more on the Government's Contracts Finder website.
- 3.9. Public procurement law is complex and the Council has recently recruited a procurement team and also has access to legal advice from the South Staffordshire Legal Service to navigate the rules.

What is the Procurement Process?

- 3.10. The key stages of the procurement cycle are shown in the diagram below:



- 3.11. There are a number of critical success factors related to procurement including the involvement of senior management, early involvement of procurement and other professional advisors, a focus on delivering the right outcomes, good preparation and planning, stakeholder engagement and ongoing risk management.

How are Contracts and Relationships Managed?

- 3.12. It is during the contract management phase that the benefits the Council is paying for are actually delivered (or not) and a 'let and forget' approach is never acceptable.
- 3.13. The foundations for success in contract management are laid during the procurement process and include the identification of a contract manager, continuing management of risks, control of costs including contract variations and management of performance shortfalls.

What is Category Management?

- 3.14. Every Council needs good visibility of what it is spending and with whom and this will involve breaking down expenditure into categories such as professional services or vehicles.
- 3.15. Category management focusses on improving value for money and can involve challenging the need to purchase the goods or services or carry out the project at all, at the current time or in the way proposed.
- 3.16. In Local Government, professional buying organisations such as the Eastern Shires Purchasing Organisation (ESPO) are a vehicle for collaboration on the acquisition of common goods and services through the use of framework agreements with the aim of improving value for money.
- 3.17. Councils also have the option of using the framework agreements and other arrangements put in place by the Crown Commercial Service.

How is 'Social Value' Delivered?

- 3.18. Councils have always used their purchasing power to obtain social, economic and environmental benefits for their communities.
- 3.19. The Public Services (Social Value) Act 2012 enshrines this in law to a certain extent.
- 3.20. Under the Act, any Council proposing to award a service contract or framework agreement above a financial threshold in the EU rules must consider how what they propose to procure will improve the economic, social and environmental wellbeing of the area.
- 3.21. The Council must also consider how it will act to secure the improvement when undertaking the procurement.

Developing a Procurement Strategy

- 3.22. The process for developing a procurement strategy will be focussed on:
- Understanding where the Council currently is in terms of Procurement.
 - Identifying where the Council wants to be with Procurement.
 - Determining how the Council plans to get there "the Procurement Strategy".

An Assessment of where the Council currently is and where it wants to be with Procurement

- 3.23. The Local Government Association (LGA) has developed a toolkit to support delivery of the National Procurement Strategy for Local Government in England 2018.
- 3.24. Its purpose is to help Councils, to set objectives in relation to the levels in each of the key areas and to assess their own progress against those objectives.
- 3.25. The Council's current assessment using this toolkit is shown in detail at **APPENDIX A**.

3.26. The key themes of the National Procurement Strategy, a summary of the current assessment and the next level showing where the Council wants to be is:

- **Showing Leadership**
 - **Engaging Councillors** – Current **Minimum** next level is **Developing**
 - **Engaging Senior Managers** – Current **Developing** next level is **Mature**
 - **Working with Partners** – Current **Developing** next level is **Mature**
 - **Engaging Strategic Suppliers** – Current **Minimum** next level is **Developing**
- **Behaving Commercially**
 - **Creating Commercial Opportunities** – Current **Minimum** next level is **Developing**
 - **Managing Contracts and Relationships** – Current **Minimum** next level is **Developing**
 - **Managing Strategic Risk** – Current **Developing** next level is **Mature**
- **Achieving Community Benefits**
 - **Obtaining Social Value** – Current **Minimum** next level is **Developing**
 - **Local Small Medium Enterprises (SMEs) and Micro-Businesses Engagement** – Current **Minimum** next level is **Developing**
 - **Enabling Voluntary, Community and Social Enterprise (VCSE) Engagement** – Current **Developing** next level is **Mature**

3.27. Internal Audit have also recently undertaken a review of procurement and provided a limited assurance level. This level of assurance indicates there are some weaknesses in controls that will need to be addressed as part of the development of the procurement strategy.

The Procurement Strategy

3.28. The Council has approved additional resources over the last few years to improve procurement initially through the partnership with Wolverhampton City Council and latterly following the withdrawal of Wolverhampton City Council, the recruitment of a small in-house procurement team.

3.29. The assessment compared to the LGA toolkit shows there is room for improvement in procurement however we must be realistic in terms of setting priorities with a relatively small team.

3.30. The initial focus must be on ‘getting the basics right’ because currently we are operating at the minimum level in a number of assessment areas.

3.31. Therefore priorities will need to be focussed on achieving or consolidating at the minimum level and then moving to the higher levels based on the capacity and resources available.

3.32. The draft Procurement Strategy is shown at **APPENDIX B** and is summarised below:

- The Strategic context in terms of the Strategic Plan 2020-2024 and values.
- The procurement guiding principles.
- A procurement action plan.

Alternative Options	The Council could decide that it does not need a Procurement Strategy or could develop one that is different in the outcomes it would like to achieve.
Consultation	The Committee is being consulted to provide their views to the Cabinet.

Financial Implications	<ul style="list-style-type: none"> The average annual procurement spend over the last three years is £11m. With vehicle hire, agency staff and IT licenses being the largest spend areas. The average local spend with suppliers in the district (on a post code basis) over the last three years is 10%, with 2019/20 at 12%. The average budgeted annual spend for the next three years is £13m. The replacement waste fleet, the works to the coach park, recycling disposal costs and vehicle hire are the largest spend areas over the next three years. There is an annual procurement savings target of c1% or £84,000 assumed in the Medium Term Financial Strategy. This will be reviewed once a forward looking procurement plan has been completed.
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Contribution to the Delivery of the Strategic Plan	<p>Effective procurement can contribute to the achievement of Strategic Plan outcomes primarily in relation to developing prosperity and being a good Council.</p> <p>The development and approval of a Procurement Strategy (including a Local Procurement Code) is an action in the 2020/21 Delivery Plan.</p>
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Equality, Diversity and Human Rights Implications	An Equality Impact Assessment has been completed.
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Crime & Safety Issues	No specific implications.
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Environmental Impact	Environmental impact can be considered as part of procurement exercises.
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GDPR/Privacy Impact Assessment	No specific implications.
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	Risk Description	How We Manage It	Severity of Risk (RYG)
A	The Council's procurement ambitions have not been articulated and agreed	The Procurement Strategy will articulate where the Council wants to be and how it plans to get there	Likelihood : Red Impact : Yellow Severity : Yellow
B	Local suppliers are not provided with the opportunity to bid for Council procurements	Procurement opportunities will be part of a forward looking plan and will also be communicated more widely to provide greater opportunities	Likelihood : Yellow Impact : Yellow Severity : Yellow
C	Procurement performance is not monitored and transparent	There will be a suite of Key Performance Indicators that will be regularly monitored	Likelihood : Yellow Impact : Yellow Severity : Yellow
D	Non-compliance with legal, regulatory and constitutional requirements	The new Procurement Team will be able to ensure compliance and this will also be monitored by Internal Audit	Likelihood : Yellow Impact : Yellow Severity : Yellow
E	Procurement savings/value for money are unrealised	The new Procurement Team will be able to establish greater rigour in the Procurement process	Likelihood : Green Impact : Yellow Severity : Yellow
F	Procurements are reactive rather than planned and therefore do not achieve value for money	The procurement team will engage with service areas to minimise reactive procurement	Likelihood : Red Impact : Yellow Severity : Yellow

Background documents

A Councillors Guide to Procurement 2019 edition produced by the LGA

National procurement Strategy for Local Government in England 2018 Delivering the Ambition produced by the LGA

Procurement Service Improvement – Cabinet 4 September 2018

Ernst and Young Report Getting the basics right in procurement

A number of other Councils Procurement Strategies

Equality Impact Assessment

Relevant web links

National Procurement Strategy for Local Government in England 2018 – Delivering the ambition

Showing Leadership			
Key Area	Current Assessment of where the Council is	The Next Level and where the Council wants to be	How do we get there?
Engaging Councillors	Minimum Councillors regard procurement and commercial issues as purely operational matters	Developing The Council is exploring the best approach to Councillor engagement in procurement and commercial matters	<ul style="list-style-type: none"> • Councillors receive regular reports on procurement activities. • Councillor training and development programme to include procurement and commercial elements to develop understanding for better policy development and scrutiny.
Engaging Senior Managers	Developing The Council is exploring the best approach to obtaining procurement and commercial input into decision making	Mature Senior managers engaged with procurement and commercial issues routinely taking advice at key decision points	<ul style="list-style-type: none"> • Procurement Strategy is reviewed and refreshed. • Senior manager training and development programme to include procurement and commercial elements. • Requirement to engage with procurement for whole life cost based procurements of £10,000 or higher.
Working with Partners	Developing Council acknowledges the business case for a cross-council approach to design and implementation of solutions and is seeking to encourage this	Mature Designing and implementing solutions as a single team in high value/high risk projects	<ul style="list-style-type: none"> • Structured approach to project management for major procurements is introduced. • Training and development programme covering partnership working are developed and implemented.
Engaging Strategic Suppliers	Minimum Firefighting. Ad hoc engagement with important suppliers, usually when there is a problem to be resolved	Developing Acknowledges Business Case for improved strategic supplier management and is piloting engagement	<ul style="list-style-type: none"> • Develop criteria to identify strategic suppliers. • Evaluate options and pilot engagement with a strategic supplier. • Produce a procurement plan. • Pilot early market engagement on at least one major project.

Behaving Commercially			
Key Area	Current Assessment of where the Council is	The Next Level and where the Council wants to be	How do we get there?
Creating Commercial Opportunities	Minimum Focused on business as usual and compliance	Developing Some high value/high profile acquisitions examined for creating commercial opportunities	<ul style="list-style-type: none"> • Forward planning is undertaken in some procurements. • Opportunities to create new revenue streams are investigated. • Options appraisals are undertaken for major procurements. • Market and supplier research and analysis is undertaken for major procurements. • Procurement is involved in tenders at the planning stage. • Innovation is considered in tender evaluations. • Plain language is used in tender documentation. • Performance reporting includes social benefits as well as savings on specific procurements. • Leadership Team receive regular reports on procurement activities. • Post contract reviews are undertaken on specific procurements.
Manging Contracts and Relationships	Minimum Compliance driven. Reactive approach to contract and relationship management	Developing Identified the need to change and improve. Basic policies, procedures and systems in place.	<ul style="list-style-type: none"> • A full up to date contract register is in place with viewing and searching capability. • A change control policy is in place to capture variations made to certain contracts and standard documentation is in place and is used. • Structured approach to early engagement of suppliers in financial difficulties. • A formal approach is in place to capturing savings and accruing benefits from contracts. • Contract and relationship management is recognised in job roles where this is a significant element of the role. • Training and development programme covering general contract management is developed and implemented.
Managing Strategic Risk	Developing Good awareness of issues involved and potential threats with basic systems in place to manage should they occur	Mature Taking a proactive approach to strategic risk management with all vulnerable areas identified and mitigating policies and plans in place	<ul style="list-style-type: none"> • Proactive approach to financial loss and fraud for supplier payments. • Risk areas for fraud and financial loss identified. • A risk register with mitigating actions is in place. • Expenditure categories/contracts with potential for modern slavery identified and basic checks made. • Actively identifying and reviewing contracts where data issues could occur.

Achieving Community Benefits

Key Area	Current Assessment of where the Council is	The Next Level and where the Council wants to be	How do we get there?
Obtaining social value	<p>Minimum Compliant. Doing just enough to meet the conditions of the Act.</p>	<p>Developing Compliant but only proactively seeking social value in a few contracts only</p>	<ul style="list-style-type: none"> • A Social value policy is developed and approved. • A senior officer is given a direct reporting responsibility for social value. • Measuring some limited form of social value. • Social value is taken into account in larger contracts and tenderers asked for social value commitments.
Local small medium enterprises (SMEs) and micro business engagement	<p>Developing SME organisations are engaged in a few key contracts only.</p>	<p>Mature Taking a proactive approach to integrating SME organisations into procurement and commissioning.</p>	<ul style="list-style-type: none"> • A SME policy is developed and approved. • Engagement events and communication channels are developed. • Dedicated support and contact point for SMEs. • Dynamic purchasing systems (DPS) used in certain areas of the Council. • All procurement opportunities are published to increase the opportunities for SMEs. • Contract management includes sub-contracting relationships. • SME spend is captured and analysed.
Enabling voluntary, community and social enterprise (VCSE) engagement	<p>Developing VCSE organisations are engaged in a few key contracts only.</p>	<p>Mature Taking a proactive approach to integrating VCSE organisations into commissioning and procurement processes.</p>	<ul style="list-style-type: none"> • Engagement events and communication channels are developed. • Dedicated support and contact point for VCSEs. • Prior engagement with VCSEs prior to publishing procurement opportunities. • All procurement opportunities are published to increase the opportunities for SMEs. • Procurement processes adapted to reflect the capacity and capability of VCSEs. • Contract management includes sub-contracting relationships. • VCSE spend is captured and analysed to determine how it might be improved.

Procurement Strategy

Our Strategic Plan

Every four years we put together a strategic plan. Our current strategic plan describes the high level outcomes we want to achieve for our community from 2020 to 2024. Our plan helps us to focus on what is important locally and to direct our resources and budget where they will have the most benefit:

Enable people to

- help themselves and others
- collaborate and engage with us
- live healthy and active lives

Shape place to

- keep it clean, green and safe
- preserve the characteristics
- make sure sustainability and infrastructure needs are balanced

Develop prosperity to

- encourage economic growth
- enhance the district for all
- invest in the future

Be a good council that is

- financially sound
- transparent and accountable
- responsive and customer focused

Our Values

We have developed a set of values that all our staff work together to achieve in all that we do and are relevant to this procurement strategy.

Our values are set out in our strategic plan and are:

Put customers first

- We are passionate about our customer service.
- We always listen and work with our customer to meet their needs.
- We take responsibility for things we can change and improve and encourage our customers to do the same.

Improve and innovate

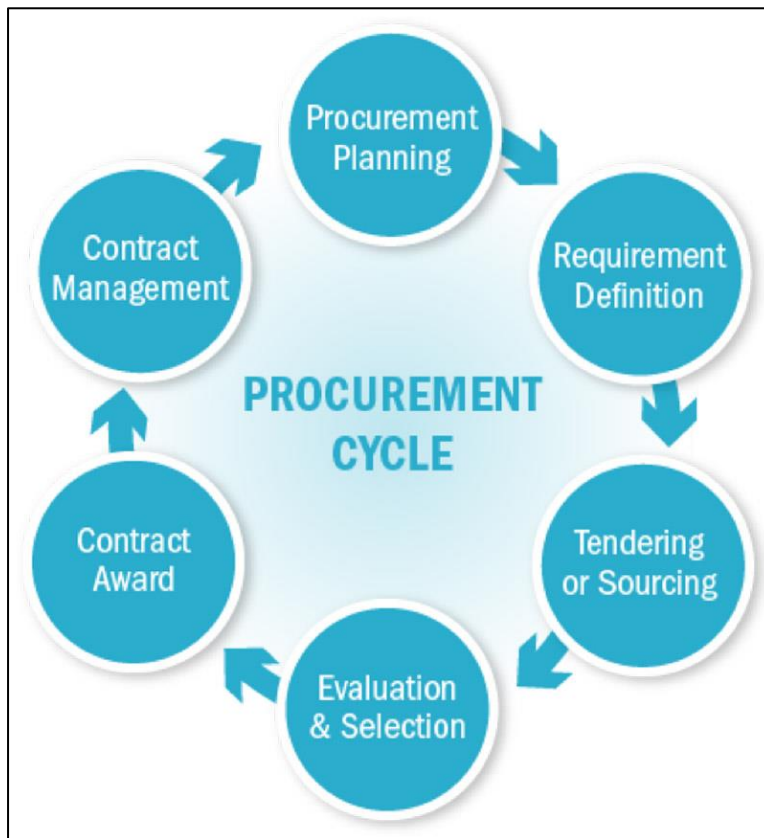
- We challenge each other to look for ways to do things better.
- We listen to feedback and learn from it so we can improve.
- We welcome change and move forward with confidence.

Have respect for everyone

- We listen to one another and understand each other's views and pressures.
- We appreciate each other and trust our colleagues to do a good job to the best of their ability.

Our Procurement guiding principles

These outcomes and values will be reflected in the key stages of the procurement cycle shown below:



Our primary focus on sustainable procurement supports the overarching aim and guiding principles of the procurement service:

“To deliver the Council’s strategic objectives and best value through a straightforward, professional and focussed approach to procurement”

- **straightforward:** To eliminate unnecessary burdens arising from the procurement and to make procurement and payment processes more effective through e-procurement
- **professional:** To ensure procurement and contract management skills are well embedded and distributed across the Council
- **focused:** To use sound procurement practices and innovative procurement solutions to promote sustainability and best value, in particular supporting the best use of resources agenda and making use of collaboration and partnership opportunities

The purpose of this strategy is to ensure that sustainability is an integral part of all stages of our procurement processes and that our procurement activities support the delivery of our outcomes whilst achieving value for money. In particular we want to ensure our procurement contributes to a strong local economy and leads us to make intelligently green procurement choices – i.e. those that have a positive environmental impact and generate financial or community benefits such as:

- Supporting local jobs
- Supporting local skills
- Local sourcing of goods
- Energy efficiency
- Increasing use of renewable energy
- Minimise waste
- Sustainability of materials and products

Therefore we will:

- take a long term strategic view of our procurement needs while continually assessing, reviewing and auditing our procedures, strategy and objectives
- require that a proper business case is produced to support all significant procurement decisions and expect contracting activity to be as a result of competition
- assess all procurement proposals against a criteria that includes effectiveness, efficiency, best value, sustainability and on the basis of whole life costs, providing this does not prejudice service delivery
- measure outcomes rather than outputs where appropriate
- be a pragmatic and intelligent customer maximising the benefits offered by joint procurements, developing partnerships, embracing technology and harnessing economies of scale through consortia
- actively manage our supplier portfolio, in line with all requirements local government
- support, encourage and develop our staff, ensuring equality of opportunity for all and ensure those that procure through procurement have the same principles
- ensure social value principles become embedded in procurement and contract management processes.
- comply with any legislation, corporate policies or other requirements relevant to our activities, ensuring that all officers responsible for procurement and contract management are aware of and adhere to the requirements of all relevant law, the Council's contract procedure rules, financial procedure rules, required standards and best practice and ensure those we procure also comply where applicable
- require services to programme and manage their procurements in accordance with Governance timetables
- ensure that risk is identified, assessed and managed at all stages of the procurement process
- ensure that every procurement is led and managed by an appropriate officer, is allocated a suitable contract manager and that records are properly maintained, decisions recorded and clear audit trails exist to ensure openness, propriety and probity
- have regard to all aspects of sustainability including environmental sustainability and climate change as well as supporting our Climate Change Pledge.
- participate in partnerships and shared services where these can deliver overall service improvements and provide value for money
- Where appropriate key contractors are required to have safeguarding policies, procedures and training in place, in addition to providing confirmation of compliance with the Modern Slavery Act 2015

Monitoring the Procurement Strategy

The Procurement Strategy will be monitored using a balanced scorecard of indicators initially identified as:

Strategic		Financial	
Indicator	Baseline	Indicator	Baseline
% of spend in Lichfield District ¹	12%	Financial savings achieved in total	£0
% of spend with Small Medium Enterprise (SMEs) in Lichfield District	N/m	Annual financial savings achieved	£0
% of spend with Voluntary, Community and Social Enterprise (VCSEs) in Lichfield District	N/m		
Number of tenders with Social Value criteria	N/m		
Operational		Compliance/Risk	
Indicator	Baseline	Indicator	Baseline
% of suppliers paid within 30 days – target 90% ²	86.15%	Number of waivers to Contract Procedure Rules ³	10
% of procurement opportunities published	N/m	Number of legal challenges	N/m
Service area satisfaction with procurement	N/m		

¹ The 2019/20 financial year based on post codes

² As at 31 March 2020 and Reported to Cabinet and Strategic (Overview and Scrutiny) Committee

³ Relates to 2018/19 financial year and Reported to Audit and Member Standards Committee

Procurement Action Plan

	What we plan to achieve	What we plan to do	Who we will work with
Professionalise Procurement	A fully staffed trained procurement team	<ul style="list-style-type: none"> Recruit to permanent roles Support Chartered Institute of Purchasing and Supply training and appropriate legal courses 	Human Resources Team
	Enhance procurement knowledge in the Council	<ul style="list-style-type: none"> Identify gaps in knowledge and develop additional training courses 	Officers with budget responsibility
	A flexible and responsive procurement team	<ul style="list-style-type: none"> Undertake engagement with customers through a feedback survey 	Heads of Service and Managers in all service areas
	High performing procurement function	<ul style="list-style-type: none"> Develop a series of Key Performance Indicators 	Cabinet Member and Leadership Team
Systems and Processes	A fully populated electronic contracts register	<ul style="list-style-type: none"> Update with information received. Continue to support the embedding of self-service 	Heads of Service and Managers in all service areas
	To move towards LDC requests for quotation and invitations for tenders to be run via electronic tendering system ⁴	<ul style="list-style-type: none"> Training programme for staff Procurement team to utilise the system on behalf of officers as required 	Heads of Service and Managers in all service areas
Visibility and Data	A fully populated forward looking work plan	<ul style="list-style-type: none"> Update with information received and procurement initiation form content. Regular engagement with officers and managers. Regular Procurement updates to officers 	Heads of Service and Managers in all service areas
	Improve visibility of Procurement opportunities	<ul style="list-style-type: none"> Future work plan to be published on website in form of anticipated procurement opportunities All current procurement opportunities to be published 	Heads of Service and Managers in all service areas
	Publish and monitor expenditure with suppliers, SME's, and VSCE in Lichfield District	<ul style="list-style-type: none"> Monitoring spend through the new Finance System 	Finance Team
Suppliers and Social Value	Recognise and embed Social Value (potentially adopt National TOMs (Themes, Outcomes and Measures) Framework 2019 for social value measurement)	<ul style="list-style-type: none"> Develop a Social Value Policy and guide for officers Consider the inclusion of social value criteria in each relevant procurement 	Heads of Service and Managers in all service areas
	Environmental sustainability	<ul style="list-style-type: none"> Develop criteria for environmental sustainability for inclusion in procurement 	Heads of Service and Managers in all service areas
	Improve engagement with Local suppliers	<ul style="list-style-type: none"> Develop a selling to the council guide and publish on website Attendance at any relevant meet the buyer event 	Economic growth team Local suppliers

⁴ Does not include those via frameworks or other public buying organisations as they often use proprietary processes.

	What we plan to achieve	What we plan to do	Who we will work with
		<ul style="list-style-type: none"> Widen advertising of relevant contract opportunities to include Social Media. Identify local suppliers and encourage them to register on electronic tendering system. Identify demand for a 'how to tender' workshop in advance of any significant procurements, and/or general workshop. 	
Compliance	All relevant contracts are advertised on Contracts Finder	<ul style="list-style-type: none"> Regular monitoring process 	Heads of Service and Managers in all service areas
	All procurements with a value of over £10,000 are agreed with procurement	<ul style="list-style-type: none"> Regular monitoring process 	Heads of Service and Managers in all service areas
	Ensure the procurement elements of the Contract Procedure Rules remain fit for purpose	<ul style="list-style-type: none"> To review the procurement elements of the Contract Procedure Rules 	Heads of Service and Managers in all service areas
	"Procurement Information" Transparency Code 2015 requirements are met	<ul style="list-style-type: none"> Regular monitoring process 	Heads of Service and Managers in all service areas
Collaboration	Ensure opportunities for collaboration are explored	<ul style="list-style-type: none"> Completion of all relevant surveys from buying organisations 	Buying organisations
		<ul style="list-style-type: none"> Representation at Heads of Procurement Networks 	Other local authorities
		<ul style="list-style-type: none"> Host or attend knowledge transfer meetings with neighbouring authorities to share forward looking work plans. 	Other local authorities
	Maximise opportunities for collaboration	<ul style="list-style-type: none"> Approach local authorities when a new procurement is initiated to understand scope for collaboration 	Other local authorities
		<ul style="list-style-type: none"> Monitor all major procurement buying organisations (PBO's), align relevant opportunities to forward work plan. Disseminate relevant opportunities to key officers 	External organisations. Heads of Service and Managers in all service areas
Contract Management	Improve post contract award and commercial outcomes	<ul style="list-style-type: none"> Development of a Contract Management guide for Officers Support Key officers in commercial negotiations and continuous improvement activities. 	Heads of Service and Managers in all service areas