

1.1	Procedures & Governance	CPSS should review and update procurement training, guidance manuals and templates, in consultation with relevant stakeholders, to ensure it is sufficiently clear, concise, consistent, accurate and up to date.	Commercial and Procurement have reviewed the guidance and nearing completion of updating of templates. Revised guidance and templates will be published on the C&PSS SharePoint page with communication to all Delegated Procurers issued on the updates. The E_Learning modules on ACC Learn will thereafter be updated to reflect changes.	Moderate	Complete	<p>1. Review of Procurement Manual and all associated templates.</p> <p>2. Publish revised guidance and templates on CPSS SharePoint (re-design of SharePoint page to reflect each procurement process and relevant stages).</p> <p>3. Draft and issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum.</p>
1.2	Procurement Checklists	CPSS should mandate and automate use of the procurement checklist.	Commercial and Procurement have reviewed the guidance and templates are currently being finalised based on the review, this includes an updated procurement checklist (the checklist template is in word and opportunities for automation will form part of a review on potential processes for automation by Commercial and Procurement), the revised guidance will include a requirement to utilise the procurement checklist for all procurement activity above quotation threshold.	Moderate	Complete	<p>1. Development of revised Procurement Checklist, including review by Internal Audit.</p> <p>2. Draft and issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum - messaging included use of Procurement Checklist mandatory for all procurement activity above £50k.</p>
1.3 a	Delegated Procurement Authority	CPSS should explore options for linking training, DPA, and procurement system records to obtain assurance that procurement is only undertaken by those with the appropriate training and delegated authority. This could include use of a common identifier (e.g. payroll reference numbers), or the use and review of self-declarations at the point of procurement (see 1.2).	Commercial and Procurement will explore options for linking training and update the delegated procurement authority form and process accordingly.	Major	Complete	<p>1. Delegated Procurement Authority (DPA) Form updated with section for employee number, DPA register also included with this information. Self declaration included to ensure users are clear that responsibility for compliance lies with them and there is a need to be familiar with internal regulations, processes and procedures.</p> <p>2. Engagement with colleagues in People & Citizen Services to look at current process and agreed way forward.</p> <p>3. Internal Delegated Procurement Authority Process drafted and implemented.</p>

1.3b	Delegated Procurement Authority	In the interim, CPSS should perform regular random checks on Procurement active users and the level of expenditure to ensure users are suitably qualified to undertake that level of procurement activity.	Along with implementing a process for random checks the delegated procurement authority form will be updated to include a self-declaration and confirmation of understanding that procurement activity can only be completed up to the value of the level of DPA applied for.	Major	Complete	<p>1. Delegated Procurement Authority (DPA) Form updated with section for employee number, DPA register also included with this information. Self declaration included to ensure users are clear that responsibility for compliance lies with them and there is a need to be familiar with internal regulations, processes and procedures.</p> <p>2. Engagement with colleagues in People & Citizen Services to look at current process and agreed way forward.</p> <p>3. Internal Delegated Procurement Authority Process drafted and implemented.</p>
1.3c	Delegated Procurement Authority	A specific exercise should be undertaken to ensure all Chief Officers have undertaken the relevant training and obtained DPA.	Chief Officers will be advised that they are required to undertake the relevant training and obtain DPA Level 3.	Major	Complete	<p>1. Three minute brief presented to Extended Corporate Management Team (ECMT) on the process for Delegated Procurement Authority with information on how to complete training and to be added to the register.</p> <p>2. Agreement of Chief Officers to undertake training and submit forms.</p> <p>3. Chief Officers issued with current DPA register to check delegated procurers per Cluster up to date and accurate.</p>
1.3d	Delegated Procurement Authority	The Council should determine whether or not it is an appropriate option to delegate any of the tasks required of Chief Officers under Procurement Regulations, and if so how internal control will be maintained.	Commercial and Procurement will review options for delegation of tasks required of Chief Officers under Procurement Regulations and consider how these would be recorded/internal controls maintained.	Major	Complete	<p>1. Procurement Sub-Delegations drafted.</p> <p>2. Three minute brief presented to Extended Management Team (ECMT) to seek agreement on way forward and to ask Chief Officers to consider what if any sub-delegations they would wish to have in place.</p> <p>3. Completed Sub-Delegations to be saved in ECMT team site.</p>
1.4a	Procurement Documentation	CPSS should clarify the mandatory information and documentation to be uploaded to the contract register system.	Commercial and Procurement will update the guidance for the Amelior Contract Register system clarifying the mandatory information/documentation to be uploaded and at which stage documents should be added to the system,	Major	Complete	<p>1. Contract register system guides updated to include updated information on required on documents for upload.</p> <p>2. Draft and issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum.</p>

1.4b	Procurement Documentation	Checks and controls should be put in place to ensure key procurement stages cannot progress until documentation has been completed and uploaded.	Wording will be added to the procurement checklist to instruct delegated procurers that all steps in each key procurement stage should be completed before moving on the next stage, adhering to the delegated procurer responsibilities.	Major	Complete	<p>1. Development of revised Procurement Checklist, including review by Internal Audit.</p> <p>2. Draft and issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum - messaging included use of Procurement Checklist mandatory for all procurement activity above £50k.</p>
1.4c	Procurement Documentation	The need to update the system for changes should be reinforced.	The Amelior Contract Register system guidance will also seek to reinforce messaging around updating the system with any changes throughout the life of a contract.	Major	Complete	<p>1. Contract register system guides updated to include updated information on required on documents for upload.</p> <p>2. Draft and issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum.</p>
1.4d	Procurement Documentation	The accuracy of the public contracts register should be reviewed periodically to identify and correct potential anomalies.	The Public Contracts Register will be checked for accuracy before each publication.	Major	Complete	<p>1. Development and implementation of Internal CPSS process in relation to the Publication of the Contract Register. The process includes review of any gaps with services as appropriate.</p>
1.5	Procurement Planning	All procurements for the upcoming year should be added to the Procurement Plan, in advance.	A change is proposed in the Scheme of Governance review for 2024 to remove the requirement for an annual work plan to be presented by each Function/Cluster to committee. Commercial and Procurement do have a process in place to record upcoming procurements via Category Manager Work Plans (which is used along with information from the Contract Register to inform the forward plan in Annual reports) which in part is developed through regular engagement with Services and also through review of expenditure. This process will be reviewed to look at options around ensuring contracts are aggregated sufficiently and also to make this information publicly available for ease of access for suppliers/meet statutory requirements.	Moderate	Complete	<p>1. The terms of reference for the Demand Management Control Board (DCMB) revised to include requirement for annual work plan.</p> <p>2. Draft Work Plan developed and issued to Chief Officers/Senior Management Teams for completion.</p>

1.6a	Aggregate Spend and Exceptions	Requirements for aggregation should be considered in advance, based on planned and historic spending patterns.	A change is proposed in the Scheme of Governance review for 2024 to remove the requirement for an annual work plan to be presented by each Function/Cluster to committee. Commercial and Procurement do have a process in place to record upcoming procurements via Category Manager Work Plans (which is used along with information from the Contract Register to inform the forward plan in Annual reports) which in part is developed through regular engagement with Services and also through review of expenditure. This process will be reviewed to look at options around ensuring contracts are aggregated sufficiently and also to make this information publicly available for ease of access for suppliers/meet statutory requirements	Moderate	Complete	<p>1. The terms of reference for the Demand Management Control Board (DCMB) revised to include requirement for annual work plan.</p> <p>2. Draft Work Plan developed and issued to Chief Officers/Senior Management Teams for completion.</p>
1.6b	Aggregate Spend and Exceptions	Regular use of emergency and technical exemptions should be reviewed and challenged, with longer term procurement strategies identified to demonstrate continuing Best Value for specific requirements.	A process for recording exemptions approved will be created/agreed and implemented to allow for periodic review, as part of the process consideration will be given to rejecting requests where insufficient quotations have been invited (where such requests are not due to market limitations in terms of number of available suppliers).	Moderate	Complete	<p>1. Development of Internal CPSS Process in relation to quote exemptions.</p> <p>2. Revise quote exemption form and develop exemption register.</p> <p>3. Draft and issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum.</p>
1.6c	Aggregate Spend and Exceptions	Consideration should be given to reducing the allowed duration of contracts arising from un-planned procurement.	As part of the above process – potential for restricting contract values will be considered.	Moderate	Complete	<p>1. Development of Internal CPSS Process in relation to quote exemptions.</p> <p>2. Revise quote exemption form and develop exemption register.</p> <p>3. Draft and issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum.</p>
1.7a	Approvals	Clear guidance and controls should be put in place to ensure all relevant approvals are obtained and consistently and transparently evidenced before procurement progresses to subsequent stages, and in every case before a contract is awarded.	Commercial and Procurement will review the current controls and provide clarity on process/procedure.	Major	Complete	<p>1. Development of revised Procurement Checklist, including review by Internal Audit.</p> <p>2. Draft and issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum - messaging included use of Procurement Checklist mandatory for all procurement activity above £50k.</p>

1.7b	Approvals	Contracts should only be awarded within the boundaries of approval granted by Committee.	Contract award report to be reviewed to identify options for additional controls.	Major	Complete	<p>1. Award Report revised and shared as part of overall governance review.</p> <p>2. Draft and issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum.</p>
1.7c	Approvals	Off contract spend in excess of defined procurement thresholds should be independently reviewed, challenged, and where necessary and appropriate procured through the correct channels.	Commercial and Procurement will work with Finance to develop a reporting tool in PowerBI which shows on/off contract spend against budget (and as part of this identify whether possible to have live updates from the Finance and Contract Register systems – this will provide the ability to further scrutinise contracts and spend in real time. This should support identification of issues at an earlier stage and improve scrutiny around off contract spend.	Major	Complete	<p>1. Off-Contract spend dashboard created in PowerBi.</p> <p>2. Assessment was conducted to identify whether live updates from the systems is possible but unfortunately it is not. The dashboard will be created and published quarterly.</p>
1.8	Contract Notices	A process should be developed and put in place to ensure that in all necessary instances contract notices are published correctly and within prescribed timescales.	<p>The process established will be reviewed now the new contract register system is in place to identify whether any additional actions/controls can be put in place to mitigate this risk.</p> <p>Commercial and Procurement will work with Finance to develop a reporting tool in PowerBI which shows on/off contract spend against budget (and as part of this identify whether possible to have live updates from the Finance and Contract Register systems – this will provide the ability to further scrutinise contracts and spend in real time. This should support identification of issues at an earlier stage.</p>	Moderate	Complete	<p>1. Internal CPSS process development and implemented containing a section on engagement with services and escalation method.</p> <p>2. Draft and issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum.</p>
1.9a	Tenders & Quotations	CPSS should consider rejecting requests to proceed with fewer than four competitive quotations where this is the result of insufficient quotations having been invited.	A process for recording exemptions approved will be created/agreed and implemented to allow for periodic review, as part of the process consideration will be given to rejecting requests where insufficient quotations have been invited (where such requests are not due to market limitations in terms of number of available suppliers).	Major	Complete	<p>1. Development of Internal CPSS Process in relation to quote exemptions.</p> <p>2. Revise quote exemption form and develop exemption register.</p> <p>3. Draft and issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum.</p>

1.9b	Tenders & Quotations	A record should be maintained of all instances where permission has been granted to proceed without the requisite number of quotations. This should be subject to periodic review to identify patterns of behaviour and areas where improvement work should be targeted.	The above process will include the creation of a central record for such requests and the team will review whether there is any opportunity to automate the process.	Major	Complete	<p>1. Development of Internal CPSS Process in relation to quote exemptions.</p> <p>2. Revise quote exemption form and develop exemption register.</p> <p>3. Draft and issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum.</p>
1.9c	Tenders & Quotations	A review process should be developed and implemented to confirm whether tender exercises with smaller numbers of bids represent best value, before contracts are awarded.	The procurement guidance will be supplemented to include information on tender exercises with a smaller number of bids and key points for DPA's to ensure best value.	Major	Complete	<p>1. Evaluation guidance developed included what to do where smaller number of bids are received.</p> <p>2. Draft and issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum.</p>
1.9d	Tenders & Quotations	Tender evaluation matrices should include details of officers involved and should be recorded on the contracts register system. Where records indicate evaluations have not been completed by more than one officer, contracts should not be awarded until this has been reviewed.	The contract register guidance will be updated on mandatory documentation to be uploaded which will include evaluation matrices.	Major	Complete	<p>1. Contract register system guides updated to include updated information on required on documents for upload.</p> <p>2. Draft and issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum.</p>
1.10	Framework Agreements	CPSS should develop and implement controls to ensure that frameworks cannot be used until their adoption has been confirmed; relevant call-off contracts have been entered into, following appropriate competition or approved justifications for direct awards; and the call-off contracts with each individual supplier for which approval to spend has been granted have been added to the contracts register system.	Further guidance will be developed around the use of frameworks for delegated procurers, assessment of current process to identify whether there are any areas where controls could be automated are to form part of the review mentioned in the management response.	Moderate	Complete	<p>1. Develop new user guide and templates for use of framework agreements.</p> <p>2. Publish revised guidance and templates on CPSS SharePoint (re-design of SharePoint page to reflect each procurement process and relevant stages with section on frameworks and information on adopted framework agreements).</p> <p>3. Draft and issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum.</p>

1.10	Framework Agreements	The requirements should be clarified in procedures and guidance to avoid ambiguity over the circumstances in which this should apply.	Further guidance will be developed around the use of frameworks for delegated procurers, assessment of current process to identify whether there are any areas where controls could be automated are to form part of the review mentioned in the management response.	Moderate	Complete	<p>1. Develop new user guide and templates for use of framework agreements.</p> <p>2. Publish revised guidance and templates on CPSS SharePoint (re-design of SharePoint page to reflect each procurement process and relevant stages with section on frameworks and information on adopted framework agreements).</p> <p>3. Draft and issue communications via the Intranet, to delegated procurers and to Chief Officers/Leadership Forum.</p>
1.11	Direct Awards	CPSS should record justifications for each non-competitive action, with explicit reference to relevant sections of the legislation. The prevalence of direct awards without competition should be reviewed to ensure there is continued sound justification in every case.	A process for recording exemptions approved will be created/agreed and implemented to allow for periodic review.	Major	Complete	<p>1. Development of Internal CPSS Process in relation to quote exemptions.</p> <p>2. Revise quote exemption form and develop exemption register.</p> <p>3. Draft and issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum.</p>
1.12	Purchase Orders and Payments	All purchase orders, however generated, should have contract reference numbers included. Controls should be implemented to ensure orders cannot be raised without a contract reference. Material up-front payments should be subject to appropriate controls / approvals.	Commercial and Procurement will work with Finance to develop appropriate corporate messaging, there are limitations around controls as the system does not have an option for a mandatory contract reference field.	Moderate	Complete	<p>1. Developed with Finance appropriate communication on purchase order evidence requirements, issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum. .</p> <p>2. Developed with Finance messaging around upfront payments linked to contract payment terms, issue of communication via the CPSS SharePoint page, the main ACC Intranet Page, to delegated procurers, to Chief Officers/Leadership Forum.</p>