



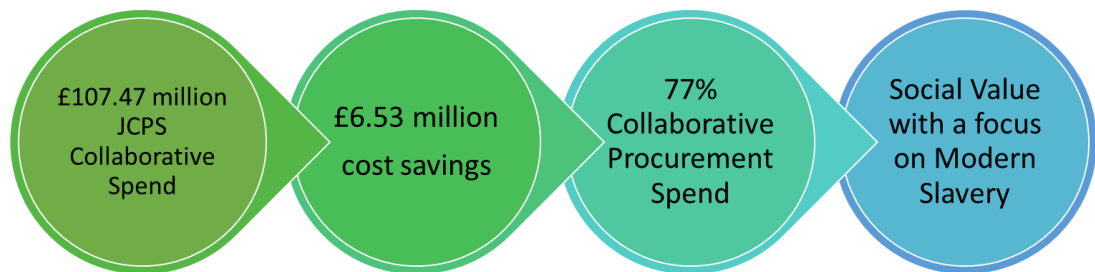
Decision log PCCG-2022-017

Southern Wales Forces Procurement Collaboration

Joint Commercial and Procurement Services

Annual Report 2021 | 2022

EXECUTIVE SUMMARY



In 2021/22 the three Southern Wales forces spent £140 million on goods, services and works of which 77% was spent collaboratively, a figure which has received praise from HMIC.

Procurement related cost savings were delivered across Dyfed-Powys, Gwent and South Wales Police, totalling £6,530,760, of which £6,096,386 are cashable savings. On a national basis, the 43 police forces greatly surpassed the Home Office £20 million cashable savings target, with £36.4 million savings delivered.

£434,374 of **notional savings** were recorded by South Wales and Gwent including £80,454 by the Ordering Teams. Notional savings compare the winning bid in a tender process with the *average* of bids received, thus demonstrating the value for money achieved through a procurement process and as a result of our practice to demonstrate value for money for purchases exceeding £500.

Savings are reported to the Home Office on a monthly basis but responsibility for the management of collating this data transferred to Bluelight Commercial in 2021.

The South Wales Police and Gwent Police Joint Commercial and Procurement Services (JCPS) unit was established on **1st June 2020** with Dyfed Powys Police retaining involvement in the collaboration from a strategic perspective and continuing to lead some collaborative procurements.

We are making best use of our resources through the joint unit and more widely where JCPS or Dyfed-Powys are procuring on behalf of the three southern Wales forces or more widely. Additional benefits are realised through sharing best practice and continuous improvement as well as by working with Bluelight Commercial. The Welsh forces are leading the way on tackling modern slavery in supply chains and in considering social value benefits through our procurements.

Embedding a new unit has been a challenge whilst all staff, including some new starters, are working remotely but this report evidences some significant achievements in the second year since the establishment of the unit, particularly as a result of the appointment of the Contract Management Officers. The 2020-21 report identified 5 priorities for 2021-22 and the report demonstrates progress against each of these.

Progress Against the Priorities identified in the 2020-21 report

1. *A continued focus on Contract Management*

By appointing two new contract management officer posts, JCPS has been able to achieve a range of improvements which would not have otherwise been possible. These include:

- a review of key contracts to resolve outstanding issues, a deep dive audit to ensure the forces are receiving value for money and the setting up of quarterly business reviews to monitor supplier performance.
- the introduction of a contract classification tool to determine the appropriate level of resource required by both the client and JCPS. The development of an improved contract manual, contract bulletins for BOB and The Beat
- £133,062 cost savings through negotiation, continuous improvement and cost avoidance as a result of the contract management officer roles.
- Contract Management Training – JCPS worked with Bluelight Commercial to develop training for client leads and operational contract managers. South Wales and Gwent were asked to be the pilot forces for two cohorts of training for our officers and staff.
- development of an e-learning package for both forces to upskill colleagues to make compliant purchases and understand public sector procurement.

2. *To publish a refreshed modern slavery statement in early 2021/22 underpinned by a local action plan*

Noteworthy progress has been made against this priority to tackle modern slavery within our supply chains. Bluelight Commercial have confirmed that the Welsh forces continue to be amongst those leading the way in addressing unethical and illegal employment practices in our supply chains.

The forces are mapping their supply chains to ensure our suppliers understand and tackle the risks of modern slavery. As at March 2022, 55 higher risk suppliers have been issued with an SAQ, with 48 providing a response. Both forces are well on track to meet the action plan target of assessing their top 100 suppliers by 2025.

3. *To work with Bluelight Commercial to trial a social value tool and to develop themes, outcomes and measures that are relevant to policing and support our police and crime plans*

From January 2021, under Procurement Policy Note 06/20, social value should be evaluated and measured in tender bids where the requirements are related to the subject matter of the contract. To support the evaluation and measurement of social value through tender bids, Bluelight Commercial have developed a Social Value Application and Measurement Toolkit. JCPS worked with Bluelight in advance of this to understand how the toolkit would include policing themes in line with our police and crime plans. Both JCPS and Dyfed-Powys volunteered to trial the social value tool in our tenders.

We will commence the inclusion of social value as a scored evaluation criteria in relevant and appropriate tenders in 2022. A four force workshop is scheduled for the end of April 2022 to allow force leads to identify the economic, environmental and social priorities we will ask our supply chains to support the forces in delivering over the next 12-18 months

4. To support the Welsh forces' collective response to an assessment of efficiency in policing and to contribute towards each force's value for money plans.

JCPS has evidenced its contribution towards each force's value for money plan through the delivery of cashable and notional savings noted above, thus demonstrating the value of the procurement process. Our aim is to deliver on our priority to spend public money wisely in order to best support policing in our communities.

By encouraging client departments to engage with the market and to spend time on the Pre-Procure phase of the commercial lifecycle, we have ensured that the specification we advertise to the market meets the needs of all the forces named and that the goods or services we are seeking to purchase are available and take advantage of the latest developments in the market. It is too easy to specify what we have purchased in the past and to miss an opportunity for better value for money.

We have built closer working relationships internally with key departments such as Estates, Fleet and IT and improved our understanding of the Gwent Police agreements in place with local authorities who provide a service to Gwent through collaborative arrangements.

The Head of Commercial Services continues to provide a clear link to Bluelight Commercial to ensure we engage proactively, and it is reassuring that the southern Wales forces have been asked to act as pilot forces for various initiatives during the year. The Welsh forces have engaged well with Bluelight Commercial in order to contribute to a collective response to driving efficiency and make best use of resources in policing.

Procurement Skills Training

The **Procurement Skills e-learning** package, developed in conjunction with South Wales Learning Development Services was adapted for Gwent Police and is now available to upskill officers and staff who have involvement in spending force funds. Officers and staff frequently lack business skills and are not aware of the requirements of procurement in the public sector and of the importance of demonstrating and delivering value for the public purse.

In addition, JCPS delivered **Developing Commercial and Procurement Skills training** to South Wales and Gwent supervisory and senior management level officers and staff. This builds on the skills learnt at Practitioner level and provides essential skills for those responsible for spending larger amounts of funding and therefore involved in the commissioning cycle. The training will be offered to other officers and staff in 2022/23.

Priorities for the Year Ahead

The priorities for the year 2022/23 will be to further progress the work of the Joint Commercial Services and Procurement unit, to continue to deliver the Southern Wales forces collaborative procurement strategy 2020-2025 and to deliver the following objectives:

1. To build on the work commenced in 2021/22 to upskill client leads and contract owners in contract management and to ensure that the managers of the top 20 critical contracts have this core competency.

2. To continue the work to tackle modern slavery in our supply chains, led by the Chief Financial Officer who is the appointed Ethical Champion in each force. A refreshed Modern Slavery Statement will be published in 2022, underpinned by a local Action Plan for each of the four strands identified. Delivery of the actions will be monitored at the regular Task and Finish Group meetings. Our initial discussions with Police Digital Service and the Met Police will aid our efforts to make best use of the procurement resource nationally. The work across Wales is a joint approach and progress will be reported at an All Wales strategic level.
3. As an extension of the work on ethical supply chains, the Welsh forces will support the All Wales Sustainability Strategy and work with clients to deliver social value through relevant procurements. Using key priorities based on policing themes, we will specify, evaluate and monitor social value in our procurements, in order seek to change behaviours and work to protect the environment, workers' rights and mental and physical wellbeing.
4. To take full advantage of the collaborative contracts and opportunities led by Bluelight Commercial, providing input at the pre-procure phase to ensure the needs of the Welsh forces are represented. We will continue to maximise the level of collaborative spend where this delivers best value commercially and with regard to sustainable solutions.
5. To continue to contribute to value for money savings through effective specifications and procurement exercises, demand management, collaboration and consolidation.

1.0 PURPOSE AND RECOMMENDATION

The purpose of this report is to provide information on the activity and progress of Procurement and Commercial Services across the Southern Wales forces during the period 1st April 2021 to 31st March 2022. In particular, the report provides information on the South Wales and Gwent Joint Commercial and Procurement Services (JCPS) unit for monitoring and reporting purposes.

There are no recommendations requiring a decision.

2.0 INTRODUCTION & BACKGROUND

The southern Wales forces have continued to progress collaboration in procurement and collaborative procurement is now a business as usual consideration for the purchase of our goods and services. We are making best use of our resources through the joint unit and more widely where JCPS or Dyfed-Powys are procuring on behalf of the three southern Wales forces or more widely. Additional benefits are realised through sharing best practice and continuous improvement as well as by working with Bluelight Commercial on matters such as the development of training and the response to supporting goods and services during the pandemic, the EU Exit supply shortages and the Ukraine and Russia crisis. The Welsh forces are leading the way on tackling modern slavery in supply chains and in considering social value benefits through our procurements.

The 2020/21 report identified 5 priorities for this year and progress against each of these is expounded in section 3.1 of this report.

In 2021/22 the three southern Wales forces spent £140,023,079 on goods, services and works of which 77% was spent collaboratively. Gwent and South Wales spent £39.58 million and £77.24 million respectively. Dyfed Powys's collaborative spend figure was maintained at the previous year's figure at 69%.

A more detailed analysis of the year's expenditure is shown in Appendix A. The top 10 suppliers to each of the three forces account for 53%-66% of the goods and services spend.

3.0 ISSUES FOR CONSIDERATION

3.1 Delivery of the priorities identified in the 2020-21 Report

The report for 2020-21 highlighted five priorities as a focus for the coming year and progress against each of these is evidenced below.

- 1. A continued focus on Contract Management, supporting client departments and contract owners and working with Bluelight Commercial to offer fit for purpose contract management training to upskill officers and staff across the forces.***

When the joint unit was established, two new Contract Management Officer posts were approved with the purpose of increasing the focus on contract management, relationship management and support to client departments and contract owners. Working with the JCPS team, the Contract Management Officers have achieved a range of improvements which would not have been possible without this resource. The improvements include the following:

- Review of an initial set of key contracts including Uniform supplied by DHL, Cleaning, Energy, ANPR, Gwent's IT service supplied by the SRS and Estates services provided under an arrangement with Monmouthshire Council. Many outstanding issues have been resolved, a deep dive audit into the contractual documentation has been carried out to ascertain if the force(s) is receiving value for money and quarterly business reviews are set up to measure the suppliers' performance.
- Introduction of a Contract Classification tool - Gold, Silver, Bronze – based on complexity, risk and value. The classification allows priority contracts to be identified at procurement stage, to determine the appropriate level of contract management post award and to indicate the level of resources required by the client and JCPS.
- Review of standard Invitation to Tender (ITT) and contract documentation to consider enhancements to better support contract management, such as improved KPI and performance mechanisms, continuous improvement obligations on the contractor, ease of documentation to attract greater market interest.
- Creation of a central hub for contract management documentation and associated tools for use by the strategic procurement team. These include an improved contract management manual, change control, lessons learned, better governance, terms of reference, a relationship management matrix, continuous improvement plan and benefits capture.
- Contract Management Training - we have worked with Bluelight Commercial to develop specialist Contract Management training for client leads and operational contract managers, considering best practice from Chartered Institute of Procurement & Supply (CIPS), IACCM and the Government Commercial Function. South Wales and Gwent were the pilot forces for this training and two cohorts of 14 officers and staff attended the training sessions with future sessions available to other leads. By upskilling our client leads and contract owners, we are enabling them to better manage key contracts. The challenge is to continue to provide training to others moving into client lead roles, especially to officers where there is continual churn. JCPS will continue to work with BLC to accelerate the delivery of the training across other forces.
- In conjunction with Learning and Development, JCPS has developed an e-learning package to enable colleagues in both Forces to develop basic procurement skills and to make purchases compliant with Force Contract Standing Orders and national procurement legislation.
- Financial Risk Monitoring - utilisation of Dun & Bradstreet portfolio reporting to monitor and notify of business changes in circumstance of our strategic suppliers.
- Contract Bulletins for force wide contracts drafted and communicated on the Gwent procurement intranet page. We are working to implement a joint page for the Beat and BOB.
- The improved contract manual is included as part of the procurement lifecycle and used in the mobilisation when handing over to the internal stakeholders.
- Ethical Supply Chains – this work is detailed under Point 2 below, but in summary, we have been able to issue assessments to a large number of higher risk suppliers to provide assurance to the forces that

our commitment to tackle modern slavery is shared by our suppliers. We have mapped our supply chain to understand the risks both strategic and labour within the two Forces.

- Sustainability Support - the Contract Management Officers provide guidance and advice to deliver responsible procurement and in the agreement of sustainable procurement priorities, working alongside Bluelight Commercial and Welsh Government.
- Delivery of a range of cost savings through negotiation, continuous improvement, and cost avoidance as a result of the establishment of the new contract manager roles. They have led the process, improved supplier relationship management and investigated the reason for price increases that historically would have been accepted without the resource to do a deep dive. Some of the highlights are summarised in the table below.

2. To publish a refreshed modern slavery statement in early 2021/22 underpinned by a local action plan

Important progress has been made against this priority to tackle modern slavery within our supply chains. Bluelight Commercial have confirmed that the Welsh forces continue to be amongst those leading the way in addressing unethical and illegal employment practices in our supply chains.

In order to fulfil our commitments within the Welsh Government Ethical Employment in Supply Chains Code of Practice, each force published a refreshed Modern Slavery Statement for 2021-2022, underpinned by an annual Action Plan.

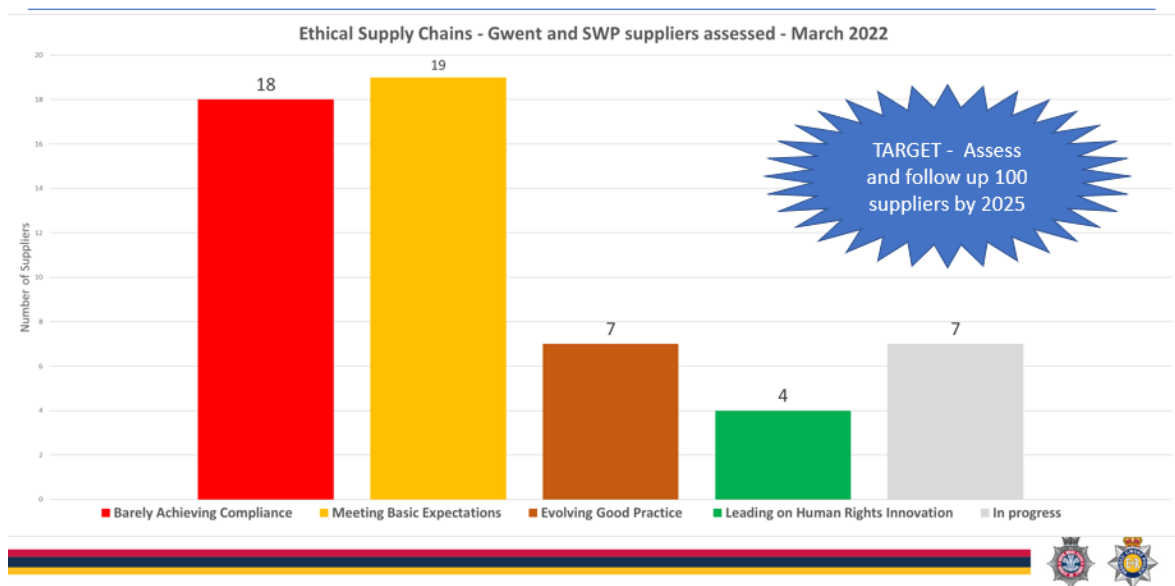
Our approach to identifying and tackling ethical supply chain issues remains focused on four strands:

- **Enforcement** – improving Intelligence gathering through compliance with the Code of Practice
- **Ethical Procurement** – promoting the development of ethical supply chains in the delivery of contracts for the police service in Wales
- **Employment** – All Wales working to a common policy with buy-in across the organisations impacting mainstream and day to day business
- **Environment** – The public in Wales is not a bystander and reports exploitation in all its forms

Modern slavery extends far beyond our national borders and risks are increased with complex supply chains. Whilst tackling modern slavery is a policing priority for each force, the Welsh forces recognise that modern slavery can extend throughout our supply chains and that we have a responsibility to address this through procurement practices.

Ethical Supply Chain Task and Finish Groups were held bi-monthly throughout 2021/22 in both South Wales and Gwent, chaired by Chief Financial Officer/ACO-Resources. The groups demonstrated good progress in implementation of the local action plan. Using a Supply Chain Due Diligence Tool and

Supplier Assessment Questionnaire (SAQ) the forces are mapping their supply chains. As at March 2022, 55 higher risk suppliers were sent an SAQ, with 48 providing a response. Both forces are well on track to meet the action plan target of assessing their top 100 suppliers by 2025.



JCPS are sharing the mapping information of common suppliers with Dyfed Powys Police and have issued assessments on their behalf to a small number of suppliers as part of our collaborative approach. In addition, we have liaised with the Met Police who are undertaking a similar campaign with their key supplier, with a view to making best use of resources. We have asked BLC and the Police Digital Service to support this work by managing modern slavery progress by national suppliers on behalf of the Forces.

3. *To work with Bluelight Commercial to trial a social value tool and to develop themes, outcomes and measures that are relevant to policing and support our police and crime plans*

Sustainability and Social Value

The police forces in Wales have taken good steps forward to decarbonise and develop more sustainable working and are developing an All Wales Sustainability Strategy with ambitious targets. Social value recognises the additional social, economic and environmental benefits to local communities, and we are able to consider how well-being may be improved through the goods, works and services we procure. Examples of tangible benefits range from an increase in the number of apprenticeships, a reduction of CO2 footprint to softer benefits such as reducing the risk of modern slavery in the supply chain. The social priorities are linked with the United Nations [Sustainable Development Goals](#) which the UK has committed to deliver.

Delivering social value allows us to change behaviours and work to protect the environment, workers' rights and mental and physical wellbeing. From January 2021 under Procurement Policy Note 06/20, social value should be evaluated and measured in tender bids where the requirements are related to the subject matter of the contract.

To support the delivery of this through procurement, Bluelight Commercial have developed a Social Value Application and Measurement Toolkit. JCPS worked with Bluelight in advance of this to understand how the toolkit would include policing themes in line with our police and crime plans. Both JCPS and Dyfed-Powys volunteered to trial the social value tool in our tenders. This is good preparation to commence the inclusion of social value as a scored evaluation criteria in relevant and appropriate tenders in 2022. Currently, this is only mandated for central government, but the Welsh forces recognise their responsibility and the opportunity to deliver benefits through social value.

A four force workshop is scheduled for the end of April 2022 to allow force leads to identify the economic, environmental and social priorities we will ask our supply chains to support the forces in delivering over the next 12-18 months. The work on tackling modern slavery is one element of this work. Whilst the consideration of Social Value is not new, the emphasis on this has increased significantly and the challenge is for client leads to understand the relevance in order to reduce demand on the police and other public services.

In addition, South Wales Police's application to become an accredited Living Wage Employer was approved in early March 2022. This is an important fair work practice which we will evaluate in tenders where appropriate.

4. To support the Welsh forces' collective response to an assessment of efficiency in policing and to contribute towards each force's value for money plans.

JCPS has evidenced its contribution towards each force's value for money plan through the delivery of cashable and notional savings, demonstrating the value of the procurement process. Our aim is to deliver on our priority to spend public money wisely in order to best support policing in our communities. We are amongst the forces leading the way on evaluating social value priorities in our procurements as we intend to consider this for relevant contracts in early 2022.

By encouraging client departments to engage with the market and to spend time on the Pre-Procure phase of the commercial lifecycle, we have ensured that the specification we advertise to the market meets the needs of all the forces named and that the goods or services we are seeking to purchase are available and take advantage of the latest developments in the market. It is too easy to specify what we have purchased in the past and to miss an opportunity for better value for money.

The focus on contract management rather than a 'let and forget' mindset is further evidence of how we are supporting contract owners to achieve best value. By establishing two Contract Management Officer posts, we have delivered savings, such as those listed in the table in point 1 above.

We have built closer working relationships internally with key departments such as Estates, Fleet and IT and improved our understanding of the Gwent Police agreements in place with local authorities who provide a service to Gwent through collaborative arrangements.

The Welsh forces have engaged well with Bluelight Commercial in order to contribute to a collective response to driving efficiency and make best use of resources in policing.

5. To find better solutions to ensure a manageable workload for the JCPS team, to prioritise effectively to minimise disruption.

Demand for Procurement Services

South Wales and Gwent Joint Commercial and Procurement Services (JCPS) is now established across both forces and continues to make best use of a finite procurement resource, enabling collaboration, increasing a focus on contract management and aligning ordering functions across South Wales and Gwent.

The increased level of demand that arose during the pandemic has continued this year as expected and the risk is highlighted on the local risk register. The demand is not expected to reduce whilst a high level of officers and staff continue to work from home, but it is hoped that 2022/23 will see a change to hybrid working. This has already commenced with the opening of Gwent Police's new Headquarters.

A snapshot of the demand taken in October 2021 showed 325 procurement projects allocated across 10 procurement leads with a further 35 awaiting allocation.

We were able to fill the vacancies created through the creation of the new joint unit but a year later, new vacancies arose through growth and losing staff to pursue promotion within external organisations. Whilst the vacancies are almost all filled again, growing our own talent and succession planning has proved successful but the unit is a victim of its success where further promotion is not possible. The level of demand for procurement services in Dyfed-Powys continues at the unparalleled level seen throughout the pandemic, resulting in a high workload for the small team of three.

The pressure on the strategic procurement staff is at times considerable and has affected wellbeing. This is being managed through prioritisation, with decisions escalated to chief officers where necessary, as well as through communication and educating project leads to ensure JCPS is advised of any upcoming procurement requirements as early as possible. The joint unit has been successful in reducing the number of single tenders approved by letting contracts under suitable frameworks, particularly relating to ICT software.

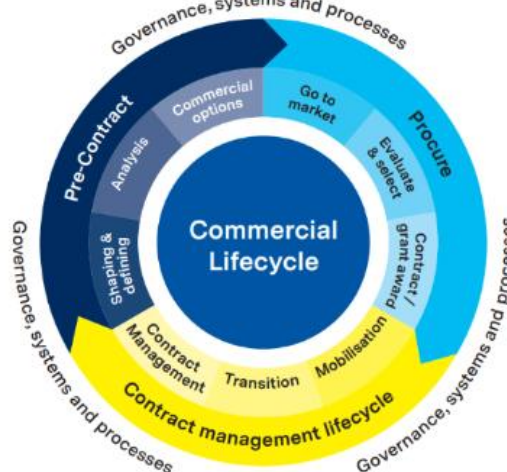
Further information on the procurements managed by the team this year is provided in section 3.4 below.

3.2 2020-2021 Procurements and Expenditure Summary

The contracts awarded during 2021/22 were for a wide range of goods, services and works. The work on many above-threshold contracts commenced in 2020/21.

The number of procurement projects in the Pre-Contract or Procure phase of the commercial lifecycle means that the strategic procurement staff are managing multiple procurements at any one time, in addition to supporting contracts in the contract management stage of the phase of the lifecycle.

The table below shows that 183 contracts, 23 extensions to contracts and 40 formal quotation exercises were awarded by JCPS for South Wales



and Gwent forces between April 2021 and March 2022. Of these 94 contracts were Single Tender approvals.

Of the £91.37 million spent by South Wales and Gwent on goods, services and works, 78% via JCPS was collaborative, a level which has received praise from HMIC.

Joint Commercial & Procurement Services (Combined figures for Both Forces)					
Contracts Awarded	Extensions Awarded	Quotations over £10k	Spend Both Forces	Collaborative Spend Both Forces	Savings
March-22	March-22	March-22	March-22	March-22	March-22
22	3	5	£13,311,839	£5,887,386	£5,488,986
Value	Value	Value	YTD 2021-22	March % Collaboration against G&S	YTD 2021-22
£9,283,747	£68,000	£118,552	£160,436,396	62%	£6,270,836
YTD 2021-22	YTD 2021-22	YTD 2021-22	Goods & Services Mar-22	YTD 2021-22	
183	23	40	£9,465,536	£91,372,830	
YTD Value	YTD Value	YTD Value	Goods & Services YTD	YTD % Collaboration against G&S	
£46,546,400	£3,085,351	£909,492	£116,820,297	78%	

The dashboard in Appendix A provides further detail on the expenditure and cost savings delivered for the year by Force.

3.4 Collaborative Procurement Progress and Key procurements

Some of the highlights for this year are outlined below.

1. Joint Control Room System

For the first time South Wales and Gwent forces joined together to tender for a new joint control room system to replace several systems currently in use. We drafted a set of very complex tender documents alongside operational and technical leads from both forces. Significant process has been made with the tender process and the final evaluation is underway with presentations being planned. Engaging the market at the pre-procure phase of the commercial lifecycle and ensuring the specification was agreed and reflected the needs of all parties was critical for a good result. The final result should be known at the end of April 2022.

2. Disposal of Devices that contain data

We have established a framework which allows forces across the country to either have devices destroyed or wiped and sold for income. To date, an offer of over £128,000 has been accepted for the sale of SWP's old Samsung devices and circa £60,000. Another competition is underway for the sale of Gwent's devices, and it is possible that some of the existing HP laptops will be sold for income when the replacement programme has been completed later in 2022.

3. Patient Management system

We carried out a joint tender process to replace the current system in Gwent and the manual processes within SWP and DPP. Extensive work has gone into drafting a specification for the first time and evaluating tenders received. Vetting is underway, along with consultation between Procurement, the Client Departments, ICT, SRS FIRMS, and the respective FISOs before the contract can be signed and implemented.

4. Mobile Phone replacement programme

We worked with ICT and DSD to carry out a joint competition for the replacement of more than 7000 Samsung mobile phones, along with support of relevant software. The contract was awarded and, in accordance with the DSD plan, Gwent's deliveries were prioritised over SWP's to ensure all project deadlines were met for the roll out in both Forces.

5. New SIP (Session Initiation Protocol) Telephony contract

JCPS supported ICT in tendering for a new SIP Telephony contract which was awarded to BT at a cost of around £1.4 million per year for 5 years with 2 years' possible extension. The contract includes decommissioning our PSTN services and transferring to "SIP IP Infrastructure" future proofing SWP as we move away from traditional phone hardware to newer software-based telephony such as Teams. The savings are expected to be considerable in comparison to the previous service provision. Savings will be achieved as the old system is decommissioned and the new services are up and running, added to the roll out of Office365 which will see more calls being made via Teams.

6. Force Medical Advisor contract

SWP made a saving of £109,243 during the period April 2020 and March 2021 on our Force Medical Advisor contract. Due to an issue in the supply of doctors, the service was nurse managed with assistance from our provider when required. A new contract under the National Procurement Service framework will be awarded for the three southern Wales forces in early 2022.

7. Weapons System for Joint Firearms Unit

A tender for a new Weapons system was completed in Summer 2021 with a supplier market engagement event held prior to the tender. In addition to the traditional quality and commercial evaluation stages this tender included testing and 3rd party toxicology testing. The contract commenced in December 2021. This tender was one of the first contracts to include the newly developed modern slavery questions.

8. Planned Events Catering

For the first time the forces collaborated on a Planned Events Catering. The contract was split into lots and initially awarded to the same supplier, but the supplier could not fulfil the SWP requirement, so negotiations were undertaken with the 2nd ranked supplier and we have managed to provide continuity of service for SWP.

9. Office Furniture

A new Office Furniture and associated products contract was awarded on behalf of the three southern Wales forces as a result of a mini competition via the NPS Furniture Solutions, awarded in July 2021. This supports our commitment to collaborating with the Welsh public sector and as three forces where possible.

10. Temporary Labour

JCPS worked with Bluelight Commercial on their new national Contingent Labour framework. The contract is due to be awarded officially in Spring 2022. It is anticipated that the contract will provide a solution that will cover forces specialist requirements, offering competitive rates and reduce aggregated spend with multiple suppliers.

11. Forensic Analytical Services

Dyfed Powys is the Host Force for the West and South Coast Consortium (WSCC), who facilitated the tender process with the Central Management Team (CMT). WSCC consists of 15 member forces which act as a consortium for the purpose of contracting with Forensic Analytical Service Providers. CMT contract manage the agreement on behalf of all member forces, who have signed up to a Collaboration Agreement which governs the WSCC. The value of contracts for the WSCC total £21,235,311 annually.

The new contract is for a period of three years, expected to commence 1.7.22, with an option to extend for two further years. The Lead Force acts as agent for the purpose of contract signature only as each Force contracts individually with each supplier as necessary.

Due to financial status of suppliers tendering and fragility of forensic supplier market, additional due diligence has been undertaken and has been presented to WSCC DCC's for approval. Whilst there is a large average increase (approx. 20.5%), this follows a period of significant underspend. The risk to Policing of a Supplier leaving the market due to financial distress would have huge ramifications for many stakeholders within the CJS and is a risk that cannot be dismissed

12. Capital Projects

JCPS continued to support major build capital projects in both forces. Gwent Headquarters and SWP Police Learning Centre were handed over in 2021/22. Other capital projects included the Abergavenny Hub, the Gwent Operational Policing Facility, Tri Force Firearms Range and the Cardiff Temple of Peace refurbishment. Work has been undertaken to establish routes to market for Construction and Project Services to support the forces long term Estates strategy.

13. Extensive work with Safer Streets

The award of large Home Office grants for Safer Streets 2 and 3 to both forces added an unplanned and high volume demand on the team with over 25 requirements within the space of a few months.

This demanded a mix of mini competitions, Requests for Quote, Single Tender Requests and direct awards to ensure value for money was achieved within the tight timescales the Home Office imposed on spending the grants.

Dyfed-Powys Procurement Highlights

14. Forensic Analytical Services

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15. Contact Management Solution

Dyfed Powys have undertaken a significant procurement exercise in 2021 to award a contract for a new Contact Management Solution, that will incorporate Emergency Telephony with a Customer Relationship Management system within the Force Contact Centre. The contract was awarded to Airwave Solutions.

16. **The contract for Independent Police Complaints** used by OPCC for North Wales, Gwent and Dyfed Powys has been renewed.

17. **Rigid Inflatable Hull Boat**

Dyfed Powys Marine unit secured significant funding to purchase a new Rigid Inflatable Hull Boat and a contract was awarded via the Bluelight Commercial Framework. Timescales were tight to utilise the funding which needed to be committed by 31st March 2022, the framework enable the procurement to be conducted at pace.

3.5 Procurement Skills Training

The Procurement Skills e-learning package, developed in conjunction with South Wales Learning Development Services was adapted for Gwent Police and is now available to upskill officers and staff who have involvement in spending force funds. Officers and staff frequently lack business skills and are not aware of the requirements of procurement in the public sector and of the importance of demonstrating and delivering value for the public purse.



Furthermore, JCPS delivered Developing Commercial and Procurement Skills training to South Wales and Gwent supervisory and senior management level officers and staff. This builds on the skills learnt at Practitioner level and to provide essential skills for those responsible for spending larger amounts of funding and therefore involved in the commissioning cycle and will be offered to other officers and staff in 2022/23.



Requirement – Specification

Considerations

Input Specification	Output Specification	Outcome Specification
Explains in detail how a client expects to achieve their goals – clear technical standard, plans, drawings, prescribes how a service should be provided or the specification of a specified component: Do we have expertise? No incentive to innovate or improve service effectiveness. More suitable for goods than services. How do you know it is really what you need? Client takes full responsibility for fitness for purpose.	Defines what the service provider is expected to deliver e.g. to paint a building. Supplier has freedom to avoid in developing the best route to the result. Still requires informed and detailed spec. Needs careful drafting – e.g. how clean? Standards are available for defining performance requirements. Transfers more risk to the supplier.	Defines what the client aims to achieve over the duration of the contract or beyond. Communicates ultimate business objective to allow supplier to determine a best fit solution. May include guidance but better to contract e.g. for a financial report by a deadline than for two weeks consultancy by an accountant.

"Focusing mainly on the intended outcomes gives potential suppliers more opportunity to offer alternative solutions. Organisations should be clear about what outcomes they are seeking to achieve, to help set out their requirements when entering into commercial agreements"
NIG Good Practice Guidance Managing the Commercial Lifecycle, July 2021

3.6 Gwent No PO, No Pay policy and credit card improvements

A No PO, No Pay policy in Gwent was launched in February 2020 to encourage good practice of raising requisitions prior to agreeing to purchases and to ensure suppliers are paid promptly. This policy was put on hold during the pandemic but went live again in December 2021.

Current compliance level figures are below and show a significant improvement in the percentage of transactions covered by purchase order.

Percentage of Transactions Covered by Purchase Order	%
2020/21	29.67%
2021/22	53.06%

Gwent Non-Pay Spend covered by a purchase order	
2019/2020	42.06%
2020/2021	60.96% N.B. This figure is skewed by several large payments relating to Gwent HQ construction project
2022	62.62% and 58.32% excluding payments for the Gwent HQ construction project

Improvement to the management of Gwent force credit cards

The cards, currently provided by Barclaycard under the Welsh public sector framework, moved from Gwent Finance to be managed by JCPS in 2021, as is the case within South Wales Police. This has proved a good opportunity to streamline the cards, tighten up processes and practice and improve the reconciliation of expenditure by card holders, thus reducing risk to the force.

• COLLABORATION

4.1 Joint Commercial and Procurement Services

Established in June 2020, the joint unit is now firmly embedded within South Wales and Gwent. The structure for the strategic procurement teams and responsibility for Gwent's Ordering team are operating well. Dyfed Powys retains involvement from a strategic perspective and is managing key procurements such as leading on Forensic Analytical Services for the WSCC (West and South Coast Consortium) in conjunction with the Central Management Team and playing a leading role in the ESN project. The latest structure of the joint unit and the Dyfed Powys team are illustrated in Appendix D.

South Wales and Gwent have aligned contract management, ordering processes and the continuous improvement of procurement processes and practice. A workplan is in place for two primary categories, each headed by a Procurement Manager, under the Head of Commercial Services.

The benefits of the joint unit include:

- A clear workplan across goods, services and works categories. A procurement manager has ownership of each of the two primary categories, under the Head of Commercial Services.
- Alignment of working practices and continuous improvement of the same to respond to changes in legislation, case law and lessons learned
- Resilience for the Ordering Teams
- Removal of duplication thus making best use of resources
- A clear link to Bluelight Commercial to maximise the benefits of this commercial partner to police forces
- Improved data analysis of goods and services expenditure and a monthly dashboard
- Cashable and other procurement related savings
- A reduced level of risk by establishing better contract arrangements and reduced contract leakage.
- 120 files for **new** procurements let by the joint unit were set up in 2021/22, in addition to the 104 files created in the first year of the unit.
- The Contract Management Officer posts have enabled a vital focus on the contract management phase of the commercial lifecycle. The benefits delivered to date are summarised in Section 3.1, Priority 1 of this report. We would not have been able to achieve a range of successes without this resource.

4.2 Bluelight Commercial

Bluelight Commercial (BLC) has developed its work this year as the commercial partner to forces to aid the delivery of value through commercial expertise and innovation.

The Head of Commercial Services remains the main point of contact with BLC for the southern Wales forces, but Procurement Leads engage with BLC for particular pillar activities. The Regional Commercial Director with responsibility for the southern Welsh forces meets regularly with the Heads of Procurement to ensure our priorities are represented within BLC and to keep us well-informed of BLC activities. We have agreed some improvements to the communication structure to ensure that the BLC updates provided meet the specific needs of the Welsh forces.

Bluelight Commercial's support to police forces this year included:

- Support, guidance and workshops on Social Value. The provision of a Social Value Toolkit to assist forces in the delivery of social value through their supply chains. BLC have contacted 1300 larger suppliers to invite them to register on a Social Value Action Planning Tool.
- The first Strategic Sustainable Governance Board took place in November 2021 with representation from the NPCC, APCC and the College of Policing. The programme covers three workstreams – strategy & policy, estates & energy and transport & supporting infrastructure. BLC are establishing baseline data with forces.
- Provision of a range of learning for commercial professionals. This includes a Contract Management Training course where South Wales and Gwent were the pilot forces, with two cohorts of officers and staff attending in October/November 2021 and January/February 2022.
- Co-ordination of national spend data and savings.
- Publication of a commercial pipeline outlining the national procurement activity taking place over the next 3 years.
- Procurements carried out on behalf of forces for a range of goods and such as Fleet, Aviation, Rigid Inflatable Boats and Contingent Labour. The Contingent Labour contract to support temporary staff needs and specialist roles, is expected to deliver significant savings from June 2022, particularly for Gwent who have a high expenditure in this area.
- BLC have held a range of workshops such as for Healthcare in Custody, Uniform, Training to work with the forces in these areas.
- Working with Op Talla to ensure the supply of all Covid PPE supply to policing.
- With the NPCC Pensions team, BLC are engaging with software suppliers and administrators to consider the commercial implications of implementing the McCloud Remedy.
- The provision of market insight reports which provides research and advice in relation to the impact of the EU Exit, worldwide supply shortages and the pressures due to the Ukraine and Russia conflict
- Awarding a contract for Contingent Labour to support temporary staff needs and specialist roles within forces, to include investigative roles and IT project managers.
- Award of a contract for Rigid Inflatable Boats (RIBs) – Dyfed Powys and South Wales forces have both purchased a RIB under this framework.
- Award of a national Vehicle contract. Global vehicle production has been heavily impacted by a shortage of microchips and by the pandemic. BLC are working with NAPFM and CCS to source alternative arrangements where required
- Leading a Dynamic Purchasing System to be launched in 2022 for the provision of healthcare services in custody, although the timing means that the southern Wales forces must let their own tender
- Production of a Social Value Toolkit to assist forces in the delivery of social value through their supply chains. A Social Value Action Planning Tool is available for suppliers to use.

4.3 Welsh Government Commercial Delivery and Collaboration

A smaller national contracting function has replaced the National Procurement Service (NPS) and the NPS name and branding has been retired. Working alongside the Welsh Local Government Association (WLGA), a smaller number of collaborative agreements will be delivered for the Welsh public sector. The national function is now part of the [Wales Collaborative Procurement Pipeline](#) which offers framework agreement. Of particular relevance to the police forces are Furniture Solutions, Utilities, Vehicle Hire, IT Products and Services, Multi-Functional Devices, eProcurement Solutions, Stationery, Occupational Health Services and Construction Consultancy. Appendix C shows usage of the Welsh Government framework by the police forces in 2021/22.

The forces are committed to collaborating with the Welsh public sector as this brings benefits to the local economy, both to SMEs and larger businesses in Wales. In addition, the arrangements should deliver sustainability solutions and promote optimum long-term outcomes for Wales.

• NEXT STEPS

The priorities for the year 2022/23 will be to further progress the work of the Joint Commercial Services and Procurement unit, to deliver the Southern Wales forces collaborative procurement strategy 2020-2025 and to deliver the following objectives.

1. To build on the work commenced in 2021/22 to upskill client leads and contract owners in contract management and to ensure that the managers of the top 20 critical contracts have this core competency.
2. To continue the work to tackle modern slavery in our supply chains, led by the Chief Financial Officer who is the appointed Ethical Champion for each force. A refreshed Modern Slavery Statement will be published in 2022, underpinned by a local Action Plan for each of the four strands identified. Delivery of the actions will be monitored at regular Task and Finish Groups. The initial discussions with Police Digital Service and the Met Police will continue to make best use of the procurement resource nationally. The work across Wales is a joint approach and progress will be reported at an All Wales strategic level.
The Action Plan is shown in **Appendix B**.
3. As an extension of the work on ethical supply chains, the Welsh forces will support the All Wales Sustainability Strategy and work with clients to deliver social value through relevant procurements. Using key priorities based on policing themes, we will specify, evaluate and monitor social value in our procurements, in order seek to change behaviours and work to protect the environment, workers' rights and mental and physical wellbeing.
4. To take full advantage of the collaborative contracts and opportunities led by Bluelight Commercial, providing input at the pre-procure phase to ensure the needs of the Welsh forces are represented. We will continue to maximise the level of collaborative spend where this delivers best value commercially and with regard to sustainable solutions.
5. To continue to contribute to value for money savings through effective specifications and procurement exercises, demand management, collaboration and consolidation.

• FINANCIAL CONSIDERATIONS

Procurement related savings are only one measure of the procurement unit but the figures in this report demonstrate the benefit of strategic procurement and the value for money process operated by the forces.

The forces did not receive any legal challenges or associated fines to the tenders awarded thus demonstrating the value of a robust and compliant process.

- **PERSONNEL CONSIDERATIONS**

There are no personnel considerations in relation to this report

- **LEGAL CONSIDERATIONS**

There are no legal considerations in relation to this report

- **EQUALITIES & HUMAN RIGHTS CONSIDERATIONS**

This report has been considered against the general duty to promote equality, as stipulated under the Joint Strategic Equality Plan and has been assessed not to discriminate against any particular group.

In preparing this report, consideration has been given to requirements of the Articles contained in the European Convention on Human Rights and the Human Rights Act 1998.

- **RISK AND AUDIT**

Risks are recorded on local risk registers and escalated as necessary.

TIAA, the current provider of internal audit services to the Welsh forces, carried out a number of internal audits to review various aspects of Procurement during 2021/22.

Audits included an audit of the effectiveness of the arrangements for delivery of a strategic lead for procurement across the southern Wales forces which received **Substantial Assurance**. JCPS also provided information for an audit to test the arrangements for Counter Fraud and Creditors - Accounts Payable.

- **PUBLIC INTEREST**

In producing this report, has consideration been given to 'public confidence'? **Yes**

Are the contents of this report, observations and appendices necessary and suitable for the public domain?

The report is suitable for the public domain *with the exception of Appendix A and Section 3.3 which gives details of savings achieved. These sections should be redacted.*

Media, Stakeholder and Community Impacts: **no impacts**

- **LEAD CHIEF OFFICER**

Umar Hussain, Nigel Stephens and Edwin Harries, Chief Financial Officers for the Southern Wales forces

Appendix B

ETHICAL PROCUREMENT STRAND ACTION PLAN 2021 – 2022

Promoting the development of ethical supply chains in the delivery of contracts for the police service in Wales

Ethical Procurement	Why	When
1. Refresh the Modern Slavery Statement, summarise work completed during previous period and produce an updated Action Plan for 2021-22; publish on Police and Crime Commissioner's website.	This meets the Statutory Requirement to publish an annual Statement	Annually
2. Strategic Procurement staff to complete the annual CIPS Ethical Procurement Training refresher	Ensures Strategic Procurement staff keep abreast of ethical supply chain considerations	Annually
3. Welsh Forces to follow up with initial 18 high risk suppliers identified through the Due Diligence Project (Stop Slavery Now) through Contract Management to seek delivery of improvements in response to gaps highlighted in the Supplier Assessment Questionnaires (SAQs). Offer support to smaller suppliers to progress the work, especially where suppliers have been classed as 'Meeting Basic Expectations' or 'Barely Achieving Compliance'.	Risk Assessment of suppliers identified as higher risk. We cannot assess all suppliers so this approach allows us to risk manage appropriately within our supply chain	Ensure as part of our tender process. Clarify minimum standards pre-award. Where relevant, new providers will complete an SAQ following award and high risk assessments will be followed up as part of contract management. Aim to embed process within 12 months
4. Create a briefing on the Due Diligence project work for Strategic Procurement staff to increase their knowledge and understanding of ethical supply chains.	To upskill Procurement staff to allow appropriate risk management of suppliers	Within 12 months
5. Procurement staff to incorporate the Supplier Risk Assessment Tool into contract mobilisation and ongoing contract management activity, to identify, evaluate and estimate the level of risk.	Facilitates proportionate and appropriate identification and risk management of supply chain risks	Within 12 months
6. Finance to report payment performance statistics and publish quarterly on external website	Meets statutory requirement	Ongoing
7. Regular spend analysis to identify further suppliers to apply the Risk Assessment Tool and seek completion of SAQ. Allocate responsibility for specific suppliers across Welsh forces to make best use of resources.	Supports Ethical Employment in Supply Chains Code of Practice Commitment 7 - Assess our expenditure to identify and address issues of modern slavery, human rights abuses and unethical employment practice.	Embed process within 12 months Assess top 100 by 2025
Aim to assess the top 100 suppliers across South Wales Police and Gwent Police by 2025		
8. Work with Bluelight Commercial to adopt a standard and shared approach to ethical supply chains across the police service.	Makes best use of resources and shares the work across policing	Within 12 months
9. Work with Bluelight Commercial to make Contract Management training available to client leads, to include ethical supply chain awareness	Increases skills and awareness of officers and staff involved in the management of contracts and drives consistent approach across policing in Wales and client departments	Roll out over 12 months with continuous cycles for wider client departments. Link to competency framework
10. Raise the reporting profile at a strategic level	Meets Commitment 1 of the Code of Practice - Review the written policy on ethical employment within our own organisation and our supply chains... and monitor its effectiveness	Within 12 months

ENVIRONMENT STRAND 2021 – 2022

Create a hostile environment for modern slavery

Environment Action	Measure	Why
1. Ensure that Modern Slavery continues to be suitably positioned in Policing priorities as part of the Strategic Planning process.	Emphasis of Modern Slavery's position in the Police & Crime Plan and Force Delivery Plan.	Strategically pursue the creation of a more hostile environment for Modern Slavery.
2. Reflect Ethical Procurement as a specific objective and deliverable with the Modern Slavery element of the Strategic Planning process.	Ethical Procurement is specifically referenced as part of the Force delivery plan.	Deliberately recognise Ethical Procurement as a tool in the creation of a more hostile environment for Modern Slavery.
3. Ensure that due consideration to creating a hostile environment for Modern Slavery is given when commissioning OPCC services. e.g. Modern Day Slavery Victim Help Centre	Commissioned services target Modern Slavery specifically.	OPCC can have a direct impact on the local environment via its commissioned services.
4. Embed a culture of wider responsibility within the Force for all those involved in the procurement of goods and services rather than seeing ethical procurement as an issue for purely the core procurement team.	Strategic planning recognises that ethical procurement in the supply chain is one strand of a wider work stream.	Ensure wider awareness of Ethical Procurement issues within the local Supply Chain Environment.
5. Consider deliberate engagement with the local business community with a view to ensuring awareness and profile of the issues are involved.	Local events have been held and engaged with to increase the local awareness and profile of modern slavery.	Regional awareness of Modern Slavery issues is increased in the local environment.
6. Ensure strong partnership working internally across the various stakeholders including PVPJ, OPCC, Procurement, Vetting & the wider organisation.	Strong working relationship across the organisations create a proactive environment against modern slavery within the organisation.	A joined up internal culture / environment focused on tackling modern slavery is created internally.
7. Ensure wider partnership working is considered beyond just policing including working with Welsh Government / Soli2 Wales / Bluelight commercial and beyond.	Welsh Policing's approach is collaborative in Policing and with wider partners.	Ensure a joined-up approach across partner agencies to ensure an increased regional awareness of Modern Slavery issues is increased in the local environment.
8. Ensure all staff are aware of roles and responsibilities and the internal referral routes where modern slavery concerns are involved.	Staff are aware of and trained in the internal referral routes and these occur as appropriate.	Staff are aware of the appropriate routes for highlighting Modern Slavery concerns where they emerge.
9. Ensure a robust communication strategy and plan targeting Modern Slavery is in place.	A Modern Slavery Communication plan has been made and implemented.	A deliberate communication approach is needed to create an increased awareness and profile around modern slavery.

EMPLOYMENT STRAND ACTION PLAN 2021 – 2022

All Wales working to a common policy with buy-in across the organisations impacting mainstream and day to day business

Employment Action	Why	When
1. Develop an All Wales Whistleblowing policy with specific reference to the Welsh Government Ethical Employment in Supply Chains Code of Practice in conjunction with Regional Federation and Trade Unions	Support the Code of Practice commitment to empower staff to raise suspicions of unlawful and unethical employment practices	Within 12 months
2. All staff to watch the 4 minute Welsh Government video on Modern Day Slavery by disseminating through the Force and through the induction plan for new starters	Increases awareness of officers and staff, particularly relevant to those involved in expenditure or recruitment of workers	Work has commenced but Head of HR to roll out within twelve months
3. Obtain agreement to share ethical dilemma scenarios across forces and with Welsh Government to promote good practice. Confirm establishment of Ethical Board in each force.	Improve awareness of ethical matters across the Force	Within 12 months
4. Recruitment policy to be updated to reference the Code of Practice and specify ethical employment.	Supports commitment to ethical employment within the Force	Within 12 months
5. Employment contract to confirm that employees are expected to comply with the Code of Practice.	Supports commitment to ethical employment within the Force	Within 12 months
6. Ensure the Code of Practice is on the agenda of our Trade Unions	Supports commitment to ethical employment within the Force	Within 12 months
7. Consider good practice to ensure transparency and fairness in recruitment, promotion and other related internal processes	Considers unconscious bias and encourage good practice in	Within 12 months
8. Action Plan and its success factors to be confirmed at All Wales HR & L&D Joint Assurance Group	Supports commitment to ethical employment within the Force	Q1 2021/22
9. Ensure compliance with the statutory living wage is consistently applied by the organisation	Supports commitment to ethical employment within the Force	In line with any changes made

ENFORCEMENT STRAND ACTION PLAN 2021 – 2022

Improving intelligence gathering through compliance with the Code of Practice

Enforcement Action	Why	When
1. Develop an Action Plan for Officer and PSC Operator training on the Welsh Government Ethical Employment in Supply Chains Code of Practice	Increases officers and staff awareness of modern slavery issues	Within 12 months
2. To ensure that our neighbourhood policing model fully incorporates an awareness of modern slavery and human exploitation.	Enables PCSOs to be aware and look for signs of modern slavery and human exploitation in our communities	Within 12 months

Appendix C

Welsh Government Framework Utilisation by Welsh Police Forces - Q3 2021/22

Category	Percentage Driven Utilisation Q3 2021/22	Contract Originator	Dyfed Powys Police	Gwent Police	North Wales Police	South Wales Police	Other Police (Non Wales)	Total Spend
Construction FM & Utilities	All Wales Weather Forecasting	NPS						£0
	Building Materials 2	NPS	0%			0%	0%	£8,457
	Cleaning Materials and PPE	NPS						£0
	Cleaning Materials and Washroom Services	NPS			4%			£30,152
	Facilities Management Services	NPS						£0
	Facilities Management Services Phase 2	NPS						£0
	Gas and Electricity	CCS	0%			1%		£369,505
	Highway Lighting Materials	NPS						£0
	Maintenance and Installation of Lifts	NPS						£0
	Provision of Furniture Solutions	NPS	0%	2%	1%	3%		£228,252
Corporate & Business Support Services	Rock Salt and Associated Products	NPS						£0
	Rock Salt and Associated Products 3	NPS						£0
	Integrated Marketing and PR Services	NPS						£0
Fleet & Transport	Media Buying Services 2	NPS				0%		£2,767
	The Supply of PPE and Other Workwear	NPS						£0
	Contract Hire	NPS						£0
	Driver Licence Checking	NPS						£0
	Fuels and Associated Products and Services	NPS						£0
	Tyres and Associated Services 2	NPS						£0
	Vehicle Hire II	NPS	0%	0%		3%		£214,518
ICT	Vehicle Spares	NPS						£0
	Vehicle Telematics	NPS						£0
	Digitisation Storage and Disposal	NPS						£0
	IT Products and Services 2	NPS						£0
	Library Management Systems	NPS						£0
People Services	MFD and Document Solutions	NPS						£0
	Multi Functional Devices	NPS				7%		£139,136
	Clinical Waste Bags	NPS						£0
	Employee Benefit Schemes 2	NPS		1%				£49,768
	Occupational Health Associated Services	NPS	3%	5%		5%		£144,988
	Temporary Workers & Supply Teachers	NPS		0%				£251,933
Professional Services	Waste Disposal Bags	NPS						£0
	Barristers and Solicitors Advocates	NPS						£0
	Construction Consultancy	NPS						£0
	Regional Engineering Consultancy Framework	NPS						£0
	Solicitors Services	NPS				1%		£9,712
VAT and Financial Services Consultancy			NPS					£0
Grand Total			0%	0%	0%	0%	0%	£1,449,189

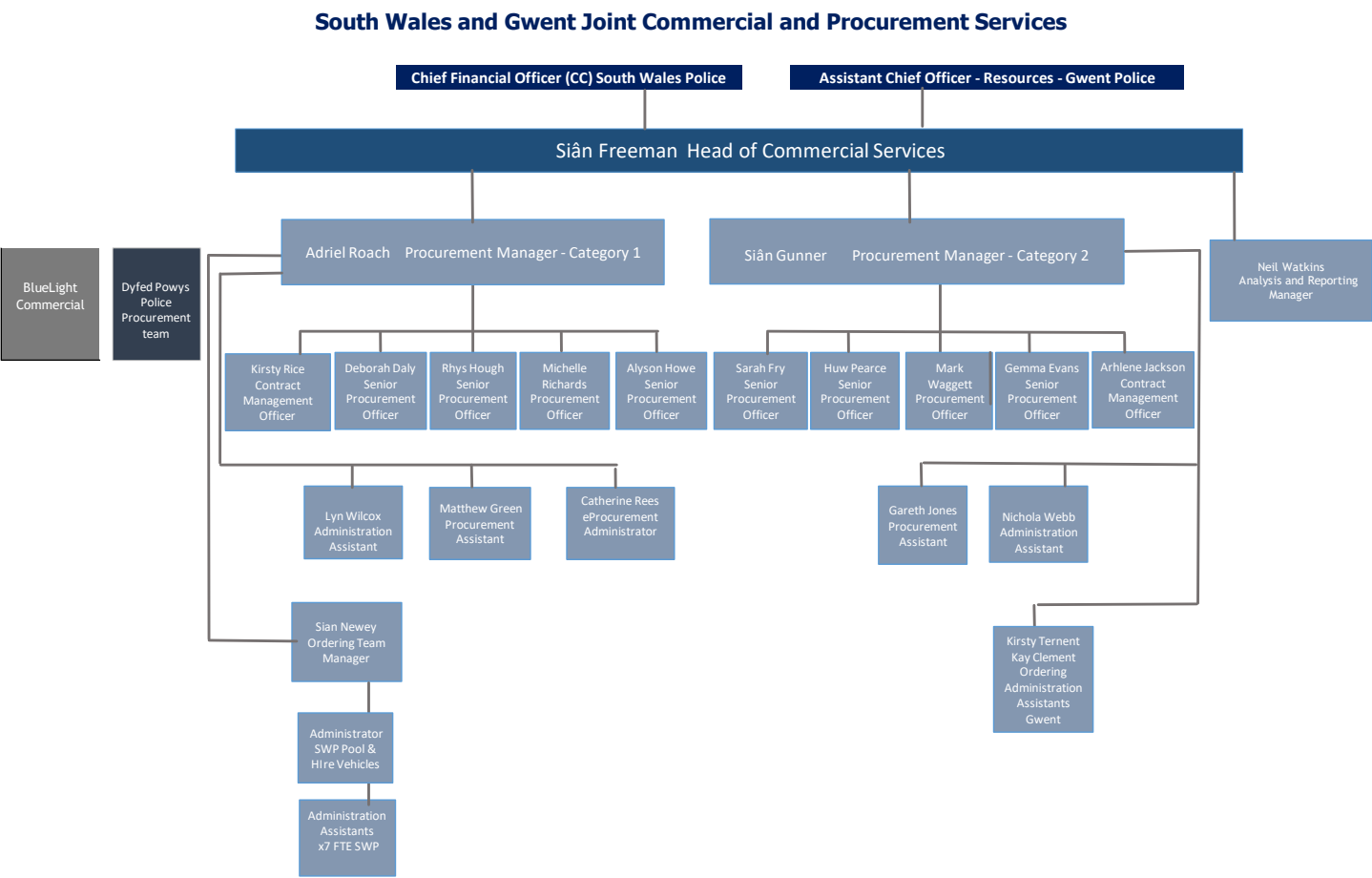
Percentages indicate the volume of takeup through each Framework

0% does not indicate no usage - percentages are rounded to the nearest whole number

Key	
	Low/No usage
	Moderate usage
	High usage
	Not Applicable

Appendix D

Southern Wales Forces Procurement Team Structure




Dyfed Powys Current Structure



Police and Crime Commissioner for Gwent

I confirm that I have considered whether or not I have any personal or prejudicial interest in this matter and take the proposed decision in compliance with the Code of Conduct.
The above request has my approval.

Signature:

A handwritten signature in black ink, appearing to read 'Jeff Cook', is written over a light blue horizontal line.

Date:

30/06/2022