BARNSLEY METROPOLITAN BOROUGH COUNCIL (BMBC)

REPORT OF: EXECUTIVE DIRECTOR CORE SERVICES

TITLE: OVERVIEW AND SCRUTINY COMMITTEE (OSC) TASK AND FINISH GROUP (TFG) REPORT ON COMMERCIAL CONTRACT MANAGEMENT AT BMBC

REPORT TO:	CABINET
Date of Meeting	20 th March 2024
Cabinet Member Portfolio	N/A
Key Decision	Νο
Public or Private	Public

Purpose of report

To report to Cabinet the findings of the Overview & Scrutiny Committee (OSC) from the investigations undertaken on its behalf by the Commercial Contract Management Task & Finish Group (TFG).

Council Plan priority

Enabling Barnsley

Recommendations

That Cabinet supports the following:

- 1. Hold an All Member Information Briefing (AMIB) to provide an overview of project and contract management
- 2. The TFG write to the Department for Levelling-up, Housing and Communities (DLUHC) to request the government continue, and go further with efforts to reduce competitive bidding for funding and increase flexibility in terms of timescales and funding profiles
- 3. The OSC is increasingly engaged in providing pre-decision critical-friend challenge of commercial ventures
- 4. Work is expanded with Go4Growth and other organisations which support local businesses in bidding for public sector opportunities and growing their capacity and capability

- 5. Executive Directors (EDs) and Cabinet Members for the Core and Growth & Sustainability Directorates undertake an annual 'lessons learned' meeting with Contract/Project Management Officers
- 6. Mandatory training is undertaken by those involved in contracting and/or procurement across the Council
- 7. New contract management procedures are tested on all 3 types of contracts, utilising a subset of Gold, Silver and Bronze tiered contracts
- 8. Ongoing dip-sampling of Gold, Silver and Bronze contracts is undertaken to ensure consistency and best practice is evident as appropriate
- 9. The OSC consider a further TFG into Commissioning activity at the Council with a focus on Adults and Children's Services

1. INTRODUCTION

- 1.1 As part of its work programme the OSC agreed to undertake a TFG investigation into commercial contract management at the Council, including the associated procurement processes, project management and contract management. Members wanted to better understand the work involved, the policies, procedures and processes in place, as well as the challenges faced, so they could provide 'critical friend' challenge and oversight of this work to ensure it is robust.
- 1.2 The unprecedented challenges to local government finances are widely reported in the media across the country. Barnsley Council is no exception to this and continues to operate in a challenging financial climate. There are high levels of demand for services and limited national government funding. Given this position, Members are keen to ensure that the Council is operating efficiently and ensures value for money at every opportunity, whilst also maintaining appropriate checks and balances.
- 1.3 The purpose of this TFG was not to focus on individual projects or contracts, but to look at the principles and processes in place, albeit, on occasion, it was helpful to consider real-life examples, to bring the processes to life. The TFG took the opportunity to hear the views of a number of different key representatives and provide challenge to the work being undertaken. As a result of the investigation, the group have highlighted a number of recommendations in support of further improvement, the rationale for which is outlined in section 6 of this report.
- 1.4 The members of the TFG who undertook this investigation are as follows: ClIrs Robert Barnard (TFG Lead Member), Dickie Denton, Jeff Ennis, Pauline McCarthy, Martin Morrell and Martin O'Donoghue.

2. SCOPE OF THE INVESTIGATION & SUBSEQUENT FINDINGS

What the Task & Finish Group Looked At

2.1 Initially the TFG met to consider the scope of the investigation. This included TFG Members outlining their key concerns around contract management, procurement processes, risk considerations, maximising opportunities to get value for money,

including by combining resources with other councils, as well as accessibility of contracts to local providers of all sizes. The officers present from the Council's Finance Directorate and Economic Development Service agreed to design a series of meetings which would outline how the Council alongside partners undertake the various elements to this work, including arranging a site-visit to see contract management in practice.

- 2.2 Following this, the TFG undertook a number of 'check and challenge' sessions with officers and partners regarding the work being carried out, future plans and key challenges. This involved asking questions of them regarding their work, their involvement, and the impact of this on the borough and its residents. This included:
 - Meeting with the Council's Director of Finance, Head of Strategic Procurement & Contract Management, Strategic Contract & Governance Manager, Head of Operational Finance & Schools Catering, Major Projects Group Leader and Regeneration Projects Group Leader to provide an overview of the various stages of project development at the Council as well as consider the Council's Commercial and Best Value Strategy.
 - Meeting with the Council's Cabinet Member for Core Services, Head of Economic Development, Major Projects Group Leader and Regeneration Projects Group Leader alongside Finance colleagues to look at project management in practice based on 'The Seam'.
 - Meeting with Council Finance colleagues as well as the Executive Director for Core Services and the Cabinet Member for Core Services to consider current contract management arrangements at the Council as well as future proposals including value for money and procurement rule reforms.
 - Undertaking a site visit to Outwood Academy Shafton to see contract management in practice regarding facilities management arrangements as a result of the Building Schools for the Future (BSF) Private Finance Initiative (PFI) programme.
 - Finally, meeting with officers from the Council's Finance Directorate and Economic Development Service to discuss the TFG Members' findings and recommendations.

What the Task and Finish Group Found

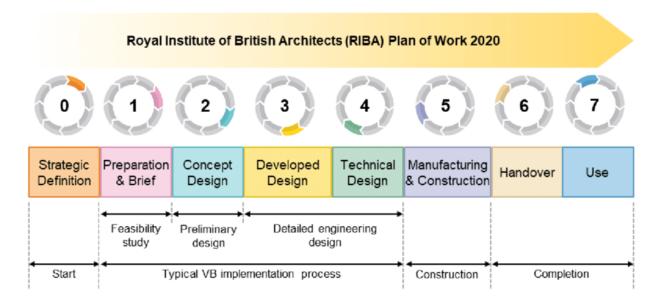
2.3 In being given an overview of project development, the TFG were reassured that officers were using industry best standards in terms of project development and management. Officers were acutely aware of the financial climate the Council is operating in and the importance of sourcing external grant funding for the majority of projects. A key a part of this, and to evidence to those the Council is seeking funding from, the Better Business Cases Five Case Model is utilised as shown below:

Better Business Cases[™] Five Case Model

PMG International" Better Business Cases



- 2.4 By utilising this model, it ensures compliance with HM Treasury's Green Book and allows officers to look at various considerations when a large-scale project is under development. This is to ensure that proposals align with the Council's and funder's strategic objectives: that a cost/benefit analysis is undertaken on the investment, revenue implications, benefits for the Borough, including the Return on Investment (ROI) and that detailed work is done to consider the financial sustainability of a project and to make sure that appropriate funding is in place. Alongside this, work is undertaken to look at the risks and issues for the short and long term, so that an impact assessment is undertaken to ensure that the project is deliverable, such as considering if there is appropriate officer resource.
- 2.5 TFG Members were advised that once the funding is secured/agreed via the Green Book process, for large scale design and build projects, officers utilise the best practice industry standard Royal institute of British Architects (RIBA) Plan of Work. This plan of work is undertaken alongside the Better Business Cases stages, so that investigative work is undertaken to provide appropriate assurances as relevant. Each stage of the process can take several months depending on the project being considered, as well as external factors which may influence each stage. Officers emphasised to the TFG the importance of the work done in the early planning stages to avoid unexpected costs and challenges as the project gets underway.



- 2.6 Despite best intentions, officers highlighted that usually, due to the way central government funding schemes often operate, they are given short notice of available funding, which requires Councils to go through a competitive bidding exercise, that also comes with strings attached in terms of tight timescales for delivery. This means that rather than working methodically through all the stages of the planning processes, officers are tied to starting part way through the process with a potential funding pot and have to work backwards in terms of making sure projects fit the brief and required outputs of both the Council and funders. This limits the time and opportunity to undertake due diligence on projects and undertake investigatory works to minimise risks later in the process. TFG Members welcomed the overview of the complexities of project management and a better understanding of why projects may have challenges with regards to timescales and budgets. Members appreciated the officer frustration in terms of short-notice pockets of funding with constraints attached and were keen to provide support to lobby central government to change these practices.
- 2.7 The second part of the first session provided the TFG with an overview of the Council's Commercial and Best Value Strategy and insight into its key elements. This included the four key themes when it was launched in 2017/18 as there was a drive for Councils to become more financially self-sufficient. The key elements of the strategy included: developing a commercial culture; ensuring Value for Money (VfM) in all the Council does; undertaking work to ensure robust procurement and contract management processes; and maximising income generation. During a refresh of the strategy in 2021, reflecting on the covid pandemic and the impact this was having across all sectors, a new focus of 'ensuring effective commercial governance arrangements' was added to the strategy. This in particular reflected challenges being seen in local government and a number of Councils failing due to poor financial management and a lack of effective governance. The TFG welcomed this and were keen to ensure that the Overview and Scrutiny Committee alongside the Audit and Governance Committee are able to play a critical role in this.
- 2.8 To implement the Commercial and Best Value Strategy, the TFG learned of several pieces of work undertaken, including efficiency reviews. Focusing on the procurement and contract elements of the strategy, a lot of work has been done on market shaping. This helps to ensure that the Council is clearly articulating projects in the pipeline and its requirements so that providers can prepare appropriately; with an intention to

ensure more accurate tenders and increasing competition to drive down costs. Tender documents have been standardised and are published via an e-tendering system to minimise administrative time required for both the Council and suppliers and to comply with procurement legislation. Work has also been undertaken to promote the system to ensure suppliers are registered to be alerted to opportunities, all of which the TFG welcomed.

- 2.9 TFG members were particularly interested in how social value elements were being embedded into contracts and challenged officers on provision to support local organisations to apply for contracts. Officers advised that they work with a company called 'Go4Growth' which was originally established in Barnsley and now works across the country. This organisation helps microbusinesses, small/medium enterprises (SMEs), voluntary organisations, community groups and social enterprises (VCSEs) access public sector contracts by providing them with free specialist advice and guidance with how to meet procurement and contract requirements. The TFG particularly welcomed knowledge of this organisation which they hope will increase spend within local communities as local suppliers are contracted to deliver services. Alongside this, officers also advised the group of social value elements required as part of contract delivery. This includes for example where on large-scale projects, contractors are required to evidence use of local suppliers and sub-contractors. This may be via using local building merchants or sub-contracting works to local traders such as electricians and plumbers, as well as providing placements for local apprentices.
- 2.10 The TFG noted the extent of systems being online and using standardised documentation and questioned officers regarding the future use of Artificial Intelligence (AI) and its potential to streamline processes even further in future. Officers responded that this was a live discussion with regional colleagues, particularly as the government is wanting to improve transparency and information on how the public sector procure and manage contracts. The aspiration is to have one platform where providers fill in minimum standard requirements so that this is completed for all potential contracts. Officers highlighted that Go4Growth already have an accreditation on this and therefore the Council is already working with them to try and create such automated efficiencies.
- 2.11 The next meeting of the group looked at project management in practice in detail based on 'The Seam'. This town centre location is earmarked as a prime development site for economic purposes. However, various plans for its use have been developed and required adaptation over several years due to varying factors. During this time, a number of proposals for its use have been drawn up based on the requirements at the time including the conditions of proposed funding streams. Over the years, the project has been subject to economic downturn, organisations involved being abolished, design work being developed at speed due to funding constraints without having time for full consultation on proposals to minimise risk, Brexit, a global pandemic, following which people's habits have changed, market rates and inflation have gone up, which has lowered the appetite for developers interested in the scheme.
- 2.12 By going through 'The Seam' in detail, the TFG gained a valuable insight into the challenge of large projects and had opportunity to question officers on the lessons learnt. With this scheme being so challenging, officers advised that time had been taken at various stages to learn from what had worked well and areas that required changes and further resource in future. Due to challenges in officer capacity, although

there is the intention to carry out a 'lessons learned' after every project, it is not always something that is prioritised, but had been a valuable exercise as part of 'The Seam', which the TFG noted. Officers highlighted that for large schemes there is good governance in place in terms of officers with various expertise meeting regularly via a main board and sub-groups to ensure that various aspects to a project are being addressed. Officers also highlighted that given the challenging funding environment they operate in, they acknowledged they ought to develop a pipeline of projects which have been sufficiently developed in terms of ground works and risk assessments so that when business cases are submitted, they are based on comprehensive preparatory work.

- 2.13 The following meeting of the group took a detailed look at the Council's Procurement and Contract Management arrangements. Officers gave the group an overview of the current context in terms of both the national and local picture, including the government tightening up on Councils' contracting arrangements in light of a number of them issuing Section 114 notices, which in essence declares a local authority as bankrupt. Members were reassured that the Council had undergone both internal and external reviews of its procurement and contract management practices which highlighted areas for improvement which it is acting upon.
- 2.14 A fundamental aspect to all this work and a key concern for the TFG, is for the Council to ensure VfM in all its activities. The Cabinet Officer defines VfM as 'securing the best mix of quality and effectiveness for the least outlay over the period of use of the goods/services bought. It is not about minimising up-front costs but based on the four Es:
 - economy minimising the cost of resources for an activity ('doing things at a low price')
 - efficiency performing tasks with reasonable effort ('doing things the right way')
 - effectiveness the extent to which objectives are met ('doing the right things').
 - equity this reflects the extent to which services are available to, and reach, the people they are intended for, and whether the benefits from the services are distributed fairly'.

The TFG were supportive of officers in implementing this standard definition across all key Council documents and to ensure that the principles are embedded when work is undertaken.

Officers gave the TFG an overview of the procurement rules reforms following the 2.15 Government's Procurement Act 2023, which come into force in Autumn 2024. One of the most significant changes is rather than procurement focusing on the 'Most Economically Advantageous Tender (MEAT), the focus on 'Economic' has now been removed. Public sector bodies are now being asked to look at what is the added value of contracts, such as social value, including economic and environmental considerations. Officers will need to determine how for example contracts can support sustainability in terms of using less fuel/energy and how local jobs and spend can be generated. The TFG welcome this focus, whilst acknowledging that such considerations are already in place in many cases across Council contracting. The group are however mindful that such considerations may be more challenging to those who only undertake procurement activity on an ad-hoc basis, compared with those for whom this is their profession. Therefore the group are keen to ensure that appropriate support and guidance is available to officers across the Council in order to maximise the social value of all contracts.

- 2.16 The TFG challenged officers on learning from best practice and were reassured by the various ways officers sought to do this. This included considering benchmarking information, actively engaging with the market to understand current rates and inform procurement processes, considering additional benefits from contracts and identifying appropriate performance measures. This was done by also working with colleagues across the region, which had recently included participating in a 'mixed basket' procurement with other Councils to obtain better VfM.
- 2.17 As part of the upcoming changes in public procurement, officers outlined the key roles and responsibilities of officers involved in procurement and contract management across the Council, and the various levels at which they are required to operate. For example 'Senior Responsible Officers' (SROs) will be EDs and Service Directors (SDs), who will have primary responsibility for ensuring contracts meet their objectives. The TFG were keen to ensure that appropriate training is provided to those involved in contract management and procurement across the organisation. They were eager to ensure that there is consistency in this work and questioned officers regarding this as they have particular concern for those who undertake contract/procurement activity on a more ad-hoc basis, especially with the new requirements in terms of documentation. The group welcomed knowledge of plans to develop a contract management network so that officers can share good practice and expertise in this field across the Council. The group were also keen for Elected Members to receive relevant training so they can add value at various stages of these processes, whether this be providing challenge on strategic committees or as part of their involvement in contracted services via Area Councils.
- 2.18 Another element of the procurement reforms is to ensure contracts are managed throughout their lifecycle. As part of the contract management toolkit, Contract Tiering has been implemented. Guidance has been provided by the Cabinet Office which officers have adapted to suit the Council, which helps to determine how critical a contract is and the approach which needs to be taken in terms of documentation and managing the contract. Contracts are tiered as either Gold, Silver or Bronze which is based on a number of factors such as the financial value, social value, risk and complexity. Therefore, just because a contract is low value, does not necessarily mean that it will be classed as bronze, as its failure may be critical to the operation of the Council. For Gold contracts, tighter controls and more stringent governance arrangements will be in place. The TFG welcomed plans to test out the new procedures on Gold contracts; however, suggested that it may be beneficial to test a subset of all 3 types of contract. The group were assured that good governance and officer expertise would be in place for Gold and Silver rated contracts but were keen to ensure ongoing dip sampling to provide assurance that VfM and best practice was being embedded across all contracts.
- 2.19 The penultimate meeting of the TFG involved a site visit to Outwood Academy Shafton to see contract management being undertaken in practice. This involved a detailed look at the BSF programme including the partnership structure made up of multiple complex relationships including the Council, the school, Barnsley Local Education Partnership (LEP) and Amey (facilities management provider), amongst others. The group were given an overview of the roles and responsibilities of various agencies and the governance that had been in place to manage the contract over several years. The session provided the TFG opportunity to explore how this contract was managed and see evidence of the good practice in place.

2.20 The TFG were impressed by what they saw on the site visit, and were assured by the tight governance in place, robust audit trails, good relationships amongst contract managers and the contractors, which on this particular occasion have been able to develop over time, which has facilitated issues being resolved which might otherwise have proved challenging. Lessons were learnt when a previous contractor had gone into administration and improvements to various systems were made. The TFG acknowledged that this set-up is not appropriate for all contracts but were keen that the good practice was utilised across other contracts where possible.



- 2.21 The final meeting of the group provided opportunity to reflect on their findings with the officers involved. Members had been impressed by what they heard and the diligence that is in place currently as well as future plans with regards to contracting, procurement and project management activities. As a result of discussions, a number of key recommendations were identified by the group in support of further improvement and are reflected in section 6 of this report.
- 2.22 The TFG would like to take this opportunity to thank all those who provided information, attended meetings and assisted with the TFG's investigation; it is much appreciated. Particular thanks are given to Outwood Academy Shafton for hosting the site visit along with the other officers involved in the ongoing Facilities Management contracting arrangements.

3. IMPLICATIONS OF THE DECISION

3.1 Financial and Risk

There are no specific financial implications or risks associated with the report, although in responding to the recommendations in the report, the financial and risk implications of these would need to be fully assessed by the appropriate services responding. Consultations have taken place with representatives of the Director of Finance (S151 Officer).

3.2 Legal

There are no specific legal implications, although in responding to the recommendations in the report, the legal implications of these would need to be fully assessed by the appropriate services responding. Consultations have taken place with the Service Director for Law & Governance.

3.3 Equality

The TFG is keen to ensure that all Council operations and activities are considerate of the needs of all its communities. The group were particularly impressed by the Council's work with 'Go4Growth' in supporting small, local businesses and VCSEs to apply for and undertake Council contracts, particularly as such organisations are likely to have a greater understanding of Barnsley's diverse communities. Given the new procurement rules, the TFG also welcomed the focus on 'equity' in procurement activity to ensure services reach the people they are intended for, including those in minorities and who may require additional support to access them, to ensure the benefits from services are distributed fairly.

3.4 Sustainability

As this report does not require a decision, the sustainability decision-making wheel has not been included.

3.5 Employee

There are no specific employee implications, although in responding to the recommendations in the report, the employee implications of these would need to be fully assessed by the appropriate services responding.

3.6 Communications

Given the unprecedented financial climate the Council is operating in, it is imperative that all officers are aware of the importance of ensuring VfM in all Council activities. As highlighted in the findings and recommendations of the investigation, the TFG are keen to expand the work of Go4Growth and would welcome opportunities to promote relevant events and services across Barnsley to ensure local groups and organisations access them.

4. CONSULTATION

4.1 Consultations have taken place with: Commercial Contract Management TFG members, OSC members, the Council's Cabinet members, Council officers from the Finance Directorate, Council officers from the Growth & Sustainability Directorate, the Account Manager for Amey, the Business Manager for Outwood Academy Shafton, the General Manager for Equitix Management Services Limited (EMS) and the Council's Senior Management Team.

5. ALTERNATIVE OPTIONS CONSIDERED

5.1 No alternative options have been considered in the writing of this report.

6. REASONS FOR RECOMMENDATIONS

6.1 Overview and Scrutiny is a statutory function in local government to enable Councillors to provide 'critical friend' challenge of local services and make recommendations to drive improvements.

6.2 The recommendations in this report are made as a result of the OSC's Commercial Contract Management TFG undertaking a detailed investigation into work surrounding how the Council undertakes project and commercial contract management. The TFG were reassured by the amount of work being done in this area and have made the following recommendations in order to support the continual improvement of services.

6.3 **Recommendation 1: Hold an All Member Information Briefing (AMIB) to provide** an overview of project and contract management

As highlighted in the findings, the TFG found the sessions very informative in terms of them having a better understanding of the complexities of project and contract management. This included having an appreciation for the officer diligence when managing large projects, but also the challenges faced across the lifetime of a scheme.

6.4 Recommendation 2: The TFG write to the Department for Levelling-up, Housing and Communities (DLUHC) to request the government continue, and go further with efforts to reduce competitive bidding for funding and increase flexibility in terms of timescales and funding profiles

Through the investigation, TFG members saw evidence of the challenges that having lots of short-term funding pots, requiring competitive tendering, with several terms and conditions attached creates when trying to deliver the best for the Borough. The group are keen to highlight to the Government that resources could be much better spent if funding was assigned on an allocative basis with less restrictions on Local Authorities.

6.5 **Recommendation 3: The OSC is increasingly engaged in providing pre-decision critical-friend challenge of commercial ventures**

The TFG recognise the importance of good governance and critical-friend challenge of the Council and its partners, particularly in the current financial climate. The TFG are keen that the OSC is involved in pre-decision scrutiny where possible. Whilst the OSC conducts business in the public domain, it appreciates that due to commercial sensitivity it may be necessary for such sessions to be held in private, with a public minute of the meeting recorded to evidence it taking place.

6.6 **Recommendation 4: Work is expanded with Go4Growth and other organisations** which support local businesses in bidding for public sector opportunities and growing their capacity and capability

As noted in the report, TFG members were particularly keen on the social value element of contracts, including ensuring local spend. The TFG would support continued work with Go4Growth and expansion of this where possible to develop local supply chains wherever possible. Members were also keen to be made aware of events being put on in local areas so that they could publicise them amongst their communities.

6.7 Recommendation 5: EDs and Cabinet Members for the Core and Growth & Sustainability Directorates undertake an annual 'lessons learned' meeting with Contract/Project Management Officers

Members noted the value and importance of taking time to understand lessons learned from various stages of projects. The group appreciate the challenge of prioritising this amongst limited resources but are mindful of the added value and timesaved in future by undertaking this process. Therefore, the TFG are recommending that although 'lessons learned' sessions are undertaken on an ongoing basis, the relevant EDs and Cabinet Members are involved annually to learn from various projects to ensure this learning is taking place and be involved in the process for their benefit also.

6.8 **Recommendation 6: Mandatory training is undertaken by those involved in contracting and/or procurement across the Council** The TFG is mindful of the unprecedented challenges local government finances are

under and the need to ensure VfM in all the Council does. Therefore, they feel it is imperative that all those involved in contracting and/or procurement across the Council should undertake relevant training and are provided with ongoing support in undertaking their role, particularly those who are not necessarily specialists in these activities. This also includes Elected Members who may be involved in various elements of contracting/procurement.

- 6.9 **Recommendation 7: New contract management procedures are tested on all 3 types of contracts, utilising a subset of Gold, Silver and Bronze tiered contracts** To test out the new contract management procedures, the TFG felt it would be better to utilise a small subset of all 3 types of contracts, rather than focusing solely on Gold rated contracts. By doing this, the group felt that this would fully test the procedures, rather than risk finding that they don't work as well across the full range.
- 6.10 **Recommendation 8: Ongoing dip-sampling of Gold, Silver and Bronze contracts is undertaken to ensure consistency and best practice is evident as appropriate** Given the tiered approach which will be taken to managing contracts and the associated governance in place, the TFG are keen to ensure that there remains evidence of best practice being utilised across all types of contracts.
- 6.11 Recommendation 9: The OSC undertakes a further TFG into Commissioning activity at the Council with a focus on Adults and Children's Services Given the value of this TFG including the knowledge gained by the group and challenge undertaken of officers, the group feel it would be beneficial to extend this TFG to take a detailed look at Commissioning processes at the Council. This would be for Members to gain a better understanding of this area of work, links across services and reassurance regarding processes in place and performance.

7. GLOSSARY

AI	Artificial Intelligence
AMIB	All Member Information Briefing
BMBC	Barnsley Metropolitan Borough Council
DLUHC	Department for Levelling-up, Housing and Communities
ED	Executive Director
OSC	Overview and Scrutiny Committee
ROI	Return on Investment
SME	Small/Medium Enterprise
TFG	Task and Finish Group
VCSE	Voluntary Organisations, Community Groups and Social Enterprise
VfM	Value for Money

8. LIST OF APPENDICES

There are no appendices for this report.

9. BACKGROUND PAPERS

Barnsley Council Tenders and Contracts: https://www.barnsley.gov.uk/services/business-information/tenders-and-contracts/

Procurement Act 2023: https://www.legislation.gov.uk/ukpga/2023/54/contents/enacted

HM Treasury - The Green Book: <u>https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-government/the-green-book-2020</u>

If you would like to inspect background papers for this report, please email <u>governance@barnsley.gov.uk</u> so that appropriate arrangements can be made.

10. REPORT SIGN OFF

Financial consultation & sign off	Senior Financial Services officer consulted and date Colette Tyrell 21/02/2024
Legal consultation & sign off	Legal Services officer consulted and date Sukdave Ghuman 19/02/2024

Report Author: Anna Marshall/Jane Murphy Post: Scrutiny Officers Date: 7th March 2024