

<b>Item No.</b> 11.	<b>Classification:</b> Open	<b>Date:</b> 30 April 2019	<b>Meeting Name:</b> Cabinet
<b>Report title:</b>		Gateway 1 – Nursing Care	
<b>Ward(s) or groups affected:</b>		All	
<b>Cabinet Member:</b>		Councillor Jasmine Ali, Children, Schools and Adult Care	

## **FOREWORD – COUNCILLOR JASMINE ALI, CABINET MEMBER FOR CHILDREN, SCHOOLS AND ADULT CARE**

The paper outlines the procurement strategy to bring to life the Council Plan commitment to open two good quality nursing homes in Southwark. This move will raise the bar in nursing home provision. The facilities will be beautifully built, enjoyable and comfortable, with a range of social activities both within the home and out in the surrounding communities for the people living in there, for their friends and families. We will use this timely procurement opportunity to make sure that the new nursing homes embrace new technological innovation in the care of people with different needs including different degrees of dementia.

The recent Association of Directors of Adult Social Services (ADASS) Peer Review in Southwark was positive and the opening of two new nursing homes was on the list of things that we were praised for, not least because many other local authorities have seen their local nursing homes close down.

Currently 70% of Southwark people requiring nursing beds are placed out borough. In 2017/18, 80% of people that we placed out of borough would prefer to be in Southwark, but in the absence of high quality local services this was simply not an option. Due to fluctuating quality in the borough, the number of nursing homes in the borough has reduced to two; and one of these homes is blocked booked by the London borough of Lambeth.

There are currently 212 nursing care beds available in the borough. Planning permission has been granted to the development of a care home that will include 48 nursing beds. This means that the total, by the end of 212 will increase to 260 by 2020. There is a second nursing home that has outline planning permission for 80 nursing care beds and therefore the total could increase to 340 by 2022.

The council has been speaking with providers who are prepared to open nursing homes but these discussions are property deals. In order to comply with EU procurement regulations (adopted into English Law), the council must advertise the opportunity to award care contracts. The best way to comply with this legislation is to undertake a meaningful tender for the nursing care market is a Negotiated Procurement Process.

Soft market testing shows that there is interest to provide services in Southwark and in order to ensure that the council secures good quality services at a fair price is to take this compliant but little used tender process. Using the one council approach, corporate procurement and legal colleagues will support Commissioners during the process.

Cabinet is advised that the procurement strategy will require separate negotiations with different providers. The contracts will be approved through individual Gateway 2 reports. The report's author the commissioning director and I recommend that the decision to award the subsequent contracts is now delegated to the strategic director in consultation with myself as the lead member for children, schools and adults. We would like to make sure that providers can be identified and the above aspirations for two new good quality nursing homes in Southwark can be procured, developed and up and running in a timely manner.

## **RECOMMENDATIONS**

1. That cabinet approves the procurement strategy for the purchase of nursing care beds in good quality homes situated within the Borough of Southwark; namely to advertise (through an OJEU notice) contract opportunities using a negotiated approach with providers either currently operating or planning to operate nursing care homes, within the borough.
2. That cabinet notes that this procurement strategy will require separate negotiations with individual providers resulting in separate contract awards which will be approved through individual Gateway 2 reports.
3. That cabinet delegates the approval of the award of contracts, following these individual negotiations to the strategic director for children and adults' services, in consultation with the cabinet member for children, schools and adult care.
4. That cabinet notes that the total estimated maximum figure for the contracts is in the region of £7.3m per annum.

## **BACKGROUND INFORMATION**

5. The Council Plan 2018-22 commits to the development of two new nursing care homes within the borough. The March 2018 cabinet approved a Gateway Zero business case to undertake a procurement exercise to ensure value for money and to stimulate the evolving local nursing care market. This report sets out the procurement strategy to deliver the council's commitment.
6. Nursing care homes are regulated by the Care Quality Commission (CQC) to provide both general and dementia beds where the care is supervised by a nurse funded by the local Clinical Commissioning Group (CCG). Nursing care homes usually contain floors that are not registered for nursing care (referred to simply as "Residential care". Services tend to operate from large buildings, usually purpose built to meet the specialist requirements of their residents.
7. The council spent around £9m in 2017-18 on adult social care nursing care home provision. Nursing Care providers receive an additional payment per resident from the host CCG through a standard funded nursing care (FNC) fee. This rate in 2018/19 was £158.16 per week.
8. Of the total spend approximately £2.2m was spent with one local supplier currently rated by the CQC as "Requires Improvement". There are presently no block contracting arrangements for nursing care, with each nursing placement individually negotiated for each service user. Around 70% of clients are currently found beds out of borough in over 70 different homes. Nursing homes in Lambeth, Lewisham, Croydon and Bromley tend to be those most frequently used.

9. The council supports the ambition of older people to remain in their own home for as long as possible, with the number of people receiving nursing care remaining relatively constant over recent years:

**Table 1 Nursing Care Permanent Placements**

<b>Financial year</b>	<b>No at end of the year (snapshot)</b>	<b>Total number of permanent placements during the year (flow)</b>
2014-15	238	321
2015-16	230	336
2016-17	246	333
2017-18	232	351

(Source: SALT Short and Long-Term returns - Additionally, there are usually around a further ten people on temporary placement, either to provide respite for family carers, or to facilitate timely hospital discharge).

10. Due to of the increasing frailty of most people accessing this setting of care, the average length of stay for all new placements has been decreasing. Between April 2017 and November 2018 has been 351 days. Modelling of demand has shown that if there was sufficient local supply, around 80% of these placements would have been made in borough (186 people in 2017-18). The remaining cohort of service users will require a longer term placement in a specialist home (primarily those of working age adults with complex acquired brain injury) or primarily older people who have family connections to other areas.

**Summary of the business case/justification for the procurement.**

11. Since the March 2018 cabinet considered the Gateway zero business case report, officers have been exploring various contracting models, seeking the views of providers, health and social care professionals and service users and their families. This exercise concluded that:
- a) Around 80%+ of placements are for very frail older adults, who are living with multiple and complex conditions in the final months of their lives. These tend to be people with very strong family and community connections with Southwark, requiring continuity of care from the local health and social care services towards the latter stages of their lives.
  - b) There are a small but increasing number of frail people who require short term placement; in order to either provide respite for family carers or facilitate therapeutic timely hospital discharge. This group again, will benefit from this procurement exercise, as new bespoke local contracts can clearly identify trusted pathways in and out of local homes from across Southwark’s wider health and social care economy.
  - c) To support client and family preferences to stay in Southwark and in order for local services ensure continuity of care, the Council and Southwark CCG support local homes through a range of initiatives. These include multi-disciplinary joint working, free staff training opportunities and an enhanced GP primary care service.

- d) The most effective partnerships between homes, local authorities and the wider health and social care system involve local mutually agreed pathways and strong ongoing relationships developed between the council and their local nursing home(s) are agreed and multi-disciplinary working is concentrated on specific key local nursing care facilities as opposed to clients being placed in multiple homes across the region.
  - e) The local market has not been able to respond to the requirements of Southwark citizens and has seen the closure of a number of homes (See paragraph 13) generally the demand for affordable nursing beds across central London outstrips supply, with different Councils and CCGs competing for the beds that are available.
  - f) Nursing providers price the cost of a bed based on a triangulated assessment of the needs of client, matched against standard staffing levels and core competencies and the existing levels of dependency of residents at their home. In a demand-driven market, Councils often pay a higher individual fee than most London CCGs, who combine their collective purchasing power and co-ordination through the pan-London Any Qualified Provider Framework. This framework is only available to CCGs.
  - g) Due to local circumstances, neighbouring boroughs are not able to commit to developing cross-borough joint commissioning arrangements; in part because they too wish to procure beds in borough for their local residents, for the same reasons as the Council.
12. For the reasons set out, the council wishes to advertise opportunities to negotiate for contracts for good quality local nursing care beds in borough.

### **Market considerations**

13. The CQC highlights that nationally nursing care faces the most significant challenges in relation to financial sustainability and the maintenance of good quality care across the entire health and social care system. These national issues are compounded in Southwark which has seen a 46% reduction in nursing care beds since 2011 (Five homes with a loss of 252 beds<sup>1</sup>). This is comparable to several inner north London boroughs– e.g. Tower Hamlets and Islington, although none of our immediate south London neighbours have experienced such a sharp decline.
14. The reasons cited by providers for this decline are the higher land prices that deter the development in inner London, workforce challenges, a younger population and relatively few self-funders compared to outer London areas such as Bromley, Croydon and Ealing. These are areas with much larger populations of older people with far higher rates of owner occupation (a basic indicator of what proportion of people pay for their own care). This means that Southwark homes are far more reliant upon state funded placements; where the costs have been tightly managed as a result of ongoing austerity measures.
15. There are currently only two homes in Southwark who are registered to provide nursing care:

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<sup>1</sup> Southwark Home closures since 2010-11 : Southwark Park Road (2010) Evergreen (2011) Cherry Croft (2013) : Camberwell Green (2016) and Burgess Park (2017)

- Tower Bridge, which is a very large home whose CQC rating has fluctuated over recent years between “Good” and “Requires Improvement”. It is currently assessed as the latter, although demand for beds from local people remains very high.
  - Queens Oak, which is currently block booked to Lambeth and is not currently accessible for Southwark citizens. The home was recently down graded from “Good” to “Requires Improvement” and Lambeth are currently working with the provider to improve quality.
16. From market testing, it is unlikely that any of the six purely residential care homes in the borough who operate from buildings which are large enough to provide nursing facility on site, would wish to deliver nursing care status.
17. The council is aware of re-development plans for sites of former homes where the council owns the freehold. The first of these is at Picton Street (the former Burgess Park care home) where a full planning application has been formally submitted in early 2019. The second is a nursing home on D'Eynsford Road has submitted a pre planning application in 2018, although as yet no formal planning application. The local market is therefore summarised in table 2 below:

**Table 2 The evolving Southwark Nursing Care Market**

<b>Nursing home and number of beds</b>	<b>Provider</b>	<b>2015</b>	<b>2018</b>	<b>2020</b>	<b>2022</b>
Burgess Park (Picton Street)	Country Court Care from 2017 – Previously Four Seasons	55	0	93*	93*
Tower Bridge**	HC-One Ltd	124	124	124	124
Queens Oak**	Excelcare	88	88	88	88
<b>Total</b>		<b>267</b>	<b>212</b>	<b>305</b>	<b>305</b>

\*The new home on this site will contain 48 nursing care beds

\*\* These homes contain a number of non-nursing residential beds

18. The procurement approach recommended does not restrict other potential suppliers who may be able to meet in borough requirements from applying.

## **KEY ISSUES FOR CONSIDERATION**

### **Options for procurement route including procurement approach**

19. The strategic objective of the procurement exercise is to purchase good quality beds situated within the borough of Southwark that provide value for money and supports the local market. Several options have been considered which are summarised below (including the recommended option):

**Table 3 Procurement Options**

<b>Recommended Option</b>	<b>Detail</b>
Negotiated process	The council places a notification in OJEU and Contract Finder to providers and potential providers of Southwark homes, stating that it:

Recommended Option	Detail
	<ul style="list-style-type: none"> <li>• Wishes to procure good quality nursing beds in the borough</li> <li>• Would be keen to receive applications from any provider who can deliver these requirements by 2022 (Aligned to the commitments as set out in the Council Plan)</li> <li>• Welcome contact from other potential providers</li> <li>• Has identified a number of providers who currently or plan to develop local homes with whom it would highlight the procurement process</li> <li>• A draft service specification, co-produced with local people and key multi-disciplinary leads will also be posted as part of the advert.</li> </ul>

Not Recommended Options	Detail	Advantages	Disadvantages
Do nothing	Carry on purchasing beds on an individual basis	Buy only what is needed when it is needed	This approach has not ensured sufficient local supply and does not necessarily provide value for money.
Cease the service	No longer use nursing care facilities	No need to undertake a procurement	This will not meet statutory duty defined under the Care Act 2014.
Shared Service Delivery	Purchasing beds with other boroughs through joint contracting arrangements	Achieve economies of scale	There is little tangible interest currently amongst neighbouring boroughs and this approach would not necessarily support the development of a market within Southwark
Bring in house	The council provides nursing care itself	council uses its assets to create local supply	The council does not possess the technical expertise in this area and it is unlikely that this approach would provide value for money.
Voluntary sector/not for profit provision only	Restrict bids to non profit making organisations	Profits on any operation would be directed back into the service and not towards company profit. Providers also can fund raise to support running costs	The recommended approach does not exclude charitable organisations, but soft market testing recognises that few voluntary and community sector providers now deliver general nursing care for frail older people due to the financial and operational challenges.
Single-borough Dynamic Purchasing	Establish a framework from which to	Simpler to procure in the first stage and	The market showed little interest in engaging with this approach and is unlikely to

Not Recommended Options	Detail	Advantages	Disadvantages
System (DPS) or other forms of framework agreements.	undertake “call Offs “or mini competitions as required	DPS in particular gives scope for new providers to join during the term	support the local market and guarantee sufficient supply A DPS may be administratively burdensome to use once in operation.

### Proposed procurement route

20. An advert will be placed as set out in table 3 above, giving potential suppliers an opportunity to express an interest up to six (6) months from the date of the OJEU Notice and the council reserve the right to re-open the expression of interest should it be required.
21. Dependent upon the response received from the advert, the recommended procurement strategy is likely to involve a number of concurrent negotiated exercises; which will be informed by the council’s requirements and specific circumstances.
22. Each of these negotiated exercises will require interested providers submitting a “Standard questionnaire” (SQ) providing details of company structure and financial standing, alongside their record of delivering nursing care and the details of the nursing home in Southwark from which they will deliver this care. If the information supplied is satisfactory, the council will then enter into formal contract negotiations with each bidder covering areas such as:
  - A detailed assessment of the cost of a bed
  - Bed numbers to be covered by any contract
  - The ratio of beds for standard and dementia nursing care
  - The mix of complexity of need of the residents
  - Approach to delivering the service to the required standards set out in the service specification
  - Approach to multi-disciplinary partnership working
  - Length of contract term and any specific targets or milestones to be achieved during that term
  - Process to be followed if quality, such as CQC (rating) falling below “Good” and not pay “Void” costs whilst agreed improvements are delivered by the provider.
  - How general void costs can be minimised for both the council and the provider.
23. Each individual contract award will be made following approval of a Gateway 2 report and any subsequent variations being approved by way of Gateway 3 reports.

## Identified risks for the procurement

24. Several risks have been identified in this procurement

**Table 4 Risk log**

<b>Risk</b>	<b>Mitigation</b>
Lack of interest	Soft market testing has demonstrated that there is interest within the sector to deliver good quality homes within the borough under contract with the Council.
Challenge from providers	The proposed approach satisfies the requirements of the (EU) Public Contracts Regulations 2015 as they apply to “light touch” services, which allow for a negotiated process.
The procurement approach recommended is un-affordable or fails to meet requirements as set out in the council’s Fairer Futures Procurement Strategy.	The negotiations will be informed by the Fairer Future Promises Strategy with Council maintaining the right to continue with current purchasing arrangements, should the outcome of individual negotiations not provide value for money.
CQC ratings are not satisfactory.	The CQC history of a provider and the home from which the service is intended to be delivered will be considered with any individual contract award potentially being linked to the achievement or maintenance of quality milestones through the initial contract term. The Southwark Plan sets out a commitment to develop a Residential Care Charter, which is due to be approved in 2019-20 , that is likely to be a condition of contract for all homes procured in borough.

## Key /Non-key decisions

25. This is a key decision

## Policy implications

26. The recommendations as set out in this report are strongly shaped by the Council Plan 2018-22; to commit to increase good quality local nursing care beds and the development of a residential care charter, which is due to be approved by the Cabinet towards the end of the current year.

27. The Care Act 2014 places a duty on the council to assess and support frail and disabled adults with their eligible care needs, whilst promoting diversity and quality in the provision of services.

28. Southwark’s vision for adult social care is to deliver well-co-ordinated personalised health and social care services to prevent, delay or reduce the need for care, and to support people to live as independent lives as possible. Nursing care within this context applies to those living with complex needs who require 24-hour care in the latter stages of their life.

29. Southwark Council and Southwark CCG have developed a joint “Five Year Forward View” which sets out a shared vision on how to improve the health and wellbeing outcomes for specific population segments through more effective joint planning and commissioning arrangements. It is estimated that there are approximately 4,000 Southwark citizens who are frail, living with dementia or approaching the end of life, to whom nursing care may be a significant area of service provision.

**Procurement project plan (key decisions)**

30. Given the nature of this procurement strategy and the evolving position of the local market, it is proposed that this means that the timetable for completion of individual negotiations and contract awards could possibly cover a period up to 2022. Therefore, key dates following the placing of an advert are not completed at this stage.

**Table 5 Timeline**

<b>Activity</b>	<b>Complete by:</b>
Enter Gateway 1 decision on the Forward Plan	13/02/2019
Submission to CCRB	22/02/2019
CCRB Review Gateway 1	28/02/2019
DCRB Review Gateway 1	20/03/2019
Brief relevant Cabinet Member (over £100k)	2/04/2019
Agenda Planning	02/04/2019
Deadline for final report	11/04/2019
Notification of forthcoming decision - Cabinet	23/04/2019
Approval of Gateway 1: Procurement strategy report	30/04/2019
Scrutiny Call-in period and notification of implementation of Gateway 1 decision	09/05/2019
Completion of relevant documentation	20/05/2019
Publication of OJEU Notice	20/05/2019
Publication of Opportunity on Contracts Finder	21/05/2019
Anticipated receipt of expressions of interest	30/06/2019
Anticipated completion of desk top assessment of expressions of interest	30/07/2019
Anticipated completion of negotiations for expressions of interest	30/09/2019
Closing date for receipt of expressions of interest	20/11/2019
Anticipated first contract awards	02/12/2019

**TUPE/Pensions implications**

31. There are no considerations.

### **Development of the documentation**

32. The standard SQ will be amended and method statement will be drafted.
33. The requirements for the service will be set out through the publication of a draft service specification co-produced with local residents of care homes, their families/supporters, and key clinical and operational leads from across the local health and social care system.
34. The key aspects of subsequent negotiations will be recorded, and templates as required developed to assess the value for money for bed prices quotes, to ensure a thorough audit trail

### **Advertising the contract**

35. Notification on OJEU and Contract Finder. Homes who have engaged with the Council under soft market testing are advised to register on the government's "contract finder" portal, so they will receive notifications of the advert automatically once placed.

### **Evaluation**

36. Evaluation of submissions and the subsequent negotiations will be carried out by senior council officers who have sufficient seniority and expertise in the area. Clinical expertise in any negotiation is likely to come from officers within SCCG.

### **Community impact statement**

37. Age and Disability are "protected characteristics" under the Equality Act 2010 and the outcome of the Council's proposed procurement plans will particularly benefit older people and those living with very complex conditions.
38. Local care homes may also provide employment opportunities for local people.
39. More details are contained in Appendix 1.

### **Social Value considerations**

40. The Public Services (Social Value) Act 2012 requires that the council considers, before commencing a procurement process, how wider social, economic and environmental benefits that may improve the wellbeing of the local area can be secured. The details of how social value will be incorporated within the are set out in the following paragraphs.

### **Economic considerations**

41. Local care homes provide employment opportunities for local people, with homes required to expand apprenticeship schemes as a condition of contract in line with the Council's "Southwark Apprenticeship Standard" requirements of one apprentice per £1m of expenditure.

### **Social considerations**

42. Nursing care homes provide job opportunities to local residents. Contract negotiations will include how providers propose to engage with local Job Centre

Plus and apprenticeship schemes, alongside other workforce and training issues. The contract negotiations will also explore the application of the Southwark Ethical Care Charter, as per the Fairer Futures Procurement Strategy, looking at providers approach to issues such as London Living Wage, apprenticeships, zero hours work contracts and Trade Union recognition agreements. The outcome of the negotiations in these areas will be reported back in each Gateway 2 report.

### **Environmental/Sustainability considerations**

43. Care home buildings will not leave large carbon footprints on the environment as workers are likely to live locally; although residents require secure warm and safe premises so there will be a higher use of heating than non-regulated premises.

### **Plans for the monitoring and management of the contract**

44. The experience of residents in care homes is monitored by social workers who undertake regular planned reviews or respond to quality concerns. The contracts and performance team with commissioning officers are responsible for the monitoring and inspection of homes as required.

### **Staffing/procurement implications**

45. There are no new staffing implications in relation the individual nursing and residential care placements.

### **Financial implications**

46. The expected annual contract value of £7.3m is estimated as 80% of the 2018-19 forecasted adult social care nursing care spends of £9.1m.
47. There is sufficient budget for the proposal. Please note nursing care is part funded by an allocation from the Improved Better Care Fund.

### **Legal implications**

48. Please see concurrent from the director of law and democracy.

### **Consultation**

49. Views were sought from care homes residents, their families and advocates to co-produce "I Statements" that form the core of the draft service specification as well as supporting the development of the planned Residential Care Charter.
50. Commissioners also carried out extensive engagement with operational teams within social care, with NHS partners and senior council legal, procurement and finance leads to develop this procurement approach.

## **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

### **Strategic Director of Finance and Governance (51TJ201819)**

51. The strategic director of finance and governance notes the recommendations of this report in furtherance of the provision of additional quality nursing care beds within the borough. There are no direct financial implications arising from this procurement strategy, however budget holders will need to work closely with finance colleagues

to model the likely impact of the proposed procurement route, noting that this is likely to result in multiple contract awards, each requiring separate financial due diligence.

### **Head of Procurement**

52. This report seeks approval for the procurement strategy to procure in borough nursing care beds for Southwark citizens.
53. The proposed procurement route, outlined in paragraphs 20 to 24, is to establish a competitive EU compliant negotiated process in line with the EU regulations and council's own contract standing orders.
54. The identified risks and proposed mitigation of this tender are laid out in paragraph 24 and the associated table.
55. The report confirms the monitoring and management arrangements that will be in place during the life of the contract laid out in paragraph 44.
56. Southwark Council's procurement officers will be advising on the tender documents to be used to ensure that all relevant statutory questions are included and due diligence to ensure the successful supplier is financially stable

### **Director of Law and Democracy**

57. This report seeks approval of the procurement strategy in relation to the purchase of in-borough nursing care beds.
58. These services are classed as light touch services under the Public Contract Regulations 2015 (PCR15), and as the estimated values exceed the light touch threshold of £615k, they are subject to the tendering requirements of the PCR15. This requires that a contract notice for the opportunity is placed in OJEU, but thereafter authorities have flexibility to use any process or procedure they choose to run the procurement and can design their own process altogether. In designing that process the council is required to ensure this meets the EU Treaty principles of transparency and equal treatment, they must conduct the procurement in accordance with the information noted in the OJEU notice, and any time limits proposed for responding must be reasonable and proportionate. The report details the proposed procurement process from paragraph 20.
59. The proposed procurement strategy is also consistent with the council's contract standing orders in all respects and will assist the council to fulfil its duties under the Care Act 2014.
60. The decision to approve the recommended procurement strategy is one which is expressly reserved to the cabinet under the council constitution. The community impact statement set out from paragraph 37 of this report summarises the effect of the Public Sector Equality Duty contained in section 149 of the Equality Act 2010, and in making procurement decisions the council must consider and have due regard to any effects of the decision on the community at large and, in particular on people identified as possessing "protected characteristics", as defined in the Act.

## BACKGROUND DOCUMENTS

Background Documents	Held At	Contact
Gateway Zero	Partnership Commissioning Team 160 Tooley Street London SE4 2QH	Andy Loxton 020 7525 3130
<b>Link:</b> <a href="http://moderngov.southwark.gov.uk/mgListPlanItems.aspx?PlanId=508&amp;RP=153">http://moderngov.southwark.gov.uk/mgListPlanItems.aspx?PlanId=508&amp;RP=153</a>		
CQC State of Care Report	Partnership Commissioning Team 160 Tooley Street London SE4 2QH	Andy Loxton 020 7525 3130
<b>Link:</b> <a href="https://www.cqc.org.uk/sites/default/files/20171011_stateofcare1718_report.pdf">https://www.cqc.org.uk/sites/default/files/20171011_stateofcare1718_report.pdf</a>		

## APPENDICES

No	Title
Appendix 1	Community Impact Assessment

## AUDIT TRAIL

<b>Cabinet Member</b>	Councillor Jasmine Ali, Children, Schools and Adult Care	
<b>Lead Officer</b>	David Quirke-Thornton, Strategic Director for Children's and Adults' Services	
<b>Report Author</b>	Andy Loxton, Joint Commissioning Manager, Residential Care	
<b>Version</b>	Final	
<b>Dated</b>	11 April 2019	
<b>Key Decision?</b>	Yes	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance and Governance	Yes	Yes
Head of Procurement	Yes	Yes
Director of Law and Democracy	Yes	Yes
<b>Contract Review Boards</b>		
Departmental Contract Review Board	Yes	Yes
Corporate Contract Review Board	Yes	Yes
<b>Cabinet Member</b>	Yes	Yes
<b>Date final report sent to Constitutional Team</b>		11 April 2019