

Item No.	Classification: Open	Date: 7 June 2022	Meeting Name: Strategic Director of Housing and Modernisation
Report title:		Gateway 2 - Contract Award Approval Facilities Management Contract Procurement for the operational estate	
Ward(s) or groups affected:		Not applicable	
From:		Head of Corporate Facilities Management	

RECOMMENDATION(S)

1. That the Strategic Director of Housing and Modernisation approves the award of the Facilities Management (FM) call off contract via the Crown Commercial Services (CCS) Framework to Atalian Servest Limited for the estimated sum of £5.2m per annum for a period of four years, with a contract value of £20.8m with an option to extend for a further two years making a total estimated contract value of £31.2m with a start date of 1 October 2022.
2. That the Strategic Director of Housing and Modernisation approves additional spend maintenance and additional security work for the operational estate under the contract, as detailed in the closed report.
3. That the Strategic Director of Housing and Modernisation approves the additional provision for spending for capital works and ad hoc call off work, which is estimated at £3.5m per annum and approves an exemption from the tendering requirements of Contract Standing Orders (CSOs), as permitted under CSO 6.8 to allow orders for capital and life cycle project works to be instructed to Atalian Servest Limited throughout the term of the contract as further detailed in paragraph 54.
4. That the Strategic Director of Housing and Modernisation notes the ongoing uncertainty and cost of the pandemic measures that will be delivered through this contract, as required.

BACKGROUND INFORMATION

5. The planned procurement strategy was the subject of a Gateway 1 report approved by the Cabinet on 9 March 2021, and in which Cabinet delegated the Gateway 2 decision to the Strategic Director of Housing and Modernisation. The procurement was undertaken via CCS framework, Framework Ref: RM3830.

6. The contract is required to enable a single supplier of Hard FM, Soft FM and delivery of capital and life cycle project work to the council's operational estate.

Procurement project plan (Key Decision)

Activity	Completed by/Complete by:
Forward Plan for Gateway 2 decision	25/02/2022
Briefed relevant cabinet member (over £100k)	29/09/2021
Approval of Gateway 1: Procurement Strategy Report	09/03/2021
Invitation to tender	29/10/2021
Closing date for return of tenders	14/01/2022
Completion of evaluation of tenders	10/03/2022
DCRB Review Gateway 2:	04/04/2022
CCRB Review Gateway 2:	14/04/2022
Notification of forthcoming decision – Five clear working days	09/05/2022
Approval of Gateway 2: Contract Award Report	17/05/2022
Scrutiny Call-in period and notification of implementation of Gateway 2 decision	24/05/2022
Contract award	25/05/2022
Add to Contract Register	27/05/2022
TUPE Consultation period (if applicable)	01/07/2022
Contract start	01/10/2022
Publication of award notice on Contracts Finder	24/06/2022
Contract completion date	30/09/2026
Contract completion date – if extension(s) exercised	30/09/2028

KEY ISSUES FOR CONSIDERATION

Description of procurement outcomes

7. The procurement process was undertaken to appoint a single FM supplier to provide planned soft and hard facilities management services to 199 operational properties (subject to confirmation during mobilisation) and provide a reactive call out service to a further 412 properties. The procurement followed the process in accordance with CCS framework RM3830. Efficiencies will be gained through the contract from added social

value outcomes. Annual reviews will be undertaken to identify any cost savings. The procurement process concluded that a bidder from the framework met all the requirements of the evaluation criteria for quality, social value and finance and it is recommended to proceed to contract award.

Key/Non Key decisions

8. This report deals with a key decision.

Policy implications

9. The council seeks to move to a new FM Contract with added benefits of committing to social value through the delivery of FM to the operational estate and supporting the delivery of the council's Fairer Future commitments to its residents. The procurement was carried out in line with the council's Fairer Future Procurement Framework.

Tender process

10. This procurement utilised the CCS framework RM3830, Lot 1b for the supply of Total Facilities Management Services to the value between £7m to £50m.
11. The CCS framework identifies 31 suppliers under Lot 1b and allows authorities to run an initial market test exercise based on requirements and geographical location. Following this CCS identified 26 suitable bidders who met Southwark's criteria. All 26 bidders received the tender pack and eight bidders confirmed they wanted to proceed.
12. A tender pack including a number of questions was issued to the bidders who submitted an interest in proceeding. This pack also included a detailed specification of requirements, which was developed from the CCS framework model in order to better meet all the requirements of the council.
13. During the tender submission process, seven of the eight interested bidders withdrew from the process. One bidder remained. Follow up discussions were held with the bidders that withdrew via CCS to understand the reasons for their decision. The reasons presented were varied including issues with resourcing at the time of the tender, other projects and unable to resource a bid, financial restrictions and Covid-19 implications.

Tender evaluation

14. The evaluation model included a quality and financial split of 35% Quality, 10% Social Value and 55% Price. The values in Gateway 1, item 51, were set at 60% price and 40% quality. The change was agreed with the Strategic Director of Housing and Modernisation senior management team to allow for specific provision for social value at 10%.

15. As the CCS procurement process allows continuation with one bidder, the evaluation continued on this basis: A bidder must submit a compliant and comprehensive bid and meet all the quality and financial requirements, as defined in the tender pack issued to bidders.
16. The remaining bidder submitted their tender return and the quality (including social value) and financial evaluation was completed.

Quality evaluation

17. The quality evaluation was a scored weighted process by a wide selection of council officers, from Corporate FM (CFM) and the wider council. Individual scoring was then discussed at a group consensus meeting.
18. The scoring process used the Southwark scoring methodology with 40% as the minimum satisfactory level.
19. There were 16 quality questions covering all aspects of the service delivery.
20. The final quality evaluation score met and exceeded the acceptable evaluation level with a weighted score for quality at 51%, which was satisfactory. This met the criteria to proceed and satisfied Southwark's contract requirements and specification.

Social value evaluation

21. The social value evaluation was included in the overall quality element of the evaluation model. The Social Value Portal were engaged to undertake the social value evaluation process. Southwark included five mandatory Themes, Outcomes and Measures (TOMS) and presented 60 TOMS with options for tenderers to make social value commitments against throughout the contract. The bidder's response demonstrated commitment to the mandatory five TOMS and committed to 40 other TOMS, demonstrating an acceptable level of planned qualitative approach to support these commitments. The final social value score was 4.9%, which was over 3.5% acceptable level.

Financial evaluation

22. The financial evaluation was undertaken based on a comparison with a pre-defined benchmark costs and known estimated ad hoc delivery costs. The process was not scored and ranked due to their being only a single bid submission. The financial evaluation was undertaken by evaluator's independent to the quality and social value scoring and in line with the CCS process.
23. As the procurement was undertaken using the CCS framework, CCS continue to monitor and manage financial health checks on all the suppliers selected on their frameworks. Whilst there were some concerns with the results of the Southwark financial health check, when checked with CCS, they were above the required risk score for the lot used for this procurement. CCS monitor and check scores on a monthly basis and have

confirmed that the preferred bidder was fully compliant with the health check process and can proceed.

24. The evaluation process also included an interview and presentation from the bidder. The panel undertaking the interview consisted of key representatives from the quality and financial evaluation teams.
25. The interview and presentation were not scored and was purely to allow for any minor clarifications and provide an opportunity to meet the bidder and seek assurance on their bid submission. The questions presented to the bidder were clarifications against the quality, social value and financial management areas. The bidder was able to provide clear assurance and understanding on all questions raised.

Plans for the transition from the old to the new contract

26. CFM will monitor and manage this contract in accordance with the provisions of the contract. The performance monitoring mechanism will be used in respect of:
 - Compliance with the specification and contract terms;
 - Performance of the supplier;
 - Cost;
 - User satisfaction;
 - Social Value Portal monitoring;
 - Risk management and
 - KPIs.
 - Annual Performance Reports will be submitted in line with Contract Standing Orders.
27. A demobilisation plan will be developed to manage the exit of the current contract, which will be in line with the exit strategy of the current contract terms. A mobilisation plan by the new supplier will also be developed and run in conjunction and in partnership with the council's mobilisation requirements. CFM will be responsible for the managing the mobilisation and demobilisation process.
28. The mobilisation process will include management of TUPE transfers. This will include TUPE transfers from the incumbent supplier to the new supplier as well as the incumbent supplier to the council for the transfer of cleaning services at Tooley Street and Queens Road to in-house management.

Plans for monitoring and management of the contract

29. CFM are responsible for the management of the contract.
30. The contract includes a number of key performance indicators against service performance and delivery. All Key Performance Indicators (KPI) will be reported on a monthly or quarterly basis, as part of the management process. This will also include management and reporting against delivery on all social value measures, which will be supported by the social value portal team.

31. Reporting will also include a six month operational performance review and an annual contract review. Additionally, and internally, there will be an Annual Performance Report on the anniversary of the contract start date.
32. The council's contract register publishes the details of all contracts over £5,000 in value to meet the obligations of the Local Government Transparency Code. The Report Author must ensure that all appropriate details of this procurement are added to the contract register via the eProcurement System.

Identified risks for the new contract

33. The table below identifies the specific risks associated with this contract, the likelihood of occurrence and the controls in place to mitigate the risks:

R/N	Risk Identification	Likelihood	Risk Control
R1	Bidder ceases trading or goes into administration/liquidation	Low	CCS test and regularly monitor the financial viability of the suppliers on this Framework.
R2	Covid-19 implications	Low	There may be an impact on resource availability and parts for systems whilst the engineering and FM industry recovers from the impact of shutdowns.
R3	Brexit: Leading to increase in price list	Low	There will be ongoing contract reviews and life cycle updates to ensure assets are managed. Any issues for obtaining or delay in parts will be monitored and reviewed as part of the lifecycle management.
R4	The mobilisation period will include an asset and property verification process that may impact on the costs included in the bid submission.	medium	All cost amendments are undertaken in line with the rates submitted in the contract and contract terms.
R5	Economic and supply chain issues creating pressures on contract price	High	Ongoing contractual review and partnership working to understand and manage issues. Early reporting when issues arise. Risk management reviews

Community, equalities (including socio-economic) and health impacts

Community impact statement

34. The contract has a direct impact on all operational buildings, which houses council staff, council's elected members and public access. This contract will provide a working environment that will ensure that none of the council's equality agenda are negatively impacted. It will deliver building related facilities management services that will enable the operational buildings to continue to welcome staff and visitors to the council.

Equalities (including socio-economic) impact statement

35. This contract has a borough wide scope and is strategic in nature in that it supports the effective delivery of all services through the provision of facilities management. However, there are no direct impacts on any protected characteristics or groups in this provision. The contractor has been evaluated on Social Value and this award will have positive economic and social outcomes overall, and will deliver their service in support of the council's equalities policy and aims.

Health impact statement

36. The facilities management contract will allow for the effective support of healthy and welcoming facilities for all our staff, including any special adaptations and technical aspects that are required. There are no direct health impacts.

Climate change implications

37. Sustainability and climate change formed a central part of Southwark's specification for this procurement. The successful bidder has set out clear targets and processes to support this, and have committed to meet our specific performance targets around plastics, waste reduction, energy and transport. They have also committed to becoming a net carbon neutral business by 2030 in line with Southwark's aim. Delivery against these climate and sustainability targets will be monitored and reported on as part of the management of this contract.

Social Value considerations

38. 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 well-being of the local area can be secured. The social value considerations included in the tender (as outlined in the Gateway 1 report) are set out in the following paragraphs in relation to the tender responses, evaluation and commitments to be delivered under the proposed contract.
39. Social Value formed 10% of the overall quality weighting. Bidders were presented with the following 5 mandatory social value measures and were allowed to choose from 60 optional social value measures.

NT41	Percentage of staff on contract that is paid at least the relevant Real Living wage as specified by Living Wage foundation. (This related to LLW)
NT10	No. of weeks of apprenticeships on the contract that have either been completed during the year, or that will be supported by the organisation until completion in the following years - Level 2,3, or 4+. Southwark policy shared.
FM29	Total amount (£) spent in local supply chain through the contract
FM60	Savings in CO2 emissions on contract achieved through de-carbonisation (i.e. a reduction of the carbon intensity of processes and operations, specify how these are to be achieved)
FM89	Single-use plastic packaging eliminated through reusable packaging solutions or schemes (e.g. Loop or equivalent) on the contract

40. The Social Value Portal were engaged to undertake the social value evaluation process. Southwark included five mandatory Themes, Outcomes and Measures (TOMS) and presented 60 TOMS with options for tenderers make commitments against throughout the contract by the bidders. The bidder's response demonstrated commitment to the mandatory five TOMS and committed to 40 other TOMS, demonstrating an acceptable level of planned qualitative approach to support these commitments, which included social local economic value. The social value element of the evaluation was undertaken through the social value portal and measures are undertaken against proxy values associated with the benefit of the social value commitment (based on central government's Green Book).
41. The social value TOMS included commitments to employing local people, specific recruitment programmes for women, 16-25 year olds and BAME, initiatives to support older, disabled and vulnerable people, supporting local supply chains, savings in CO2 emissions, eliminating plastic packaging and safeguarding the environment.

Economic considerations

42. The full cost of this service for the required period is set out in the financial implications section. All employees associated with the supplier will be paid London Living Wage (LLW) which will be subject to an annual review and contract price increase in line with the announcement.

Social considerations

43. Social Value forms a key part of the contract and formed part of the evaluation process. Social Value Portal will continue to monitor supplier data and support progress and implementation of the social value commitments. The contractor has committed to eight apprentices on the contract, their progress and continued employment will be monitored in the six monthly contract review meetings.

Environmental/Sustainability considerations

44. The contract promotes the purchase and use of environmentally friendly products. For suppliers to get on the framework they had to respond to quality questions in relation to waste reduction and their approach to carbon footprint reduction. The new supplier is committed to excluding single use plastic and where possible, carbon reduction and other environmentally friendly products in relation to the delivery of FM.

Market considerations

45. The preferred bidder is a UK private limited company incorporated in 2007 with contractual presence in neighbouring London boroughs delivering FM services.

Staffing implications

46. For the outsourced contract, TUPE will apply on a secondary basis (affecting the staff of the existing contractor). The award of this contract has no TUPE implications for current council staff, however, TUPE from the outgoing contractor to the council will apply given the transfer of cleaning services from the existing contractor to in house council management.
47. The bidder's approach to secondary TUPE transfers was assessed as meeting the council's and statutory requirements in the quality evaluation

Financial implications

48. Prior to this procurement, a benchmarked contract cost was identified. In addition to this, CFM manages and delivers a number of capital projects, which while not guaranteed contractual spend, it can be expected that the preferred bidder will be awarded some of this work.
49. The benchmarked contractual costs and spend are based on current expenditure, but exclude standard cleaning services for Tooley Street and Queens Road, as these are to be moved in house in line with the change of contracts.
50. The preferred bidders bid was in line with the expected benchmark cost.
51. The planned services cost include all works up to a £750 financial threshold per work item at the contractor's risk / met by the contractor with the cost of works above this threshold met by the council.
52. The contract mobilisation period includes a property and asset verification process. This allows the new supplier to check and confirm all assets listed at each property. In addition, the council will confirm the property list that will be in place from the start of the contract. The tender pack included property and asset data at the time of issue of the tender, so this process will allow for checks as well as any amendments to be made to the property

portfolio since the time of release of information to bidders in October 2021. Any amendments will be made in line with the rates and terms of the contract and the overall costs per property will be amended accordingly with full council management and approval.

53. The bid costs for planned deliverables are below the current contract costs, which is positive and indicates that savings may be possible down the line once the contract is fully mobilised and the asset and property verification process is complete. However, the council will be entering into this contract during an uncertain period, with relatively high inflation set to continue in comparison with recent years, developing consequences due to the recent invasion of Ukraine and the continued impact of Covid-19 including dealing with new variants. The cost of the service will be monitored closely and continually assessed against budget provision post contract award and once stabilised any budget options that materialise will be reported to Cabinet in the normal way through future budget setting processes.
54. The contract will include delivery of capital and life cycle project work to the council's operational estate. The contract will allow for project works i.e. refurbishment and alterations consisting of works above £25k and up to £499k required by the council to alter or improve the working environment and activities which fall outside the repairs and maintenance regime. The contract will offer three out of four projects to the contractor subject to value for money assessment and one out of four projects to the council's preferred supplier list or the wider market will ensure the council has the ability to benchmark costs and ensure continued best value.
55. The contract will allow for other departments to call off the contract as well as additional ad hoc spend against the contract. These costs will be authorised by the individual departments.
56. The contract costs above exclude ongoing annual expenditure in relation to Covid-19 to deliver those additional services necessary to maintain safe working environments across the operational estate for the council's employees.
57. LLW applies to the contract including all staff and contractors employed by the main contractor and will be increased in-line with the annual announcement.
58. The contract is subject to an annual price review, which is linked to the Consumer price Index (CPI) with the indexation mechanism set out in the contract. The baseline monthly payment will increase from the second anniversary of the contract start date and applied each anniversary of the contract start date thereafter. The day rates and schedule of rates in the variable cost streams will also increase annually in line with the agreed index.

Legal implications

59. Please see concurrent from the Director of Law and Governance.

Consultation

60. All internal departmental stakeholders have been consulted.

Other implications or issues

61. None

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Strategic Director of Finance and Governance (H&M 22/006)

62. This report seeks approval from the Strategic Director of Housing and Modernisation to award a Facilities Management (FM) call off contract to Atalian Servest Limited for the estimated sum of £5.2m per annum for a period of four years, with a contract value of £20.8m. The award also includes an option to extend for a further two years making a total estimated contract value of £31.2m with a start date of 1 October 2022. While this estimated spend represents an initial saving on current comparable costs, the contract needs to be properly baselined over the first twelve to eighteen months of operation before any consideration can be given to present as a saving option in future budget rounds.
63. The Strategic Director is also asked to approve additional spend on maintenance and additional security work for the operational estate under the contract.
64. The report also asks the Strategic Director to approve the additional provision for spending for capital works and ad hoc call off work, which is estimated at £3.5m per annum. It also asks for approval to an exemption from the tendering requirements of Contract Standing Orders (CSOs), as permitted under CSO 6.8, to allow orders for capital and life cycle project works to be instructed to Atalian Servest Limited throughout the term of the contract. As stated in the report, these capital and life cycle investment arrangements provide the opportunity to ensure that value for money will be a key determinant in awarding the work to the contractor or another provider.
65. It should be noted that this contract will in addition to the above likely include on-going costs pertaining to the safety measures the Council initiated in response to the pandemic. At this point it is not clear whether or for how long these measures will remain in place but this expenditure is not specifically budgeted for, however, there is a remote possibility that it could be contained in the overall contract sum. This will need to be closely monitored but may require budget growth going forward.
66. As this award is the outcome of a procurement exercise that engendered only one bidder, the Strategic Director has considered the specific risks this presents and will ensure that robust contract monitoring arrangements are put in place across all the work streams mentioned above to mitigate those risks.

Head of Procurement

67. This report seeks the approval of the Strategic Director of Housing and Modernisation for the award of the Facilities Management (FM) contract to Atalian Servest Limited. The contract is a call off from the Crown Commercial Services (CCS) Framework for an estimated sum of £5.2m per annum for a period of four years making the total with a contract value of £20.8m. There is the option to extend for a further two years making a total estimated contract value of £31.2m. The contract start date is 1 October 2022.
68. The report also asks that the Strategic Director of Housing and Modernisation approves additional spend on maintenance and security works for the operational estate under the contract, as well as provision for spending for capital works and ad hoc call-off work under the contract, the value of which is not guaranteed but detail provided in the closed version of the report.
69. The report also asks that the Strategic Director of Housing and Modernisation approves an exemption from the tendering requirements of Contract Standing Orders (CSOs), as permitted under CSO 6.8 to allow orders for capital and life cycle project works to be instructed to Atalian Servest Limited throughout the term of the contract as further detailed in paragraph 54 of the open report (para.42 of the closed report).
70. The report sets out the details of the tender and evaluation process undertaken in paragraphs 10 – 25. The social value achieved is detailed in paragraphs 38-44. London Living Wage is paid under the contract as confirmed in paragraph 42.

Director of Law and Governance

71. The Director of Law and Governance notes the contents of this report which seeks the approval of the Strategic Director of Housing and Modernisation to the award of a Facilities Management (FM) call off contract via the Crown Commercial Services (CCS) Framework to Atalian Servest Limited as highlighted in paragraphs 1 to 4 of this report.
72. On the basis of the information contained in this report it is confirmed that this procurement was carried out in accordance with Contract Standing Orders and the relevant legal requirements.
73. The tender and the evaluation processes are outlined in paragraphs 10 to 25 of this report.
74. The Strategic Director's attention is drawn to the Public Sector Equality duty (PSED General Duty) under the Equality Act 2010, which requires public bodies to have regard, when making decisions, to the need to eliminate discrimination, advance equality of opportunity and foster good relations between persons who share a relevant protected characteristic and those who do not share it. The Strategic Director is specifically referred to the

community, equalities (including socio-economic) and health impacts at paragraphs 34 to 36 of this report setting out the consideration that has been given to equalities issues, which should be considered when approving the recommendations in this report.

75. The Strategic Director's attention is drawn to the climate change implications in paragraph 37 and the environmental/sustainability considerations in paragraph 44 of this report.
76. Paragraph 47 of this report highlights the staffing implication in regards to TUPE.
77. Contract Standing Order 2.3 requires that no steps are taken to award a contract unless the expenditure involved has been included in approved estimates, or otherwise approved by the council. Paragraphs 48 to 58 confirm the financial implications of this award.

PART A – TO BE COMPLETED FOR ALL DELEGATED DECISIONS

Under the powers delegated to me in accordance with the council's Contract Standing Orders, I authorise action in accordance with the recommendation(s) contained in the above report (and as otherwise recorded in Part B below).

Signature Michael Scorer.....

Date.....31 May 2022

Strategic Director of Housing and Modernisation

PART B – TO BE COMPLETED BY THE DECISION TAKER FOR:

- 1) All key decisions taken by officers
- 2) Any non-key decisions that are sufficiently important and/or sensitive that a reasonable member of the public would reasonably expect it to be publicly available (see 'FOR DELEGATED DECISIONS' section of the guidance).

1. DECISION(S)
As set out in the recommendations of the report.
2. REASONS FOR DECISION
As set out in the report.

3. ALTERNATIVE OPTIONS CONSIDERED AND REJECTED BY THE OFFICER WHEN MAKING THE DECISION
Not applicable.
4. ANY CONFLICT OF INTEREST DECLARED BY ANY CABINET MEMBER WHO IS CONSULTED BY THE OFFICER WHICH RELATES TO THIS DECISION
none
5. NOTE OF ANY DISPENSATION GRANTED BY THE MONITORING OFFICER, IN RESPECT OF ANY DECLARED CONFLICT OF INTEREST
<i>If a decision taker or cabinet member is unsure as to whether there is a conflict of interest they should contact the legal governance team for advice.</i>
none
6. DECLARATION ON CONFLICTS OF INTERESTS
<p>I declare that I was informed of no conflicts of interests.*</p> <p>or</p> <p>I declare that I was informed of the conflicts of interests set out in Part B4.*</p> <p>(* - Please delete as appropriate)</p>

* Under the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, the council is required to put in place a scheme for recording and publishing some officer executive decisions. This process is sometimes referred to as "Regulation 13(4)".

BACKGROUND DOCUMENTS

Background documents	Held At	Contact
Gateway 0 - facilities management contract for the council's operational estate 13 March 2018	160 Tooley Street, SE1 2QH.	Paul Symington Phone number 0207 525 0225
Link: http://moderngov.southwark.gov.uk/documents/s74539/GW0%20-%20FM%20contract%20for%20the%20councils%20corporate%20estate.pdf		
Gateway 1 - Procurement Strategy Approval -Facilities Management Contract Procurement for the operational estate	160 Tooley Street, SE1 2QH.	Paul Symington Phone number 0207 525 0225
Link: Gateway 1 - Procurement Strategy Approval -Facilities Management Contract Procurement for the operational estate		

APPENDICES

No	Title
None	

AUDIT TRAIL

Lead Officer	Paul Symington, Head of Corporate Facilities		
Report Author	Lisa Charles, CFM FM Procurement Lead		
Version	Final		
Dated	23 May 2022		
Key Decision?	Yes		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title	Comments Sought	Comments included	
Strategic Director of Finance and Governance	Yes	Yes	
Head of Procurement	Yes	Yes	
Director of Law and Governance	Yes	Yes	
Cabinet	n/a	n/a	
Date final report sent to Constitutional Team		31 May 2022	