

# ORDINARY MEETING OF COUNCIL

21 JUNE 2017



## PROCUREMENT POLICY AND FINANCIAL DELEGATIONS UPDATE

**WARD:**

**WHOLE OF MUNICIPALITY**

**GENERAL MANAGER:**

**CHRIS CARROLL, ORGANISATIONAL  
PERFORMANCE**

**PREPARED BY:**

**WAYNE MOORE, COORDINATOR  
CONTRACTS, PROCUREMENT & FLEET**

**TRIM FILE NO:**

**16/01/654**

**ATTACHMENTS:**

**I. Procurement Policy**

**PURPOSE** To outline the results of the annual review of the Procurement Policy and seek approval of the revised Procurement Policy.

### I. RECOMMENDATION

That Council:

- 1.1 Notes that the annual review of the Procurement Policy has been completed that facilitates increased efficiency, probity and sustainability.
- 1.2 Adopts the Procurement Policy 2017 (Attachment I).

### 2. BACKGROUND

- 2.1 In November 2008 amendments to the *Local Government Act (1989)* were passed including Section 186A which requires Council to prepare and approve a Procurement Policy.
- 2.2 The Act also requires that Council review the Procurement Policy annually and make it available for public inspection.
- 2.3 The Finance department has led the annual review of the Procurement Policy with support from an internal stakeholder and advice from Arc Blue, an independent procurement specialist.



### 3. KEY INFORMATION

#### **Context**

- 3.1 The procurement profile and performance measures from the past three years is summarised in the following table;

Indicator	2014/15	2015/16	2016/17
Total number of purchase orders	13,229	12,074	11,679
Total invoices paid	\$131,169,270	\$124,090,873	\$134,668,934
Number of public tenders	56	100	83
Total expenditure under contract	\$66,862,995	\$69,731,682	\$75,053,547
% of purchase orders raised prior to invoice	85	83	85
Number of breaches of section 186 of the LGA	Nil	Nil	1*
Negotiated savings through best and final offer	N/A	\$724,397	\$505,099

- *Reported in the CEO Report in June 2017. Investigation identified improvement opportunities which are being implemented through changes proposed to this Policy and related guidelines.*
- 3.2 Analysis of the procurement activity highlights a continued reduction in the number of purchase orders raised in 2016/7 notwithstanding an increase in value procured.
- 3.3 The overall percentage of total expenditure resulting from a competitive tendering process has increased slightly to 56%.
- 3.4 Council is working with our neighbouring councils to develop collaborative procurement opportunities. Port Phillip City Council has signed a Memorandum of Understanding with the City of Melbourne, City of Yarra and City of Maribyrnong. To date we have completed tenders for Security Services and Coin Collection, Counting and Banking Services. The latter contract resulted in savings of \$200,000 in the first year of the contract.
- 3.5 The procurement team has also helped progress the Melbourne Renewable Energy project to tender evaluation stage with the City of Melbourne and other partners.



**Summary of key changes**

- 3.6 A requirement to develop and report against a rolling four-year Enterprise Procurement Plan updated annually outlining all major procurement activity. This will enable a more strategic and planned approach to procurement and be used as tool for identifying collaboration opportunities with other councils.
- 3.7 A comprehensive review of our delegation framework including benchmarking with similar Councils has identified a number of proposed improvements:
- 3.7.1 The current delegation framework provides the CEO with a \$1M delegation if the preferred tenderer submits the lowest price, however this delegation reduces to \$500,000 if the preferred tenderer does not submit the lowest price. It is proposed to remove this distinction and streamline this whereby the CEO has a \$1M delegation in all instances. This is in line with Council's focus on best value versus lowest price. The requirement for contracts above \$1M regardless of price to go to Council remains.
  - 3.7.2 The current Financial Authority Limits and Power to Enter into Contracts are structured in separate delegation tables. In order to provide greater clarity, it is proposed to merge these two frameworks.
  - 3.7.3 The delegation levels for managers, coordinators and team leaders have been increased to better reflect the operational nature of these roles. The proposed change will assist with streamlining the decision making process at all levels of the organisation.
  - 3.7.4 Section 186(5)(a) of the *Local Government Act* makes provision for Council to exempt expenditure due to emergency situations. The Victorian Local Government Best Practice Procurement Guidelines 2013 identifies the key emergency characteristics:
    - The occurrence of a natural disaster such as flooding, bushfire or epidemic,
    - Flooding or fire to Council premises,
    - Unforeseen cessation of trading of a core service provider,
    - Any other situation which is liable to constitute a risk to life or property.In order to provide greater clarity to the emergency provisions, it is proposed to provide the CEO with a \$5M delegation in emergency situations. The contract must be limited to that required to deal with the emergency while a compliant process is conducted.
- 3.8 The introduction of Procurement Cards to streamline the process for low value, low risk and repetitive procurement. Robust business rules will be incorporated within our processes and procedures to ensure we meet the organisation's probity requirements.

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- 3.9 Amendment of the spend threshold table to better align with our expenditure profile and to reflect the introduction of Procurement Cards. These changes will streamline low value low risk expenditure enabling greater focus and support on high value high risk expenditure. The key changes include:
  - 3.9.1 Enabling the use of Procurement Cards for expenditure up to \$10,000.
  - 3.9.2 An increase in the current \$10,001-\$25,000 threshold (two written quotes) to \$50,000.
  - 3.9.3 Removal of the current \$25,001-\$100,000 (three written quotes) and \$100,001 to \$149,999 (three written quotes via Tenderlink) thresholds.
  - 3.9.4 A new threshold of \$50,001 to \$149,999 requiring three written quotes – with Tenderlink optional but a range of more specific management requirements.
- 3.10 An increased emphasis on Corporate Social Responsibility (Sustainable and Ethical Procurement). As per section 7 of this report.
- 3.11 Enhanced monitoring and reporting including:
  - 3.11.1 A monthly reporting to Senior Managers on purchase order compliance and vendor spend levels.
  - 3.11.2 A quarterly report to the Executive Leadership Team outlining progress against the Procurement Plan, compliance with key internal controls, financial savings and economic, environmental and social benefits achieved through procurement.
  - 3.11.3 An annual report to the Audit and Risk Committee and the Council on annual procurement activity, compliance with key internal controls, financial savings and economic, environmental and social benefits achieved through procurement.
- 3.12 Greater clarity on the Procurement Policy exemption process – designed in part to address the breach of the legislative tender thresholds.
- 3.13 The Victorian Local Government Best Practice Guidelines 2013 states that Councils must undertake a public tender for insurances. As insurance premiums are reviewed on an annual basis it is proposed to streamline the process and delegate to the CEO to approve annual insurance policy renewals following a public tender process.



## FURTHER SUPPORTING INFORMATION

### 4. ALIGNMENT TO COUNCIL PLAN AND COUNCIL POLICY

- 4.1 The Policy supports the draft Council Plan 2017- 2027. The key alignments include:
- Direction 3 we have smart solutions for a sustainable future. Broader sustainability engagement in procurement decision making together with an integrated sustainability training program supports this objective.
  - Direction 6.1 transparent governance and an actively engaged community. The consistent application of sound procurement processes promotes a culture of good governance.

### 5. CONSULTATION AND STAKEHOLDERS

- 5.1 The review was informed by ongoing feedback from key stakeholders across the organisation.

### 6. LEGAL AND RISK IMPLICATIONS

- 6.1 Policy is a requirement of Section 186 of the Local Government Act.
- 6.2 The revised policy seeks to reduce the risk of legislative breach through enhanced monitoring and reporting of procurement activity and more detailed guidance on policy exemptions.

### 7. SUSTAINABILITY – Triple Bottom Line

#### 7.1 ENVIRONMENTAL, SOCIAL, CULTURAL AND ECONOMIC IMPLICATIONS

- 7.1.1 The proposed policy seeks to enhance environmental, social and economic sustainability through:
- 7.1.1.1 Enhanced requirements to consider these aspects in procurement planning and decision making.
  - 7.1.1.2 Allowing, all other things being equal, a price preference of up to 10 per cent for:
    - the purchase of recycled and environmentally preferable products
    - goods with relevant ecolabels and certification
    - purchase of goods, machinery or material manufactured in Australia and New Zealand
    - purchases from social enterprises.
  - 7.1.1.3 For procurements over \$1m, a requirement for the Sustainability and Transport Department to be engaged in the process and for tenderers to provide a Corporate Social Responsibility statement.

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- 7.1.1.4 Engaging Ecobuy, Supply Nation (Indigenous Business Directory), and Social Procurement Australia to help improve our sustainable procurement capability and practices.

### **7.2 FINANCIAL IMPLICATIONS**

- 7.2.1 The proposed changes will require approximately \$30,000 per annum for membership with and support from peak bodies related to sustainable procurement. Effort will be made to fund this through reprioritisation.
- 7.2.2 The use of purchasing cards will lower costs offsetting increased costs related to high value tenders.

## **8. IMPLEMENTATION STRATEGY**

### **8.1 TIMELINE**

- 8.1.1 Following adoption, the Procurement Policy will be updated on both the intranet and internet by July 1 2017.
- 8.1.2 An internal communication will be sent to staff advising them of the revised changes by July 1 2017.
- 8.1.3 The ongoing procurement and contract management training program will continue and reflect the changes introduced in this Policy.

### **8.2 COMMUNICATION**

- 8.2.1 In accordance with the requirements of Section 186 of the Local Government Act 1989 the procurement policy must be reviewed and approved by Council on an annual basis.
- 8.2.2 The proposed changes to the Procurement Policy are largely designed to improve the efficiency of low value low risk purchases while increasing the focus on high value high risk purchases. They also seek to improve the environmental, social and economic outcomes from our procurement activities.

## **9. OFFICER DIRECT OR INDIRECT INTEREST**

- 9.1 No officers involved in the preparation of this report have any direct or indirect interest in the matter.



# Procurement Policy

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DRAFT

Responsible officer	Chief Financial Officer	TRIM folder	16/01/654
Approved by	Council	Approval date	June 2017
		Review date	June 2018



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## I. PURPOSE

The Council purchases approximately \$135 million in goods, services and works each year to support service delivery and the maintenance and development of infrastructure. The Council is required under section 186 of the Local Government Act (the Act) to prepare, approve and comply with a procurement policy. In accordance with the Act, this policy sets out the key principles, processes and procedures applied to all purchases of goods, services and works by Council.

## 2. GUIDING PRINCIPLES

- 2.1 Best value – procurement should seek to achieve the best mix of cost, quality (i.e. ability to meet user requirements) and sustainability (environmental, social and economic).
- 2.2 Probity – procurement should demonstrate fairness and impartiality, transparency and accountability, confidentiality, and effective management of conflict of interest.
- 2.3 Efficiency – the cost of procurement activities to the organisation and participants should be minimised without compromising other procurement principles.
- 2.4 Continuous improvement – procurement activities should seek to promote continuous improvement and innovation in design and delivery of services, goods and works.
- 2.5 Collaboration – council will seek to collaborate with other councils and relevant bodies in procurement to share better practices and achieve best value.
- 2.6 Advanced practice – the council is committed to achieving advanced practice in procurement, including accreditation by relevant bodies.



### 3. DEFINITIONS

Best value	The best mix of cost, quality (i.e. ability to meet user requirements) and sustainability (environmental, social and economic). The lowest price will not necessarily represent the best value.
Emergency	A sudden or unexpected event requiring immediate action including the occurrence of a natural disaster, flooding or fire event such as flooding or fire at a council property; the unforeseen cessation of trading of a core service provider; any other situation which is liable to constitute a risk to life or property.
Probity	Probity is the evidence of ethical behaviour, and can be defined as complete and confirmed integrity, uprightness and honesty in a particular process.
Corporate Social Responsibility	Council has a strong focus on Corporate Social Responsibility. To deliver on Council's commitment to local community and to the environment, Council considers and seeks to improve environmental, social and economic outcomes for its procurement activities
Material breach	Any breach of this policy that may also represent a breach of legislation such as procurement thresholds, fraud or corruption
Tenderlink	Council's third party Quoting and Tendering portal

### 4. SCOPE

- 4.1 This policy applies to all procurement activities at the City of Port Phillip and all Councillors, Council staff and other persons undertaking procurement on Council's behalf.

### 5. COUNCIL POLICY

#### ***Procurement Structure, Processes, Procedures and Systems***

- 5.1 The Council maintains a centre led procurement function. The Contracts and Procurement Unit is responsible for:
- Developing and reporting against a rolling four-year Enterprise Procurement Plan updated annually outlining all major procurement activity.
  - Maintaining the Procurement Policy, Contracts and Procurement Guidelines and associated processes and procedures.
  - Maintaining appropriate purchasing, procurement and contract management systems and tools.



- d) Providing procurement related advice and support including support of request for quotation processes above \$50k and all tender processes.
  - e) Building organisational procurement and contract management capability (including delivery of training and provision of guidance materials).
  - f) Promoting awareness of and monitoring compliance with this policy and all relevant legislation and reporting breaches and corrective actions in a timely manner.
  - g) Collaborating with other councils and organisations to identify best practice in and achieve better value from procurement.
- 5.2 Councillors, staff and persons undertaking procurement on Council's behalf are responsible for complying with this policy.
- 5.3 The Council will maintain a Contracts and Procurement Guidelines document detailing the processes, procedures and systems related to procurement.
- 5.4 The Council will maintain a contract management system which includes details of tendered contracts.
- 5.5 Information regarding Current Tenders, Closed Tenders, and Awarded Contracts is placed on Council's website.

### **Ethics and Probity**

- 5.6 At all times, Councillors, Council staff and other persons undertaking procurement on Council's behalf must:
- a) conduct themselves ethically and with integrity
  - b) comply with the Gifts and Hospitality Policy and not seek or receive personal gain
  - c) declare and effectively manage real, perceived and potential conflicts of interest
  - d) maintain confidentiality and security of information
  - e) comply with the Code of Conduct.
- 5.7 Councillors must not improperly direct or improperly influence council staff in the exercise of any duties or powers related to procurement.
- 5.8 Council officers with delegated Council powers or duties related to procurement are prohibited from exercising those powers, duties or functions if they have conflicts of interest.
- 5.9 All persons engaged in the evaluation of quotations or tenders must adhere to this policy and complete and lodge a Conflict of Interest Declaration and a Deed of Confidentiality.
- 5.10 A Tender Evaluation and Probity Plan must be developed for all high value (more than \$500,000 over life of contract) and/or high risk procurements. A Probity Auditor or Advisor should be considered.
- 5.11 Any purchase in excess of \$50,000 must include a Quotation (Probity) Declaration.
- 5.12 An audit trail must be kept for all procurement that shows clearly that a process has been undertaken and that the process is fair, transparent and reasonable.
- 5.13 Beneficiaries of goods or services cannot approve the expenditure. Council staff may not for example approve their own training, coaching or professional development.



## Procurement Methods

5.14 The standard methods for procurement will be:

- a) Procurement card
- b) Purchase order following a quotation process
- c) Purchase order under contract following a tender process
- d) Under approved purchasing schemes (Panel contracts)
- e) Under an arrangement approved by the Minister.

5.15 The source of funds must be identified and the procurement authorised in accordance with the delegations register, before any commitment to purchase is made.

5.16 More than one person will be involved in, and responsible for, each transaction with appropriate authorisations obtained and documented.

5.17 Council may seek Expressions of Interest where:

- a) there are likely to be many tenderers
- b) tendering will be costly or the procurement is complex and Council does not wish to impose the costs of preparing full tenders on all tenderers
- c) there is uncertainty as to the willingness and / or interest of vendors to offer the required procurement
- d) Council requires advice from the market regarding how best to address a particular need.

5.18 Expressions of Interest must be publicly advertised.

5.19 The Panel Contracts include CoPP Panel contracts, eligible State Government Panel contracts<sup>1</sup>, including the Construction Supplier Register, and approved schemes including MAV Procurement and Procurement Australia. For procurements where there is an existing Panel Contract, staff are required to:

- Obtain the relevant number of quotes from suitable Panel members (see Table 2)
- Raise a purchase order including the relevant information.

## Procurement Delegation of Authority and Thresholds

5.20 This Policy includes delegations made by the Council to the CEO and from the CEO to staff related to procurement (see Table 1).

5.21 Competitive procurement processes are demonstrated by compliance with the quotation and tender requirements incorporated in Table 2 (Spend Threshold table).

5.22 Public advertising is required for all tenders. Council officers may choose to publically advertise for quotations where they believe this is warranted.

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<sup>1</sup> Not all Whole of Victorian Government Panel Contracts are exempt from the provisions of the *Local Government Act*.



## **Tender Evaluation and Negotiation**

- 5.23 Late tenders will not be accepted.
- 5.24 The tender selection criteria and weighting for each criterion will be documented prior to the requesting of tenders.
- 5.25 An appropriately qualified Evaluation Panel will be established to evaluate each tender submission against the tender selection criteria.
- 5.26 External representatives may be part of, or an advisor to, the panel to ensure appropriate skills, experience and/or probity.
- 5.27 The evaluation process must be robust, transparent and unbiased and documented in a Tender Evaluation and Probity Plan. A Tender Evaluation and Probity Plan must be developed for all high value (more than \$500,000 over life of contract) and/or high risk procurements.
- 5.28 Contract Negotiations can be conducted in order to obtain the best outcome for Council, providing negotiations remain within the intent and scope of the tender.
- 5.29 Council may conduct a shortlisting process. Shortlisted Tenderers may be invited by the Council to submit a Best and Final Offer.
- 5.30 The results of the Tender Evaluation and demonstration of the robustness of the process must be documented in a Tender Evaluation Report approved by the relevant delegate.
- 5.31 The Contracts and Procurement Unit must be a member of all Tender Evaluation Panels above \$500,000.

## **Corporate Social Responsibility (Sustainable and Ethical Procurement)**

- 5.32 Council is committed to environmental, social and economic sustainability and will consider how to further this in its procurement activities through for example:
- the specification of goods, services and works to be procured e.g. banning single use plastics, requiring use of recycled materials or setting minimum employment ratios
  - setting quotation and tender evaluation criteria and weightings e.g. social, environmental and local economic impact criterion
  - inviting targeted organisations to participate in selective quotation processes e.g. ensuring local, social, or green enterprises are invited where appropriate.
- 5.33 All other things being equal, a price preference of up to 10 per cent can be collectively applied to:
- the purchase of recycled and environmentally preferable products
  - goods with relevant ecolabels and certification
  - purchase of goods, machinery or material manufactured in Australia and New Zealand
  - purchases from social enterprises.
- 5.34 Wherever practical, for all procurement processes with a total contract value of \$1 million or greater, a representative from the Sustainability and Transport Department will be engaged in the development of tender specifications, and tenderers must complete the Corporate Social Responsibility Schedule including mandatory disclosure of whether a company has dealings with, or funds;
- Offshore detention
  - Fossil fuel energy generation



- Distribution of electronic gaming
- Animal racing
- The entertainment industry.

5.35 Suppliers must have appropriate OHS practices, insurances, and quality assurance processes relevant to the nature of good, services or works being supplied.

5.36 Council will renew or seek membership of Eco Buy, Supply Nation and Social Procurement Australia to help us further economic, social and environmental benefits from procurement.

5.37 A training program will be implemented to help officers better understand Corporate Social Responsibility.

### **Policy exemptions and breaches**

5.38 The relevant General Manager or CEO may provide an exemption to this policy and related procedures provided best value and legislative compliance can be demonstrated.

5.39 A situation may arise for instance where insufficient quotations are received to satisfy the procurement thresholds.

5.40 Any exemption must be recorded in the appropriate form and submitted to the Coordinator Contracts, Procurement and Fleet for:

- a) review and endorsement prior to approval by the General Manager or CEO
- b) recording after General Manager or CEO approval.

5.41 Provisions in the Act including public tender thresholds of \$150k for goods and services and \$200k for works can only be exempted in accordance with the Act.

5.42 To enable prompt action the CEO has delegation to declare if that a contract must be entered into because of an emergency and hence be exempt from the public tender thresholds.

5.43 The scope and timeframe for such contracts entered into in an emergency must be limited to deal with the emergency while a compliant procurement process is conducted.

5.44 A breach of the policy and procedures without an appropriate exemption may result in disciplinary action.

5.45 Any material breach will be reported to the ELT, Council, Audit and Risk Committee and public (via the CEO as soon as practical).

### **Monitoring, Review and Audit**

5.46 The Contracts and Procurement Unit will monitor procurement activity on an ongoing basis and provide as a minimum the following reports:

- a) A monthly report to managers outlining the number of purchase orders raised after invoice date and vendors with spend of between \$80,000 and \$150,000 in the last 12 months without a competitive tendering process.
- b) A quarterly report to the Executive Leadership Team outlining progress against the Procurement Plan, compliance with key internal controls, financial savings and economic, environmental and social benefits achieved through procurement.



- c) An annual report to the Audit and Risk Committee and the Council on annual procurement activity, compliance with key internal controls, financial savings and economic, environmental and social benefits achieved through procurement.

5.47 Procurement will be included in the Internal Audit Plan with implementation of this policy and related internal controls audited on at least a four yearly basis unless deemed prudent not to by the Audit and Risk Committee.

## 6. RELEVANT LEGISLATION, POLICY and OTHER DOCUMENTS

- 6.1 The key legislative requirements for this Policy include:
  - a) section 186 of the Act (Power to enter into Contracts)
  - b) section 186A of the Act (Procurement Policy)
  - c) section 3C of the Act (Objectives of a Council)
  - d) section 208B of the Act (Best Value Principles)
  - e) sections 77A, 77B, 78, 78A to 78E, 79, 79B to D, 80, 80 A to C, 81, 95 and 95AA of the Act (Conflict of Interest)
  - f) section 98 of the Act (Delegations)
  - g) section 140 of the Act (Accounts and Records)
  - h) The relevant provisions of the Competition and Consumer Act 2010 (Cth).
- 6.2 Key policies and other documents relating to this policy include:
  - a) Councillor Code of Conduct
  - b) Staff Code of Conduct (including conflict of interest clause)
  - c) Gifts and Hospitality Policy
  - d) City of Port Phillip Procurement and Contract Management Guidelines
  - e) Victorian Local Government Best Practice Procurement Guidelines



## Table I: Delegation Limits – Financial Authority, Power to Award, Enter into and Sign Contracts

Council approves delegations to the CEO. Delegations to staff are authorised by the CEO and recorded in the delegations register. The delegations below are as at 1 July 2017. These may be amended from time to time by the CEO.

Limit of delegation	Delegate
\$1,000,000	Chief Executive Officer
\$300,000	General Manager
\$200,000	Executive Manager Service and Business Improvement Executive Manager Enterprise Portfolio Management Office Chief Financial Officer Chief Governance Officer Manager Maintenance and Renewal Manager Open Space and Recreation Manager Project Services Portfolio Director Manager South Melbourne Market Manager Safety and Amenity
\$100,000	All other Managers
\$30,000	Coordinators
\$10,000	Team Leaders

### Schedule of Additional Authorisations to the Chief Executive Officer

\$5M	Power to declare a contract is required to be entered into due to an emergency and to award, enter into and sign such contracts up to a value of \$5M
Insurance Exemption	The CEO has delegation to authorise payment of annual insurance premiums procured in accordance with the requirements of Table 2.

### Variation to Contract

The delegate has the power to vary any contract however the contract variation/s in aggregate must not exceed the financial limit delegated to the position provided there has been a prior budget allocation and the contract variation is in accordance with this Policy.



## Table 2: Spend Thresholds

\* All values are including GST.

\*\*Only exemptions are Rates Refunds, Fleet Refunds, Staff Reimbursements and certain utilities.

Range of total value of goods or services*	Procurement action	Management requirement	Record keeping requirement
Up to \$1000**	A minimum of one quotation (can be verbal, email or screen shot)	A Procurement Card to be used or a Purchase Order to be raised at the time of ordering	Records to be kept locally if required or in accordance with Purchasing Card requirements
\$1001 to \$10,000	A minimum of one written quotation (can be an email or screen shot)	A Procurement Card to be used or a Purchase Order to be raised at the time of ordering	Records to be kept locally if required or in accordance with Purchasing Card requirements
\$10,001 to \$50,000	A minimum of two written quotations are to be obtained  No advertising is necessary, a specification is required	A Purchase Order must be raised at the time of ordering and a contract considered	Records of quotations must be stored in the Financial System
\$50,001 to \$150,000	Three written quotations are to be obtained in response to a brief or specification  No advertising is necessary  Quotation/Probitry declaration must be completed	RFQ Documentation  Evaluation Criteria and weighting must be incorporated  Tenderlink may be used  Evaluation Panel  Delegate Report  A Purchase Order must be raised at the time of ordering and a contract considered	Records of quotations, evaluation reports and materials must be stored in the Financial System and HP Records Manager
\$150,000 plus	Public tender process or eligible Panel contracts	In accordance with Contracts and Procurement Procedures Guidelines	In accordance with Contracts and Procurement Procedures Guidelines

### Deviations

Deviations will be reported to ELT on a monthly basis and the Coordinator Contracts, Procurement and Fleet is to sign off on the deviations to say they meet best value principles.