

KNOWSLEY METROPOLITAN BOROUGH COUNCIL

PROCUREMENT STRATEGY 2012-2014

Contents

	Page
1. Foreword	2
2. What is the purpose of the procurement strategy?	3
3. What is procurement?	5
4. Where are we now?	6
5. Where do we want to be?	7
6. What will we do?	8
Appendix A: Guiding Principles	11

1. Foreword

As a council, we spend in the region of £130m each year on goods and services. As well as making sure that we achieve 'best value' when buying goods / services, we also have a duty to use our purchasing power to help to deliver our wider corporate objectives and the Council's pledges.

In particular, through effective, intelligent and innovative procurement we can help to stimulate and support the local economy, encouraging the creation of local jobs and creating the right environment for enterprise to flourish. We can help to develop and grow social value, investing in our communities and supporting our aim to become 'the Borough of choice'.

As one of the biggest spending organisations in the Borough it is important that we get as much benefit out of the Knowsley pound as we can. Money spent locally will help the Borough's economy and keep people in jobs. This has to be taken into account when we are looking at achieving "value for money" in our procurement.

An effective procurement strategy will also support our change and transformation agenda and our commitment to become a commissioning organisation, helping to transform services and meet the financial challenges that we all face.

This Strategy sets out how effective procurement has already helped to deliver efficiencies and savings and how we will continue to use procurement to drive out further savings. In particular, we will continue to work collaboratively to take advantage of the savings that procuring across a larger footprint can generate and, to this end, we will continue to lead the Merseyside Procurement Partnership.

Of course, none of this will happen without the support, involvement and commitment of all services across the Council and local businesses themselves. It is only through this support and through active engagement that the potential benefits of this Strategy will be realised for Knowsley.

Cllr Norman Keats
Cabinet Member for Finance & Information Technology

2. What is the purpose of the procurement strategy?

This document sets out the Council's strategic approach to procurement for the next three years. It aligns to the overarching vision of the Council which is to make Knowsley *'The Borough of Choice' in terms of having a sustainable and diverse population with successful townships that provide a sense of place and community*. For the period 2012 -2015 the Council has also set out a number of key priorities, with clear targets and milestones. In summary these priorities are:

- Improving educational attainment;
- Helping residents get jobs;
- Building new and affordable homes;
- Reducing personal debt;
- Supporting community enterprise; and
- Playing a key role in the work of the Liverpool City Region

The fundamental purpose of this strategy is to communicate clearly to all within the Council, residents, and suppliers in the private and voluntary sectors, **the Council's use of the procurement of supplies and services in implementing the Council's vision for the Borough, so that they may play a part in the achieving of that vision.**

The strategy is aimed at promoting effective procurement and seeks to strike a balance between setting out a detailed plan for improvement with specific targets, and a flexible planning framework. It builds upon the successes of the last strategy covering the period 2008 to 2011.

In summary the role of procurement can be defined as:

"Sustainable procurement is a process whereby organisations meet their needs for goods, services, works and utilities in a way that achieves value for money on a whole life basis, in terms of generating benefits not only to the organisation, but also to society and the economy, while minimising damage to the environment" *Procuring the Future (Sustainable Procurement Task Force, 2006).*

Procurement offers opportunities for **using spending to secure social, economic, and environmental objectives** in ways that offer real long term benefits to the local community by supporting social enterprises and small to medium enterprises (SMEs) and recycling money within the Borough and city region.

The Council has historically spent around £130m annually on procuring goods and services across the main spending categories, and given the challenges arising from the Comprehensive Spending Review in 2010 there is an urgent need to get improved value for money from this expenditure.

In addition, the development of the Borough as a sustainable thriving area lies at the heart of what the Council is trying to achieve. This requires a sustainable and vigorous local economy with businesses that can deliver innovative services, and provide local prosperity. **The more money that is spent locally as the “Knowsley £”, the greater the positive impact this will have on the local economy especially for small and medium sized businesses and social enterprises.** The Council is leading the work across the Liverpool City Region on developing a framework to secure a better link between procurement expenditure and local economic development.

The importance of procurement spend to a local economy was quantified in Manchester through a study undertaken by the Centre for Local Economic Strategies (CLES) on economic development, regeneration and local governance. This study found that 43p in every £1 of procurement expenditure was spent locally in the city. In addition, with construction schemes supporting employment and apprenticeships the study identified for every £1 spent an additional £4.74 was generated in social, economic, and environmental benefits in terms of increased household income, reduced welfare benefits, and improved health.

Knowsley’s strategy recognises that effective procurement arrangements are critical, because procurement crosses service and Borough boundaries, and reaches and affects all the Council’s divergent activities. **It has a crucial role in delivering savings, lowering the cost base, and helping to meet the difficult financial challenges** the Council and the Borough faces during the period covered by this strategy. As a result of the need to reduce costs, the profile of procurement in the whole public sector has been given greater prominence. The effectiveness of how we procure and how suppliers perform does impact on the quality of services which people receive and impact on local businesses and partners. Working on a Liverpool City Region basis for this will deliver more profound benefits.

Over the next few years, the Council plans to embrace further the **strategic commissioning approach to include all of its services**. In terms of Government legislation, the Localism Act gives social enterprises, community groups, parish councils and local authority employees the **right to challenge** and express an interest in running local authority services. A procurement exercise for the relevant service must be conducted once a valid proposal is accepted by the Council. The procurement exercise is open to competition, including the private sector, not just those submitting the original expression of interest. A reasonable period between the expression of interest acceptance and the procurement process starting is determined by the Council, potentially giving time for the groups who submitted expressions of interest to prepare to compete in the procurement exercise. Similarly, the Open Public Services white paper signals a change from local authorities providing the services itself to one where the

service is commissioned from a range of providers in the public, private, and third sectors.

Therefore, the importance and complexity of procurement is likely to increase in line with these developments.

This strategy sets out the direction for the next three years and will be supplemented by an annual procurement service action plan. The strategy highlights the actions necessary to maximise the contribution from procurement for the Council both from its own spend and by leveraging economies of scale from the combined city region spend. Regarding the latter, the Council leads the Merseyside Procurement Partnership, a continually developing collaboration of choice for public sector partners in or neighbouring Merseyside. Thus the strategy will form an integral part of the procurement vision covering the Liverpool City Region.

3. What is procurement?

Procurement is the process of acquiring supplies, services, and works, covering both acquisitions from third parties and from in-house providers for the provision of services to the community. It is a key part of the commissioning cycle spanning the whole life cycle of procuring goods, works and services from the initial concept and definition of business needs, through to contract closure.

This cycle involves procuring goods and services based on planned outcomes which in turn have been based on a needs and policy analysis. There is also a significant commissioning role in stimulating and growing the market to deliver the required services locally from private and social enterprises.

The diagram below shows the full commissioning cycle. The highlighted area shows how the practical delivery aspects of procurement fit within the overall commissioning cycle.



4. Where are we now?

During 2010/11, third party spend was reviewed as part of the change and transformation programme. When compared to best practices, there was much to commend about the outcome of the previous procurement strategy 2008 to 2011 on the effectiveness of the procurement service. In particular, the £13m savings from collaborative contracts across the city region, for Knowsley £1.765m was achieved, the £0.797m in savings generated by the corporate procurement team during the last strategy period, the identification of categorised spending in a systematic manner, use of electronic tendering, electronic contracts register, joint contracts with the PCT, and complying with spending and contract transparency publicity requirements. During 2011/12, full year savings of £0.716m were achieved.

The Merseyside Procurement Partnership, apart from sharing contracts, acts as a forum for shared learning and problem solving, providing a network of expertise. The benefits of such “soft” collaboration have not been economically quantified, but the networking experience has provided a professional hub benefiting all partners, especially:

- joint training;
- eAuction processes;
- investment in technology such as the Chest (Due North) where all tenders for councils in the North West are available to bidders on line;
- spending analysis tools (Spikes Cavell and now SpendPro);
- standardisation of Pre-Qualification Questionnaire;
- joint statement on sustainability standards;
- incorporation of equality & diversity impact assessments;

- meet the buyer events; and,
- engaging with SMEs and third sector organisations.

This procurement strategy, and in particular, the resultant procurement service action plan is running alongside the change and transformation work and provides a framework for systematically bringing together future developments and efficiencies. These action plans reflect the outcome of the review of procurement and most importantly the service change and transformation programme.

As an indication of the breath of procurement activities, the team gets involved in major procurement exercises such as the Knowsley Leisure & Culture Park and the Kirkby town centre regeneration, as well as working with commissioners on the procurement of, for example, domiciliary care and residential homes. This is in addition to the procurement of more routine services such as IT equipment, fuel, and food, as well as more complex arrangements, for example, transport and consultancy.

The procurement function itself has and will continue to be required to make savings and a balance will be struck between reducing back office costs and the benefits that procurement can deliver. Principally, this needs to come from efficiencies from effective processes and systems combined with the economies of scale from collaboration and sharing expertise.

5. Where do we want to be?

Principally, the goals of procurement can be described as being the achievement of value for money, savings, improved service delivery, and best practice through procurement for the benefit of the residents and the economy of the Borough. It is expected that these aims will remain valid throughout this strategy period.

The Council should ensure that procurement activity promotes the social, economic, and environmental well being of the Borough in a manner that is consistent with public procurement regulations, including the European Union (EU) procurement regulatory framework.

There is a popular view that the EU procurement rules prevent taking social and economic considerations into account when procuring. Whilst EU rules may limit the Council's discretion in that it cannot just buy "local", it does not inhibit procurement's role in finding innovative solutions to support change in how services are delivered and making informed choices to deliver the optimum combination on whole life cost, quality, and wider community benefits. There are numerous possibilities for taking account of social and economic considerations as long as they are **relevant to what is being procured and provided that the principles of competition, anti-discrimination, and transparency are**

respected. Furthermore, the Public Services (Social Value) Act 2012 requires the Council to consider how what is procured might improve the economic, social, and environmental well-being of the Borough and how that improvement might be secured, again as long as it was relevant and proportionate.

Procurement approaches that potentially generate social, economic or environment benefits need to move to the situation where they are **considered the default position** for all procurements. So that where a social benefit can be obtained then it will be. This would **complement the Council's activities in encouraging social growth, marketing the Borough, and is reflected in the Council's Economic Regeneration Strategy 2012-15.** Also this is part of the wider work across the Liverpool City Region as a whole.

Finally, there is the strategic shift towards commissioning as the means of delivering innovation, service transformation, and the desired outcomes for the Council. Therefore, **the relationship between commissioning and procurement will need to be developed further** with a closer working relationship and a degree of integration as both are essentially concerned with deploying resources effectively to support the achievement of strategic goals and policy objectives.

The Council remains committed to developing and maintaining high quality standards of procurement by having efficient, relevant, and where appropriate joint procurement arrangements.

In doing so, the Council will apply the following guiding principles in its procurement activity, these are discussed in more detail in Appendix A:

- **savings and value for money** - ensure that all procurement activity seeks savings and obtains value for money for the Council;
- **local markets** - stimulate the local economy and encourage small to medium sized businesses, social enterprises, and voluntary sector to apply for Council contracts;
- **wider benefits** - promote the attainment of social, environmental and community benefits through procurement processes;
- **engagement** - ensuring that procurement is integral to the planning of all commissioning so aiding the achievement of the priorities of the Council;
- **informed** - by improving the quality and use of management information, market knowledge will improve so shaping how to procure services for each category of spend;
- **collaborative procurement** - seek opportunities for collaboration with other organisations in order to maximise procurement leverage, reduce duplication of effort, share information, and explore alternative ways of procuring supplies, services, and works;

- **innovation and risk** - consider the potential for innovation, the management and balance of risk, and the opportunity for new or alternative methods of service delivery;
- **capacity and expertise** - ensuring the procurement function has the right skills and capacity to deliver the strategy and action plans; and,
- **ethics** - applying openness, fairness, accountability, and transparency to all activities.

6. What will we do?

The guiding principles for delivering the strategy have been used as the basis of a detailed improvement action plan. The improvement action plan necessitates flexibility and seeks to recognise a direction of travel as well as detailed actions. To ensure a focus on delivery it covers one year only and can be amended if circumstances change. Progress on achieving the procurement plan will be monitored by the Strategic Procurement Board.

Principally, the goals of procurement will be focussed on the achievement of value for money and savings, social and economic benefits, and supporting commissioning as all services become “commissioning ready”.

The key challenge will be the **incorporation of social value into the procurement process**. In reality, the Public Services (Social Value) Act 2012 does not increase the powers available to the Council nor change the procurement regulations. It only places an obligation to consider how what is being procured might improve the economic, social, or environmental well-being of an area and how that improvement might be secured by the procurement process itself. Therefore, a creative approach to procuring social value will need to be taken for the benefits to be realised including working closer with the social enterprise sector and the economic regeneration teams.

A proactive approach by procurement to contracting will be taken by monitoring, supporting, and alerting commissioners when they need to review their services giving sufficient time for effective tendering.

This approach across the Council is a way of providing support to the commissioners with a **focus on specific areas of spending** so that procurement can deal with future requirements by promoting innovation and challenging service requirements. This requires a closer working relationship with the commissioners of services and an understanding of their future and continuing procurement needs.

The support service offered by the corporate procurement team will have an improvement action plan based on the following key features:

- develop the **procurement approach** with commissioners for each specific requirement that provides the best outcome for the Council and the Borough;
- **closer liaison** with commissioners in order to alert them when contracts need to be retendered;
- understanding the service needs to develop **innovative approaches** to procurement that deliver **improved value for money and social value benefits**;
- **supporting the local economy** and support the **growth of a social enterprise sector**;
- ensuring **procurement requirements are proportionate** and do not create unnecessary barriers to small or medium enterprises, social enterprises, and voluntary groups;
- **review procedures**, e.g. Contract Procedure Rules, to ensure they effective, agile, and facilitate innovation and social value through procurement;
- seeking out and delivering further procurement **collaboration**;
- review opportunities to **drive efficiencies** from existing and new contracts; and,
- research and identify **best procurement practice**.

A cross cutting theme is that collaboration within the region will ensure that capacity and expertise across all authorities can be better utilised at a lower cost than would have been achieved as individual authorities. Where appropriate, the Council will use other public bodies' contracts and frameworks especially those of the YPO purchasing consortium of which the Council is a member authority.

At the operational level, the management of contracts is critical and can make the difference between a successful contract and a failed one. Contractual arrangements should be effectively managed and monitored throughout the contract duration. A good working relationship should be developed with all suppliers, with liaison meetings held at suitable intervals. Contracts should include quality and performance standards which are monitored and reviewed. In addition, benchmarking and soft market testing can be undertaken to measure the effectiveness of procurement decisions.

In order to help raise the profile of procurement and communicate the approach taken in this strategy it needs to be communicated to a wide and varied audience, in particular:

- the strategy will be on the Council's intranet site for internal use and on the internet site dedicated to how suppliers can sell to the Council;
- launched as an internal news item and externally via the regeneration team's newsletter;
- distributed to partner organisations involved in the economic regeneration strategy for the Borough;

- progress in implementing the procurement action plan will be reported to the Strategic Procurement Board; and,
- the Senior Management Group will be made aware of the outcomes and issues arising from the procurement activities.

Regarding collaborative work, the Merseyside Procurement Partnership does produce a newsletter on success stories designed to engage with the various interested parties.

Guiding Principles

1. Savings and value for money

Given the high level of expenditure with third parties and the **Council's need to make significant savings** then this must be a key feature of the overall procurement strategy. All procurement exercises must identify where savings can be maximised while maintaining value for money.

In the context of a procurement process, obtaining value for money means choosing **the optimum combination of whole life costs and benefits to meet the Council's requirements**. This is not necessarily the lowest initial price option and requires an assessment of the continuing revenue costs as well as the initial purchase price or capital investment. The Council's requirement can include social, environmental and other strategic objectives that are specified at the earliest stages of the procurement cycle. The criterion of value for money is used at the award stage to select the bid that best meets that requirement.

2. Local markets

Supplier diversity is essential to a competitive and innovative market, and through buying local, the Council can **provide work for local companies and people, and support the local economy**. However, it is important that the principles of the procurement regulations in that no unfair advantage is given to any supplier during a procurement exercise and the processes are open, fair, accountable, and transparent is followed.

Supporting the local economy can be done in numerous ways, including:

- companies registering once only for forthcoming quotation and tender opportunities on the Chest;
- helping suppliers in identifying and bidding for opportunities is available from the Council's regeneration team;
- maintaining a how to sell to the council internet page;
- ensuring procurement requirements are proportionate and do not create unnecessary barriers to small or medium enterprises, social enterprises, and voluntary groups doing business with the Council;
- parcelling into smaller or geographical lots where sensible and economically viable;
- specifying, for example, prompt response times, reduced carbon footprint, or daily fresh deliveries that may condition the location of bidders;
- encouraging and facilitating local employment and development of skills;
- contact with local business through supplier days;
- encouraging contractors to utilise local sub-contractors and suppliers; and,

- encouraging supplier partnerships to better facilitate competitive quotations through consortium bids.

3. Wider benefits

Social Value –

The Council will consider how what is being procured might improve the economic, social, or environmental well-being of an area and how that improvement might be secured by the procurement process itself. In order to comply with the procurement regulations certain criteria must be met in that the social value requirements:

- should reflect policies adopted by the Council, including the overarching social value model;
- be capable of being measured in performance terms;
- are identified in the specification, so becoming part of the contract; and,
- are specified in ways that do not discriminate against bidders across the EU.

The Council's social value model reflects the local social value priorities and was created in conjunction with local social enterprises, third sector, and business representatives. In order to make the supplier community aware of these requirements there may be soft market testing prior to the procurement exercise.

Sustainability -

The Corporate Plan identifies that one key element to delivering a sustainable environment is sustainable procurement. Sustainable procurement includes social and ethical issues, in addition to environmental ones.

The Council recognises the need to **carry out procurement activities in an environmentally responsible manner** and therefore:

- complies with all relevant environmental legislation;
- encourages contractors and suppliers to investigate and develop environmentally friendly procedures and products;
- where appropriate, ensures that suppliers' environmental policies are considered during tender evaluations and environmental criteria are used in the award of contracts;
- wherever practicable, specifies the use of environmentally friendly materials and products; and,
- ensures that specifications, where appropriate, facilitate suppliers to provide environmentally friendly alternatives.

Equality & Diversity -

The Council will treat all people equally including those contracting to provide supplies or services. It will not discriminate on the grounds of gender, race, ethnic origin, disability, age, sexual orientation, gender identity, nationality, religion, belief, or on any other unjustifiable grounds. Suppliers or contractors approved for the provision of goods, services, or works will have to comply with such criteria. **In particular the Council will adhere to, promote, and utilise best practice recommendations and guidelines.**

The Council anticipates that suppliers will demonstrate their commitment to this important area and where appropriate and relevant following an equality impact assessment, be taken into consideration during tender evaluations.

Accordingly, the Council uses the provisions of the Local Government Act 1988, the Transfer of Undertakings – Protection of Employment Regulations (TUPE) 2006, and the Equality Act 2010 to ensure these issues are addressed in the procurement of supplies, services, and works.

4. Engagement

The approach ensures that procurement has a clear direction and is **an integral part of the service planning in all new commissioning and contracting activity**. This should avoid the inconsistent engagement of the procurement team, often at a very late stage in the procurement cycle. There is an optimal balance of responsibilities between corporate procurement and commissioner's activities to be struck. Therefore, closer liaison with commissioners and the forward planning of procurements will feature.

5. Informed

A dedicated **focus on specific areas of spending** will allow the procurement team to deal with future contracts so providing innovation and challenging services. **This approach, which is forward looking rather than relying on past practices**, has been successfully applied elsewhere, and represents best practice.

The use of frameworks or boarding contracts will also highlight where there is a role for YPO and also collaboration within the region will ensure that capacity and expertise across all authorities can be better utilised at a lower cost than would have been achieved as individual authorities.

The focus on specific areas of spending has the following features:

- analysing spend and identifying supply market trends;
- closer liaison with services to develop future procurement strategies for each spend category;

- seeking out and delivering effective procurement collaboration;
- review opportunities to drive efficiencies in existing contractual relationships;
- understanding the service needs to develop innovative approaches to procurement that deliver improved value and benefits;
- research and identify best practice both in the public and private sector in each category and recommend the procurement approach that provides the best outcome for the Council;
- having a supplier relationship that is appropriate to the category, in terms of criticality, value, suppliers in the market, and availability; and,
- identify underdeveloped markets and work with services to encourage new supplier provision.

6. Collaborative procurement

It is more beneficial for authorities to work together in consortia or networks in order to:

- share best practice;
- promote collaborative procurement where this leads to economies of scale, efficiency, and improved value for money; and,
- develop centres of procurement excellence.

Collaboration between public bodies to **combine buying power, to procure or commission goods, works, or services jointly or to create shared services is seen as a strategic objective.**

At a minimum, the Council will seek to benchmark and use framework agreements via the Government Procurement Service, YPO, Pro5, and other local authorities. The YPO purchasing consortium, of which the Council is a member authority, and the Pro5 buying consortium that YPO is in should be used as part of optimising purchasing arrangements. The Council has a financial interest in the commercial success of YPO and receives an annual dividend. YPO offers a convenient procurement route particularly for frameworks and lower risk supplies as the Council is accessing products that have already been subject to a competitive and legally compliant process.

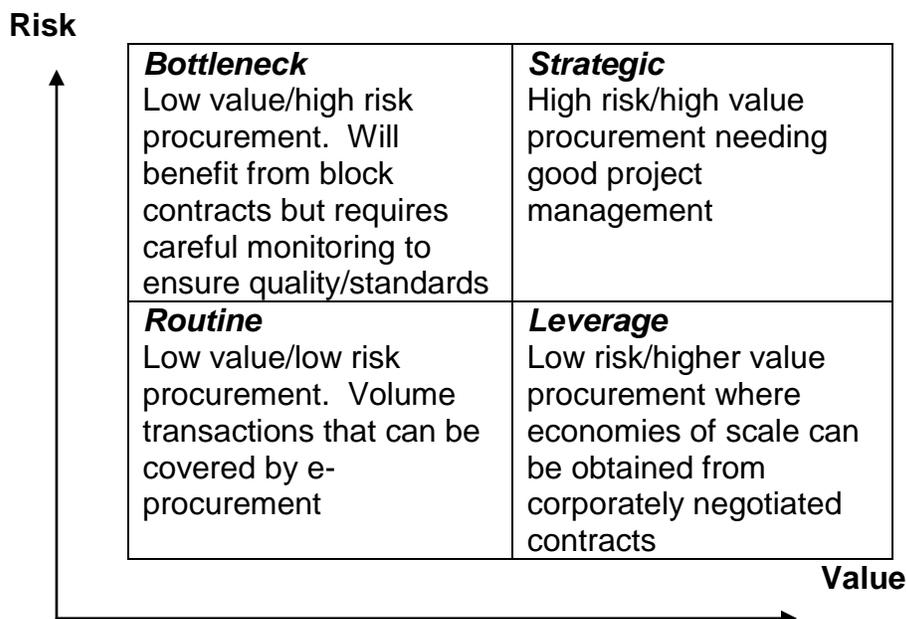
The procurement team did provide the Primary Care Trust with a professional procurement service and this service will now be offered to the Clinical Commissioning Groups.

Although schools can choose their sources of supply, governors have a duty to ensure that they are purchasing supplies and services in accordance with value for money and probity principles. The procurement team offers a traded service to any school located in the Borough and will source appropriate contracts that might already be in existence, or conduct a request for quotation or tender process, based on the needs of the school.

7. Innovation and risk

Approaches to procurement in the public sector are developing fast with the need to make savings, work jointly, obtain social value, and utilise technology ensuring the efficient use of procurement resources. This is alongside opportunities for new or alternative methods of service delivery. In considering the potential for innovation, the management of risk needs to be taken into account.

There are various options available to the Council in determining the appropriate procurement approach. Selecting the right one will depend on a range of factors including strategic importance, value, and the potential risks associated with each of the options. The **overall management of procurement takes account of a risk-value matrix**, as shown below:



Routine -

This approach will be selected for low value/ low risk procurement. The emphasis is on process efficiency and minimising the administration associated with procuring such supplies and services. The electronic procurement system is used to automate the purchase and payment of these items which are often characterised by high volumes of low value transactions (e.g. stationery). Such supplies and services are likely to be purchased from a third party supplier or service provider. **Emphasis is largely on unit price**, although delivery times and product quality will play a part.

Leverage -

This category relates to high value/low risk procurement. The emphasis is on leverage and consolidation of spend to maximise economies of scale. Again, such supplies and services are likely to be procured from third party suppliers and service providers, although there will be a **greater emphasis on the quality and service support aspects of the contract**. Examples include agency staff, IT hardware, and telecommunications.

Bottleneck -

Bottleneck procurement refers to those supplies and services that are high risk, but relatively low in unit value. Examples include catering supplies, transport, and repairs. There is a **strong emphasis on the quality of supplies and services with contract monitoring being important**. Whilst a large proportion of supplies and services within this category are procured externally, there can be examples of internal provision.

Strategic -

Strategic procurement refers to high value/high risk supplies and services. A wider range of procurement options may be appropriate. This may include outsourcing, partnerships, mutuals, retaining the service in-house, and collaboration. Emphasis will be on quality, whilst retaining the need to manage costs at an appropriate level and within budget. Examples include social care contracts, large scale construction and engineering contracts, and high value IT implementations. **The procurement of these supplies and services require rigorous monitoring and evaluation procedures utilising project methodologies**. For all major procurement projects, the identification and management of specific risks will be part of the procurement process.

8. Capacity and expertise

There is a commitment to the training and development of procurement staff and this has been supported by free or low cost training available at a regional level. There is continual development of procurement staff to ensure they remain aware of current developments and extend their competencies.

The Council is committed to **exploit further the processes and technology being deployed currently**, namely spend analysis, electronic purchasing, e-tendering system and contracts register, and electronic invoices and payments.

Information technology will be used to reduce costs and improve the efficiency and effectiveness of the procurement process for the Council and, importantly, suppliers and contractors.

9. Ethics

All procurement activity must be undertaken to the **highest standards of ethics and probity**, and controls within the procurement and financial processes exist to promote good practice and provide guidance to those involved in procurement. These controls not only help to prevent fraud but also protect the individuals concerned against allegations of misconduct. Therefore, compliance with Contract Procedure Rules, Financial Procedure Rules, and declarations of interests is essential. Staff involvement in procurement activities need to take account of the following:

- there is a duty to behave honestly and in a trustworthy manner maintaining standards which the public is entitled to expect;
- staff have a fiduciary responsibility, which means they are individually and collectively responsible for the safe and proper arrangements relating to public spending; and,
- managers have a responsibility to ensure systems and appropriate training are operating to prevent fraud.

All staff must adhere to the Officers' Code of Conduct and staff undertaking purchasing should consider that they are bound by the [Code of Ethics](#) of the Chartered Institute of Purchasing & Supply.