



True Value

TOWARDS ETHICAL PUBLIC SERVICE COMMISSIONING

By Collin McLinden

Executive summary

Public procurement and outsourcing have great potential when managed well with socially conscious processes and procedures. Unfortunately, for decades, UK governments have been unable to tap systematically into this potential and have engaged in outsourcing rather haphazardly. This has amounted to a rocky and piecemeal development of public procurement. Proposed reforms and the current government's broader levelling up agenda represent an exciting opportunity to get to grips with and enable the immense potential of public procurement and deliver for neighbourhoods and communities.

The changing procurement landscape

For decades, UK public procurement was governed further by EU rules and legislation, and as such had to work within its framework. Rules laid out in EU directives dictated how and where contracts could be advertised, how suppliers were assessed, grounds for the awarding of contracts, and the approved punishment for when a rule was broken. Most significantly though, the Public Contracts Regulations 2015 required that contracts be awarded to the lowest bidder across the EU and thus left domestic contracting authorities unable to be more strategic with their contract-awarding process.

Amidst this context, the strategic purview of procurement has, for the most part, been limited – as many see it as merely a back-office processing function. Symptoms of this widespread perception are frustrating: a lack of investment in development, digital systems, skills, training, and people have compounded public procurement issues. Under the weight of austerity and EU competition law, the tendering process has inclined to default to a matter of what is most cost-effective and economically advantageous, without thought to wider social and economic impact.

The UK is now a part of the WTO's GPA – a simpler, less prescriptive plurilateral agreement on procurement. Freedom from EU directives and the single market could go one of two ways for the future of UK public procurement. On the one hand, a status quo has developed around these conditions and is predicated on access to EU tenders. Unless some sort of compensative or familiarisation process accompanies upcoming reforms, contracting authorities risk falling significantly short. On the other hand, it is a pivot point and represents a critical opportunity to reform UK public procurement to be more strategic, to leave more room for innovation, and deliver better services for communities.

From back office function to strategic tool – changing views of procurement

In recent years, views of public procurement have begun to shift towards an understanding of its power to achieve long-term strategic goals, particularly at the local level. Procurement does not just sit in isolation, it can be a tool at the disposal of a contracting authority, used towards the delivery of strategic priorities and public value. Better understanding of this notion is developing, and some local authorities have begun to demonstrate exciting best practice in this regard. There has been an increase in strategic partnership working that moves towards longer-term, advisory relationships between stakeholders and suppliers, as opposed to transactional, 'one-off' arrangements. Commissioners are no longer the only people in the room when thinking about procurement – collaborative and co-designed long-term procurement strategies are being produced at the local level. This change in approach is an exciting prospect for public procurement and its ability to deliver for modern requirements post-Brexit. This 'turn' in procurement was encapsulated in a 2020 Cabinet Office Green Paper titled 'Transforming public procurement'.

Procurement reform

The Green Paper outlines a more flexible and principled procurement process and system, now that the UK is outside the EU's legislative framework. The Green Paper also comes with a distinct message to all contracting authorities that they do not have to select the lowest price bid when procuring, instead insisting that authorities should take a broader view of value for money that incorporates 'social value'. This is presented as a means of encouraging public procurement; contract terms, strategies, ways of working, delivery plans, and evaluation processes to become built around a broader interpretation of 'value' and the purpose of achieving social value objectives.

Taking advantage of no longer having to adhere to EU procurement directives, and, as alluded to by the reforms, the government is also looking inward towards a more domestic and socially-conscious procurement policy. The Green Paper places particular emphasis on SME and VCSE suppliers, although the reality of the situation is much more complex than typical binary perceptions of 'small' and 'large' business suggest. Larger suppliers could be perceived as monolithic or homogenous but may in fact have multiple different geographic bases in the country where they act as key local anchor institutions. Nevertheless, the point is to have all local procurement stakeholders collaborating and complementing each other to work towards a more mutually beneficial procurement system that is ethical and transparent – legislatively opening up the opportunity for more organisations to become more involved in public procurement is a positive step from government to this end.

Risks have been identified with the proposed changes of the Green Paper. There is the unavoidable unfamiliarity of new processes to buyers and suppliers, and relevant familiarisation costs. There are also concerns that the increased flexibility of the proposed reforms may result in greater divergence across buyers, limiting the potential for standardised, outcomes-based approaches, and increasing the overall time and cost of procurements due to unfamiliarity with complex procedures and increased potential for poor practice. Increased legal challenges will be inevitable as the new flexible procedure is tested. There is therefore a risk that the principles of the government's 'new procurement' are established through court decisions and precedent – which themselves are subject to specific circumstance and context.

For local government, there have been several key concerns with the proposed reforms – including a lack of local nuance, resourcing, and the risk of losing step on social value progress in the context of recovery, clean growth, and levelling up. Furthermore, there is little attention paid to how local authorities, as democratically elected self-governing bodies, engage with procurement to meet community needs – the legislation instead uses the oversimplified term 'contracting authorities' to describe all public buyers irrespective of democratic status. Local authorities are unique public organisations, and for them the reforms will require some tailoring as well as a far more certain financial outlook than has been provided for local government in recent years.

Value and the case for social procurement

The reorientation of procurement from a contract-by-contract consideration centred on value for money to a strategic function has antecedents in the turn to social value of the 2010s. The consideration of social value, as well as economic value, in procurement was introduced by the Social Value Act almost a decade ago. The act enshrined into law the duty of paying regard to social value when making procurement decisions. Since then, the incorporation of a social value element into the assessment of contracts has become a universally recognised consideration, particularly in the recent context of a national need for economic recovery.

In 2020, the UK Government published its own social value model. The model, written in the context of COVID-19 recovery, puts forward eight thematic policy outcomes. These outcomes are as follows;

- helping local communities to manage and recover from the impact of COVID-19;
- creating new businesses, new jobs, and new skills;
- increasing supply chain resilience and capacity;

- effective stewardship of the environment;
- reducing the disability employment gap;
- tackling workforce inequality;
- improving health and wellbeing; and,
- improving community integration.

This new model centres the outcomes-focused approach to social value – the determination of social impact. The government’s model also aligns with the general thrust of the procurement green paper in seeing procurement and social value as pathways to achieve key policy goals like recovering from the economic impacts of the COVID-19 pandemic and tackling workforce inequality. This is in line with the growing trend in local government to use procurement in a muscular manner to achieve positive impacts in the lives of residents.

In the years since the passage and implementation of the Social Value Act, the principle of social value as a consideration within procurement, and the recognition of procurement officers as crucial to the process of realising social value, has become embedded across local government. This may not amount to a unified, sector-wide approach to evaluating social value, but nevertheless represents a step in this direction. This change has been mirrored in the private sector, with Corporate Social Responsibility an increasingly important concept throughout the 2010s. Alongside this, 'BCORP' status has become sought-after by many firms as a way of demonstrating their commitment to sustainability goals in equal measure to the more traditional focus on turnover and profit. This shift represents a broadening of the concept of 'value' – beyond strictly value-for-money calculations, and towards a wider consideration of impact and returns from commercial activity.

Social value has spread across departments, organisations, and sectors – significantly breaking down silos and encouraging collaborative working¹. Links between local authorities, small and larger suppliers, social enterprises, anchor institutions, and community groups have formed for the purpose of social value delivery – and there are examples of the sector taking it upon themselves to build their own capacity in this regard. There is also now a wealth of shared good practice and frameworks to help social value development and familiarisation within organisations. The future of a values-led, 'social' procurement looks bright. However, the success of this model hinges on an authority’s ability to embed a refreshed public sector ethos and involve communities and other relevant

1 Crossley (2021) – Collaboration is the key to social value

stakeholders early in a collaborative process of setting local social value priorities. These priorities must then go on to inform the desired outcomes of each contract – with contract management operating to deliver on this basis.

Towards a new ethical model

Ethical public procurement is fair, corruption-free purchasing that avoids conflicts of interests, ensures external transparency and, most importantly for public authorities, delivers conspicuous and inconspicuous benefits for communities on the ground. Sadly, public procurement has been plagued by several unethical and sometimes illegal practices over recent decades, tarnishing perceptions of the public sector ethos. Excessive secrecy, suspect procedures, and inappropriate working relationships are all red flags for practices such as bribery, coercion, extortion, favouritism, illegal sourcing, and a general traffic of influence – all of which contribute to public procurement losing sight of who's being served.

Public sector transparency is essential to raising and maintaining a higher ethical standard – those involved in procurement must know what is expected of them and be able to make decisions promptly and efficiently. It is not uncommon for suppliers to feel as though there is not enough consistency or transparency in how local authorities score and evaluate bids. This is justified given that local authorities do tend to change and switch their systems, and there are often inconsistencies in approach across and within localities. This has led to misleading tenders. An independent review of how local authorities approach scoring and evaluating bids will contribute greatly to achieving consistency and transparency across the sector and could reveal important practical lessons beyond this.

It is time to be bold and pursue a new model of 'social procurement' that is built around and further entrenches existing ethical principles, as well as incorporating new commitments – such as collaboration, social value, sustainability, probity, higher labour standards, and a prioritisation of prevention over penalisation – necessary for public procurement to serve society in the long term.

Procuring local

The strategic turn in procurement outlined in the green paper, bolstered by the lessons and experiences of ten years of the social value act, has great potential to deliver real impact at the local level. However, there are many considerations around the nuances of local government procurement which must be built into reforms if they are to be embedded across the whole public sector.

Local authorities currently find themselves weathering a perfect storm of real-term cuts, rises in demand for public services, and tremendous social care costs

that now threaten to reach catastrophic levels – amid fraught post-Brexit supply chains and the ongoing volatility and impacts of COVID-19 and its aftermath. Which means councils are operating under severe capacity constraints whilst simultaneously spending a great deal of money on procurement. This is not reflected in the money spent on organisational processes or training around procurement, which leads to the disjunct between leadership ambitions and procurement processes. A shift in mindset is beginning to develop, but this is not to be confused with an effective systemic transformation – which requires guidance, planning, and resources.

Widespread effective local procurement is limited by insufficient capacity, fraught reputation status, and a fundamental lack of commercial skills across the public sector. Procurement teams often have little involvement or oversight in key strategic decisions made by local authorities, despite being relied upon to manage and deliver on said priorities when the time comes. Whilst there is widespread understanding of the important role procurement plays in delivering value for money and efficiencies², there is a tendency for local procurement to prioritise procuring goods and services over procuring for specific issues of strategic importance to a local authority. This is then reflected in the capability of procurement teams in handling different types of contracts. And whilst there is an understanding that procurement is important in delivering value for money, it has been concluded that the sector has tended to fail in providing such value.

An increased awareness is developing around the need for a better understanding and management of supply chains, whether locally, regionally, or nationally, when exploring how local procurement spend can be leveraged to boost recovery and deliver benefits to localities and their communities. It is now crucial that discussions on the strategy and practice of procurement do not take place in isolation and that there is a more wholesale recognition that the strategic power of public procurement can only be facilitated by broadening the scope beyond the activity of procurement teams alone. This involves a greater understanding at all levels of local government of the importance of pre-procurement and contract management.

Pre-procurement

Engaging with the market early, strategising and structuring contract management, and embedding KPIs and the needs of communities throughout are all critical parts of the pre-procurement stage that must be handled with care and depth. As a pre-requisite to a more mindful and strategic use of public procurement, there are two key

² House of Commons, Communities and Local Government Committee (2014) – Local government procurement: Sixth Report of Session 2013-14

areas a contracting authority ought to be mindful of: setting social value priorities and market consultation.

Setting social value priorities ought to be collaborative and strategically-minded – so that the themes, outcomes, and measures are distinctly local. Having these be co-designed and well-defined allows them to be deferred and referred back to at every stage of a contract to ensure value is being delivered according to the ‘TOMs’ laid out in pre-procurement. Communities should be the go-to for ascertaining the details of what social value priorities should consist of in this regard. If community and resident voices are not included from the beginning, then it sets up too much room for error in how a local authority and relevant stakeholders define value and subsequent success. A good balance between quantification and qualitative understanding is required. Data utilisation and key performance indicators (KPIs) are of course necessary to evaluate bids and outcomes of social value offers. However, in setting the parameters for action and evaluation pre-procurement, there must be a qualitative interpretation framed in local context.

If transparency is not implanted and well-understood in the pre-procurement phase, it becomes much more difficult for accountability and transparency mechanisms to be effective from then on. It is particularly important that councils are transparent in their application of social value and indeed all other weightings at all stages of the tender. Suppliers often find that the weighting applied to social value at the top-level of the tender is stripped away by the time procurement has moved onto the more detailed, lower-level calculations of a tender – effectively social value is removed from the final consideration and value for money once again trumps all.

Market consultation involves engaging with potential bidders as early as possible. This allows for a local authority’s key messages to be conveyed and for emphasis to be placed on the importance of strategic goals and social value priorities, as well as the potential for unique social value offers from suppliers to be identified and considered. Contracting authorities can now choose to reserve procurements for either local SMEs, VCSEs or large firms with strong local links, thanks to recent reforms. Through pre-procurement market consultation, a platform can be set up for local stakeholders and relevant suppliers to engage with one another, knowledge gained from which can go on to develop the procurement approach from the contracting authority. Furthermore, those suppliers with commitments of a particularly high ethical standard – e.g. those with strong net-zero strategies in place, or pay a living wage organisation-wide – can be identified and brought into the fold of a network of relationships and ethical arrangements, that all work towards circular, sustainable local growth and prosperity.

Whilst social value is an exciting movement that is demonstrative of a growing will and desire to see procurement deliver better outcomes for communities, it should be noted that social value offerings and ethical procurement are not one and the same. A supplier may score well on social value by delivering on specific asks but at the same time behave unethically in their day-to-day practices. Ensuring an evaluation of supplier ethics is a key part of a local authority's pre-procurement process and will be key to securing the delivery of social value whilst encouraging more wholesale ethical practice.

Contract management

Transparent and accountable contract management is crucial for all involved to buy into a more ethical public procurement practice which maximises the potential to deliver local transformative change. Often what is deemed unethical public procurement is the result of poor contract management – where relationships and delivery are mismanaged, and the governance of contracts are far below standard. Contracts are often complex, resource intensive and long-lasting, involving multiple actors and stakeholders. Therefore, effective, and efficient contract management is critical to achieving ethical public procurement that delivers strategic goals and social value priorities. Local authorities should be aiming for their contract management to be recognised as essential to driving ongoing improvement and improved service outcomes – with well-developed policies, systems, procedures, and staff all working holistically to drive forward planning and cost control, whilst consistently delivering on strategic goals and social value priorities.

Barriers to good local procurement

Various assessments, evaluations, and policy reviews have highlighted constraints on the efficacy of local procurement. These include:

- **Communication throughout the procurement process from all parties.** Interaction, and therefore collaboration and the like, is often hampered by a lack of communication between a contracting authority, suppliers, and service users. Rising above this and developing open channels of communications between a local authority, suppliers, and service-users will develop a local procurement system that is more reliable and strategically minded.
- **Inconsistent application of policy.** There are often gaps and inconsistencies in how the public sector uses procurement rules, regulations, and policy – this can be off-putting to potential suppliers and ultimately hinder the potential for better outcomes being achieved locally and nationwide.

- **Limited knowledge-share.** Knowledge-share can be a powerful tool and is key to unlocking the potential of public procurement more wholesale across the sector. However, as the National Audit Office has stated previously, there is a way to go before enough networking and sharing of information is occurring for the public sector and local contracting authorities to be considered a more “intelligent client”.
- **Capacity and skills gaps.** Pressed for funding, local authorities tend to have trouble in an environment of purchasing services instead of funding them. A lack of contracting skills and too great a focus on reducing costs short-term are symptoms of this.
- **Poor data utilisation and market intelligence.** There is a fundamental lack of an extensive dataset, that is coherent and comparable, relevant to the national public procurement market, and often, local procurement markets too. Plugging these gaps and improving market intelligence where possible will be critical to the responsibilities of place leadership and enhancing local economic benefits garnered from public procurement.
- **Poor risk management and risk aversion.** The public sector has had a poor track record with risk management and, more acutely, risk aversion. Safe, tried, and tested procurement options are opted for and prioritised, with practitioners being rewarded for following rules stringently, whilst more innovative solutions, that may require more distinct risk management processes, tend to be avoided

Recovery and levelling up

The procurement reforms, along with the imperative of recovery after the pandemic and boosting local economies following Brexit, are considered part of the wider levelling up agenda to reduce regional inequality and produce more and better-distributed economic growth. Understanding how the procurement reforms can best be tailored to levelling up is crucial to achieving the maximum impact of public spending on the targets of the agenda.

Identifying the left behind and stimulating recovery

If levelling up is to be about uplifting the most ‘left-behind’ places, communities, and people up to a worthy standard of economic, social, and environmental wellbeing, then the upmost priority for localities must be to identify where a lack of life’s essentials is most prominently felt – particularly post-pandemic, where many have fallen further behind. Ensuring safe and just spaces for people to inhabit, ensuring progress means progress for *everyone*, and reconfiguring the local economy to be ‘circular’ by design are key success factors for central and local

government – particularly when spending public money.

Moving towards a local economy that uplifts those most left-behind, contracting authorities have and should aim to increase the level of retention generated by their procurement spend at the local level. Key to this is mapping a local authority's spend amongst suppliers – including the geography of spend, subsequent re-spend by suppliers, the ethos of suppliers regarding their contributions to 'social foundation', and gaps in spend by ward and type of industry. Of course, it is not possible and perhaps not desirable for a local authority's spend to stay entirely within its boundaries, this could potentially reduce dynamism and shut firms out of the market by creating a public contracting closed loop. Being able to differentiate, particularly when dealing with very large suppliers, between the differing potential impact of national companies on the local economy is therefore critical. To this end, there is great value in clearly communicating with major suppliers what the goals of a council's procurement strategy are and what targets for recovery and levelling up have been identified

However, within a tendering system that is open market and favours broadened competition, maintaining procurement spend spatially and reducing 'leakage' of money outside boundaries is no simple task. On the one hand, there are several complex dynamics that influence local procurement; geographical location, online purchasing, supplier sector, and the relative feasibility of re-investment. On the other, collecting, collating, and analysing the data required for such a mapping remains far too big of a task for any single local authority. Therefore collaboration, networked partnerships, and full utilisation of the critical mass available at the sub-regional, regional, and even national level is of utmost importance. Making good use of growth bodies such as LEPs and relevant industrial strategies will help here.

Boosting local economic benefits

Partnership working is crucial to effective public procurement, due to its potential for significant cost-savings, efficiencies, increased capacity, knowledge-sharing, and contributions to innovation, productivity, and a shared sense of working towards place prosperity. Working with local authorities is not, however, an easy task for any business. There are multiple barriers to accessing opportunities to bid for local contracts, both in terms of the time taken to prepare and submit a bid and the money spent on the resources used in the process. Excessive barriers and bureaucracy must therefore be reduced wherever possible, and at times calculated risks on new local suppliers may need to be taken, in pursuit of more strategic and locally beneficial procurement.

It is also important to engage with those large-scale, major suppliers which all local authorities work with to some degree or other as part of the process. These organisations can work with local authorities in the development of works programmes which encompass a plurality of priorities and interests, like bringing in local firms as partners or working with further education colleges in the area on skills provision in the medium and long term. Long-term partnerships with large organisations can therefore generate aggregated social value benefits through multiple multi-year contracts. As recovery develops and reveals itself, the importance of boosting local employment, retaining local economic benefits, and building stronger communities will be greater than ever. Using early market engagement to identify potential large-scale partner organisations and developing contracts which maximise local economic benefits can help build robust relationships to the aggregated benefit of local economies.

Proposed reforms and levelling up

The proposed reforms to public procurement show signs of a break from the status quo that the barriers to strategic procurement described in this report have developed under. Fleshing out social value expectations, allowing for the prioritisation of local economic impact when procuring, and a fundamental shift in tone away from simply economic assessments of value, are all very welcome in this regard. However, despite being freed of various EU directives, the lack of local nuance and information on how stated objectives can be achieved in practice still leaves the deck heavily stacked in favour of incumbent providers.

Beyond enabling action through legislation, central government must also adjust its approach to the capacity funding of local government, which must be adjusted in terms of both scale and timeframe if local procurement is to work towards the goal of levelling up. Resourcing aside, the lack of long-term certainty in finance is also an obstacle to the kind of cultural change required. The aim of using procurement to drive the levelling up agenda is about moving from a fragmented to an holistic approach, which will take time and planning, requiring certainty.

The challenge of a cultural shift in procurement must be met both in individual local authorities and across the network of local government, in a way that is guided by central government priorities and resources as part of the wider push to level up. Individual authorities must be able to determine what the role of procurement should be in their broader economic development strategy, in a way which aligns with the goals of the levelling up agenda. Alongside these individual efforts, councils must share best practice and experience, making use of the local government network embodied by institutions such as the LGA and CIPFA, so that organisations working with councils across the country can observe a consistency

in principles even if the approaches differ depending on locality. This cannot be an entirely optional endeavour if levelling up is to work across the country. Guidelines must be set by central government for both training and networking to ensure a minimum standard.

Recommendations

A local English charter for ethical procurement

A written procurement ethics policy is the key place to start for raising and maintaining a higher ethical standard – those involved in procurement must know what is expected of them and be able to make decisions promptly and efficiently. A clear and concise written policy, with general principles, specific rules, and adequate guidance on how they should be applied, would help with this. Below is a charter for councils to follow when drawing up procurement policies, and to guide relationships between local authorities and suppliers.

1. **Good Jobs**

- Suppliers should all pay the Living Wage, as determined regularly by the Living Wage Foundation.
- Councils should commit to a diverse workforce and expect the same of suppliers.
- In cases of large suppliers, workers should be represented on the board where possible.
- Career progression opportunities should be available to the employees of council suppliers.

2. **Transparency**

- Councils must take a proactive, not reactive, approach to transparency.
- Contract registers should be made publicly available in *the simplest form possible*, with dashboard overview of council spend and impact available to residents.
- Key performance indicators for public value should be agreed by the council.
- Weighting for social value in tendering should be applied equally and consistently throughout the process.

3. **Good business**

- At the front end of the contracting process, councils should engage and consult with the market to ensure opportunities are well communicated and tailored to local specifications.
- At the point of application, councils should ensure that the application and tendering process is as simple as possible and consistent across council contracts.
- At the back end of the contracting process, it is vital that councils commit to prompt and timely payment of suppliers, with suppliers carrying this commitment onto their own supply chain.
- Councils should sign up to the ISO 44001, which details requirements for the effective identification, development, and management of collaborative relationships within or between organisations

4. **Understanding local impact**

- When dealing with large suppliers, councils should understand the impact the supplier could have locally, on the labour market and in the community.
- Councils must seek to maximise the 'multiplier effect' of spreading SME spending across as many local firms as possible.

5. **Carbon commitments**

- Councils should ensure that all smaller suppliers, within reason, undertake carbon accounting and are aware of their carbon footprint.
- In the case of major suppliers, councils should wherever possible ensure that large suppliers are on a path to net-zero emissions before 2030.
- This information should be aggregated and made available so residents can be aware of the carbon impact of their council's procurement.

6. **Good training**

- Councils must be aware of and communicate to suppliers the desired outcomes of procurement policy on the local labour market, using a robust evidence base.
- Councils must act as a coordinator between suppliers and local educational institutions to ensure commitments around training and skills provision are upheld in the most constructive and effective way possible.

7. High standards

- Upon signing up to this charter, councils should, wherever possible, ensure that the standards of doing business with the council are passed down the supply chain of large suppliers.

Unlocking strategic procurement: central government procurement reforms

The Procurement Green Paper and subsequent policy notes provide the beginnings of a positive step-change in procurement across the public sector. Building on this reorientation of the discipline, the following recommendations for procurement reform are designed to unlock strategic procurement at the local level and promote levelling up through procurement across the public sector.

- **Long term, stable funding for local government to build strategic procurement capacity.** Local procurement can be used as a strategic instrument of levelling up, providing resources are provided to fund a long-term reorientation and widespread organisational change.
- **A move away from ring-fenced and competition-based funding.** The ability of the local government to use procurement towards strategic goals is greatly diminished when much of what they procure is paid for through ring-fenced, one-off capital injections, often at the back end of a costly competition process.
- **Training pathways and standards for procurement officers and senior councillors.** Changing the emphasis and principles of public procurement must be accompanied by appropriate training for procurement officers. The government should ensure that all council procurement teams are brought up to speed, using institutions like CIPFA or the LGA to provide training and set standards.
- **A regional competition policy to replace EU competition law.** With the UK no longer subject to EU competition law, there is an opportunity for central government to rework the rules for local procurement in line with the aims to be outlined in the Levelling Up White Paper.
- **A shift in the onus of local procurement officers from value-for-money to local impact.** An explicit and statutory duty should be placed upon local procurement departments to consider the local impacts – economic and social – of procurement first, and value-for-money second.

- **Clear and consistent metrics of local impact, aligned with the Levelling Up White Paper.** The Levelling Up White Paper should definitively state the criteria for measuring a place's success in levelling up. These should be aligned with guidelines for measuring impact in the procurement reforms.
- **A responsibility for central government departments to prove impact of their procurement spend in priority areas.** As major contracting authorities, central government departments should have to demonstrate how their spend has been targeted to help achieve levelling up goals as outlined in the White Paper.
- **An independent review of how local authorities approach scoring and evaluate bids.** This will contribute greatly to achieving consistency and transparency across the sector and could reveal important practical lessons.



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