



Executive Decision Report

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| <p>Decision maker and date of Leadership Team meeting or (in the case of individual Lead Member decisions) the earliest date the decision will be taken</p> | <p><i>Lead Member for Families, Children and Schools</i></p> <p>Date of decision (i.e. not before): <i>11 July</i></p> <p>Forward Plan reference: <i>05145/18/A/AB</i></p> |  <p>THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA</p> |
| | <p><i>Cabinet Member for Family Services and Public Health, and the Cabinet Member for Economic Development, Education and Community</i></p> <p><i>Date of meeting or formal issue (i.e. not before): 11 July</i></p> |  <p>City of Westminster</p> |
| <p>Report title</p> | <p><i>PASSENGER TRANSPORT TAXI FRAMEWORK AWARD – PART A</i></p> | |
| <p>Reporting officer</p> | <p><i>Annabel Saunders, Assistant Director, Integrated Commissioning</i></p> | |
| <p>Key decision</p> | <p><i>Yes</i></p> | |
| <p>Access to information classification</p> | <p><i>Part A: Public</i></p> <p><i>Part B: Confidential/exempt</i></p> <p><i>Part B of this report is currently exempt from disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.</i></p> | |

1. EXECUTIVE SUMMARY

- 1.1. The Passenger Transport Procurement Strategy for both taxi and minibus transport was agreed in January 2018. Following the taxi procurement exercise this report seeks approval to appoint a number of suppliers onto a Framework for the provision of Passenger Transport Taxi services for eligible children, young people and vulnerable adults in the Royal Borough of Kensington and Chelsea (RBKC) and Westminster City Council (WCC) (“the Councils”).
- 1.2. Procurement activity has been staggered; the new taxi framework is due to go live in August 2018, subject to the approval of this award report, and the procurement activity for minibus services will commence from October 2018 followed by a contract start date of September 2019.
- 1.3. The procurement strategy proposed to deliver the twin imperatives of continuous quality improvements and responsiveness to stakeholder wishes. The outcome of this procurement is the establishment of a robust and sustainable framework of taxi suppliers, that derives value for money, that has been co-designed by key stakeholders, and that will meet the needs of eligible children, young people and vulnerable adults.
- 1.4. The service design has been informed by significant consultation with a range of key stakeholders including parents, carers, schools and day services who have been involved throughout the process. Feedback from the consultation and engagement has been incorporated into the new service specification which formalises and further develops quality standards expected from passenger transport services under this new framework.
- 1.5. Additionally, the procurement has been undertaken by reviewing and applying the lessons learned from previous passenger transport procurements which included the need for stakeholder engagement, sufficient market capacity, managed mobilisation and ongoing communication with stakeholders.
- 1.6. The outcome of this exercise points to a success in procuring a service with enhanced quality while delivering good value for money. In 2014, when the last taxi framework was established, just two suppliers were awarded to the Westminster framework, without a clear pricing schedule and a specification that has required a high level of contract management. Following a strong response from the market, this report seeks approval to appoint a total of 9 suppliers for Lot 1 Regular and Scheduled Taxi Provision and 10 suppliers for Lot 2 Ad-hoc Taxi provision which represents a robust and sustainable framework.
- 1.7. London Living Wage has increased by 15 percent since 2014, and this increase in wage costs has not translated into the prices received this year. As part of this procurement, there was a strong quality response from market, for example all top ranking suppliers have committed to London Living Wage, clear Social Value commitments such as apprenticeships and green fleet strategies. The new service will also be underpinned by a strong contract management regime with a comprehensive set of KPIs.

- 1.8. The Passenger Transport Taxi arrangements, overseen by the existing in-house Bi-Borough Travel Care and Support Team (TCST), will continue to maintain and deliver a service that fulfils statutory requirements, and provides a safe and customer focused service that enshrines strong quality standards. The TCST's role includes contract and performance management of suppliers to ensure a high level of quality; relationship management of parents, carers, schools, day services and residents to ensure operational efficiency; and acts as the first point of contact for all issues relating to passenger transport.
- 1.9. This report seeks approval to establish a four-year Passenger Transport Taxi Framework for use by both WCC and RBKC from 1 August 2018 which consists of Lot 1 Regular and Scheduled taxi provision and Lot 2 Ad-hoc taxi provision. The lifetime framework value will be £11m, this is based on an estimate of maximum spend over the four years in line with current usage. Taxi services will commence from August 2018 for adults' transport and September 2018 at the start of the new academic year for children's transport.
- 1.10. Lot 1 Regular and Scheduled taxi provision is where consistency of driver, vehicle, and (where required) Travel Care Assistant, is critical to the successful delivery of services. For home to school transport, regular and scheduled taxi provision is used when it is either not possible or not cost effective to use a minibus. Lot 2 Ad-hoc taxi provision specifies those occasions when the Councils need taxi provision on an ad-hoc basis to transport a range of service users, often at short notice.
- 1.11. The recommendation is to appoint 9 suppliers for Lot 1 Regular Scheduled services and 10 suppliers for Lot 2 Ad-Hoc services. The report also seeks approval for the appropriate delegated authority to call-off contracts from the framework. Further details on the recommendations are provided in Section 2.
- 1.12. A rigorous evaluation process took place to ensure that only those suitable to provide a quality service would be appointed on to the framework. The evaluation panel included a number of Officers and stakeholder partners including parent representatives and a head teacher who were able to bring their expertise to evaluate relevant questions. Further detail on the tender submissions and proposals are summarised in Section 6 and Section 7.
- 1.13. Following appointment onto the Framework, individual contracts will be awarded to the highest scoring taxi supplier (based on combined quality and cost) within each Lot and vehicle category. Where the highest scoring supplier is unable to meet this demand (subject to their capacity and availability) the contract will be awarded to the second highest scoring supplier and so on. This process is referred to as a 'call-off'.
- 1.14. For Adult Social Care, there are currently no regular scheduled taxi routes. Current Adult taxi usage is solely ad-hoc with relatively low levels of spend. In 2017/18, ad-hoc taxi spend was £9,136 in RBKC and £86,299 in WCC. Ad-hoc taxi journeys will be called-off as and when they are required according to the Lot 2 league table rankings which can be found in the Part B exempt section of this report.

- 1.15. For Children's Services, the majority of spend is on Lot 1 Regular Scheduled taxis, for the provision of statutory home to school transport for children and young people with Special Educational Needs and Disabilities. For the financial year 2018/19, spend with existing contracts is currently forecast at £824,000 for RBKC and £1,730,000 for WCC. Detailed finance analysis of the Children's Services spend forecast for each borough under the new Framework is provided in Part B exempt section of this report.

2. RECOMMENDATIONS

Westminster City Council

- 2.1. It is recommended that the Cabinet Member for Family Services and Public Health and the Cabinet Member for Economic Development, Education and Community, approve the following decisions:
- 2.2. The establishment of a Passenger Transport Taxi Framework, to be used by both WCC and RBKC via an Inter-Authority agreement.
- 2.3. The appointment of the following suppliers, to Lot 1 - Regular and Scheduled Taxi Provision of the Passenger Transport Taxi Framework for the duration of the four-year Framework:
- Chequers Transport Ltd
 - Green Tomato Cars Limited
 - HATS Group Ltd
 - Jimac Radio Cars Ltd
 - London Hire Community Services Ltd
 - London VIP Cars
 - Olimpicas Limited
 - One Transport Ltd
 - Westway CT Trading Ltd
- 2.4. The appointment of the following suppliers, to Lot 2 - Ad-hoc Taxi Provision of the Passenger Transport Taxi Framework for the duration of the four-year Framework:
- Chequers Transport Ltd
 - Dial-a-Cab Limited
 - Green Tomato Cars Ltd
 - HATS Group Ltd
 - Jimac Radio Cars Ltd
 - London VIP Cars
 - Olimpicas Ltd
 - One Transport Ltd
 - Q-Despatch (West) Ltd
 - Westway CT Trading Ltd

- 2.5. Approval for the following selection methods for the award of call-off contracts for both Lot 1 - Regular and Scheduled Taxi Provision and Lot 2 - Ad-hoc Taxi Provision:
- i. That the ranking of taxi suppliers (as detailed in the exempt section of this report) be used to award all taxi contracts for both Lot 1 - Regular and Scheduled Taxi Provision and Lot 2 - Ad-hoc Taxi Provision according to their ranked positions, unless a mini-competition is required as outlined in the recommendation ii below.
 - ii. That for out-of-Borough, longer distance, and TUPE-related contracts, and when in the Council's interests to do so, suppliers on the relevant Lot of the Framework will be invited to participate in a mini-competition.
 - iii. That the decision to award and enter into call-off contract, valued at £100,000 and under, be delegated from the Corporate Leadership Team to the Head of Travel Care or in his/her absence the Assistant Director of Integrated Commissioning, to ensure transport is delivered to service users in a timely and efficient manner. Should any taxi contract be valued at £100,000 or more, that this contract will be awarded by the Executive Management Team in accordance with the WCC Procurement Code.
- 2.6. That approval is given for WCC to enter into an Inter-Authority agreement with RBKC to enable both Councils to call contracts off the WCC Framework, and to share taxi routes where appropriate.
- 2.7. In order to aid efficient future decision-making, given the possibility of fluctuating demand, to approve the delegation to the Assistant Director for the Integrated Commissioning Directorate to review and approve all minor contract variations (up to 10% of the contract value) to ensure they are a compliant modification, whilst also ensuring that there is no disruption of service to vulnerable service users.

The Royal Borough of Kensington and Chelsea

- 2.8. That the Lead Member for Families, Children and Schools approve the following decisions:
- 2.9. For RBKC to enter into an Inter-Authority agreement with WCC to enable RBKC to access and use the WCC Framework to call-off contracts with the recommended suppliers for both Lot 1 - Regular and Scheduled Taxi provision and Lot 2 - Ad-hoc Taxi provision.
- 2.10. For RBKC to approve WCC calling-off from the Passenger Transport Taxi Framework on its behalf.
- 2.11. Approval for the following selection methods for the award of call-off contracts from Lot 1 - Regular and Scheduled Taxi Provision and Lot 2 - Ad-hoc Taxi Provision:

- i. That the ranking of taxi suppliers (as detailed in the exempt section of this report) be used to award all taxi contracts for both Lot 1 - Regular and Scheduled Taxi Provision and Lot 2 - Ad-hoc Taxi Provision to their ranked positions, unless a mini-competition is required as outlined in the recommendation ii below.
 - ii. That for out-of-Borough, longer distance, and TUPE-related contracts, and when in the Councils' interests to do so, all suppliers on the relevant Lot of the Framework will be invited to participate in a mini-competition.
 - iii. That the award decision and entering into call-off contract, valued at £100,000 and under, be delegated from the Director of Integrated Commissioning Directorate to the Head of Travel Care or in his/her absence the Assistant Director of Integrated Commissioning, to ensure transport is delivered to service users in a timely and efficient manner.
- 2.12. In order to aid efficient future decision-making, given the possibility of fluctuating demand, to approve the delegation to the Assistant Director for the Integrated Commissioning Directorate to review and approve all minor contract variations (up to 10% of the contract value) to ensure they are a compliant modification, whilst also ensuring that there is no disruption of service to vulnerable service users.

3. REASONS FOR DECISION

Reasons for re-procurement and establishment of Framework

- 3.1. The Local Authority has a statutory duty to provide home to school transport provisions as per the Education Act 1996. Both Councils have a Travel Assistance Policy which clearly sets out these duties, together with further information via the Local Offer. The Travel Assistance policies can be found in the background papers appended to this report.
- 3.2. For Adults, the Care Act 2014 stipulates a duty to Local Authorities to meet assessed needs, and while transport is not prescribed provision, it may be one way of meeting people's assessed needs and preferences relating to their personal outcomes towards independence and engagement with the community.
- 3.3. The West London Alliance (WLA) framework which service the existing taxi contracts expired in July 2016. RBKC and WCC extended current Taxi contracts under the WLA framework to July 2018, the maximum contract length possible.
- 3.4. The re-procurement provides RBKC and WCC with an opportunity, through more detailed service specifications, to formalise current quality standards and to incorporate the feedback from consultation and engagement with stakeholders.

Reasons for delegated authority to call-off contracts from the Framework

3.5. The approval of delegations to award call-off contracts under the Passenger Transport Taxi Framework, outlined in section 2 of this report, will enable the service to:

- Align statutory passenger transport provision with the current practice of delegating authority to award care placements to the Director of Family Services based on the needs of children and young people;
- Offer a quality passenger transport taxi service that is responsive, flexible and offers real-time provision to meet the needs of the child, young person or vulnerable adult;
- Ensure that the volume of call-off contracts required at the beginning of the new academic year in September is provided without delay or disruption to children and young people's needs;
- Meet the changing demands of passenger transport on an ongoing basis in a timely and efficient manner;
- Achieve best value for the Councils by ensuring that out of borough, longer distance and TUPE related contracts are subject to mini-competition, and;
- Ensure that taxi contracts can be modified to support the Councils' fluctuating demands and achieve best value for money through route optimisation whilst also ensuring consistency of service.

Reasons for Inter Authority Agreement

3.6. The shared service re-procurement on a Bi-Borough basis between RBKC and WCC requires the development of a new Inter Authority Agreement between the two Boroughs to enable them both to operate effectively under the Framework.

3.7. It is proposed that WCC will call-off from the Framework on behalf of itself and RBKC. The Inter-Authority Agreement will therefore sets out the contractual relationship between the two Councils including how contracts are called off the Framework; how the Councils co-operate to manage the services through the Travel Care and Support Team; WCC's responsibilities to operate the contract on behalf of RBKC; how any defaults or performance issues by a supplier are managed; RBKC's obligations to co-operate and comply with the terms of the call-off; the liability between the two Councils; and how any disputes between the Councils are resolved.

4. BACKGROUND AND CONTEXT

4.1. The previous passenger transport provision was commissioned as part of a shared service agreement with RBKC, WCC, and the London Borough of Hammersmith and Fulham (LBHF). However, this service was disaggregated into LBHF sovereign and Bi-Borough arrangements through variations of existing contracts and contract extensions.

4.2. The current taxi contracts were called-off the West London Alliance (WLA) framework, and WCC and RBKC have extended the current taxi contracts until July 2018, the maximum contract length possible. The WLA framework has now

expired, and a re-procurement provides RBKC and WCC with an opportunity to procure and deliver a Bi-Borough service informed by extensive stakeholder engagement which formalises and strengthens existing quality standards.

- 4.3. In January 2018, Leadership in RBKC and the Cabinet Members for Children and Young People and Adult Services in WCC approved the Bi-Borough procurement strategy to establish a new taxi and minibus framework for children and adults. A decision was then taken to separate out the procurement processes for taxis and minibuses, undertaking the taxi procurement in February 2018 and minibus procurement in October 2018.
- 4.4. The reason for separating the procurements for taxis and minibuses was primarily due to current minibus contracts being in place until 2019. Undertaking a separate minibus procurement will permit suppliers to price accurately according to requirements rather than running the risk of submitting prices a year and a half in advance and the market changing. The phased contract start will also allow for a more managed mobilisation process.

5. ENGAGEMENT-LED STRATEGY

- 5.1. The procurement strategy was based on an extensive consultation and engagement exercise with stakeholders including parents, parent representative groups, young people, adult service users, school staff, head teachers, day services, as well as internal Council specialists from the Looked After Children services, Adult Social Care services, the Special Educational Needs services and the Safeguarding Team.
- 5.2. The consultation and engagement programme consisted of three phases. The purpose of phase one was to obtain feedback on the current service provision, and this was done via surveys to all parents, carers and adult service users using the service, as well as presentations and feedback sessions with schools, colleges, day services, parent reference groups, and young people and adults using the services.
- 5.3. Phase two of the consultation and engagement programme included holding workshops with parents, carers, pupils, services users and school, college and day service staff who were invited to co-design the service specification and contribute to the procurement evaluation design.
- 5.4. Using the feedback from the consultation and engagement programme, Officers analysed the feasibility of the ideas for improving the service, considering what stakeholders wanted and what the Councils could achieve. Officers returned to stakeholders to outline proposals in a 'You Said, We Did' document which allowed stakeholders to see how their feedback and ideas would shape the new service.
- 5.5. Feedback was also obtained from the supplier market by holding a market engagement event on 14 November 2017. The event was well attended with 21 representatives. The aim of the event was to share the Councils' vision, strategic

approach and objectives for delivering the new Bi-Borough passenger transport service, to test assumptions on the proposed procurement approach, and to provide an opportunity for the market to clarify the approach and respond to any queries.

- 5.6. Continued high levels of engagement with schools, day services and parents will be part of the mobilisation of the contract and represents Phase 3 of the engagement plan.

6. IMPROVING SERVICE QUALITY

- 6.1. As outlined in the section 5, Engagement Led Strategy, the views of stakeholders helped to shape the final specification. This re-procurement represents an opportunity to respond to the themes raised during the consultation. Improvements have been either featured in the specification or will be addressed by the service as part of internal work;

Delivering quality through a co-designed service specification

- 6.2. The specification used on the former service is much looser than the specification used in the new framework. The Passenger Transport Taxi Framework's Specification will ensure that suppliers have to commit to a number of areas that they did not have to commit to in the past.
- 6.3. The key messages from the consultation and engagement was that stakeholders wanted to see greater assurance in a number of areas which included;

Ensuring all staff have an understanding of individual needs

- 6.4. Stakeholders asked that staff, most notably drivers and Travel Care Assistants have a greater understanding of service user needs. To ensure this is featured in the new service, the specification required suppliers to develop pen portraits for service users in consultation with parents/carers, schools, day centres and offer 'meet and greets' to families giving them the opportunities to meet the drivers and Travel Care Assistants before the service commences. In addition, suppliers will be required to attend 'Parents Perspective' training delivered by a local parent representative group.

Consistency of staff

- 6.5. Stakeholders asked that staffing be kept as consistent as possible to minimise the disruption experienced by service users. The service requirements were split into two Lots, with Lot 1 Regular and Scheduled Journeys including a key requirement for consistency, enhanced training and retention of staff. A specified driver and Travel Care Assistant will be attached to each vehicle and route, where possible and if required by the service user, these staff will serve for one school term on a given route, to prevent disruption and distress for service users and to build longer term relationships. An effective notice period and clear

handover procedures are required for when staff changes do occur, to minimise disruption.

Staff training

- 6.6. Stakeholders wanted to see improvements with the level of staff training. The new specification sets out a mandatory training matrix of core courses which staff must receive in order to work on the service. Mandatory training includes General Disability Awareness Training, Emergency First Aid, Safeguarding, and Parents Perspective training organised by local parent representative groups. In addition, service user specific training will be provided where necessary, and this may include medical training. Further details on training requirements can be found in the Service Specification in the background papers for this report.

Effective communication with parents and carers

- 6.7. Stakeholders wanted improvements on communicating changes or lateness. To address this, as part of regular communications with parents/carers during the summer, the Travel Care and Support Team will be encouraging use of their text messaging service to maximise its effectiveness in reaching as many parents/carers as possible. Parents/carers will need to provide a working mobile number to be able to receive text updates on any delays and updates to journeys and staffing. In addition, all suppliers have committed to tracking technology to enable the TCST to access real-time information, thereby speeding the response time to queries about the location of vehicles which can then be relayed to parents promptly.

Staff being paid fairly

- 6.8. Stakeholders wanted see that staff who worked on the service, drivers and Travel Care Assistants, were being paid fairly. In response, the specification outlined clear staff quality and staff retention expectations and suppliers were required to propose appropriate remuneration to meet these standards. Suppliers were required to specify minimum hourly rates above National Minimum Wage, and almost all providers have made explicit commitments to London Living Wage.

Suitable and roadworthy vehicles with air conditioning

- 6.9. Stakeholders wanted cleaner, comfortable, roadworthy vehicles with air conditioning. Market testing was undertaken with suppliers in respect of the desire for air conditioning to ascertain what the potential additional cost might be of this request. All suppliers consider there would be no impact to pricing received for a contract period (5+2 years) for minibuses as proposed by RBKC and WCC. All suppliers on the taxi framework will be using air conditioned vehicles, and there is a robust checks and inspection regime to ensure vehicles remain roadworthy throughout the lifetime of the contract.

The introduction of 'Never Events'

- 6.10. There are certain events which should never happen, and to ensure there is a common understanding of these between the Councils and potential suppliers, they have been included into the specification and contract. 'Never Events' are a list of clear minimum standards, particularly in relation to safety and safeguarding of children, young people and adults, the breaching of which would result in an immediate default notice.

Delivering quality through the procurement process

- 6.11. Each tenderer was required to achieve a minimum level of acceptability as defined by compliance standards and the Councils reserved the right to reject without further discussion any tender which does not meet the compliance standards. These included:

- Their suitability to pursue the professional activity;
- Satisfaction of the Council's Minimum Standard for Economic and Financial Standing;
- Insurance levels, public liability, employer's liability, professional liability etc.; and
- Experience and technical capacity.

- 6.12. Minimum thresholds were built into the procurement process to ensure that suppliers appointed to the framework have demonstrated that they can meet certain minimum standards and to enshrine quality within the overall supplier evaluation.

- 6.13. If standards are not met by one or more of these suppliers, the other Framework suppliers can be accessed. The creation of a separate taxi Framework will give the Councils the required flexibility of service and more clearly defined quality standards through the revised specification. The Framework will be underpinned by an established KPI framework that is outcome focused and included within the specification to assure quality standards.

Delivering quality through effective contract monitoring and operational oversight:

- 6.14. A dedicated Travel Care and Support Team is in place to maintain and develop standards of service, to ensure a quality service that is safe, responds to the needs of its users and fulfils its statutory obligations. The team is key in delivering a "help desk" function for schools, day centres, parents, carers and suppliers, communicating updates, delays and any changes in journeys and is best placed to communicate to all parties in the event of any emergency. The team manages any formal or informal complaints to bring about a speedy resolution. In addition, the team works closely with services (such as the Special Educational Needs Service, Adult Social Care, Day Services, Looked After Children's Service) to better match assessed need with appropriate transport and staff training.

- 6.15. The TCST are responsible for the daily management of the passenger transport service and ensuring that the services run to the highest possible standards using current best practice, meeting the needs of service users and the Councils and are responsive to changing demands.
- 6.16. The Team also develops and implements the contract management framework with suppliers, sources and ensures appropriate provision of service based upon the needs of individuals and approves and reviews routes to ensure value for money.
- 6.17. A robust set of Key Performance Indicators for each operator is monitored by the TCST. These include outcomes based KPIs for a range of service elements such as Punctuality, User Satisfaction, Complaints, Incidents, Consistency of service, Safeguarding and Staffing. The TCST will conduct termly reviews of the KPI to ensure targets are being met and work with suppliers to address any performance concerns and develop service improvements.

Delivering quality through conditions of contract

- 6.18. The TCST oversight, contract management and KPI framework will be underpinned by conditions of the contract which will clearly set out contractual obligations for the supplier(s).
- 6.19. The conditions of contract outline that the Councils reserve the right to carry out checks and audits where considered necessary, to increase the frequency of checks and audits, and to issue default notices, where the supplier has failed to meet significant requirements of the contract set out in the specification. Defaults and remedies will relate to the occurrence of any 'Never Events', which may lead to breach and termination of contracts.
- 6.20. There will be a number of taxi suppliers appointed to the framework which the Councils will be able to call-off from in the case of any default notices being issued as a result of breaching conditions of contract, this will ensure service continuity.

Delivering quality through effective mobilisation and communication

- 6.21. A lessons learnt report from the previous Passenger Transport Service re-procurement included several key recommendations to ensure a smooth transition to a new service. These include 'practice runs' of routes to provide clarity on journey length, the option for parents/carers to meet with staff before the service commences and strong communication to parents/carers of service users from both the TCST and the service supplier. To enable these key mobilisation activities to take place, it was recommended that the mobilisation take place across school summer holidays. This allows the longest possible period of mobilisation at a time when service suppliers are best suited to transition.
- 6.22. Prior to the start of the new service, a series of mobilisation activities will take place in relation to Lot 1 Regular and Scheduled taxi provision. Officers will be working with the suppliers who have been appointed to the framework. Starting with

introductory meetings, officers will embed key requirements of the service, the needs of the Councils and our residents as well as expectations. A series of regular mobilisation meetings will be scheduled and suppliers will work with the Councils to implement the service in Summer 2018.

- 6.23. Internally, work will be taking place to ensure that the list of service users for the new academic year is up to date, including adding new starters, noting those who have transferred school/college and those who will be leaving and no longer require the service. This information will be used to allocate routes to suppliers. Additionally, work will be undertaken by officers to ensure that all service users have up to date travel care plans.
- 6.24. Officers will ensure that the mobilisation of the service is well communicated with parents and carers, this will include an initial letter notifying them of the new suppliers on the framework, a blank Pen Portrait with details of drop in sessions to get support in filling in the Pen Portrait. A follow up letter with route details and a guide to the service. Suppliers will be required to carry out practice runs of routes, as well as offer families the opportunity to meet with the driver and/or Travel Care Assistant who will be staffing the route before the service starts. The regular journeys between home and school which form much of the work for Lot 1 will commence from 3 September 2018.
- 6.25. There are currently no regular routes which are used by adult service users. Therefore, there is no mobilisation plan required to implement routes for adult service users.
- 6.26. A robust communication and engagement plan has been developed as part of the project plan for the re-procurement and the mobilisation of the contracts. Key objectives of this include:
 - Ensuring suppliers work with schools to ensure high levels of communication and engagement with parents and carers.
 - This would include opportunities at schools or day services where people can meet and get to know the suppliers.
 - Clarifying provision of the service and what it means to receive passenger transport.
 - Clarifying roles and responsibilities (i.e. what is expected of parents who receive the service and what is expected of staff providing the service, including the TCST).
 - Communicating relevant and personalised information to parents, carers and residents to ensure they are included in developments and taken on the journey.

Delivering quality through social value

- 6.27. The specification has outlined the ambition of the Councils to seek to enhance Social Value - defined as '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 to society and the economy, whilst minimising damage to the environment' - in all of its service commissioning activities.

6.28. The areas where social value is a priority include the following:

- Opportunity – providing opportunities to residents to help them towards work, examples include advertising locally first, providing supported employment or working interviews.
- Neighbourhood – making positive impact locally, examples include using your business' skills to support a local charity or voluntary sector organisation.
- Environment – Central London suffers with some of the worst air quality in the country. The Councils are asking everyone to play their role in reducing pollution, examples include supporting the anti-idling campaign by ensuring drivers switch off engines while vehicles are stationary.

6.29. The Councils require suppliers to find creative and mutually acceptable ways in which Social Value can be further enhanced during the life of the Framework - this might be achieved in many different ways such as the provision of further staff training to improve and extend the support given to Service Users, the potential for employment of citizens with disabilities to support Service Users, and so on.

6.30. To enable measurement of Social Value commitments, suppliers were required to set out details on each deliverable, the approach to delivering, milestone details and evidence that will be provided to demonstrate progress or achievement. This was assessed as an aspect of the quality evaluation stage. A summary of the responses from tenderers can be found in section 7

7. PROPOSAL AND ISSUES

Procurement Process Overview

7.1. A full and open OJEU compliant procurement exercise has taken place, and the outcome of the procurement is positive. A highly competitive response was received from the market. Suppliers could bid for either Lot 1 or Lot 2 or both Lots and a total of 14 individual suppliers submitted bids. 12 bids were received for Lot 1 (regular scheduled taxi services), and 12 bids were received for Lot 2 (ad-hoc taxi services) and therefore a total of 24 individual tenders were received and evaluated.

7.2. The proposal is to appoint suppliers to a Framework Agreement for Passenger Transport Taxi services which is split into two Lots, with separate specifications and requirements. Lot 1 for Regular Scheduled Journeys, and Lot 2 for Ad-Hoc Journeys.

- 7.3. Lot 1 of the services is for scheduled and regular taxi provision where consistency of driver, vehicle, and (where required) Travel Care Assistant, is critical to the successful delivery of the services. Regular scheduled journeys are primarily for home to school transport for pupils with special educational needs assessed as requiring transport and vulnerable adults travelling to and from their day activities as part of their agreed social care provision.
- 7.4. Lot 2 specifies those occasions when the Councils need taxi provision on an ad-hoc basis to transport a range of service users, often at short notice. These occasions may include the need to quickly move a vulnerable child at risk to safety and into care; the need to quickly move a victim of domestic violence and any children they may have to safety and refuge, taking children in care to/from contact visits with family members, short term home to school/day care journeys. The main difference in Lot 2 is that there is not the requirement for the provision of Travel Care Assistant nor the same requirements in respect to mobilisation (N.B. crews meeting passengers prior to the commencement of the service) and consistency of driver or vehicle. Lot 2 taxi suppliers are required to have the requisite flexibility, capacity and sensitivity to work with the Councils quickly to provide urgent, unscheduled taxi services.
- 7.5. Tenderers were invited to bid for between one and seven vehicle categories for each Lot. For Lot 1 where Travel Care Assistant may be required, there were seven specified “driver only” vehicle categories and seven specified “driver and Travel Care Assistant categories.
- 7.6. The procurement was undertaken with three stages, including qualification (pass/fail minimum standards), technical (quality), and commercial (price). The criteria for award consisted of 40% for quality and 60% for price. Each supplier’s overall quality score was added to their commercial price score for each vehicle category. The combined quality and commercial scores will determine suppliers’ appointment and position on the Framework by a “league table” ranking for each vehicle type. Suppliers will be offered routes according to the direct award call-off process based upon their ranking in the “league table”.

Procurement Outcome

- 7.7. The tender was published the Council’s e-tender portal ‘capitalEsourcing’ on 7 February 2018 and the closing date for submissions was 12 March 2018. The total number of framework tender submissions received was 24, with 12 submissions for Lot 1 Regular Scheduled provision and 12 submissions for Lot 2 Ad-Hoc provision.
- 7.8. Of the suppliers who tendered, 1 did not pass the Councils’ qualification criteria which detailed minimum requirements relating to financial and economic standing. A further 2 suppliers did not pass the quality stage as their responses to the quality criteria did not demonstrate satisfactory evidence that they could deliver the service to the Councils’ specified standards.

- 7.9. For Lot 1 Regular and Scheduled taxi provision, the proposal is to appoint the following 9 suppliers on the Passenger Transport Taxi Framework:

Chequers Transport Ltd
Green Tomato Cars Ltd
HATS Group Ltd
Jimac Cars Ltd
London Hire Community Services Ltd
London VIP Cars
Olimpicars Limited
One Transport Ltd
Westway CT Trading Ltd

- 7.10. For Lot 2 Ad-Hoc taxi provision, the proposal is to appoint the following 10 suppliers on the Passenger Transport Taxi Framework:

Chequers Transport Ltd
Dial-a-Cab Limited
One Transport Ltd
Green Tomato Cars Limited
HATS Group Ltd
Jimac Radio Cars Ltd
London VIP Cars
Olimpicars Ltd
Q Despatch (West) Ltd
Westway CT Trading Ltd

- 7.11. The ranking of each supplier for each of the Lots according to vehicle type is included in the exempt part of the report.

Procurement Process Stage 1: Compliance

- 7.12. Stage 1 involved compliance requirements. Each tenderer had to achieve a minimum level of acceptability as defined by both Councils' compliance standards relating to matters such as financial and economic standing, insurance, health and safety.
- 7.13. The Councils' set standards for economic and financial standing based on financial accounts that bidders should meet. These standards are set to reassure the Councils that, if awarded contracts, suppliers are financially sustainable throughout the lifetime of the contract.
- 7.14. Where one or more of these criteria is not met, the Invitation to Tenderers advises them that the Council can, if it wishes, use its discretion to pass a tenderer who fails to meet the above criteria, subject to approval of a report to the Section 151 Officer outlining any mitigating circumstances on why a tenderer should pass the economic and financial assessment.

7.15. Of the 14 suppliers who tendered, 13 passed the Council’s compliance standards. Further detailed information on the tenderers’ compliance assessment can be found in the exempt section of this report.

Procurement Process Stage 2: Quality

7.16. It was paramount that the procurement process ensured that quality suppliers were appointed to the Framework. The technical quality stage consisted of a number of questions in key areas of the service requirements.

7.17. Ensuring quality through the procurement process was of particular importance within the context of the over-arching 60% price and 40% quality ratio. Quality was ensured by designing detailed questions which listed every aspect of the requirements that tenderers were expected to reference. In addition, the procurement had a robust scoring criteria of 0 – 5 with the requirement to achieve a minimum score of 3 to pass, or be eliminated from the process. The Councils also stipulated that if any tenderers achieved a 2 for a question then the supplier may be awarded a pass at the discretion of the evaluation panel where the weaknesses in the response were not considered so significant as to jeopardise the tenderer’s ability to meet the overall requirements of the service.

7.18. The Evaluation Panel consisted of a total of 10 individuals including Council Officers and external stakeholder partners. Officers included Commissioners, Travel Care and Support team members, a safeguarding lead, and representation from special educational needs and adult social care. External stakeholder partners included parent representatives from Full of Life (RBKC) and Westminster Parents Participation Group (WCC), and a head teacher from a local Special Educational Needs school.

7.19. There were a total of 9 quality questions for each Lot, for an assessment of areas including;

- general requirements;
- implementation and mobilisation (Lot 1 Regular and Scheduled provision only);
- rapid response and reaction (Lot 2 Ad-hoc provision only);
- communications and relationships;
- operating requirements;
- staff competence and checks;
- social value;
- vehicles;
- safeguarding;
- and performance, risk management and quality assurance.

7.20. A summary of questions and an overview assessment of the proposals are provided in the following table:

| Question | Assessment |
|-----------------------------|---|
| General Requirements | Most tenderers submitted good and excellent responses detailing their |

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| <p>Each tenderer was required to detail their ability to meet the Councils' requirements to deliver a safe, secure, consistent, suitable, reliable and communicative service and meet the individual needs of children, young people and adults. The new Bi-Borough service has also introduced the concept of "Never Events" which are a list of clear minimum standards, particularly in relation to safety and safeguarding of service users, the breaching of which would result in an immediate default notice.</p> | <p>approach to meeting these requirements and the highest scoring tenderer submitted a response which comprehensively addressed all of the objectives and included great detail about the processes in place to deliver the service to an excellent standard.</p> |
| <p>Implementation and Mobilisation (Lot 1 only) and Rapid Response and Reaction (Lot 2 only) Implementation and mobilisation arrangements for Lot 1 (regular scheduled journeys) included requirements for suppliers to communicate and build relationships with stakeholders to minimise the impact of any change. For Lot 2 (ad-hoc journeys), implementation and mobilisation were not requirements as the journeys would be ad-hoc and/or required at short notice. Suppliers were required to demonstrate their capacity for sufficient geographical coverage, flexibility and their proposed response times.</p> | <p>For Lot 1, suppliers who will be appointed onto the Framework demonstrated an understanding of the importance of communications and supporting stakeholders through change, as well as mobilisation plans to ensure a smooth start to the service. All suppliers will be required to meet with parents and/or service users during mobilisation before the commencing the service. The evaluators for this panel included a head teacher from a local Special Educational Needs school.</p> |
| <p>Communications and Relationships Feedback from the consultation and engagement highlighted that effective communication and the development of strong relationships with stakeholders was essential in delivering transport services to some of the most vulnerable children and adults. Suppliers were required to demonstrate how they would understand the needs of children and adults and communicate with key partners like schools and day services to develop and deliver the service.</p> | <p>The evaluators for this questions included two parent representatives from organisations local to RBKC and WCC (Full of Life and Westminster Parents Participation) and a head teacher from a local Special Educational Needs school, to enable them to bring their unique expertise into the process. The highest scoring tenderer submitted a robust response demonstrating the importance of understanding needs, building relationships, and using technology to relay real-time tracking information. Two tenderers scored '2' due to responses providing limited evidence and assurance and were subsequently eliminated from the process.</p> |
| <p>Operating Requirements Operating requirements assessed tenderers' ability to deliver the service with reference to</p> | <p>Responses detailed suppliers' practical arrangements in place, with good evidence of systems and standards</p> |

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| <p>a consistent point of contact, booking arrangements, dispatch arrangements, ensuring timeliness of pick-up and drop-off, and meeting standards relating to checks and inspections.</p> | <p>processes. Strong technology proposals such as GPS tracking will ensure that taxi provision meets the Councils' requirements and enables ongoing development and improvement.</p> |
| <p>Staff Competence and Checks Ensuring the provision of competent trained staff required suppliers to set out their processes in place to recruit staff and assess their abilities, meeting employment standards and checks, training requirements and arrangements to assess how drivers and Travel Care Assistant would provide appropriate care and ensure safety on a continuous basis</p> | <p>Two suppliers who were eliminated from the process scored 2 in this response as this is an area critical to the delivery of a quality service. London Living Wage was not specified as an explicit requirement, however in the interest of continuity of quality staffing, tenderers were expected to outline their pay proposals including a minimum average hourly rate and retention strategies to encourage and retain quality staff. For Lot 1 regular scheduled journeys, out of 9 suppliers who will be appointed on to the Framework, 8 suppliers committed within their tender submission to paying London Living Wage.</p> |
| <p>Social Value Both Councils are committed to maximising Social Value through their procurement activities. The three priority areas are defined as opportunity for residents to help them towards work, neighbourhood and environment.</p> | <p>Examples of delivering Social Value through opportunity for residents to help them towards work including advertising locally, providing supported employment and work interviews. Social Value delivered through "neighbourhood" included making a positive impact locally, including supporting local charities. Social Value delivered through "environment" included playing a role in reducing air pollution by actively supporting anti-idling campaigns. Many tender responses also stated that they have or are working towards environmental accreditations. Highest scoring responses included specific commitments relating to local employment, apprentices, and environmental policies such as only using hybrid and electric vehicles. The majority of the drivers who will be operating on the service will be self-employed, therefore be highly financially incentivised to drive in a smart and efficient manner as well as switch off the engine while idle.</p> |
| <p>Vehicles</p> | <p>All suppliers submitted good or excellent responses with assurance that these</p> |

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| <p>The Councils specified clear standards in relation to the provision of suitable, safe and roadworthy vehicles and equipment, vehicle licensing, vehicle maintenance and compliance with the law and local environmental regulations.</p> | <p>requirements would be met, including timely inspections, checks and standards particularly for self-employed drivers who own their own taxi vehicles and will be highly financially incentivised to procure the more fuel efficient vehicles on the market which are low emission vehicles. All of the suppliers have stated that the vehicles they use are increasingly hybrid/electrical vehicles. All vehicles operating on the framework are required to meet TFL regulations, these including, meeting requirements of the ultra-low emission zone and improving air quality.</p> |
| <p>Safeguarding Safeguarding is of critical importance, particularly in relation to children and adults who are vulnerable and may have complex needs. Tenderers were required to demonstrate their understanding of safeguarding, detail the processes they have in place to prevent, identify and report safeguarding incidents, outline the training and approach to staff awareness and embedding practice and to submit a robust safeguarding policy.</p> | <p>The evaluation panel for this question included a safeguarding professional to ensure that only those suppliers who have robust processes and practices in place would be appointed onto the framework. The evaluation panel have recommended suppliers for inclusion on the framework who they have assessed as being able to meet these important requirements.</p> |
| <p>Performance, Risk Management and Quality Assurance Tenderers were required to outline how they would work in partnership with the Councils' Travel Care and Support Team (TCST) to monitor, manage and improve services, undertake risk assessment and risk management strategies, as well as responding and resolving complaints to the benefit of all parties.</p> | <p>Responses to this question were of a good standard, with the highest scoring tenderers detailing their systems and processes which provided excellent assurance on all elements of the requirements. A robust KPI framework has been developed and shared as part of the tender documents. The Councils invest significant resource into the TCST who will continue to monitor and develop the quality and standards of the contracts.</p> |

7.21. A summary of the key strengths of the top ranking suppliers can be found in part B exempt section of this report.

Procurement Process Stage 3: Price

7.22. Tenderers that passed the required thresholds for Stage 1: Compliance and Stage 2: Quality then proceed to be evaluated at Stage 3: Price. Pricing submissions accounted for 60% of tenderers' overall scores.

- 7.23. Those tenderers that passed all three stages of the evaluation have their quality and price scores added together, and ranked accordingly to arrive at the most economically advantageous tender for each vehicle category. (i.e. the tender with the highest total percentage score is ranked first by vehicle category on the Framework. All subsequent tenderers will be ranked sequentially (by vehicle category) in order of their total combined score to form a “league table” for each vehicle category.
- 7.24. Suppliers that are appointed to the Framework will be offered routes according to the direct award call-off process based upon their ranking in the “league table.” The Councils also reserve the right to award work through mini competitions where appropriate. Where a call-off award is made, tenderers will be expected to accept work offered at the price submitted during the Tender process, where they have reasonable capacity to do so.
- 7.25. Refer to Part B exempt section of this report for a summary of the League Table rankings.

Procurement Price Analysis

- 7.26. Overall, the financial outcome of the procurement as set out in Part B points to a success in procuring a service with enhanced quality for a price which is likely to result in minimal change, see Part B exempt section of this report for further detail on the costs of the newly procured service.
- 7.27. In 2014, when the last taxi framework was established on a TriBorough basis, just two suppliers were awarded to the Westminster framework, without a clear pricing schedule and a specification that has required a high level of contract management and at a time when the application of the London Living Wage was widely accepted as the exception, rather than the “norm”.
- 7.28. Four years later, this report seeks approval to appoint a total of 9 suppliers for Lot 1 and 10 suppliers for Lot 2. For Lot 1 regular scheduled journeys, out of 9 suppliers who will be appointed on to the Framework, 8 suppliers were explicit in their commitment in their tender submissions to paying London Living Wage. This represents a framework which will be sustainable in terms of the number of suppliers and the standards they have set in terms of staff retention through paying the London Living Wage. These suppliers have committed to a detailed specification (that was co-designed with service users and stakeholders), with clear Social Value commitments and a robust monitoring / contract management regime with a comprehensive set of KPIs.
- 7.29. There is a clear price per mile framework for pricing, any increases over the lifetime of the framework can only be index-linked and costs can be further reduced through a programme of mini-competition between the framework suppliers. The framework terms and conditions permit absolute flexibility to add or remove taxis as required to the needs of the service.

- 7.30. In comparison with other similar procurement exercises in this and other London Authorities; the response from the market was excellent. This has driven some strong competition and the prices reflect this. 4 years ago, London Living Wage was at £8.80/hr while today it is £10.20/hr; however, this (15%+) percentage increase in wage costs has not translated into the prices received this year against those received 4 years ago.
- 7.31. Across London there has been exponential growth in the number of children with SEND and the increasing complexity of need has caused overspends in SEND transport budgets in 26 out of 30 London boroughs in 2016/17 who responded to a London Councils survey in December 2017. This equates to an average £1 million overspend per borough. Across 20 boroughs providing full data over time, spend on SEN transport increased by 20% between 2013/14 and 2016/17.

Alternative Travel

- 7.32. To better manage demand of transport provision, a programme of Alternative Travel options is being developed by the Councils. Alternative Travel aims to promote independence to support young people's outcomes and reduce their dependency on transport provision, thereby reducing 'lifetime' transport costs.
- 7.33. Alternative Travel options include Independent Travel Training where children and young people with SEND can learn how to travel from home to school or college, on a specific route, on their own and in a safe and responsible way. Training is delivered by qualified Travel Trainers at schools or colleges and all trainers have a background of working with young people with SEND.
- 7.34. As part of implementing Alternative Travel options, a Travel Care Coordinator will undertake and review travel care assessments annually to ensure travel options for eligible children and young people are appropriate and relevant. This will have a key impact on reducing cost pressures on the service, for example by recommending Independent Travel Training as an alternative, or recommending to transfer a service user from a taxi to a minibus provision.

8. CONSULTATION AND COMMUNITY ENGAGEMENT

- 8.1. Best practice procurement and commissioning principles were applied throughout. This included engaging extensively with stakeholders prior to re-procurement and involving stakeholders in the specification development, the procurement and the mobilisation of the new service. An engagement plan that has been in effect since May 2017.
- 8.2. Refer to Section 5 and 6 of this report for how the consultation and engagement has informed the strategy and design of passenger transport services.
- 8.3. Proactive engagement with stakeholders has taken place to obtain feedback on the current service provision and to understand what improvements can be made. The engagement plan comprised of 3 phases;

- Phase 1 – extensive engagement with stakeholders to obtain feedback on current service provision and suggested improvements.
- Phase 2 – co-design of the specification with parent’s groups and a contribution to the procurement evaluation design.
- Phase 3 – during mobilisation of the new service, officers will ensure that stakeholders are kept informed of updates including who the new providers are as well as personalised communications informing them of route details and meet and greet arrangements with providers.

9. HUMAN RESOURCES AND EQUALITIES IMPLICATIONS

- 9.1. An Equality Impact Assessment was compiled and approved with the strategy in January 2018. These have been updated for the purposes of the award and can be found in the background papers used to prepare this report.

10. LEGAL IMPLICATIONS

- 10.1. This report is recommending the appointment of suppliers to a framework agreement for taxi passenger transport services. A framework agreement is essentially a facilitative arrangement. It provides a mechanism for the Council to place orders with a supplier on standard terms. The award of the framework by itself does not commit the Council to calling off any services.
- 10.2. As set out in this report, individual contracts can be either called-off directly or by way of mini-competition.
- 10.3. Legal services have been involved and advised officers throughout the procurement process. The procurement process has been run in accordance with the Public Contracts Regulations 2015.
- 10.4. Further legal implications which are legally privileged and/or commercially sensitive are contained in Part B to this Report in accordance with Schedule 12A of the Local Government Act 1972.

Legal implications provided by Cath Tempest, Senior Solicitor (Contracts). Email: ctempest@westminster.gov.uk

11. FINANCIAL AND RESOURCES IMPLICATIONS

- 11.1. Financial implications for Children’s Services and Adult Social Care have been included within Part B within this report. These comments have been included in Part B, given the commercially sensitive nature of the information.

12. PROCUREMENT IMPLICATIONS

- 12.1. This report recommends the establishment of a four year Westminster City Council Passenger Transport Framework for use by both WCC and RBKC through an inter-authority agreement.
- 12.2. Throughout the design of this procurement there has been comprehensive engagement with all relevant stakeholders, particularly service users, their families and schools which has resulted in a co-produced specification with service users.
- 12.3. A market engagement event was also conducted which was well attended and ensured that suppliers informed of the Bi-Borough's commissioning intentions prior to publishing the tender, and also gave suppliers the opportunity to feedback on these intentions, which were also incorporated into the procurement design.
- 12.4. The competitive tendering has been fair, robust, transparent, and delivered 9 taxi suppliers for Lot 1 (Regular and Scheduled Taxis) and 10 suppliers for Lot 2 (Ad-hoc taxi provision). This is a significant increase in the number of suppliers from the current position of two suppliers, and will ensure good levels of competition and value for money.
- 12.5. The recommendations to delegate authority to enter into contracts are supported, to ensure that Council Officers are able to move quickly and efficiently to safeguard and protect children and vulnerable adults at risk.
- 12.6. Further procurement implications are provided in the exempt Part B section of this report, given the commercially sensitive nature of the information relating to tenderers.

*Procurement implications provided by Sarah Reardon, Procurement Consultant.
Email: sarah.reardon@rbkc.gov.uk*

Local Government Act 1972 (as amended) – Background papers used in the preparation of this report

| | Description of Background Papers | Name/Ext of holder of file/copy | Department/Location |
|---|--|--|---|
| 1 | Passenger Transport Procurement Strategy | Marjana Tharin 07739 316961 Marjana.Tharin@rbkc.gov.uk | Integrated Commissioning, Children’s Services, Kensington Town Hall |
| 2 | Mobilisation Strategy | Marjana Tharin 07739 316961 Marjana.Tharin@rbkc.gov.uk | Integrated Commissioning, Children’s Services, Kensington Town Hall |
| 3 | You Said We Did | Marjana Tharin 07739 316961 Marjana.Tharin@rbkc.gov.uk | Integrated Commissioning, Children’s Services, Kensington Town Hall |
| 4 | Anonymised Pen Portrait | Marjana Tharin 07739 316961 Marjana.Tharin@rbkc.gov.uk | Integrated Commissioning, Children’s Services, Kensington Town Hall |
| 5 | Special Educational Needs Travel Assistance Policy | Marjana Tharin 07739 316961 Marjana.Tharin@rbkc.gov.uk | Integrated Commissioning, Children’s Services, Kensington Town Hall |
| 6 | Passenger Transport Taxi Service Specification | Marjana Tharin 07739 316961 Marjana.Tharin@rbkc.gov.uk | Integrated Commissioning, Children’s Services, Kensington Town Hall |
| 7 | RBKC Equalities Impact Assessment | Marjana Tharin 07739 316961 Marjana.Tharin@rbkc.gov.uk | Integrated Commissioning, Children’s Services, Kensington Town Hall |
| 8 | WCC Equalities Impact Assessment | Marjana Tharin 07739 316961 Marjana.Tharin@rbkc.gov.uk | Integrated Commissioning, Children’s Services, Kensington Town Hall |

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Formal clearance requirements for all key decision reports

| | |
|---|----|
| Cleared by Finance (officer’s initials) | AL |
| Cleared by Director of Legal Services (officer’s initials) | CT |
| Cleared by Communications & Community Engagement (officer’s initials) | NT |