

TA 11.4 Bid Assessment Framework

Technical Annex

Water Resource Management Plan

September 2018
Version 1.0

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Navigation: TA.11.4 – Bid Assessment Framework (WRMP)

Purpose:

This technical annex sets out our bid assessment framework to support the market to deliver water resource management plan solutions. It comprises part of the supporting evidence for chapter 11 Wholesale Water.

The table below summarises the Ofwat tests that are addressed by the evidence presented in this Annex.

Table 1 - Relevant Ofwat tests

Ref	Ofwat test		Comment
Primary Focus Areas			
CMI 6	To what extent has the company produced a bid assessment framework for water resources, demand management and leakage services that demonstrates a clear commitment to the key procurement principles of transparency, equality/non-discrimination and proportionality and the best practice recommendations?	<p>High-quality plan: An organisation-wide, integrated approach to appraising risks to resilience supported by strong evidence that takes suitably long-term views using a range of forward-looking appraisal techniques across key service areas.</p> <p>Effectively engage with customers on resilience in the round, including facilitating informed choices.</p> <p>Use innovative approaches to the appraisal of risks to resilience, supported by best practice techniques to understand and appraise uncertainty across the full range of pressures, from acute shocks to longer term chronic stresses. It should also consider hazards and threats, such as cyber security, flooding and disruptions to energy supplies.</p> <p>Include cross-references to changes in operational risk and planned levels of service, supported by strong evidence.</p> <p>Thoroughly appraise options for mitigating resilience presenting a full range of options as evidence that the plan will deliver the best value long-term options for customers.</p>	<p>Sets out our bid assessment framework to support the bidding market to deliver water resource management plan solutions which help us ensure a resilient future water supply for our customers.</p> <p>The framework will permit innovative solutions to be put forward including: new sources of water; shared sources of water; transfers; demand management solutions; leakage services and catchment management improvements.</p>

This will include utilising options beyond its boundary to mitigate risks in its own area (and also looking beyond its boundary to understand how it can support long-term resilience elsewhere).

Ambitious and innovative plan:
Strong evidence that innovative approaches will deliver sector-leading operational resilience including the role of partnership, use of markets, catchment management and other softer option in combination with fixed asset based solutions.

Secondary Focus Areas

OC1	Delivering outcomes for customers
CMI1, CMI2	Targeted controls, markets and innovation

Executive Summary

The purpose of this document is to set out our bid assessment framework to support the market to deliver water resource management plan solutions which help the company meet its supply duty.

Innovative solutions put forward could include: new sources of water; shared sources of water; transfers; demand management solutions; leakage services and catchment management improvements.

All solutions put forward by third parties, as part of this bid process, must be compliant with all of the relevant legislation, regulations and guidance such as WRAS/Regulation 31 approved items.

With regards to Direct Procurement for Customers (DPC), please refer to [TA.15.1 DPC Screening Process](#).

Introduction

We supply water to more than one million homes and businesses in Kent, Sussex, Hampshire and the Isle of Wight.

Most of the region is officially classed as ‘water-stressed’, which means that at times the demand for water can be higher than the amount available. However, each county also has different water sources and experiences different weather. It's not unusual for one area to be in drought while supplies are normal in a neighbouring area. The map in Figure 1 (below) shows where we supply water and the average amount of water used. We divide the area into 14 ‘water resource zones’.

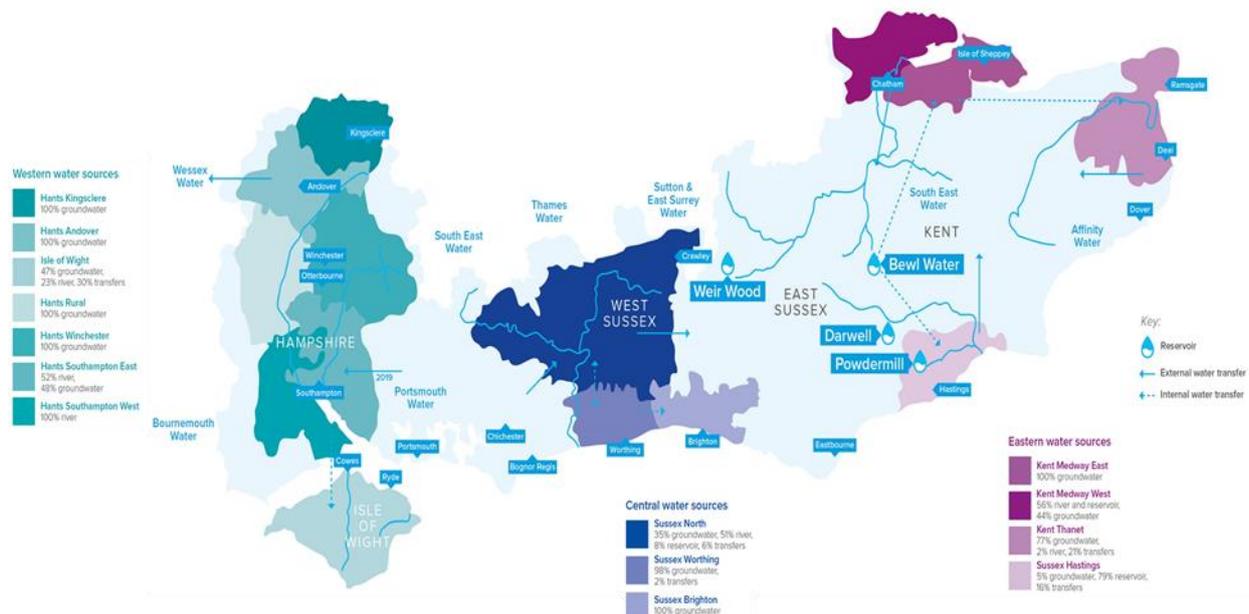


Figure 1: Water Supply Area

Existing obligations and rules

Our principles for the bid assessment framework draw on and reinforce principles from public procurement law and competition law. It also takes account of the requirement for Southern Water to take account of the requirements set out in the Water Resources Planning Guidelines.

The Water Resources Management Planning process

We published a draft Water Resources Management Plan (WRMP) in March 2018. The document sets out how we will secure resilient water supplies for our customers in the next 50 years, for a range of different futures.

The development of the plan starts by considering:

- how much water we have today;
- how much water we will have in the future;
- what the current demand is; and
- what the range of demands will be in the future.

This assessment is completed for each water resource zone. Once this data has been compiled a comparison of what we can supply, during severe and extreme droughts, now and in the future is made with what we anticipate is required, during a hot dry year, both now and in the future. When demand outstrips supply a potential deficit occurs and the company seeks to develop a solution to resolve this shortfall. A solution can be derived from one or more interventions.

Solutions are derived from a list of feasible options. This list of feasible options have either been developed by the company or third parties for and on behalf of the company. A feasible option is defined by the EA in the Water Resources Planning Guidance as:

“...a set of options that you consider to be suitable to take forward for assessment as part of your preferred programme of options. As such, it should not include options with unalterable constraints that make them unsuitable for promotion (e.g. unacceptable environmental impacts that cannot be overcome or options which have a high risk of failure).”

By applying the systematic, two-stage filtering approach as set out in our WRMP, we have developed a transparent option selection process from definition of the unconstrained list of options through to determination of the feasible list of options.

In developing this list of feasible options, the company has:

- advertised in the Official Journal of the European Union (OJEU);
- published a Statement of Need and Availability of Water;
- contacted neighbouring water companies either directly or as part of the work of the Water Resources in the South East (WRSE);
- used options that have been identified in previous WRMPs, which have been updated and reassessed against current environmental legislation or guidance;
- undertaken a targeted review of water abstraction licences within the region.
- reviewed representations from third parties directly; and
- utilised our supply chain partners who are aware of potential options which have been employed either in the UK or from around the world.

Following the consultation of the company's proposed draft WRMP, the plan will be reviewed and altered, if required. The Statement of response will set out how we propose to change our draft WRMP in response to the consultation responses we have received. Whilst this might appear that this closes the opportunity to submit any further bid information this is not the case. Even when the company has been given permission to publish its' WRMP there is still an opportunity for third parties to provide new feasible options. Any feasible options received by the company will be reviewed and included in the market information tables and the feasible option set for the company if the bid meets the criteria set out below. All feasible options will be used when either deriving the next WRMP or confirming the selection of the next choice of scheme for development. This approach ensures flexibility to accommodate new solutions as and when they arrive.

Competition law and procurement rules

We have a defined process which can be found in Appendix 3 – FNI226 Procurement, our internal Procurement Policy. The policy sets out the generic process applied to procurement to ensure bid assessment is objective, fair and has sufficient governance in place

The process is designed to meet a number of objectives

- Compliance with our procurement policy and our Commercial Procedures Manual (CPM)
- Compliance with the Utilities Contracts Regulations 2016 (the UCR) and any amended versions as well as attendant procurement case law and relevant guidance;
- Compliance with competition law
- Meeting the key principles of transparency, fair-competition and non-discrimination
- Meeting specific requirements of Ofwat's Appendix 8: Bid Assessment Framework.

Overview of our proposals and principles of the bid assessment

In this section we set out the principles of the bid framework and a summary of the approach that we will take to assess bids, where a bid is defined as a feasible option (s), which is or will be compliant with the relevant laws, regulations and best practice guidance (where relevant) at the time of its proposed implementation date. The proposed implementation date is the date from which we would achieve benefit from the proposed scheme, where benefit is defined in the procurement contract with the third parties.

The Principles

The company will abide with the three key principles set out by Ofwat, which are also the fundamental principles of public procurement law as set out in the Utilities Contract Regulations 2016. These are:

1. Transparency;
2. Equal treatment / non-discrimination; and
3. Proportionality.

We will take appropriate measures to identify and remedy any conflicts of interest in the bidding process and, when assessing third party bids against our own in house solutions, we will ensure that the selection of any schemes is undertaken in an objective way through our real options investment decision model. This assesses schemes on a cost effective basis

against the needs of the water resource zones as well as the uncertainty that is faced in those zones.

Overview of the bid process

The overall bid process will form of the following stages:

- Prequalification
- Specification of requirement(s)
- Time limits and bid clarification
- Evaluation
- Governance
- Communication of decision

These stages are detailed in sections below.

Prequalification

The third party bidder will provide sufficient information to demonstrate that the scheme they are putting forward meets the following criteria:

1. Currently is or will be compliant with all of the relevant legislation and Southern Water policies/standards.;
2. Specifies the volumetric benefit that the scheme could contribute on a daily or annual basis. The volumes quoted could refer to those associated either with a hot, dry spell or a severe / extreme drought;
3. The financial viability of the third party to deliver such a scheme;

Bids that are assessed should provide a benefit to one or more of our 14 water resource zones.

Specification of requirements

The need for an intervention will be set out in our WRMP which is published on our web site.

The WRMP will set out the potential deficits that each water resource zone faces. These deficits could occur at different times during the 50 year planning period. Therefore any scheme or project being put forward should outline how this will contribute to deficits faced in a particular zone(s) and over what time period. It is also advisable for the third party to look at the market information tables to understand what schemes are already being considered as potential feasible schemes.

Time limits and bid clarification

This phase of the process sets aside time for both parties to clarify the proposed offer, costs, regulatory compliance and other scheme details to ensure that the scheme is or will be deliverable, compliant with all necessary legislation, is resilient (financial, operational and governance) and can deliver the necessary benefits by the required timescales

Evaluation

This part of the bid assessment seeks to establish whether the option would be chosen in a preferred strategy. Ideally this evaluation would take place at the time of deriving the WRMP for the plan. However, if this option becomes available after the WRMP is authorised then

the submitted scheme will be tested, using the decision making framework of the WRMP process to see if it displaces a feasible option in the preferred plan.

If the scheme does not change the preferred plan then the scheme will remain in the feasible option list unless the third party wishes to withdraw the option. If the proposed third party option forms part of the preferred plan then it will be deemed as a viable planning alternative. If this option materially changes the WRMP then the company will consult on this alternative plan, as set out in the WRMP guidance.

The evaluation process will be transparent and follow all relevant procurement codes of practice. Each third party will be asked to complete a pre-qualification questionnaire.

The Pre-Qualification Questionnaire (PQQ) is there to identify interested parties, understand the outline of the solution(s) proposed, their technical, managerial and resource capability and their current financial position. To that end, Suppliers will be asked to complete the forms listed in Appendix 1 and Appendix 2.

PQQ Evaluation Process

Stage One - Completeness and compliance

An assessment will be undertaken in order to identify any applicant who should be disqualified in accordance with the bid criteria. Potential providers will also be assessed to determine that there are no irreconcilable conflicts of interest. Following confirmation that the potential applicant is eligible to participate in the procurement process, we will then establish whether the Applicant has complied with information requirements, responded to all questions and signed the undertaking set out in the appendix of this document. Applicants who are found not to have provided a complete and compliant response may be rejected, and those rejected will not progress to the next stage of the evaluation process.

Stage Two - Detailed assessment and short list selection

All applicants that have passed the Stage One assessment will be evaluated in accordance with the detailed assessment, conducted using the responses to the sections of the PQQ seeking their experience and capacity. These sections are either pass/fail or scored and include important values such as health and safety and modern slavery.

Stage Three - Final assessment

Where an Applicant has submitted a complete and compliant response as confirmed in the Stage One assessment, and has been selected to progress to the Invitation to Tender stage in the Stage Two assessment, we will undertake an assessment of responses to the financial suitability of the applicant, which will be assessed upon Pass/Fail criteria.

For the avoidance of doubt, the Final stage assessment will be conducted after the Stage Two assessment and only those suppliers who we intend to invite to tender will proceed to the Final stage, this will be reflected in the information provided within the notification sent to unsuccessful applicants.

Governance

All appropriate governance checks on third party bids will be completed in accordance with procurement best practice to ensure that the scheme being proposed is viable.

Conflicts

Southern Water has a detailed conflicts of interest policy to ensure the integrity of the procurement process. This will be applied in all cases and will ensure appropriate information barriers and ensure that the process embeds equal treatment and is not discriminatory.

Assessors

Assessors for each procurement will be assembled from in house resources. Further, for major procurements, an external moderator or assurance role will be engaged, particularly if there is an in house solution. .

Appeal and complaints

Appeals and complaints made pursuant to competition or procurement law have recourse through the courts. However, before a challenge escalates to that level, Southern Water would attempt to resolve through escalation and mediation.

Communication of the decision

If the third party option is selected as an alternative option then this decision will be communicated to the party and the next phase of contract negotiations will begin. These are set out below:

In house bids

Generally speaking, in house provision will be competed against the market. However, it is sometimes the case that in house provision is the more immediate, economic and efficient solution and that will be determined by applying the assessment criteria. In particular the following factors are relevant:

- Has market sounding been carried out to determine whether there is industry appetite and capacity?
- Is there a willing market?
- Is there a time imperative or constraint?
- Has the in-house option been benchmarked recently?
- Is there in-house capacity that would otherwise be under deployed?

Frameworks

In some cases a framework agreement may exist of suitable suppliers. Before a framework call off is made, the Bid Assessment Framework will be used to determine that the framework is appropriate, both in terms of how it was advertised, how framework contractors were selected and its terms and coverage.

Direct Awards

Where a procurement is of low value, it may be appropriate, economic and efficient to make a direct award (i.e. without competition) within the requirements and thresholds of the Utilities Contract Regulations. Before a contract is awarded directly, SWS will consider not only the value of the works, supply or services but also the risk profile, integration with other works and the whether the contract has an interface with stakeholders and customers.

Information

In order to ensure equal treatment, it is important that the market at large has sufficient information. This will allow appropriate solutions to come forward and allow the wider industry to respond without discrimination.

To that end all relevant information will be published in our website alongside our WRMP.

Applicable to all stages of the process

Following the evaluation of bids in line with our Procurement procedures, the supplier will be notified of his progression to the next stage or that they have been unsuccessful.

We will reserve the right to request additional information from a supplier at any stage. Failure to provide this information could result in the bidder's disqualification. In addition

disqualification may also occur where referees cannot corroborate, validate or clarify information provided.

No information contained in this Bid Assessment Framework or in any communication made between Southern Water and any Applicant in connection with this process, will be relied upon as constituting a contract, agreement or representation that any contract shall be offered in relation to this Bid.

Sales/ Advertising information

No company advertising or sales information should be submitted with the response.

Bidders' Costs

Southern Water will not be responsible for any financial outlay incurred as a result of preparing the submission at this or any future stage in the process. External Tenderers participate at their own cost, risk and expense and this is normal in the procurement market.

However in order to ameliorate the market's concerns and to ensure openness and fair competition, the following measures will be adopted:

- Tender processes will be as streamlined as possible without unnecessary stages which increase Tender costs;
- Each Tender process of any significance will be commenced with a Tenderer information day or "hot start" in order to assist the market in understanding the requirement;
- Standard documents (where applicable also market standard) will be deployed to ensure that Tenderers are able to reuse material without having to redraft standard answers (for example in relation to mandatory rejection criteria as set out in the UCR);
- Deploying Self certification and self-cleansing where appropriate in keeping with Government procurement guidance.

Appendix 1: Bid Assessment Criteria (Supply Side)

Appendix 1 – Bid Assessment Framework. These criteria are set out here to reflect the WRMP options criteria. They also apply to the planning stages, PQQ and Award criteria but will have greater or lesser applicability to each stage. For example, information criteria will be relevant only to PQQ whereas others are more applicable to Tender evaluation.

Option Details	Company
Option Details Security and Resilience	Option Name
	Option Reference
	Option Description
	Resource Type (Raw/ Potable)
	Deployable Output (Ml/d) for Dry year average and dry year critical period
	Option earliest start date
	location of solution and connection point into SWS network
	Coordinates
	An assessment of the risk and uncertainty associated with the option, including the likelihood and impact of reducing yield due to climate change, environmental constraints and the occurrence of drought
	For the occurrence of drought , describe and demonstrate the resilience of the option to severe drought, including the nature and severity of droughts that have been tested; as a minimum we expect that it would provide resilience to drought with an approximate 0.5% chance of annual occurrence
Security and Resilience Operational Regime	An assessment of the flexibility of the option to adapt to future uncertainty
	An explanation of whether the option depends on an existing scheme, or is mutually exclusive with another scheme
	Any factors or constraints specific to the option
	Water quality data to be provided by the bidder if they are an incumbent water company to all for a DWSP risk assessment on discoloration, nitrates, pH, and disinfection by-products, sufficient to meet the requirements of Regulation 15 of the Water Supply (Water Quality) Regulations 2016 (in England), and to allow us to undertake an assessment of the potential impact of mixing of different water types within our distribution network

	Description of how the option will be utilised. E.g. id the bulk export to be a 365 days per year, or is only required in drought etc Enough information on how it will be operated to allow the WRP tables to be completed.
Cost Information	Bulk Export Cost £/Ml
To ensure the protection and enhancement of biodiversity, priority habitats and species	Will the option protect and enhance priority species, habitats and sites designated for their nature conservation value?
To ensure the protection and enhancement of biodiversity, priority habitats and species	Will the option protect and enhance non-designated sites and local biodiversity?
	Will the option provide opportunities for new habitat creation or restoration and link existing habitats as part of the development process?
	Will the option protect and enhance coastal and marine habitats and species?
	Will the option result in a change in the quality of habitats due to changes in groundwater/river water quality or quantity?
	Will the option affect riparian vegetation structure?
	Will the option minimise the loss of best and most versatile agricultural land?
To ensure the appropriate and efficient use of land and protect soil quality and geodiversity	Will the option protect and enhance soil health?
	Will the option minimise conflict with existing land use patterns?
	Will the option minimise land contamination?
	Will the option utilise previously developed (brownfield) land?
To protect and enhance water quality and surface and groundwater resources and the ecological status of water bodies	Will the option protect and enhance protected sites designated for their geological interest and wider geodiversity?
	Will the option minimise the demand for water resources?
	Will the option protect and improve surface water, groundwater and coastal water quality?
To protect and enhance water quality and surface and groundwater resources and the ecological status of water bodies	Will the option result in changes to river flows?
	Will the option result in changes to groundwater levels?
	Will the option prevent the deterioration of Water Framework Directive (WFD) waterbody status (or potential)?
To reduce the risk of flooding	Will the option have the potential to cause or exacerbate flooding in the catchment area?
To reduce the risk of flooding	Will the option have the potential to help alleviate flooding in the catchment area?

To limit the causes and effects of climate change and increase resilience to the consequences of climate change	Will the option enhance water infiltration and retention?
	Will the option be at risk of flooding or be affected by flooding, if it occurred?
	Will the option reduce vulnerability to the effects of climate change by appropriate adaptation?
To limit the causes and effects of climate change and increase resilience to the consequences of climate change	Will the option increase environmental resilience to the effects of climate change?
	Will the option reduce or minimise greenhouse gas emissions?
	Will the option deliver new infrastructure that is energy efficient or makes use of renewable energy sources?
To maintain and enhance the economic and social wellbeing of the local community	Will the option ensure sufficient infrastructure is in place for predicted population increases?
	Will the option create local employment opportunities?
To maintain and enhance the economic and social wellbeing of the local community	Will the option support the local and regional economy?
	Will the option ensure that an affordable supply of water is maintained and vulnerable customers protected?
	Will the option avoid disruption through effects on the transport network?
To ensure the protection and enhancement of human health	Will the option ensure the continuity of a safe and secure drinking water supply?
	Will the option ensure that surface water and bathing water quality are maintained within statutory standards?
	Will the option adversely affect human health by resulting in increased noise and/or adverse effects on air quality?
To promote the wise use of resources	Will the option affect opportunities for recreation and physical activity?
	Will the option minimise the demand for raw materials?
	Will the option lead to reduced leakage from the supply network?
To promote the wise use of resources	Will the option improve efficiency in water consumption?
	Will the option seek to minimise the demand for raw materials?
	Will the option reduce or minimise energy use?
	Will the option promote the re-use and recycling of waste materials and reduce the proportion of waste sent to landfill?
To conserve and enhance cultural and historic assets	Will the option promote the use of sustainable design and materials?

	Will the option conserve or enhance the historic environment, including heritage assets such as historic buildings, conservation areas, features, places and spaces, and their settings?
To conserve and enhance cultural and historic assets	Will the option conserve or enhance archaeological sites and/or remains?
To conserve and enhance landscape character and other protected features	Will the option affect public access to, or enjoyment of, features of cultural heritage?
	Will the option minimise adverse visual impacts?
To conserve and enhance landscape character and other protected features	Will the option avoid adverse effects on, and enhance where possible, protected/designated landscapes (including woodlands), townscapes or seascapes such as National Parks-or AONBs be avoided?

Appendix 2: Bid Assessment Criteria (Demand Side)

Appendix 2 – Bid Assessment Framework. These criteria are set out here to reflect the WRMP options criteria. They also apply to the planning stages, PQQ and Award criteria but will have greater or lesser applicability to each stage. For example, information criteria will be relevant only to PQQ whereas others are more applicable to Tender evaluation.

Information Grouping	Data Required
Option Details	Company
	Option Name
	Option Reference
	Option Description
	Type (Metering/ Leakage/ Other)
	Option earliest start date
Security and Resilience	An assessment of the risk and uncertainty associated with the option, including the likelihood and impact of reducing yield due to climate change, environmental constraints and the occurrence of drought
	An assessment of the flexibility of the option to adapt to future uncertainty
	An explanation of whether the option depends on an existing scheme, or is mutually exclusive with another scheme
	Any factors or constraints specific to the option
Water Quality	Details of how Compliance with water quality regulations will be maintained (where applicable)
Operational Regime	Description of how the option will be implemented including how data will be managed
Cost Information	Unit Cost £/Ml
	Details of the benefits and costs
	The environmental and social impacts of the option. Including carbon.
Strategic Environmental Assessment	Guide Questions
To maintain and enhance the economic and social wellbeing of the local community	Will the option ensure sufficient infrastructure is in place for predicted population increases?
	Will the option create local employment opportunities?
	Will the option support the local and regional economy?
	Will the option ensure that an affordable supply of water is maintained and vulnerable customers protected?

	Will the option avoid disruption through effects on the transport network?
To ensure the protection and enhancement of human health	Will the option ensure the continuity of safe and secure drinking water supply?
To promote the wise use of resources	Will the option minimise the demand for raw materials?
	Will the option lead to reduced leakage from the supply network?
	Will the option improve efficiency in water consumption?
	Will the option seek to minimise the demand for raw materials?
	Will the option reduce or minimise energy use?
	Will the option promote the re-use and recycling of waste materials and reduce the proportion of waste sent to landfill?
	Will the option promote the use of sustainable design and materials?

Appendix 3: Procurement Procedures

FNI 226

OBJECTIVE

To control the procurement of goods, works and services.

This instruction covers all financial commitments made in Southern Water's name for the acquisition or supply of services, goods or materials, or for the execution of works.

[Note: Financial Commitment includes any order, purchase, sale or agreement for works irrespective of the manner of its documentation.

RESPONSIBILITIES

Director of Procurement

- Defining the processes and responsibilities necessary to control the procurement of goods, works and services
- Ensuring that the processes within the Commercial Procedures Manual (CPM) are followed throughout the business

Chief Financial Officer

- Establishing adequate control procedures to manage the risks associated with the procurement of goods, works and services

All Staff - involved in purchasing (All Business Areas)

- Ensuring that the policies and procedures set out in the CPM and this instruction are followed

PROCEDURE

Process

The processes for procurement of all goods, works and services are defined in the Commercial Procedures Manual (CPM). These must be followed at all times. In particular it should be noted that the CPM require that a Commercial Approach document to be completed for all new procurement activity over £25k.

It should be noted that split requisitions / orders, and confirmation / retrospective orders are specifically prohibited, unless approved in advance by the Group Financial Controller.

Where a contractor is authorised within their contract to undertake work over and above the initial scope of an order, as part of other work that they perform, such work is regarded as a pre-authorised activity (as it is authorised up to a set sum in the contract) and not a retrospective order. Typically this additional work is identified and performed while the contractor performs the scoped out work that has been agreed in advance.

Payments

Payments must be in accordance with FNI 228 - Treasury, Cash Management and Payments.

Supplier's Period of Credit

SW standard terms for payments are 60 days. Payment terms may only be altered with the specific written approval of the Chief Financial Officer, Group Financial Controller, or Group Treasurer.

Suppliers

The Director of Procurement will maintain an authorised list of suppliers, in accordance with the Commercial Procedures Manual (CPM).

Segregation will be maintained between creating and authorising new suppliers as well as change control for amendments to supplier details.

The authorised list of suppliers will be checked against active suppliers within the Purchase Ledger on at least an annual basis. All active suppliers within the Purchase Ledger will be periodically reviewed, and obsolete suppliers made inactive.

INSPECTIONS / AUDITS

The requirements within this Financial Instruction will be subject to review by Internal Audit as agreed in the Audit Plan (see FNI 232).

All departments will be asked, through the Letter of Compliance process, to confirm that the provisions of the Financial Instructions are being followed.

TRAINING REQUIREMENTS

There are no formal training requirements associated with this instruction.

The priority for informal training is MEDIUM. Informal training is required to be carried out every three years, or on amendment of this instruction.

ASSOCIATED DOCUMENTS

[FNI 101](#) System Overview and Objectives

[CPM](#) Commercial Procedures Manual

POINT OF CONTACT

Any difficulties with the interpretation or operation of this instruction should be directed in the first instance to the Head of Group Accounts.