

Appendix 3

Whole House Retrofit Pilot Procurement Strategy Report



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1 Executive Summary

- 1.1 The Procurement Strategy sets out the detailed review and options appraisal process adopted by Corporate Procurement Services (CPS) in order to evaluate all available options to support the delivery of the Birmingham Whole House Retrofit Pilot. The report also sets out the recommended procurement routes for the delivery of 126 cross-wall properties to EPC A rating and 174 low-rise flats to EPC B+ rating.

2 Background

To support the sourcing options appraisal process and the development of the procurement strategy, CPS engaged the services of Local Partnerships, who are jointly owned by the Local Government Association, HM Treasury and the Welsh Government. Local Partnerships have a wealth of experience in public sector procurement and in particular, the housing and retrofit category areas. Local Partnerships have also contributed and supported in the following key project areas:

- Market review & consultation to determine / validate procurement routes
- Review of GLA & London Borough of Barking & Dagenham (LBBD) procurement strategies
- Review of GLA Retrofit Accelerator Homes Innovation Partnership (RAHIP) framework
- Development of potential evaluation criteria based on 300 pilot units and wider scaling across the portfolio.
- Risk Management
- Financial cost modelling based on the recommended procurement option(s)
- Options appraisal process

3 Market Analysis

3.1 Overview of Market Intelligence

- 3.1.1 Published intelligence providing an overview and analysis of the UK domestic energy efficiency market is limited and tends to focus more on the private sector than on retrofit at scale in the social housing sector. Much of it is over three years old, so will not reflect the impact of the Covid 19 lockdown (which is likely to have had both positive and negative impacts on demand and supply for home improvement works) and introduction of new government energy efficiency funding programmes from 2020 onwards.
- 3.1.2 In launching a 'Call for Evidence: Building a Market for Energy Efficiency'¹, in 2017, the Department for Business, Energy and Industrial Strategy (BEIS) noted that the energy efficiency products sector was at the time, the largest subsector in the low-carbon and renewable economy, with a turnover of over £13.9 billion and employing over 100,000 people. The insulation and retrofit subsector were also one of three parts of the low carbon economy where the UK was a net exporter in 2017.
- 3.1.3 BEIS acknowledged in its Call for Evidence, the fragmented nature of the domestic energy efficiency market and a lack of detailed knowledge of the distinct sub-sectors each with separate supply chains, installer bases, sources of finance and different regulatory drivers. Whilst the Government keeps detailed records of all measures delivered under Government funded or regulated schemes such as the Energy Company Obligation (ECO), it is aware that many more consumers undertake energy efficiency improvements independent of any Government support. This is particularly the case for measures that are valued by consumers independently of their energy-saving properties such as replacement windows and smart heating controls.
- 3.1.4 The Call for Evidence identified several barriers to developing the market for energy efficiency products and services on both the demand and the supply side. Supply side barriers include: the lack of the necessary skills to deliver retrofit, lack of industry coordination and a historic lack of long-term signals from Government, which has reduced confidence to invest in the energy efficiency market, particularly in relation to innovation and new services. Demand side barriers includes the perception that energy efficiency works are not reflected in increased property values; long pay-back periods; lack of affordable finance options and household disruption caused by the works.
- 3.1.5 The March 2021 Household Energy Efficiency detailed release: Great Britain Data to December 2020² found that at the end of 2020, 14.3 million GB properties had cavity wall insulation (70% of properties with a cavity wall), 16.6 million had loft insulation (66% of properties with a loft) and 772,000 had solid wall insulation (9% of properties with solid walls). Indicating that measure which were low cost, minimal disruption or previously subsidised were far more likely to have been delivered.
- 3.1.6 In March 2021, the House of Commons Environment Audit Committee published a critical and challenging report³ which criticised lack of Government action to date in addressing weaknesses in the domestic energy efficiency market and supply chain, which in turn threatens the UK's ability to meet its legally binding climate change targets. In particular, 'stop-start' policies and intermittent funding streams have resulted in a dearth of competent installers of energy efficiency measures. The report found that this

¹ <https://www.gov.uk/government/consultations/building-a-market-for-energy-efficiency-call-for-evidence>

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/970064/Detailed_Release_-_HEE_stats_18_Mar_2021_FINAL.pdf

³ <https://committees.parliament.uk/work/309/energy-efficiency-of-existing-homes/>

lack of competent and accredited tradespeople hampered the initial delivery of the Green Homes Grant Voucher Scheme, and that there is a significant risk that the Government will not meet its own heat pump installation targets for the same reason.

- 3.1.7 The UK Heat and Buildings Strategy (2021) identifies the need to grow the UK-based supply chain and deployment of heat pump systems. The strategy seeks to develop the market from approximately 35,000 heat pumps a year to at least 600,000 per year by 2028, replacing around 1.7 million fossil fuel boilers per year by the mid-2030s.

3.2 Description, Size, and Growth of the Market

- 3.2.1 The UK market for energy efficiency measures and services is fragmented and immature, characterised by Small and Medium Sized Enterprise (SME) suppliers, particularly in the owner occupied and Private Rented Sector (PRS) with some specialised insulation and heating providers but in the main is characterised by general repairs and maintenance and home improvement contractors.

- 3.2.2 Until recently, the market has been characterised by installation of low-cost measures including loft and cavity wall insulation, and replacement of older inefficient gas boilers with high efficiency condensing gas boilers and smart heating controls and meters. As these 'low hanging fruit' measure have largely been delivered, attention has turned to 'deeper' more expensive energy efficiency measures such as solid wall insulation hard to treat properties and installation of air source heat pumps (ASHP).

- 3.2.3 It is notoriously difficult to apply size and growth metrics to the energy efficiency market, in part due to its fragmented nature, and its interconnectivity with other markets such as home improvement and heating and the fact that in the private sector at least, many energy efficiency measures will be privately funded as part of other home improvement projects.

- 3.2.4 There is however a more mature market for larger scale improvement and modernisation of social rented homes, where the ability to use economies of scale allows individual or groups of social landlords to optimise quality and value from the supply chain using different types of procurement frameworks and Dynamic Purchasing Systems (DPS). Low level energy efficiency measures such as windows, doors, loft, and cavity insulation have been procured using such frameworks, but deeper retrofit works are starting to be reflected within these frameworks and indeed to have specific 'lots' dedicated to 'Whole House Retrofit' approaches.

- 3.2.5 Another challenge in describing and sizing this market is that the market segment that the proposed pilot is targeting, i.e., Whole House Retrofit to SAP B+ or higher, is very underdeveloped at any scale and in any tenure. Other than the limited 'Energiesprong'⁴ examples that we are aware of, we found little evidence of large-scale retrofit projects having delivered homes to B+ or higher SAP rating. We note that several such schemes are planned but are still in design stage.

3.3 Potential / Need to Shape Market

⁴ <https://energiesprong.org/>

- 3.3.1 The Government recognises the immaturity of this market and in recent years has introduced a 'carrot and stick' approach to stimulating the market, with minimum energy efficiency regulatory requirements introduced for rented accommodation and a series of new and enhanced government funding programmes, each aimed at stimulating different segments of the market.
- 3.3.2 These funding programmes include the Green Homes Grant voucher scheme (aimed at homeowners and which failed on several counts and was suspended within six months) and other more successful schemes aimed largely at fuel poor households including the Green Homes Grant Local Authority Delivery Schemes (GHG LAD) comprising of 3 phases including both private and social tenures; Home Upgrade Grant (HUG), mainly focussed on 'off gas grid' homes and Social Housing Decarbonisation Fund (SHDF), for social housing only. Meanwhile the fourth wave of the long running ECO scheme is being increased to a value of £1bn per annum.
- 3.3.3 As an example of the early status of these funding rounds, the BEIS GHG LAD scheme was introduced in 2020 and is therefore the most advanced in terms of delivery. Across the first 2 phases, to the end of January 2022, there had been 15,464 (13,210 LAD1+ 2254 LAD2) measures installed in 12,280 (10,412+1,868) households. To date, 38,229 (24,472 +13,757) households have been identified for funding under LAD Phase 1 and are expected to receive a measure. Of the installed measures, just over 3,000 have been for solid wall (external or internal) insulation, and 839 Heat pumps have been installed.
- 3.3.4 Following the 'Each Home Counts'⁵ report in 2016 which looked at issues of poor quality and customer service in the energy efficiency market, the Government has introduced a new standards framework 'PAS 2035'⁶ which provides a specification for the retrofit of domestic buildings, and details best practice guidance. Compliance with PAS 2035 is now a mandatory requirement for all government energy efficiency funding. TrustMark⁷ has been set up as the new quality mark within this framework and is supported by an Industry Code of Conduct and a Consumer Charter. New retrofit roles have also been introduced within the PAS 2035 process, with clear responsibilities and accountabilities established, to ensure quality in retrofit design, installation, and in-use.
- 3.3.5 Whilst this new standards framework is reassuring and will help to build demand for products and services over time, it is likely to create further supply bottlenecks in the short term at least, as operatives undertake necessary training to be certified for specific roles.

4 Procurement Routes

- 4.1 Local Partnerships have undertaken a high-level review of the available routes to market for delivery of the two business case options that will be tested during the pilot phase:

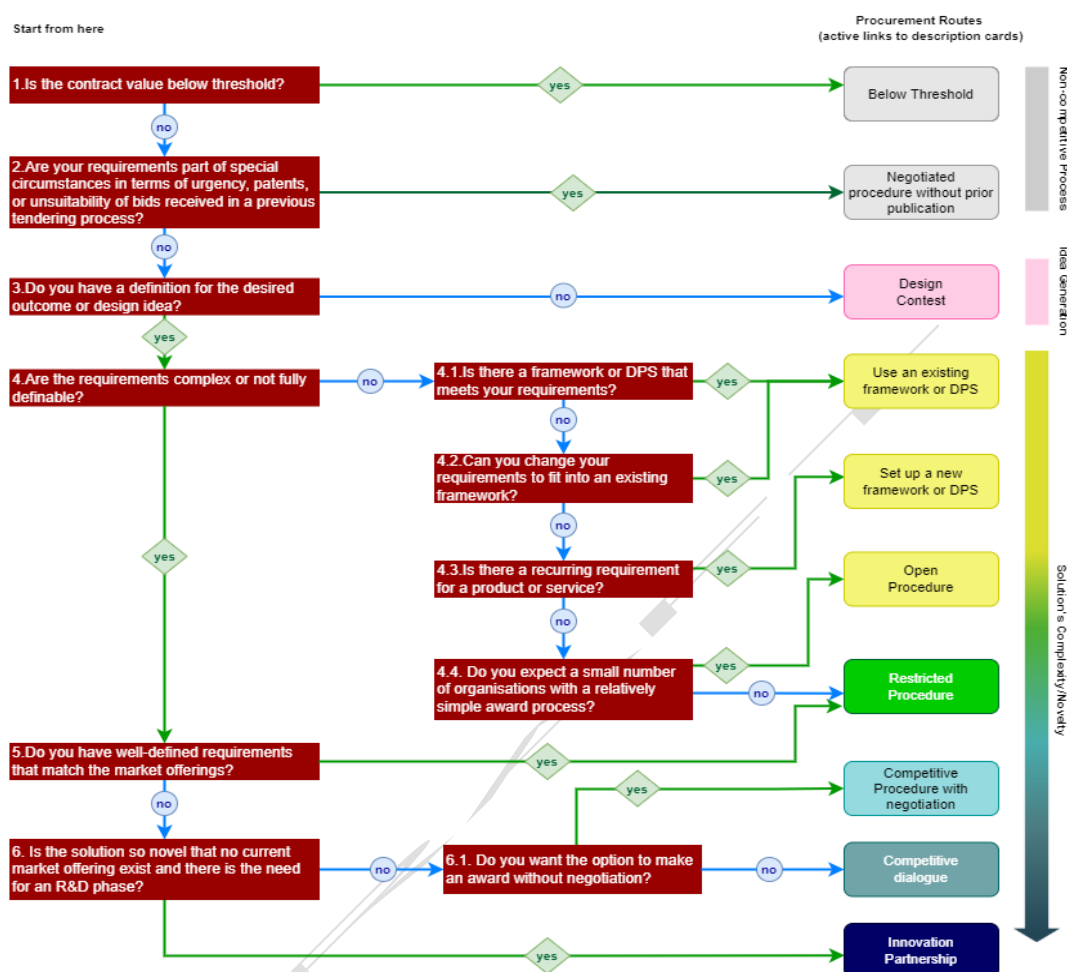
⁵ <https://www.gov.uk/government/publications/each-home-counts-review-of-consumer-advice-protection-standards-and-enforcement-for-energy-efficiency-and-renewable-energy>

⁶ <https://retrofitacademy.org/what-is-pas-2035/>

⁷ <https://www.trustmark.org.uk/>

- Option 2: EPC B+⁸
- Option 3: EPC A⁹

4.2 The below procurement decision tree was used to inform the most appropriate route to market based upon the Council's requirements for the pilot.



4.3 As the Council can define their requirements and the desired outcomes for the project, Local Partnerships undertook a review of existing framework and DPSs available to assess their suitability.

4.4 Identifying Options for Delivery of Retrofit Projects

4.4.1 Using the Energy Systems Catapult's 'Net Zero Go: Procurement Tool'¹⁰, along with additional wider market research, Local Partnerships have identified a mix of 33 frameworks and DPSs that exist to support the delivery of domestic retrofit.

4.4.2 To appraise these options in more detail, further desktop research and engagement with Framework owners has been undertaken to engage them on the suitability of their Agreements.

⁸ using existing Housing 2022-2024 Capital programme Repairs and Maintenance contractual arrangements with Equans to deliver WHR to EPC B+ rating

⁹ using the Energiesprong approach to WHR to deliver WHR to EPC A rating

¹⁰ <https://es.catapult.org.uk/news/net-zero-go-launches/>

4.4.3 After due consideration the following 10 Framework and DPS Agreements were shortlisted:

- Crown Commercial Services: Heat Networks and Electricity Generation Assets DPS (HELGA)
- Nottingham City Council: Energy Efficient Retrofit Installers DPS
- Fusion21: Council's current Provision of R&M, Gas Servicing and Capital Improvement Works Programmes – East Region of the City Contract (Fusion 21 Framework - Internal and External Refurbishment - Lot 1A Housing)
- Fusion21: Decarbonisation Framework
- Greater London Authority: Retrofit Accelerator Homes Innovation Partnership
- Greater London Authority and Local Partnerships: National Energy Performance Contracting Framework (RE: FIT)
- Pagabo: Refit and Refurbishment Framework
- Pagabo: Major Works Framework
- Places for People Group: Major Projects Framework 2
- Procurement for Housing (PfH): Capital Works and Associated Services

4.4.4 All of the above are Official Journal of the European Union (OJEU) compliant, which is necessary as the project exceeds the OJEU cost threshold and by extension The Public Contracts Regulations 2015.

4.4.5 Suitable options have then been appraised against a clear set of approved assessment criteria as detailed below.

5 Sourcing Strategy

5.1 As more than one route can be adopted to achieve the Council's aims and the requirements of the pilot, CPS have worked with Local Partnerships and the wider project team to develop assessment criteria, against which to assess and evaluate the suitability of existing Frameworks and DPSs. This criterion included, but was not limited to:

- Ownership of the Framework
- Scope of the Framework and it's suitability for the pilot
- How performance is or can be managed under the Framework
- The procurement methods availability and the associated impacts for BCC
- Fee levels and provision of/ access to support
- The supplier base – the range of providers and their suitability for the pilot
- The level of Framework use
- The cost model employed by the Framework
- Added value components

5.2 A detailed overview including the strengths and weaknesses of each suitable sourcing options, against the criteria above, is detailed in the attached 'Procurement Framework for Domestic Retrofit' file:



Procurement
Frameworks for Dom

- 5.3 Following detailed evaluation of all of the available options based upon the criteria above, CPS and Local Partnerships identified the following most suitable procurement routes for the delivery of EPC B+ and EPC A as follows:

5.3.1 EPC B+ - Procurement Option 1:

Council's Provision of R&M, Gas Servicing and Capital Improvement Works Programmes Contract – East Region of the City (2yr contract from April 2022 – 2024. Awarded via the Fusion 21 Framework - Internal and External Refurbishment - Lot 1A: Housing)

Strengths	Weaknesses
<p>Ownership: Birmingham City Council</p> <p>Cost Model: Bespoke Open Book</p> <p>Level of use: This contract is currently being utilised by the Council for housing repairs and maintenance, gas servicing and capital works programmes activity in the North, East & West regions of the City delivered in partnership with Equans.</p> <p>Fees: 0.5%</p> <p>Added Value: For every £100k of spend BCC would receive social value credits which can be used in many ways.</p> <p>Scope: The existing contract includes requirement that the Contractor/Supplier will assist the Member and the other Project Participants in exploring how the environmental performance and sustainability of the Works/Services might be improved, and environmental impact reduced.</p> <p>Level of Support: Full Contract Management Support</p> <p>Supplier Base: Allows BCC to compliantly access their existing strategic partner Equans for delivery of the services</p>	<p>Level of use: Careful resource and work package allocation management must be adopted to ensure that the pilot will not create any operational / delivery risk to the Council's existing capital programme requirements.</p>

5.3.2 EPC B+ - Procurement Option 2:

Fusion21 Decarbonisation Framework

The Decarbonisation Framework was created by Fusion21, a social enterprise, experienced and specialising in the setting up and management of public sector procurement frameworks.

The Fusion21 Decarbonisation Framework was launched in January 2022 for the provision of decarbonisation works and services for use by current and prospective Members. The Framework is split into two Lots:

- Lot 1 - Whole House Decarbonisation
- Lot 2 - Decarbonisation of Public and Education Buildings

Strengths	Weaknesses
<p>Ownership: Social Enterprise</p> <p>Scope: The Framework has been principally designed to support delivery of whole house retrofit.</p> <p>Supplier base: Regional Lots/ good range of suppliers with specific sector expertise, including BCC's existing strategic partner.</p> <p>Procurement method: Birmingham are an existing member of Fusion 21 and currently use the Construction Works and Improvements Framework to deliver their repairs and maintenance contract. Opportunity for direct award and mini competition.</p> <p>Level of use: Although untested, there is a pipeline of 50 authorities since launch in Jan 2022 with 30 authorities who have confirmed their plans to use it.</p> <p>Performance guarantees: Works approach based upon 'whole house' retrofit measures to PAS2035:2019 standards (Not Guaranteed).</p> <p>Cost model: Schedule of rates for a large range of tasks focussed on decarbonisation activities.</p> <p>Level of support: Supported framework</p> <p>Added value: For every £100k of spend BCC would receive social value credits which can be used in many ways.</p>	<p>Level of use: New Framework means that it is untested at present.</p> <p>Performance Guarantees: No performance guarantee built in. These would need to be drafted and tested with providers to assess their appetite to bid.</p> <p>Procurement method: Direct report award can be supported by Fusion21. Direct award would need to mirror the Framework terms and conditions and pricing. If there was a variance then the contract would need to be offered to the highest-ranking supplier on the framework first and then through the rankings if they decline the opportunity.</p> <p>Fees: Potential for high level of framework fee.</p> <p>Procurement method: Direct procurement, without competition, could create value for money issues. Timescales for direct award vs mini competition appear unrealistic.</p>

When the framework was launched in January 2022, there were 20 providers appointed to the Framework, including the Council's existing strategic partner Engie Regeneration Limited (now Equans).

There is the option to direct award to a single provider (providing all required criteria is met) or undertake further mini competition under the Framework. The pros and cons of these options are outlined below:

Approach	Strengths	Weaknesses
Mini Competition	<p>Good range of suppliers with sector specific experience.</p> <p>Mini competition would allow BCC to:</p> <ul style="list-style-type: none"> • Test the market and assess and range of services • Chose the supplier that offers the best value for money • Assess market appetite in advance of programme rollout 	<p>Indicative timescales of 3 months for appointment.</p> <p>Soft market testing may be required to assess levels of interest.</p> <p>Potential for high number of bidders.</p>
Direct Award	<p>Indicative timescales of 3 weeks for procurement.</p> <p>A direct award report can be produced by Fusion21, but BCC would need to satisfy itself of the justification for this approach.</p> <p>Birmingham could select their pre-existing strategic partner, if required.</p>	<p>Timescales for direct award appear optimistic.</p> <p>A specification will be required for either mini-competition or direct award.</p> <p>Direct award would need to mirror the Framework terms and conditions and pricing. If there was a variance, then the contract would need to be offered to the highest-ranking supplier on the framework first and then through the rankings if they decline the opportunity.</p> <p>Direct procurement, without competition, could create value for money issues.</p>

5.3.3 EPC A - Procurement Option 1:

Retrofit Accelerator Homes Innovation Partnership (RAHIP)

RAHIP was created by the GLA under an Innovation Partnership¹¹, which aims to provide a scalable, performance assured standard whole house net zero energy solution for retrofitting homes at an economic price point.

The GLA identified the need for an innovative solution that could not be met by what was available on the market.

RAHIP uses the Energiesprong approach, a whole house approach to retrofit whereby homes are fully insulated using offsite manufactured wall and roof panels in conjunction pre-assembled 'energy pods' providing low-carbon, high efficiency heating, hot water and renewable energy production delivered. The end result is homes that are brought up to a minimum net-zero energy standard, creating warmer, more desirable places to live.

Strengths	Weaknesses
<p>Ownership: Public Sector led</p> <p>Cost Model: Open book cost model with Gross Maximum Price (GMP) established early the procurement process to achieve a high level of cost certainty.</p> <p>Level of use: Well tested in the Netherlands and being piloted by a limited but growing number of authorities in the UK.</p> <p>Fees: Low fee levels compared to other options. A target cost is agreed at each stage of the development process to support cost reduction.</p> <p>Added Value: Collaborative approach to whole house retrofit, driving innovation in the sector and sharing lessons learnt across the wider sector.</p> <p>Level of Support: Supported framework</p> <p>Supplier Base: Solution Providers are pre-qualified and understand the requirements of retrofit projects and the Energiesprong requirements, including the Council's existing strategic partner. Low to medium risk of poor response to Tender.</p> <p>Performance guarantees: One of the only tested approaches to delivery of whole house retrofit with performance guarantees and remedial actions for underperformance (via the Energiesprong model). 10-year performance guarantee and a pre-existing option for a tenant comfort plan. Solution</p>	<p>Scope: Exclusively for the delivery of the Energiesprong whole house retrofit model. Not appropriate for lower level savings options.</p> <p>Level of Use: Innovation Partnership is in the developmental stage and has not been tested at scale by individual authorities.</p> <p>Supplier Base: Although pre-approved, there is a limited number of suppliers who are developing innovative approach to whole house retrofit. Providers are accessed on a rotational basis, therefore there is no option for the Council to select a partner. A partner will be selected for them.</p>

¹¹ <https://www.legislation.gov.uk/ukxi/2015/102/regulation/31/made>

provider is liable for underperformance charge if performance and maintenance levels are not met (capped at 15%). Over the Guaranteed Maximum Price (GMP) savings are shared between the tenant and the solutions provide (Up to 10%)	
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It should be noted that the GLA intend to launch a National Framework in 2023 to build upon the developmental process currently being utilised by authorities under the Innovation Partnership.

Framework Evaluation and Selection Criteria

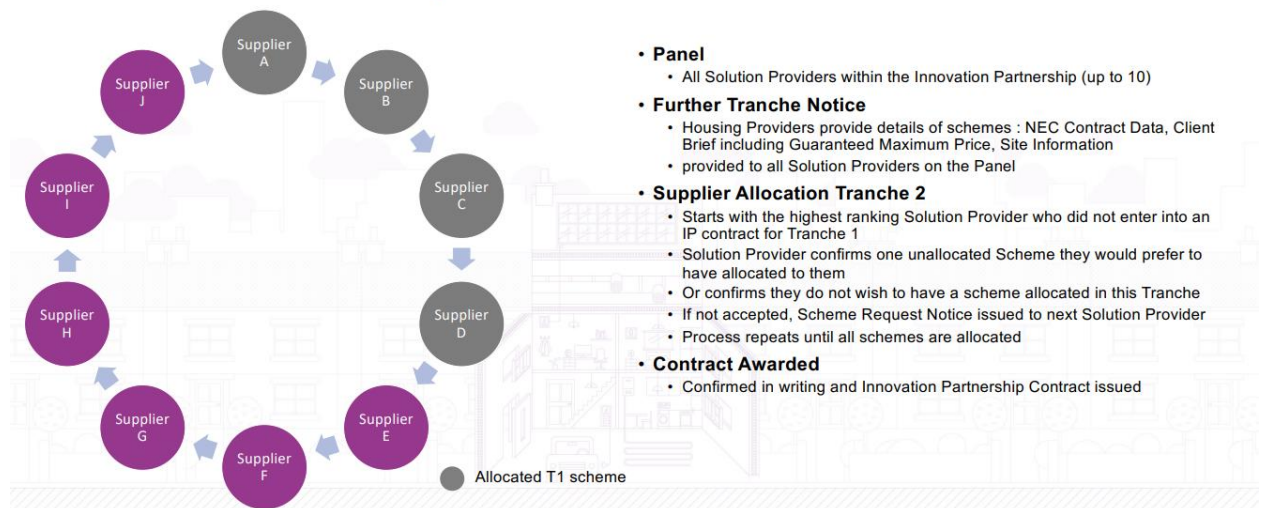
A panel of 4 solution providers have been procured by the GLA, available for projects delivering phased works through until 2030. The four providers are:

- Osborne – Carbon Neutral Solutions
- United Living Property Services
- Mi Space (now Bell Group) *
- Engie (now Equans)

**Mi Space do not operate in the Midlands area and would therefore, not be considered under this framework option.*

Contracts are awarded via the direct award process and accessed on a rotational 'Carousel' basis. This means that there is no option for the Council to select a preferred delivery partner, and therefore a delivery partner will be selected for them. If the delivery partner does not accept the service, then it is offered to the next provider until a suitable delivery partner is accepted. It should be noted that the landlord also has the option to reject the allocated solution provider.

Tranche 1 + Subsequent Scheme Allocation



All providers have been vetted to ensure sufficient experience and suitability to participate in the Innovation Partnerships delivery of services under this framework agreement.

6 Recommended Procurement Routes

6.1 Following final evaluations and consultation with the wider project team, CPS and Local Partnerships have identified the following procurement routes as the most appropriate for the delivery of this pilot:

- **EPC B+:**
Council's Provision of R&M, Gas Servicing and Capital Improvement Works Programmes Contract – East Region of the City (2yr contract from April 2022 – 2024. Awarded via the Fusion 21 Framework - Internal and External Refurbishment - Lot 1A: Housing)
- **EPC A:**
Retrofit Accelerator Homes Innovation Partnership (RAHIP) Framework

7 Forms of Contract

7.1 EPC B+: Council's Provision of R&M, Gas Servicing and Capital Improvement Works Programmes East Region of the City (bespoke contract).

The rationale for the use of the Council's existing terms & conditions for the delivery of these works is that it has been created for the delivery of the Council's Capital Works Programme and therefore, provides sufficient flexibility to accommodate the pilot's EPC B+ scope and specification requirements.

The council will need to develop a clear contract variation for delivery of EPC B+, including performance requirements at both the individual and portfolio level, and rights and remedies to protect the Council, ensure good performance and assess the commercial consequences of underperformance (beyond existing suspension and termination rights).

7.2 EPC A: NEC4

RAHIP's rationale and preference for the use of the NEC4 Framework Contract suite of documents is that they have been created for a collaborative delivery model such as Innovation Partnership led projects and therefore, with supplementary Z clause amendments, provides sufficient flexibility to accommodate the Retrofit Accelerator Programme's requirement for a framework structure and scheme-based delivery.

7.3 Service Delivery Management

7.3.1 Contract Management

All contractual arrangements in relation to the delivery of this project will be managed operationally by the Head of Service and the Asset Management and Maintenance Division of City Housing.

7.3.2 Performance Management

Performance management measures will form part of the contract including the delivery of the agreed Social Value outcomes.

The council will need to:

- Work to understand the council's requirements and define within the contract terms
- Detail the performance framework and specific performance requirements
- Define the measurement approach for individual properties and pilot portfolio

- Identify performance requirements for wider Council specific objectives, including social value and information gathering
- Develop clear rights and remedies to protect the Council, ensure good performance and assess the commercial consequences of underperformance, beyond termination and suspension of a contractor.

8 Alternative Options Considered and Recommended Proposal

- 8.1 To do nothing – this is not an option as this would leave the Council without any formal contractual arrangements, nor any ability to trial retrofit interventions to reduce the carbon emissions from the Housing stock. This would lead to only carrying out standard BAU activities with repairs and maintenance undertaken without an EPC target - leading to multiple interventions over many years for individual properties?
- 8.2 Alternative procurement options are detailed in paragraph 5.2.

9 Consultation

9.1 Internal

The Cabinet Member for Housing have been consulted on the contents of this report.

Officers from Finance, CPS and Legal and Governance have been involved in the preparation of this report.

9.2 External

This is covered in the Cabinet Report dated 4 July 2022.

10 Risk Management

- 10.1 The CPS approach is to follow the Council Risk Management Methodology and the Procurement Team is responsible for local risk management. CPS maintains a risk management register and documentation relevant for each contract.
- 10.2 The risk register for the service will be managed at project level by the Project Manager and at City Housing Transformation Programme level by the Housing Management / Capital Investment & Repairs Transformation Programme, City Housing Transformation Programme Director and Programme Board with arrangements being put in place to ensure commercial and operational risks are appropriately mitigated.
- 10.3 Risk management methodology will follow the City Council's standard approach as agreed with the Corporate PMO.

11 Compliance Issues:

- 11.1 The proposals within this report will make a direct contribution to both Corporate and Directorate outcomes.
- 11.2 Please refer to the Enhanced Business Case (EBC), Section B – Strategic Case - B4 - Social Value outcomes.
- 11.3 The payment of the Real Living Wage (RLW) will apply throughout the contract period. This will require employees of the potential suppliers engaged on this contract to be paid the RLW.

12 Legal Implications

- 12.1 The proposed allocation of work is consistent with the effective management of the Council's housing stock under Part II Housing Act 1985.
- 12.2 Legal Services have been consulted and have worked with CPS in relation to the recommended procurement routes for the delivery of EPC B+ and EPC A.

13 Financial Implications

- 13.1 Please refer to the Enhanced Business Case (EBC), Section E – Financial Case

14 Procurement Implications

- 14.1 This report concerns a procurement strategy and any implications are detailed throughout the report.

15 Human Resources Implications

- 15.1 The procurement exercise and the subsequent contract management of the contract will be undertaken by Council employees.

16 Public Sector Equality Duty

- 16.1 Regarding section 149 of the Equality Act 2010, the proposed operating model has no practices that could be considered unfair, unlawful or discriminatory within this context. The Equality Assessment (EA) that reflects the changes of this proposal will be monitored and re-evaluated at the end of consultation

17 Appendices

- 17.1 N/A