

Report of Head of Decarbonisation

Subject: Socially Responsible and Sustainable Procurement Policy and Socially Responsible Procurement Strategy

Purpose of Report

The purpose of this report is to seek formal approval from the National Park Authority of the Authority's Socially Responsible and Sustainable Procurement Policy and Socially Responsible Procurement Strategy (2024-2029)

Introduction/Background

[The Social Partnership and Public Procurement \(Wales\) Act 2023](#) has introduced the socially responsible procurement duty which the Authority needs to comply with. Under this new duty "A contracting authority must seek to improve the economic, social, environmental and cultural well-being of its area by carrying out public procurement in a socially responsible way." A contracting authority must set and publish socially responsible procurement objectives designed to maximise its contribution to achieving the well-being goals and prepare an associated strategy.

An updated Policy and Strategy has been developed in consultation with Management Team National Park Members and staff. The Strategy sets out the Authority's socially responsible procurement objectives.

The policies have been reviewed with key staff members including the Performance and Compliance Officer, finance team and building and projects team.

The review has considered updated legislation, value for money as identified in recent internal audit recommendations as well as the Authority's corporate plan and well-being objectives.

Key changes to the policies include:

- Incorporation of socially responsible procurement duty obligations
- Updated onto new format and changes.
- Changes reflect most up to date legislation, removal of referenced to EU legislation
- Updated information about decarbonisation, circular economy and social value principles
- Updated related policies and operating procedures
- Addition of modern slavery statement

Financial considerations

There are financial considerations regarding implementing the policy and strategy, which include additional resources to implement the strategy initially, for example with creating templates, delivering training, setting up frameworks. However once the above has been implemented there should be minimal additional cost.

Risk considerations

Risk of noncompliance with current procurement legislation and the financial and reputational risk associated.

Risk of not meeting our decarbonisation targets, monitored on supply chain – supply chain emissions being our highest area of emissions.

Risk in implementing additional measures and recommendations we do not receive enough interest in tenders, particularly from local SME's.

Compliance

The Authority must comply with procurement legislation including new Social Partnership and Public Procurement (Wales) Act 2023 and Procurement Act 2023 (UK Government). The Authority is in the process of reviewing its Standing Orders relating to Contracting Procedures.

The Authority must comply with the Welsh Specific Duty on Procurement under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011.

The Authority must also comply with Welsh Language Standards 76, 77, 77A, 79, 80 as part of procurement processes.

Our strategy is informed by the following:

- The Well-being of Future Generations (Wales Act) 2015
- Procurement Act 2023 (UK Government)
- Social Partnership and Public Procurement (Wales) Act 2023
- The Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Wales Procurement Policy Statement
- Net Zero Carbon Status by 2030 – sets out the Welsh Government's route map for decarbonisation across the Welsh Public Sector. Procurement is identified as a priority area for action.
- Welsh Language Standards

Human Rights/Equality issues

The Equality Act / Equality Act (Statutory Duties) (Wales) Regulations 2011 is referenced within the Policy (section 5.2).

Ethical employment in the supply chain and a fair right to work is referenced (section 5.3)

Examples of social value include equalities and fair work practise (section 8.4)

Procurement can play a crucial role in addressing modern slavery risks, a modern slavery statement is included in the Policy.

The Strategy includes objectives on:

- Improve Fair Work and equality practices adopted by suppliers
- Increasing community benefits and social value delivered by suppliers

In terms of the Strategy Action Plan, consideration of Equality and Inclusion, Fair Work and Modern-Day Slavery has been factored in across a number of areas and related actions. This should support improved understanding and practices on equality and inclusion in Authority procurement activities and strengthen our approach in terms of the Welsh Specific Equality Duty on procurement.

Biodiversity and Sustainability implications

Decarbonisation and nature recovery added to the Policy (section 7). Including requests for environmental specifications in all contract documentation and ensuring environmental criteria are used in the award of contracts.

The Strategy includes objectives on

- Contribute to the Authority's aim to be carbon neutral by 2030 and support the Park to achieve carbon neutrality.

In terms of the Strategy Action Plan, consideration of carbon reduction has been factored in across several areas and related actions. This should support improved understanding and practices on carbon reduction in Authority procurement activities

Welsh Language statement

Any external bodies or businesses that provide services on behalf of the Authority are expected to do so in accordance with the Welsh Language Standards that are placed on the Authority.

Welsh language standards are referenced in section 5.2

In terms of the Strategy Action Plan, consideration of Welsh Language has been factored in across a number of areas and related actions. This should support improved understanding and practices on Welsh Language in Authority procurement activities and strengthen compliance with Welsh Language Standards.

Recommendation

Members are asked to approve the Socially Responsible and Sustainable Procurement Policy and Strategy.

Background Documents

- [Social Partnership and Public Procurement \(Wales\) Act 2023](#)
- [Procurement Act 2023](#)
- [Welsh Government – Overview of the Socially Responsible Procurement Duties](#)

Author: Jessica Morgan

Consultees: All Staff, All members, Management Team, finance team.



Pembrokeshire Coast National Park Authority

POL_SU3 Socially Responsible and Sustainable Procurement Policy

Version	Active Date	Document Owner	Internal/ External
2		Head of Decarbonisation	

Please note: Policy Control Sheet is at the end of the document. Policy document is uncontrolled once printed. Please refer to the Authority's Intranet site for up-to-date policy.

Does this Policy relate to me:

- This policy relates to everyone that procure materials, good and services, on behalf of the Authority. From small items under £1 to large scale capital projects.

Quick Reference - Key Policy Messages:

- Delivering long-term sustainable social and economic value outcomes from National Park Authority spend
- Use Procurement to support delivery of our corporate strategy, aims and values and wellbeing objectives.

[This policy is also available in Welsh]

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1. Policy Statement

- 1.1 This policy sets out the general principles that the Pembrokeshire Coast National Park Authority will follow across all its procurement and commissioning activities to ensure that it is undertaken in a socially responsible and sustainable manner.
- 1.2 The Authority will plan and manage its procurement activities to meet corporate aims and objectives and comply with regulatory and legislative requirements.
- 1.3 This policy supports the commitment and objectives to socially responsible and sustainable procurement which is set out in the Socially Responsible Procurement Strategy 2024 to 2029:
 - Ensuring legal compliance and robust transparent governance
 - Contribute to the Authority's aim to be carbon neutral by 2030 and support the Park to achieve carbon neutrality
 - Contribute to the Authority's aim to deliver nature recovery and connectivity
 - Make procurement spend more accessible to local small businesses
 - Improving fair work and equality practices adopted by suppliers
 - Increasing community benefits and social value delivered by suppliers
 - Securing value for money and managing demand
- 1.4 Before commencing any commissioning or procurement activity, consideration must first be whether there is an alternative approach to delivering the outcome without the need for the Authority to spend at all.

2. Aim of Policy

- 2.1 Pembrokeshire Coast National Park Authority spends public money each year on a diverse range of goods, services and works from third parties. It is important therefore that this spending power is aligned with our corporate well-being objectives.
- 2.2 Carrying out public procurement in a socially responsible way, in accordance with the sustainable development principle and socially responsible procurement duty is one of the ways the Authority can seek to improve economic, social, environmental and cultural well-being.
- 2.3 The supply chain is the Authority's biggest source of carbon emissions and as a result procurement practices play a central role on our pathway to net zero.

3. Scope of Policy

- 3.1 This policy covers all procurement of materials, goods and services, across the Authority.

4. Definitions

- 4.1 **Procurement** is the process of acquiring goods, works and services, covering

acquisitions from third parties. The process spans the whole cycle from identification of needs, through to the end of a services contract or the end of the useful life of an asset. The difference between procurement and commissioning is as follows, **Procurement** is the process of acquiring services through tendering. **Commissioning** is the broader process of planning and ensuring services are available, including pre-procurement activities.

- 4.2 **Social Value and Social benefit** in public procurement ensures that the needs of the community and environment are met and considered along with other desired contract values, such as value for money.
- 4.3 **Decarbonisation** is the process of stopping or reducing greenhouse gases, especially carbon dioxide, being released into the atmosphere as the result of a process, for example the burning of fossil fuels.
- 4.4 **Circular economy** is a model of production and consumption, which involves sharing, leasing, reusing, repairing, refurbishing and recycling existing materials and products as long as possible. In this way, the life cycle of products is extended. In practice, it implies reducing waste to a minimum.
- 4.5 **Value for Money** is defined by the Authority as the optimum combination of whole-of-life costs in terms of not only generating efficiency savings and good quality outcomes for the organisation, but also benefit to society, the economy, and the environment, both now and in the future.
- 4.6 **MAT Most Advantageous Tender.** The Procurement Act 2023 places an emphasis on social and environmental criteria in contracts. The new approach to corporate responsibility and greater weighting of sustainability strategies shifts the tender assessment method from the Most **Economically** Advantageous Tender (MEAT) to the Most **Advantageous** Tender (MAT). The Authority may award a public contract to the supplier that submits the **most advantageous** tender in a competitive tendering procedure. Most advantageous means the tender best satisfies the award criteria not just the most economically advantageous.

5. Legislation and Guidance

- 5.1 Controls within the procurement and financial processes exist to promote good practice and not only help the prevention of fraud but also protect the individuals concerned against allegations of fraud.
- 5.2 All procurement of goods and services must be carried out in accordance with:
 - Authority's Financial Standards and Standing Orders relating to Contracting Procedures
 - Procurement legislation and regulations including Social Partnership and Public Procurement (Wales) Act, 2023 and Procurement Act 2023.
 - Wales Procurement Policy Statement

- Well-being of Future Generations (Wales) Act 2015. Procurement is one of the seven corporate areas for change in the Act's statutory guidance.
- Welsh Language Standards - promote and facilitate the Welsh language and ensure that the Welsh language is not treated less favorably than the English language in Wales.
- Equality Act / Equality Act (Statutory Duties) (Wales) Regulations 2011- the Authority must have due regard to whether equality considerations should be included in award criteria to help meet the general equality duty. When we specify performance conditions in our agreements, we must have due regard to whether these conditions should include equality considerations to help meet the general duties. Supporting social value clauses, community benefits and fair work practices within the supply chain can also contribute to the Authority's compliance with the Socio-Economic Duty under the Equality Act.

5.3 Our approach will take into consideration the following guidance and policy areas:

- Ethical employment in supply chains: code of practice – Sets out Welsh Government's 12 commitments expected from recipients of public money when procuring goods and services.
- Net Zero Carbon Status by 2030 – sets out the Welsh Government's route map for decarbonisation across the Welsh Public Sector. Procurement is identified as a priority area for action. WPPN 01/20 Social value clauses/community benefits through public procurement
- A guide to fair Work, Welsh Government

6. Value for money

6.1. The Authority defines Value for Money as the optimum combination of whole-of-life costs in terms of not only generating efficiency savings and good quality outcomes for the organisation, but also benefit to society, the economy, and the environment, both now and in the future.

The Authority has a finite resource and spends public money. It must therefore ensure that value for money is a key consideration. It is important also to consider wider implications of spending for social, community, economy and the environment for future generations.

6.3 The Authority will ensure Value for Money in the procurement process using the MAT (Most advantageous tender) method of procurement which places an emphasis on social and environmental criteria in contracts. See point 4.6

6.4 The Authority will establish criteria by which the social and environmental impact can be considered during tender evaluation and this will be clearly identified in tender documentation. The weight given to the social and

environmental impact of the tender will be dependent on the Authority's perception of the risks, opportunities and priorities associated with that purchase. The Authority will review its contract specifications and assess them to ensure they comply with new environmental legislation and reflect current best practice.

- 6.5 Collaboration, networks and links with other organisations, can provide benefits to the Authority. Combining buying power with other organisations to procure or commission goods, works or services jointly or to create shared services should be seen as advantageous. This form of public-public partnership should, in appropriate circumstances, be regarded as an option capable of delivering economies of scale. Where there is a suitable Framework Agreement available, that Framework may be used.
- 6.6 The Authority should consider all aspects of costs including running and disposal costs and the initial purchase price. The main elements to include when considering Whole Life Costs are:
- Direct running costs – e.g. resources used over the lifetime of the product or service such as energy, water;
 - Indirect costs – e.g. loading on cooling plant arising from energy inefficient equipment, maintenance costs, training
 - Administration costs – e.g. COSHH overheads from buying hazardous products requiring additional controls and special handling and disposal;
 - Invest to save – e.g. investing in higher levels of insulation to save heating and reduce bills;
 - Recyclability - e.g. creating markets for our own waste by buying recycled products, to promote the development of long-term markets for localised recycling activities; and
 - Cost of disposal – e.g. paying a premium at the outset to reduce waste by choosing a product which is more durable, re-usable and recyclable and does not contain hazardous substances requiring disposal in a special way.
 - Consideration should be given to current UK and Welsh waste regulations.
- 6.7 After considering these aspects it may mean value for money is provided by investing in a more expensive product or service initially, to reduce costs and increase sustainability in the long-term.

7. Decarbonisation and Nature Recovery

- 7.1 The best environmental option is to use and therefore procure less. This will conserve resources, reduce pollution, and significantly reduce the waste produced. Before buying any goods consideration should be given to whether consumption can be reduced by reusing or repairing existing materials and goods. Investigations should include whether alternative procedures can be put in place to remove the need to buy goods and services. For example, can

goods be shared, borrowed or loaned rather than purchased.

7.2 The Authority will take a positive lead by carrying out its procurement activities in an environmentally responsible manner. The Authority will therefore work to:

- Reduce the number of goods and services procured by cutting down on waste and repairing or reusing existing goods;
- Simplify stock holdings and reduce over-ordering;
- Reduce single use items and work with suppliers to minimise/ eliminate single use items;
- Purchase products that can be recycled or disposed of with minimal environmental damage;
- Purchase products and services that use fewer natural resources in production and distribution and promote Fairtrade products;
- Take account of whole-life costs, quality, environmental impacts and other benefits and not just the initial price;
- Buy the most energy-efficient products where they give value for money, taking account of whole-life costs,
- Purchase locally where possible, to reduce the impact of transport.
- Purchase goods and services in a manner that supports the preservation and effective management of natural resources.

7.3 Wherever possible and practical the Authority will work with its suppliers, to decarbonise the supply chain by, working within the MAT approach:

- Promoting environmental awareness amongst suppliers and ensuring they are aware of the Authority's Socially Responsible and Sustainable Procurement Policy;
- Asking for a carbon reduction plan in all tenders and contracts above £100,000
- Including environmental specifications in all contract documentation and ensuring environmental criteria are used in the award of contracts;
- Encouraging suppliers to introduce more environmentally friendly processes and goods (which can be verified) at competitive prices;
- Assessing the environmental credentials of major suppliers and their goods by requesting a sustainability statement for items above £25,000.

8. Community Benefits and Social Value

8.1 In tendering for work above £25,000 value we will ask for community benefit and social value in the invitation to tender.

8.2 In line with MAT we will consider weighting for social value.8.3 Community benefits can be

- Local (Pembrokeshire);
- National (Wales/UK) or
- Global (e.g. fairly traded and ethically sourced goods)

8.4 Examples of community and social value (not an exhaustive list) are

- Environmental Measures (biodiversity / decarbonisation)
- Fair Work Practices/Real Living Wage
- Promotion of the Welsh language
- Equalities
- 3rd Sector Support
- Apprenticeships and work placements

9. Local Purchasing

9.1 The Authority encourages local businesses to compete for goods, services and works.

9.2 The Authority's contracts for goods, services and works cover a wide range of requirements and local suppliers already account for a significant level of expenditure. Local business that can meet Authority's social and environmental objectives should be able to compete for work alongside contractors from outside the area.

Our Socially Responsible Procurement Strategy will support actions that help

- Have visibility of and access to opportunities to bid for Authority contracts
- Find it easier to bid for opportunities to work with the Authority
- Better understand where opportunities exist to supply through the Authority's existing suppliers and contractors

10 Equality and Fair Work

10.1 The Equality Act 2010 requires the Authority to adhere to the Public Sector Equality Duty through all its functions and services by

- Eliminating discrimination, harassment and victimisation
- Advancing equality of opportunity
- Fostering good relations

10.2 In Wales there is a specific equality duty focused on procurement. When procuring works, goods or services from other organisations on the basis of a relevant agreement, as a public body we must:

have due regard to whether it would be appropriate for the award criteria for that contract to include considerations to help meet the general duty have due regard to whether it would be appropriate to stipulate conditions relating to the performance of the contract to help meet the three aims of the general duty.

10.3 Any external bodies or businesses that provide services on behalf of the Authority are expected to do so in accordance with the Welsh Language Standards

that are placed on the Authority. Expectations will be clearly expressed in service level agreements and proper monitoring procedures will be put in place in regards to the use and status of the Welsh language.

10.4 Fair work is the presence of observable conditions at work which show workers are fairly rewarded, heard and represented, secure and able to progress in a healthy, inclusive working environment where rights are respected. In support of fair work, the Authority will put steps in place to eradicate unlawful and unethical practices from its supply chain, in line with best practice outlined in Welsh Government's Ethical employment in supply chains: code of practice and code of practice toolkit.

10.5 Procurement can play a crucial role in addressing modern slavery risks within supply chains. Assessment of suppliers and contractors is required to identify potential modern slavery risks, this could be done by

- Examining supplier practices, labour conditions, and human rights policies.
- Engaging with suppliers to raise awareness about modern slavery.
- Encouraging suppliers to adopt ethical practices, comply with relevant laws, and implement anti-slavery measures.
- Including anti-slavery clauses in contracts.
- Encouraging suppliers to disclose information about their sub-tier suppliers and labour practices.

10.6 Goods and services may be produced and delivered under conditions which involve abuse or exploitation. The globalisation of trade means that many of the goods on sale in the UK have been produced by people who experience dangerous or discriminatory working conditions. These activities inevitably affect the environment of other countries and often their National Parks.

10.7 The Authority therefore undertakes to follow a sustainable and fair procurement strategy and give guidance to its employees and suppliers to ensure that they incorporate environmental, economic and social issues into their procurement practices.

10.8 The Authority has in place a Modern-Day Slavery Statement which can be found in Appendix 1 of this policy.

11. Roles and Responsibilities

11.1 The Authority does not have a specific procurement team or procurement officer. Procurement activities are delegated to individual teams, with oversight provided by Heads of Services and Team Leaders. Capital programme procurement is managed by Building Project Team which is part of the Decarbonisation department.

11.3 Everyone who purchases materials, goods and services on behalf of the Authority have a responsibility to adhere to this policy.

11.4 Procurement activity is governed by Standing Order relating to Contracting procedures. Compliance with Standing Order relating to Contracting Procedures is monitored by the Authority's Finance Team and subject to internal and external audit.

11.5 All those involved in procurement will receive training.

11.6 Involvement in procurement requires the following:

- A duty to behave honestly and in a trustworthy manner maintaining standards which the public is entitled to expect;
- Fiduciary responsibility which means they are individually and collectively, responsible for the safe and proper arrangements relating to public spending; and
- All managers have a responsibility to ensure systems and procedures are followed and that everyone is appropriately trained to prevent fraud.

12. Monitoring and Assurance

12.1 The Authority has in place procedures to ensure that all its business activity, including procurement, is carried out in a transparent, robust and cost effective manner. This policy must be read and used in conjunction with:

- Financial Standards
- Procurement Procedures
- Standing Orders relating to Contracting Procedures
- Scheme of Delegation
- Sustainable Procurement Strategy

12.2 Reporting on procurement's contribution to carbon reduction through the Authority's performance reporting processes, including Annual Report on Meeting Well-being Objectives and Welsh Government Net Zero Reporting and analysis.

12.3 As required under the Social Partnership and Public procurement (Wales) Act the Authority will produce a Procurement Annual Report, which will be published following end of each financial year.

13. Related Policies and Operational Procedures

13.1 Environmental Policy

13.2 See section 12.1

13.4 Retail Trading Strategy

13.5 Equal Opportunities Policy

13.6 Welsh Language Standards Compliance Notice

13.7 Contractor Management Policy (Health and Safety related policy being developed)

Appendix 1 – Pembrokeshire Coast National Park Authority Modern Slavery Statement

The Authority delivers a variety of statutory and discretionary public services, delivered by a combination of a directly employed workforce, third and private sector organisations

The Welsh Government's Code of Practice for Ethical Employment in Supply Chains code covers 12 commitments including Modern Slavery and Human rights abuses, blacklisting, false self-employment, unfair use of umbrella schemes and zero hours contracts.

This statement sets out the action the Authority has taken and will take to ensure no unethical practices and modern slavery in its own business and supply chain.

Modern Slavery

Modern Slavery offences can include:

Labour exploitation - Victims are forced to work against their will, often working very long hours for little or no pay in dire conditions under verbal or physical threats of violence.

Domestic Servitude - Victims are forced to carry out housework and domestic chores in private households with little or no pay, restricted movement, very limited or no free time and minimal privacy often sleeping where they work.

Sexual Exploitation - Victims are forced to perform non-consensual or abusive sexual acts against their will, such as prostitution, escort work and pornography. Adults are coerced often under the threat of force, or another penalty.

Criminal Exploitation - Often controlled and maltreated, victims are forced into crimes such as cannabis cultivation or pick pocketing against their will.

Human Trafficking - people are tricked, threatened or coerced into situations that allow them to be exploited. These individuals are then sold on, either remaining within their country or being shipped across borders.

Debt Bondage - Victims are forced to work to pay off debts that realistically they never will be able to.

Policies

The following policies are in place to help prevent unethical practices and modern slavery in our business and supply chain

- Sustainable Procurement Policy
- Whistleblowing Policy
- Financial Standards
- Standards of Contracting Procedures
- Equal Opportunities Policy

- Safeguarding Policy
- Health and Safety Policy
- Code of Conduct

Supply Chain

The Authority has an annual third party spend in the region of £3 million. This is with approximately 934 suppliers. The high risk area for modern slavery offences are construction, manufacturing, clothing, cleaning, leisure, hospitality, catering. Due diligence is taken when awarding contracts in order to mitigate the risks of any issues with regards to Modern Slavery in high risk areas.

The Authority monitors its suppliers in these areas to ensure they comply with the Ethical Code of Practice. This is carried out during its contract monitoring arrangements. This refers to employment practices including false self-employment, working conditions, statutory rights of the employee, zero hours contracts and access to Trade Unions.

Everyone involved in procurement are required to assess suppliers and contractors to identify potential modern slavery risks, this could be done by

- Examining supplier practices, labour conditions, and human rights policies.
- Engaging with suppliers to raise awareness about modern slavery.
- Encouraging suppliers to adopt ethical practices, comply with relevant laws, and implement anti-slavery measures.
- Including anti-slavery clauses in contracts.
- Encouraging suppliers to disclose information about their sub-tier suppliers and labour practices.

Socially Responsible Procurement Strategy

The Authority will progress actions on ensuring no unethical practices and modern slavery in its own business and supply chain through its socially responsible procurement strategy. This will include awareness raising and training of staff.

Policy Control Sheet

Change Level

Change Level	Tick
Minor editorial/ accuracy changes	
Change requires Management Team Approval Only	
New Policy or Change requires NPA Approval / HR Committee Approval	Yes

Consultation

Group	Date
Head of Decarbonisation and Head of finance & fundraising. Decarbonisation officer, Building Projects Managers, Performance and Compliance Officer Do we want to check with internal auditors re: VfM audit??	19/04/2024
Staff and Members	24/09/2024
<i>[Asset Management Group/ Health and Safety Group etc.]</i>	
<i>[Management Team]</i>	09/07/2024

Assessments

Assessment – If Applicable	Date
Integrated Assessment – Full	
Integrated Assessment – Policy/ Procedure Review	
Data Protection Impact Assessment	

Approval

Approved by	Name	Date	Signature
<i>[NPA/ HR Committee/ Management Team]</i>			

Version History

Version	Active Date	Summary of Changes
2		Format new Updated legislation Updated related policies and operating procedures Updating text to include decarbonisation, circular economy and social value principles. Removed section about e-procurement as this is standard practice, using S2W. Added definitions

		Addition Modern slavery Take out references to EU legislation Take out sustainable procurement checklist. Value for money, definition and updated section considering internal auditors' recommendations 2024.
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Review

Version	Active Date	Document Owner	Review Date Trigger

Publication

Policies must be co-ordinated through the Performance and Compliance Team, for compliance, auditing, and control purposes. Please send all new or reviewed policies once approved to mairt@pembrokeshirecoast.org.uk for formal publication of policy to staff, Members, volunteers and where required on the Authority's website.

Publication	Date
Published on Sharepoint Corporate Policy Hub	
External Policy – Published on Website: HTML	

Pembrokeshire Coast National Park Authority

Socially Responsible Procurement Strategy 2024 -2029



Parc Cenedlaethol
Arfordir Penfro

Pembrokeshire Coast
National Park

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Why Procurement Matters

Pembrokeshire Coast National Park Authority spends in the region of £530,000 a year with private and third sector organisations on the goods, services and works needed to deliver our public services. It's the Authority's responsibility to manage this money effectively and efficiently.

The Authority was created as a free-standing special purpose local authority under the 1995 Environment Act (the Act). The Environment Act 1995 specifies that the Purposes of a National Park Authority are

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the park area
- To promote opportunities for the understanding and enjoyment of the special qualities of the area by the public.

The Act also states that in pursuing the above purposes the Authority has a duty to seek to foster the social and economic well-being of local communities.

Carrying out public procurement in a socially responsible way, in accordance with the sustainable development principle is one of the ways the Authority can seek to improve the economic, social, environmental and cultural well-being of its area.

The supply chain is the Authority's biggest source of carbon emissions and as a result procurement practices play a central role on our pathway to net zero.

The Authority must also comply with the Welsh Specific Duty on Procurement under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011.

The Authority must also comply with Welsh Language Standards 76, 77, 77A, 79, 80 as part of procurement processes.

This strategy and objectives play an important role in ensuring that the Authority is delivering against its

- Well-being Objectives:
 - **Our Conservation Well-being Objective:** To deliver nature recovery and connectivity at scale, so nature is flourishing in the Park, contributing to the protection of 30% of our land and seas for nature by 2030.
 - **Our Climate Well-being Objective:** To achieve a carbon neutral Authority by 2030 and support the Park to achieve carbon neutrality and adapt to the impact of climate change.
 - **Our Connection Well-being Objective:** To create a Park that is a natural health service that supports people to be healthier, happier and more connected to the landscape, nature and heritage.
 - **Our Communities Well-being Objective:** To create vibrant, sustainable and prosperous communities in the Park that are places people can live, work and enjoy.
- Equality Plan and Objectives
- Welsh Language Policy and Promotion Strategy
- National Park Management Plan

Procurement in the Authority

The Authority due to its size does not have a specific procurement team or procurement officer.

Procurement activities are delegated to individual teams, with oversight provided by Heads of Services and Team Leaders. Capital programme procurement is managed by Building Projects Team that is part of the Decarbonisation department.

The Authority seeks external advice where required. It also engages in joint procurement activities with other public bodies where it has been identified as beneficial to do so and uses appropriate frameworks.

Procurement activity is governed by:

- Standing Order relating to Contracting Procedures
- Sustainable Procurement Policy

Compliance with Standing Order relating to Contracting Procedures is monitored by the Authority's Finance Team and subject to internal and external audit.

Procurement Legislative and Policy Framework

Our strategy is informed by the following:

- [The Well-being of Future Generations \(Wales Act\) 2015](#) - Procurement is one of the seven corporate areas for change in the Act's [statutory guidance](#).

- [Procurement Act 2023 \(UK Government\)](#) – Is the law that regulates the award and management of public contracts in the UK.
- [Social Partnership and Public Procurement \(Wales\) Act 2023](#) – Introduces the Socially Responsible Procurement duty, to improve the economic, social, environmental and cultural well-being of its area by carrying out public procurement in a socially responsible way, in accordance with the sustainable development principle. Authority required to prepare strategy and publish objectives and meet reporting requirements under the Act. Places requirements on “prescribed contracts” (major construction contracts and outsourcing services contracts.)
- [The Equality Act 2010 \(Statutory Duties\) \(Wales\) Regulations 2011](#) - When procuring works, goods or services from other organisations on the basis of a relevant agreement, a listed body in Wales must: Have due regard to whether it would be appropriate for the award criteria for that contract to include considerations to help meet the general public sector equality duty. Have due regard to whether it would be appropriate to stipulate conditions relating to the performance of the contract to help meet the three aims of the general public sector equality duty. EHRC have published guidance on [procurement for listed public authorities in Wales](#).
- [Wales Procurement Policy Statement](#) – Sets out how the Welsh Government expects public bodies to undertake procurement.
- [WPPN 01/23: Procurement – sustainable risk assessments](#) - supports the use of the Welsh Government's public sector

procurement: sustainable risk assessment (SRA) templates for goods and services.

- [WPPN 01/20 Social value clauses/community benefits through public procurement](#) - Provides public sector bodies in Wales with advice on the Welsh Government's overarching policy objectives and the reporting of outcomes in relation to social value clauses/community benefits.
- Procurement through areas such as social value clauses, community benefits and supporting fair work practices within supply chain can also contribute to the Socio-Economic Duty under the Equality Act.
- [Welsh Procurement Policy Note WPPN 07/21: Small and Medium sized Enterprises \(SMEs\) - friendly procurement](#) – provides updated information and additional resources to support SMEs. This WPPN also reiterates the commitments and principles agreed between the Welsh Public Sector and SMEs, to set a minimum level of good practice and encourage SME friendly procurement.
- [Ethical employment in supply chains](#): code of practice – Sets out Welsh Government's 12 commitments expected from recipients of public money when procuring goods and services.
- [Net Zero Carbon Status by 2030](#) – sets out the Welsh Government's route map for decarbonisation across the Welsh Public Sector. Procurement is identified as a priority area for action.
- Welsh Language Standards
 - Standard 76: Any invitations to tender for a contract that you publish must be published in Welsh, and you must not treat a Welsh language version of any

invitation less favourably than an English language version.

- Standard 77: When you publish invitations to tender for a contract, you must state in the invitation that tenders may be submitted in Welsh, and that a tender submitted in Welsh will be treated no less favourably than a tender submitted in English.
- Standard 77A: You must not treat a tender for a contract submitted in Welsh less favourably than a tender submitted in English (including, amongst other matters, in relation to the closing date for receiving tenders, and in relation to the timescale for informing tenderers of decisions).
- Standard 79: If you receive a tender in Welsh and it is necessary to interview the tenderer as part of your assessment of the tender you must:
 - (a) offer to provide a translation service from Welsh to English to enable the tenderer to use the Welsh language at the interview, and
 - (b) if the tenderer wishes to use the Welsh language at the interview, provide a simultaneous translation service for that purpose (unless you conduct the interview in Welsh without a translation service).
- Standard 80 When you inform a tenderer of your decision in relation to a tender, you must do so in Welsh if the tender was submitted in Welsh.

Delivering Value throughout the Procurement Cycle

It is important that our procurement process support value for money.

The Authority defines Value for Money as the optimum combination of whole-of-life costs in terms of not only generating efficiency savings and good quality outcomes for the organisation, but also benefit to society, the economy, and the environment, both now and in the future.¹

The Procurement Act 2023 places an emphasis on social and environmental criteria in contracts. The new approach to corporate responsibility and greater weighting of sustainability strategies shifts the tender assessment method from the Most **Economically** Advantageous Tender (MEAT) to the Most **Advantageous** Tender (MAT). The Authority may award a public contract to the supplier that submits the **most advantageous** tender in a competitive tendering procedure. Most advantageous means the tender best satisfies the award criteria not just the most economically advantageous. This means high weightings on price may reduce by shifting the higher weighting to the technical and social value criteria.

¹ [Welsh Government - WPPN 01/23: Procurement -sustainable risk assessments](#)

Staff involved at each stage of procurement process in specifying, sourcing, awarding and managing contracts have a key role to play in managing value for money. It is particularly important that adequate attention and time is invested in the planning and contract management stages.

Examples of the way in which value can be generated / delivered through the procurement cycle include but not limited to:

- Encouraging innovative solutions from the market by focusing on outcomes rather than inputs and outputs.
- Developing specifications that require lower carbon materials or construction methods and reduce cost.
- Encouraging suppliers to adopt fair working practices and policies that promote equality, diversity and inclusion.
- Structuring tender processes and documents to improve accessibility to smaller and third sector businesses.
- Considering the whole life cost of decisions made.
- Including contractual clauses can ensure that fair work commitments are achieved.
- Securing community benefit and social value commitments that are equitable from contractors to support delivery of wider Authority priorities.
- Managing contracts effectively to ensure that requirements and added value commitments are delivered.

Authority Procurement Objectives

The Authority's six organisational procurement objectives set out how its procurement activity will contribute towards improving local economic, social, environmental and cultural well-being.

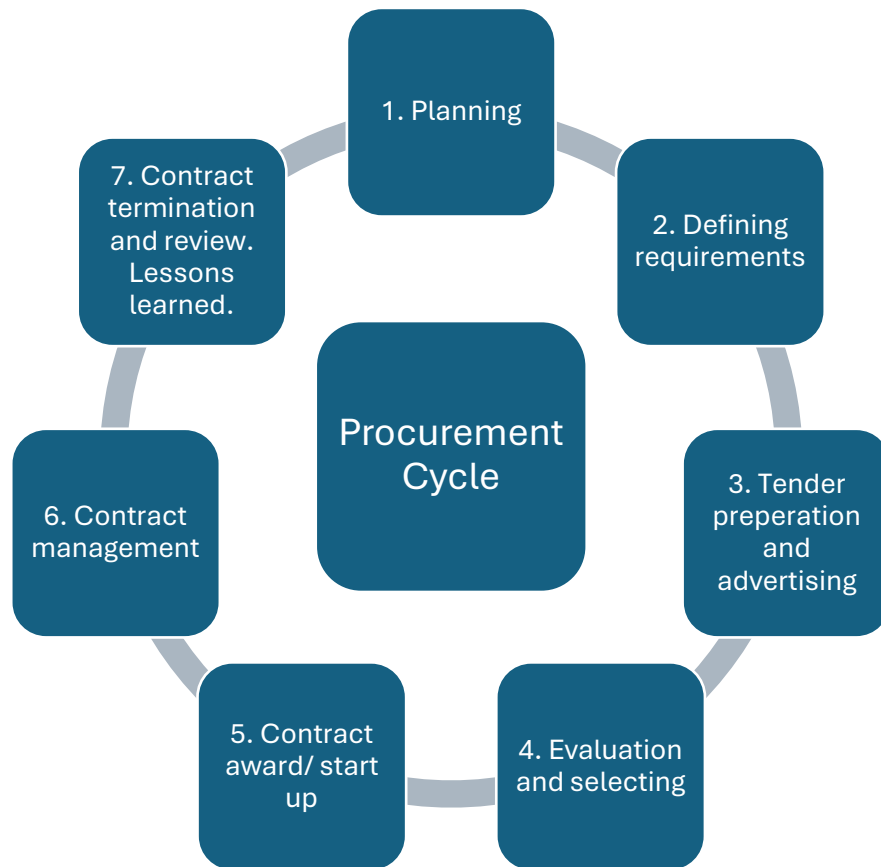
- Ensure legal compliance and robust and transparent governance
- Contribute to the Authority's aim to be carbon neutral by 2030 and support the Park to achieve carbon neutrality.
- Make procurement spend more accessible to local small businesses and third sector
- Improve Fair Work and equality practices adopted by suppliers
- Increasing community benefits and social value delivered by suppliers
- Secure value for money and managing demand

Steps to achieving our Objectives

Objective: Ensuring legal compliance and robust and transparent governance

Aim (where we want to be)

- All Management Team members, Team Leaders and officers involved in procurement processes have full awareness of the impact of the legislation and the



Authority's Contract Standing Orders which apply to procurement activity.

- The Authority complies with relevant legislation and that the governance and risk management arrangements of the Authority are proportionate and followed.

We will do this by (how we will get there)

- Regularly reviewing and updating procurement documentation, processes, systems and controls to ensure they reflect regulatory changes, best practice and provide corporate oversight and assurance.
- Training officers in the procedures and policies which must be considered to ensure legislative and governance requirements are met.
- Ensuring we have adequate arrangements in place to manage performance and are regularly reporting on procurement activity and non-compliance to Management Team and Senior Leadership Team.

We will demonstrate delivery by

- Publishing our annual Procurement Report.

Objective: Contribute to the Authority's aim to be carbon neutral by 2030 and support the Park to achieve carbon neutrality

Aim (where we want to be)

- The Authority understands the carbon impact of the supplies, services and works it buys and takes active steps to reduce their carbon footprint.
- The Authority identifies and implements opportunities to reduce carbon across the procurement cycle and opportunities to promote a circular economy approach.

We will do this by (how we will get there)

- Working towards understanding the carbon footprint of the Authority's purchased goods, services and working to ensure our carbon reduction activity is targeted where it can have the biggest impact.
- Working with our Members, staff, partners and contractors to ensure that carbon reduction is fully embedded in our decision-making processes throughout the procurement cycle and low carbon solutions are implemented where appropriate.
- Collaborating with, and learning from organisations across the public, private and third sector to encourage and accelerate the transition to low carbon solutions.
- Over the timeframe of this strategy we will start requesting carbon reduction plans for contractors for tenders via Sell2Wales or through relevant frameworks.

We will demonstrate delivery by

- Reporting on procurement's contribution to carbon reduction through the Authority's performance reporting processes, including Annual Report on Meeting Well-being

Objectives and Welsh Government Net Zero Reporting and analysis.

Objective: Make procurement spend more accessible to local small businesses

Aim (where we want to be)

- Small businesses:
 - Have visibility of and access to opportunities to bid for Authority contracts
 - Find it easier to bid for opportunities to work with the Authority
 - Better understand where opportunities exist to supply through the Authority's existing suppliers and contractors.

We will do this by (how we will get there)

- Increasing the availability, visibility and timeliness of opportunities for small businesses to supply the Authority
- Making it easier for micro and small businesses to do business with the Authority
- Working with partners to develop the capability and capacity of micro and small businesses to secure public sector contracts

We will demonstrate delivery by

- Increasing the number of business accessing and being successful when tendering for Authority opportunities.
- Increasing the spend with local businesses

Objective: Improving Fair Work and equality practices adopted by suppliers

Aim (where we want to be)

- Procurement is used to influence and increase positive fair work and socially responsible outcomes which benefit the Park and wider Pembrokeshire by addressing poverty and inequality.
- The Authority and its suppliers and contractors actively promote equality of opportunity and safeguard and promote the rights of children, young people and vulnerable adults.

We will do this by (how we will get there)

- Working towards the Welsh Government Fair Work Guidance including the Code of Practice: Ethical Employment in Supply Chains.
- Using our tendering process to ensure that our suppliers are committed to support the Authority to deliver its equality and fair work duties.
- Working with our suppliers and contractors to ensure that they adopt and promote fair work, equality and inclusion and health and safety practices within their organisation and supply chain.

We will demonstrate delivery by

- Assessing our progress against the 11 principles of the Code of Practice: Ethical Employment in Supply Chains.

Objective: Increasing community benefits and social value delivered by suppliers

Aim (where we want to be)

- Community Benefits and Social Value opportunities are maximised and aligned to support the priorities of the Authority and the individuals and communities it serves.
- Community Benefits and Social Value commitments are delivered and the benefit to the individual and / or community is evidenced.

We will do this by (how we will get there)

- Adopting a consistent approach to securing and managing delivery of Community Benefits and Social Value which is understood by the Authority and its contractors
- Exploring internally and externally how the Authority could best use community benefits and social value approach to contribute to its wider priorities.
- Considering signing up to frameworks which support community benefits and social value initiatives.

We will demonstrate delivery by

- Increasing the number of tenders that ask for Community Benefits and Social Value.
- Increasing the volume and value of Community Benefits and Social Value committed to, and delivered, through Authority contracts.
- Being part of frameworks which support community benefits and social value.

Objective: Securing value for money and managing demand

Aim (where we want to be)

- Clearly demonstrating achievement of value for money from our third-party spend through all stages of the procurement lifecycle including planning, award and management of contracts.
- Routinely evidencing consideration of quality and whole life cost in respect of financial and wider environmental, social, economic and cultural considerations, in particular carbon reduction and community benefits.

We will do this by (how we will get there)

- Reviewing and challenging what the Authority spends its money on to reduce demand and identify opportunities to deliver efficiencies.
- Demonstrating value for money and considering the whole life cost of the decisions we make.
- Managing contract delivery and the impact of price and market pressures.

We will demonstrate delivery by

- Reporting of procurement's contribution to savings targets.

Monitoring, Reviewing and Reporting

A detailed Action Plan in Appendix 1 sets out the actions that the Authority will take to deliver this Socially Responsible Procurement Strategy. The Action Plan will be reviewed and updated annually during the plan period. It will form the template for the Authority's Procurement Annual Report which will be published following the end of each financial year. The report will include:

- A progress report on the implementation of the Socially Responsible Procurement Strategy Action Plan towards achieving the Authority's Procurement Objectives.
- A summary of the public procurement exercises during the year that led to the award of a prescribed contract or were intended to lead to the award of such a contract.
- Details into the extent to which the Authority's contracts contributed to Authority's Well-being Objectives
- A statement of the how the Authority intends to further improve the delivery of economic, social, environmental and cultural well-being.
- A summary of the procurement the Authority expects to carry out in the next two financial years.

The Head of Finance and Fundraising and Head of Decarbonisation will oversee progress and delivery.

Please Note: This strategy has been informed by best practice from strategies developed by other local authorities including

- [Bridgend County Borough Council – Socially Responsible Procurement Strategy](#)
- [Cardiff Council's Socially Responsible Procurement Strategy 2022-27](#)
- [Monmouthshire County Council – Socially Responsible Procurement Strategy 2023-2027](#)

Appendix 1: Pembrokeshire Coast National Park Authority – Socially Responsible Strategy Action Plan/ Annual Report Template

Actions will be reviewed and updated annually as part of corporate planning for each financial year.

1. Pembrokeshire Coast National Park Authority - Socially Responsible Procurement Strategy Action Plan and Progress Report

Area	Action	Timescale	Lead Officer [Any additional resource required]	Annual Report – Progress Update
<p>Reviewing and updating our current procurement documentation and practices</p>	<p>Undertake a review of Contracting Standing Orders and Sustainable (and Socially Responsible) Procurement Policy in response to the Procurement Reform and Social Partnership and Public Procurement Act requirements.</p> <p>Review of Sustainable (and Socially Responsible) Procurement Policy should consider:</p> <ul style="list-style-type: none"> • Carbon Reduction • Modern Day Slavery Statement/ Welsh Government’s Ethical employment in supply chain: code of Practice • Fair Work • Equality and Inclusion • Social Value/ Community Benefits • Welsh Language • Value for Money (internal audit recommendations) 	<p>2024/25</p>	<p>Head of Finance and Fundraising / Head of Decarbonisation</p>	

Area	Action	Timescale	Lead Officer [Any additional resource required]	Annual Report – Progress Update
	<p>Review and update our standard procurement documentation/ templates and guidance for following stages of procurement process:</p> <ul style="list-style-type: none"> • Defining Requirements/ Developing Specifications • Tendering/ Communicating our Requirements to the Market • Selection and Evaluation • Award and Contract Management/ Contractual Clauses <p>To take account of best practice (while remaining compliant with wider procurement regulations) on:</p> <ul style="list-style-type: none"> • Carbon Reduction • Modern Day Slavery Statement/ Welsh Government’s Ethical employment in supply chain: code of Practice • Fair Work • Equality and Inclusion • Social Value/ Community Benefits • Welsh Language • Value for Money 	2025/26 – 2026/27	Head of Finance and Fundraising / Head of Decarbonisation	
	<p>Review our current practices against the 12 commitments expected within the Welsh Government’s Ethical employment in supply chain: code of Practice. Identify and implement improvements following on from this review.</p>	2024/25 – 205/26	Head of Finance and Fundraising / Head of Decarbonisation	

Area	Action	Timescale	Lead Officer [Any additional resource required]	Annual Report – Progress Update
	In support of 'Fair Work' considerations and seeking living wage accreditation put in place a plan to pay Authority contactors the real living wage.		Head of People Services/ Chief Executive	
	Finalise and approve Contractor Management Policy in support of Health and Safety	2024/25 – 2025/26	Health and Safety Projects Officer	
Mapping and Frameworks	<p>Map current procurement activities, supply gaps/voids, frameworks in use or frameworks that could be used where they represent value for money. This includes looking at frameworks that provide requirements on:</p> <ul style="list-style-type: none"> • Carbon Reduction • Modern Day Slavery Statement/ Welsh Government's Ethical employment in supply chain: code of Practice • Fair Work • Equality and Inclusion • Social Value/ Community Benefits • Welsh Language 	2025/26	Head of Finance and Fundraising	
	Initiate requesting carbon reduction plans for contractors for tenders via Sell2Wales or through relevant frameworks.	2025/26	Head of Decarbonisation	
	Identify Fair-Trade products suitable for Authority purchasing and work with service areas to increase usage.	2024/25 – 2025/26	Decarbonisation Officer	

Area	Action	Timescale	Lead Officer [Any additional resource required]	Annual Report – Progress Update
Training and Awareness	Identify officers across the Authority involved in procurement activities and identify their training needs – this should feed into wider Authority training plan.	2024/25 – 2025/26	Head of Finance and Fundraising/ Head of Decarbonisation / Head of People Services	
	Identify if additional external support/ expertise needs to be bought in to advice Authority staff involved with procurement activities.	2024/25 – 2025/26	Head of Finance and Fundraising/ Chief Executive	
	Develop procurement training and awareness raising programme for relevant staff involved in procurement processes including Management Team and Team Leaders focused on: <ul style="list-style-type: none"> • procurement legislation • Complying with Authority’s Contract Standing Orders, sustainable and socially responsible procurement policy, and wider procurement procedures • Use of frameworks • Value for Money • Opportunities in procurement for added value through consideration of: Carbon Reduction, Fair Work, Equality and Inclusion, Social Value/ Community Benefits and Welsh Language. 	2024/25 – 2028/29	Head of People Services/ Head of Finance and Fundraising/ Head of Decarbonisation Additional resource likely to be required to develop and deliver training.	
	Create a Procurement section on the Authority’s staff intranet, with signposting	2024/25 – 2025/26	Head of Decarbonisation/	

Area	Action	Timescale	Lead Officer [Any additional resource required]	Annual Report – Progress Update
	information and sharepoint list of frameworks available for use by the Authority.		Head of Finance and Fundraising/ Performance and Compliance Officer	
	Develop and implement a Buying Responsibly communication and education initiative to signpost staff to guidance. Including information on: <ul style="list-style-type: none"> • Value for Money • Carbon reduction, including materials guide • Fair Work • Equality and Inclusion • Social Value/ Community benefits • Welsh Language 	2027/28 - 2028/29	Head of Decarbonisation/ Decarbonisation Officer	
Engagement with Contractors/ Communities	Develop and then publicise a Selling to the Authority section on the Authority’s website to raise awareness of procurement opportunities and how to engage with them. To include: <ul style="list-style-type: none"> • Contracts Register (Awards) and Contract Forward Plan to raise awareness of the likely procurement opportunities. • Information on the different frameworks and links to further information on how businesses can join a framework 	2025/26 - 2028/29	Head of Decarbonisation/ Decarbonisation Officer Additional resource likely to be required to develop comms.	

Area	Action	Timescale	Lead Officer [Any additional resource required]	Annual Report – Progress Update
	<ul style="list-style-type: none"> • Information on following areas and how they are applied withing the Authority’s procurement processes, with specific advice for small businesses: <ul style="list-style-type: none"> ○ Value for Money ○ Carbon Reduction ○ Fair Work ○ Equality and Inclusion ○ Social Value/ Community Benefits ○ Welsh Language 			
	Participate in suitable “meet the buyer events” to promote opportunities with the Authority to local businesses, social enterprises, voluntary organisations and supported businesses.	2024/25 - 2028/29	Head of Decarbonisation/ Relevant Officers involved in procurement activities	
	Explore internally and externally how the Authority could best use community benefits and social value approach to encourage tenderers to provide employment, training and work placement opportunities	2026/27 – 2028/29	Head of Decarbonisation/ Head of People Services/ Head of Engagement and Inclusion	
	Engage with communities and interest groups to identify local opportunities / projects seeking support that could be beneficiaries of Social Value/ Community Benefits through procurement.	2026/27 – 2028/29	Head of Decarbonisation/ Head of Engagement and Inclusion	

Area	Action	Timescale	Lead Officer [Any additional resource required]	Annual Report – Progress Update
Planning, Monitoring and Reporting	Continue to monitor our Supply Chain emissions through Welsh Government Net Zero reporting, identifying and monitoring high emitting areas. Work with department to identify high carbon areas linked to our supply chain and consider opportunities to reduce carbon through challenging demand requirements and delivery models. Identifying any circular economy opportunities as part of this. Focus should be on departments that have high spend in the following high emitting categories for the Authority (Agriculture, Forestry and Fishing. Construction. Manufacturing).	2024/25 - 2028/29	Head of Decarbonisation / Decarbonisation Officers	
	Establish and maintain a Contract Forward Plan to allow effective management of resources and early consideration of opportunities to deliver improved value. Work with departments to review procurement spend data and the Contract Forward Plan to identify opportunities to manage demand and/or drive efficiencies.	2024/25 - 2028/29	Head of Finance and Fundraising	
	Publish an annual procurement report for this strategy.	Annually	Head of Finance and Fundraising / Head of Decarbonisation	
	Explore development of reports providing Procurement Spend and Assurance	2025/26 - 2026/27	Performance and Compliance	

Area	Action	Timescale	Lead Officer [Any additional resource required]	Annual Report – Progress Update
	information to Management Team and Audit and Corporate Services (as part of assurance report)		Officer/ Head of Finance and Fundraising / Head of Decarbonisation	
	Monitor compliance with Section 2 of the Authority's Welsh Language Policy which states "Any external bodies or businesses that provide services on behalf of the Authority are expected to do so in accordance with the Welsh Language Standards that are placed on the Authority. Monitor compliance with this policy by reporting on actions such as number of reports produced in Welsh/number of workshops held bilingually.	Annually	Democratic Services Manager	
<p>Key Measures:</p> <ul style="list-style-type: none"> • Number of non compliance issues identified during the year • Data/ progress on supply chain emissions from Welsh Government Net Zero Reporting, including trends relating to high emitting areas. • Data/ progress on number of small business accessing and being successful when tendering for Authority opportunities. Data on spend with local businesses. • Assessing our progress against the 11 principles of the Code of Practice: Ethical Employment in Supply Chains • Number and value of tenders that ask for Community Benefits and Social Value (committed to and delivered) • Data on procurement's contribution to savings targets 				

2. Summary of the public procurement exercises during the year that led to the award of a prescribed contract or were intended to lead to the award of such a contract.

3. Details into the extent to which the Authority’s contracts contributed to Authority’s Well-being Objectives

<p>Conservation Well-being Objective: To deliver nature recovery and connectivity at scale, so nature is flourishing in the Park, contributing to the protection of 30% of our land and seas for nature by 2030.</p> <p>○</p>	
<p>Climate Well-being Objective: To achieve a carbon neutral Authority by 2030 and support the Park to achieve carbon neutrality and adapt to the impact of climate change.</p>	
<p>Connection Well-being Objective: To create a Park that is a natural health service that supports people to be healthier, happier and more connected to the landscape, nature and heritage.</p>	
<p>Communities Well-being Objective: To create vibrant, sustainable and prosperous communities in the Park that are places people can live, work and enjoy.</p>	

4. Statement of the how the Authority intends to further improve the delivery of economic, social, environmental and cultural well-being.

5. Summary of the procurement the Authority expects to carry out in the next two financial years.