



Procurement Strategy 2025 - 2028

Prepared By

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1.0	Sept 2024	Richard Walker	New strategy

Purpose

Pickering and Ferens Homes (PFH) is committed to delivering quality services that represent value for money in the eyes of its customers. This Procurement Strategy sets out how the effective procurement of goods, services and works across all business areas will support the delivery of our ambitions and values set out in the Corporate Plan.

Effective procurement and contract management is key to PFH being able to demonstrate Value for Money, which ultimately means we can do more to increase the sustainability and efficiency of our homes, meet more local housing demand and through our supply chain deliver more health and well-being outcomes.

Background

PFH's Corporate Plan 2024/5 – 2027/8 incorporates eight strategic ambitions setting out what PFH aims to achieve. Many of these ambitions and supplementary actions cross-cut with ensuring value for money, with clear links to procurement and contract management. This Procurement Strategy complements our newly developed Procurement Policy and Procedures. This is key to driving a consistently high-quality approach to procurement that is aligned with the Public Contracts Regulations 2015 (PCR 2015), which will be replaced by The Procurement Act 2023, the National Procurement Policy Statement (NPPS) and PFH's wider strategic ambitions.

Whilst VFM crosscuts all our work, Corporate Plan ambition five relates directly to the procurement and value for money agenda:

Ambition 5:

To deliver services that you think offers value for money:

PFH Corporate Plan 2024/5 – 2027/8

To meet this ambition, PFH has established a series of headline actions:

- Deliver and report on our co-produced service standards and the full suite of Tenant Satisfaction Measures, considering them through a VFM lens
- Benchmark our performance against the regulators TSMs
- Search out the best value energy deals for communal utility services
- Improve the operating margin in line with Financial Plan assumptions

- Identify key projects related to efficiency with a focus on efficiencies generated from the previous plan's investment in IT

By delivering this work, we aim to improve overall satisfaction to 92% (TP01), improve satisfaction with being kept informed about things that matter to residents to 94% (TP07), improve satisfaction with complaints handling to 65% (TP07), implement and measure all the co-produced service standards, achieve an operating margin of 14% and deliver the outcomes of this new Procurement Strategy.

We anticipate that by meeting this ambition we will contribute positively to the local economy through use of local contractors and reduce carbon emissions through reduced travel, that our operating margin will improve including the return on capital employed VFM metric. We also envisage that through improved procurement and contract management, we can improve social value impacts and residents will feel they are receiving better value for money services.

Procurement Review 2019 – 2024

A review of our 2019 – 2024 strategy has demonstrated that its objectives have been largely delivered. The headlines are:

- We have planned procurement activities, with no eligible contracts falling out of contract during the period
- Involved residents directly in procurement through the Resident Procurement Panel, and indirectly through specification, standards and KPI updates
- Utilised several specialist procurement partners to help achieve better value for money and meet our needs

We had less success:

- Identifying and bringing to life, opportunities to collaborate with others in widening the scope for maximising purchasing power and identifying innovation
- Improving contract and supplier management consistently across all value contracts

Strategic Drivers 2025 – 2028

Procurement Act 2023

The Procurement Act 2023 replaces the Public Contracts Regulations 2015 (PCR) and is effective from 24th February 2025. Existing contracts will continue to follow the PCR2015 requirements, but all commissions from the 24th February 2025 will fall under the Procurement Act requirements.

It represents a significant transformation in procurement law. In preparation for this, specialist support via Procurement for Housing (PfH) has been utilised in updating our Policy and Procedure to ensure we are fully prepared to be compliant with the legislative requirements. PFHs internal capacity to meet all the requirements set out in the legislation, both in terms of procurement preparation, ongoing contract management and administrative requirements through the formal publication of notices, KPIs and skills, knowledge and experience in procurement and commerciality is limited, presenting a future resourcing challenge. The work of PfH has been established to ensure processes are simple, effective and standardised where possible, to meet the legislative requirements. Ongoing review and monitoring is required to ensure the administrative burden doesn't detract from other day to day activities or business priorities.

Spend Analysis

The PfH review identified that during 2022/23, PFH spent £9.4million across 251 suppliers, with over £8.5million across 207 suppliers being 'influenceable'.

Table 1: Spend Classification

Spend Classification	Number of Suppliers	Spend
Influenceable	207	£8,642,235.26
Non-Influenceable	44	£719,312.25
Total Spend	251	£9,361,547.51

Applying the Pareto Principle (80/20), 80% of influenceable spend is across 6% of suppliers, enabling us to identify where resource should be focused to drive the greatest value through further analysis and targeted interventions.

Table 2: Spend Distribution

	Spend	No of Suppliers	% of Suppliers
80% of Spend	£6,913,788.21	12	6%
20% of Spend	£1,728,447.05	195	94%
	£8,642,235.26	207	100%

94% of our supply chain is classified as ‘tail end’ spend, which is significant. We spent less than £1,000 with 58 suppliers, with an average spend of only £397 per supplier, with these low value suppliers accounting for around 30% of the supplier tail by number, but only 1.3% (£23,031) of the spend. This is significantly disproportionate and provides an opportunity for supplier rationalisation to drive greater efficiencies and economies of scale.

80% of total organisational spend goes to 13 suppliers, with over £100,000 or more being spent with 12 of these each year, totaling £6.4million (excluding one-time suppliers). Within the past two years we have moved to a more robust contracts register, able to provide prompts and reminders for renewals, insurance certification and alignment with data protection requirements, all in one place with defined ownership and accountability. There is some further enhancement required to align this and ease procurement processes under the new legislation and ensure all contract documentation is accessible and up to date, specifically for the higher spend contracts making up the top 80%.

The table below summarises the top-level category overview, for spend during 2023/23 at PFH.

Table 3: Top 20 Categories of spend (ProClass Level 1)

ProClass Level 1	Total Spend	No of Suppliers	% of Total Spend	% of Total Suppliers
Works - Construction, Repair & Maintenance	£3,541,704.79	13	40.98%	6.31%
Building Construction Materials	£1,511,583.78	17	17.49%	8.25%
Financial Services	£1,040,851.32	18	12.00%	8.74%
Facilities & Management Services	£611,271.73	19	7.07%	9.22%
Horticultural	£386,031.52	3	4.47%	1.46%
Information Communication Technology	£360,011.90	23	4.17%	11.17%
Legal Services	£262,280.53	6	3.03%	2.91%
Consultancy	£255,004.80	23	2.95%	11.17%
Healthcare	£141,540.64	2	1.64%	0.97%
Cleaning & Janitorial	£115,639.65	8	1.34%	3.88%
Health & Safety	£106,459.74	13	1.23%	6.31%
Housing Management	£70,982.00	6	0.82%	2.91%
Human Resources	£68,957.72	18	0.80%	8.74%
Furniture & Soft Furnishings	£64,004.64	2	0.74%	0.97%
Utilities	£59,232.21	12	0.69%	5.83%
Environmental Services	£16,043.60	5	0.19%	2.43%
Education	£9,275.31	2	0.11%	0.97%
Domestic Goods	£9,048.68	1	0.10%	0.49%
Catering	£4,541.42	5	0.05%	2.43%
Social Community Care Supplies & Services	£3,369.00	3	0.04%	1.46%

This demonstrates that 80% of spend is being driven through 5 core categories of spend, consisting of 70 suppliers. In addition to consideration of supplier rationalisation, there is also a significant industry of invoice management undertaken which can be resource intensive, and estimated to be £25 per invoice based upon PfH's review. Approximately 125 invoices processed in the year were below the average cost of processing, meaning it cost us more administratively than the value of the works or services delivered on each of these occasions. Opportunities for invoice consolidation will be explored alongside the implementation of our new finance and housing management system to provide opportunities for easier financial forecasting and analysis, prevent potential missed payments and further improve relationships with suppliers through a streamlined billing process.

Procurement and commercial skills

Unlike larger organisations, PFH does not have a specialist individual or team responsible for procurement at a strategic or operational level. This does present us with a risk of non-compliance with the new legislative requirements or missed opportunities to derive best value or contract management. In preparation for the Procurement Act coming into effect, the Home Services Director as the strategic lead on procurement has represented PFH in the Yorkshire Community of Practice preparing for the new legislation and is undergoing the Government's Commercial College 'Transforming Public Procurement' programme. Further training will be provided to other key members of staff with specific job functions relating to procurement and contract management. Whilst this does provide PFH with some internal knowledge of the requirements, it will not be a substitute for specialist expertise in the field. Skills are bolstered using procurement partner specialists within the sector as a mitigation to this risk. We will need to assess how fit for purpose these arrangements are under the new legislative regime or if alternative arrangements need to be put in place, such as partnering with another smaller housing association, or buying in specific expertise on a retainer.

Contract Management

A forward plan of procurement is in place and linked to the contract register, this is reported to the Board on an annual basis and has recently been extended from a 12 to 18 month forward plan. The procurement plan for the life of this strategy can be found at Appendix A.

Traditionally 9 of the 12 high spend suppliers have regular contract management meetings with PFH, some have been less frequent, or not deemed necessary, such as insurance brokers and furniture providers, who

provide services in a different way. Other smaller suppliers, that deliver higher risk services are also subject to regular contract management meetings. As part of our supplier rationalisation process the top 20% of supplier spend may change, but we will endeavor to ensure all high value and high-risk contracts are subject to effective contract and supplier management processes through a contract management toolkit in order to provide consistency, drive value for money, social value and supplier innovation.

We will continue to undertake regular business continuity audits with our higher risk contractor partners to ensure robust arrangements are in place to mitigate disruptions through emergencies and unforeseen events.

Supply Chain – Local, SME and National

An intention of the new procurement legislation is to make it easier for local and small, medium enterprises (SME) to access opportunities. Historically PFH has benefitted from procuring locally, supporting local employment and increasing the likelihood that wealth is recirculated locally and also reduced carbon footprint. Approximately 58% of PFHs third party spend goes to suppliers located within Hull, increasing to 62% when considering the wider region of Yorkshire & Humber.

Under the Public Services (Social Value) Act 2012, PFH has an obligation to consider the economic, social and the environmental well-being of the local area for service contracts, where the contract value is above the relevant thresholds. Wherever possible PFH will prioritise giving opportunities to local SMEs, and fostering mutually beneficial relationships and continue to drive the delivery of high quality, personalised and value for money services for residents. Irrespective of threshold limits, this will include commitments to de-carbonise services/delivery, not only to provide, but proactively promote opportunities that reflect the under-represented communities in the area and improve labour standards through the abolition of practices such as modern slavery through the supply chain.

Value for Money (VFM)

Traditionally PFH performs well and achieves high levels of resident satisfaction in most areas of delivery, and within approved budgets, suggesting a robust approach to VFM.

Continued resident engagement, either directly through resident procurement panels, or indirectly through the utilisation of feedback to design specifications and improve standards will be undertaken. We will continue to use a 60/40

cost/quality rating but will consider increasing the quality weighting through resident engagement, for tenders that have a proportionality higher impact upon overall satisfaction or have experienced higher levels of complaints and dissatisfaction. This will ensure a continued resident voice in all key procurement exercises, and we have an option to move to the most advantageous tender (MAT) under the PA23 as opposed to the traditional most *economically* advantageous tender (MEAT) under the PCR15. This will also provide us with greater flexibility to meet social value ambitions by making the assessment and award criteria more flexible.

As we plan to renew revenue and capital programmes, we will explore the synergy between them to promote improved economies of scale and further achieve value for money.

Strategic Ambitions 2025 – 2028

Policy, procedure & Strategy

A fully embedded Procurement Strategy, complemented by clearly defined procurement policies and procedures, is key to driving a consistently high-quality approach to procurement that is aligned with the PCR 2015, the NPPS and the PFH Corporate Plan.

This approach will ensure PFH can demonstrate Value for Money, which ultimately means we can do more to increase the sustainability and efficiency of our homes, meet more local housing demand and through our supply chain deliver more health and wellbeing outcomes and ensure continuous improvement in its procurement practices.

Value For Money

Key to the ambition to deliver quality services that represent value for money, in the eyes of our customers is a clear understanding of our costs and liabilities. Regular analysis of third-party expenditure will provide insight into PFH's procurement activities and expenditure, enabling the identification of opportunities to exert greater control and lower the overall cost to procure goods, services and works.

Commercial Procurement

Promoting early and meaningful engagement with the market ahead of the commencement of strategic, high values and/or high-risk procurements is important to ensure an understanding of the market, constraints, requirements, risks and opportunities. We will operate on the most advantageous offer,

balancing price and quality, but placing enhanced quality weighting through resident consultation on services that are more likely to impact resident experiences. We will achieve this through strategically planning out our procurement activities and collaborating/partnering with us where it is advantageous to do so.

Compliance & Risk Management

Compliance with PCR 2015 and the coming Procurement Act 2023 (effective February 2025) a fundamental component of effective procurement. Compliance not only protects the organisation from challenge, but demonstrates to suppliers and potential suppliers, the Regulator of Social Housing, and other external stakeholders that PFH is a 'buyer of choice' who acts with openness, honesty and transparency.

Supplier & Contract Management

Effective contract management is key to successfully delivering a contract post-award and driving value for money throughout the life of the contract. Good contract management focuses on delivering the intended outcomes, value for money and creating an environment where the parties effectively work in partnership.

Measurement & Reporting

Measuring and quantifying the impact of procurement is fundamental to ensure its effectiveness as well as to inform future budget decisions and to demonstrate value for money. Reporting of savings and social value benefits along with sound business practices that evidence the impact of better commercial procurement will ensure the delivery of the PFH's strategic ambitions and value for money objectives.

Procurement performance and effectiveness will be measured through the following set of key performance indicators (KPIs).

Measure	Base Line (2023/24)	Year 1 (2025/26)	Year 2 (2026/27)	Year 3 (2027/28)
% Influenceable ¹ Spend Under Contract	80%	81%	82%	83%
% Contracts, above £100,000, with a Social Value obligation	TBC	80%	90%	100%

¹ Influenceable Spend is non-payroll expenditure which can be influenced by procurement, such as tendering, negotiation and changing demand. Non-Influenceable Spend is considered to be Payroll, Taxes, Council and Business Rates, the full list is set out in the Spend Analysis to ensure this is a repeatable process each year.

% Influenceable spend through local suppliers (Y&H)	62%	63%	64%	65%
% Suppliers subject to an annual contract review	TBC	25%	25%	25%

Procurement performance will be presented to SLT on a six-monthly basis and to the Board annually through the annual procurement review.

Management information will be reviewed quarterly, and where a KPI deteriorates or does not demonstrate sufficient progress for two consecutive quarters action plans will be developed to address any issues promptly. Targets and key performance indicators will be reviewed on an annual basis, and additional indicators added as our procurement capabilities progress.

Procurement Objectives

1. Have the right policies and processes in place to manage key stages of procurement and contract management, ensuring legislative compliance, consistency, reduce risks, achieve better outcomes for PFH and residents and that PFH becomes a 'buyer of choice' that is easy to do business with.

What are we going to do?	By when?	How will we measure it?
Develop a comprehensive self-service procurement toolkit, supported by templates and guidance	Feb 25	ACTUS will demonstrate all staff with procurement and/or contract management responsibilities have undertaken training
Introduce procurement approval processes and the subsequent award of contracts to demonstrate robust decision making	Feb 25	
Develop and roll-out procurement and contract management training to ensure all those with purchasing responsibility understand the regulatory and internal policy requirements, the toolkit and their responsibilities	Mar 25	Procurement processes are delivered consistently and to a high standard with key decision being documented and approved at the right level

2. Deliver value for money through robust contract administration, associated budget management and spend analysis

What are we going to do?	By when?	How will we measure it?
Further develop the central contracts register to ensure our third-party relationships are clearly and	Mar 25	Procurement Pipeline published annually internally and reviewed

consistently documented, supported by a clear process for the addition of new contracts post-award		at least quarterly, to support the budget setting process and ongoing management
Through the regular review of spend, identify opportunities to drive greater efficiencies and value for money, through supplier consolidation, invoice reduction and reduction of our supplier tail, where appropriate	Mar 26	

3. Undertake a commercial and planned approach to procurement activity, so support the ambitions of this Procurement Strategy, driving better value for money and service deliverables to residents and PFH.

What are we going to do?	By when?	How will we measure it?
Create, publish and regularly review a Procurement Forward Plan, which sets out our procurement and commercial activity over the next 18 months as a minimum	Oct 24	Implementation of an 18-month Procurement Forward Plan agreed by services as part of the annual budget setting process Minimum of 75% of influenceable spend under contract by March 2027
Actively collaborate on procurement and supplier management with other contracting authorities and central purchasing bodies to make the best use of commercial and procurement skills; benefit from economies of scale; achieve efficiencies in the use of resources and realise savings and wider social value benefits	Mar 27	
Through a greater understanding of the markets in which we operate and working with residents, we will look to deploy evaluation approaches that focus on the most advantageous offer, balancing price and quality to ensure the right model is applied to the right contract opportunities	Mar 26	
Our processes will promote early, meaningful engagement with the market ahead of the commencement	Mar 25	

of strategic, high value and/or high-risk procurements to ensure we understand the supply market, constraints, requirements, risks (and appetite for risk allocation) and opportunities		
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4. Deliver effective supplier and contract management post award, ensuring contracts deliver intended outcomes, VFM and effective partnerships.

What are we going to do?	By when?	How will we measure it?
Set clear roles and responsibilities in the contract management cycle, to ensure that through a decentralised approach we make the best use of resources and improve supplier performance	Jun 25	Ensure 10% Social Value weighting is included in all procurement activity over £100k where relevant and proportionate to the nature of the contract
Update the contracts register to incorporate all contracts within policy thresholds and align to the PA23 requirements.	Dec 24	Higher engagement in the procurement process from SMEs and local suppliers
Further develop processes for monitoring, managing and reporting on the risks associated with our supply chain. Making sure we assess the resilience of our Business Critical and Strategic suppliers, whom we rely on for our own business continuity.	Jun 25	Create a baseline dataset in order to monitor and increase in the % of Contracts awarded in Lots and the % of spend with SME and Local suppliers
In advance of the Procurement Act 2023, develop a core set of KPIs, templates and guidance to support the rollout of the Contract Management Framework, address supplier performance issues and build good practice ahead of the new regulatory changes.	Feb 25	

Ensure that all new projects include performance measures that are relevant to the service objective and proportionate to the size and complexity of the contract, as part of the procurement process to ensure these form part of the signed agreement.	Mar 25	
All new Contracts will provide suppliers with a clear set of standards and expectations in respect to the customer and satisfaction. Suppliers will be monitored against key performance indicators to help us achieve the excellent customer service we have committed to in the PFH Corporate Plan	Mar 25	
Be proactive in considering, where appropriate, breaking down contracts into smaller lots, therefore reducing their size and financial risk which could make them more attainable for smaller locally based suppliers	Mar 25	
Create 'one version of the truth' in respect to contracts and supplier management through the development and implementation a Contract Management toolkit	Jun 25	

5. Create effective measurement and reporting to aid in quantifying the impact and effectiveness of procurement and inform future budget decisions

What are we going to do?	By when?	How will we measure it?
Develop and present spend, procurement and performance dashboards to be made available to senior stakeholders, to increase the	Mar 25	Full spend analysis that is refreshed at least annually

visibility of spend data and highlight trends and opportunities to deliver savings, spend consolidation and address tail-end spend. As a minimum, this will be provided to SLT six monthly		Procurement reports provided to SLT six monthly Annual Procurement reports to Board
Develop a benefits realisation process, to ensure consistent and comprehensive reporting of both savings and additional benefits delivered through the procurement and contract management process.	Mar 27	
For all 'above threshold' contracts, report annually against the promises made during the tender process	Mar 26	
Report against Social Value derived through procurement exercises	Mar 26	
Benchmark procurement practices to ensure continuation in best practice and value for money	Mar 26	

Appendix A

Title	Contract Status	Contractor Name	Contract Commencement	Current End Date	Potential End Date (Including Extensions)		Total Value Committed	Contract Type	FTS Threshold	2025 - 2028 Plan
24 Hour Emergency Call Centre	Under Review/Tender	Astraline	03/04/2023	04/02/2024	02/04/2024	£	68,792	Services	Above Threshold	Procure under PA23 as an above FTS threshold contract up to 5 years.
Telecare Maintenance	Live	Tunstall	01/06/2023	31/05/2024	31/05/2024	£	20,000	Services	Below Threshold	Specialist contract - current agreement to work to existing terms, under FTS threshold on an annual basis
GDPR Advice	Live	Data Protection People	24/11/2023	23/11/2024	23/11/2024	£	3,240	Services	Below Threshold	Under FTS threshold contract - review annually
Grounds Maintenance (East Riding)	Live	Beaumonts Garden Maintenance	01/04/2024	31/03/2025	31/03/2025	£	9,240	Services	Below Threshold	Procure under PCR15 rules commencing September 24, consider longer term contract
Electronic payment services	Extended 2	Allpay.net	01/10/2021	30/09/2025	30/09/2025	£	25,868	Services	Below Threshold	Under FTS threshold - review in 2025
New Build Construction - Padstow Phase 1	Live	Azza Construction	28/09/2022	30/09/2025	30/09/2025	£	3,480,000	Works	Below Threshold	No renewal - package deal - one off. Such arrangement fall outside of regulations
Development	Live	Unity Housing Association	01/04/2024	31/12/2025	31/12/2025	3% of development cost		Services	Below Threshold	Review based upon each development to determine whether under or other FTS thresholds.
Fire Risk Assessments	Live	Pyro Fire Services	02/01/2024	01/01/2026	01/01/2026	£	14,963	Services	Below Threshold	Procure under PA23 as a below threshold contract to be awarded in 2026
3 Star Gas Contract and Maintenance (Including installations)	Extended 2	The Gas Company	12/03/2021	30/04/2025	11/03/2026	£	265,000	Services	Above Threshold	Procure under PA23 as an above threshold contract to be awarded in 2026 as a 5 year contract (potentially extracting boiler replacements subject to net zero plans)
Health & Safety Advisor	Extended 1	LRMS	01/04/2023	31/03/2026	31/03/2026	£	14,443	Services	Below Threshold	Procure under PA23 as a below threshold contract to be awarded in 2026 as a 3 year contract
Replacement Windows	Live	Anglian Windows	01/08/2021	31/03/2025	31/03/2026	£	1,000,000	Services	Above Threshold	Procure under PA23 as an above threshold contract to be awarded in 2026 as a 5 year contract
Marketing & Communications	Extended 1	Home Marketing	01/05/2023	01/05/2025	30/04/2026	£	69,051	Services	Below threshold	Procure under PA23 as a below threshold contract on a 3 year contract
Asbestos Surveying	Extended 1	The Testing Lab	17/06/2022	31/07/2025	16/06/2026	£	20,000	Services	Below Threshold	Procure under PA23 as a below threshold contract on a 3 year contract
Kitchen Manufacturer	Live	Symphony	01/08/2021	31/07/2026	31/07/2026	£	1,000,000	Services	Above Threshold	Procure under PA23 as an above threshold contract to be awarded in 2026 as a 5 year contract
Fire Alarms & Emergency Lights	Live	Securitas	01/09/2023	31/08/2026	31/08/2026	£	17,000	Services	Below Threshold	Procure under PA23 as a below threshold contract on a 3 year contract
Experian Credit Referencing Services	Live	Experian	08/12/2023	07/12/2026	07/12/2026	£	645	Services	Below Threshold	Under FTS threshold - review in 2026
Furniture Replacement	Live	Furniture Resource Centre	01/02/2023	31/01/2025	31/01/2027	£	90,000	Goods	Above/Below Threshold	Determine if required subject to pop-in refurbishment programme. If used, reprocare as an above threshold contract under PA23 if longer than 2 years. Route will depend on term of contract.
Lone Worker Devices	Live	First 2 Help You	28/02/2024	27/02/2027	27/02/2027	£	5,977	Services	Below Threshold	Under FTS threshold - review for award in 2027
Grounds Maintenance	Live	OUTCO	01/04/2022	31/03/2025	31/03/2027	£	1,000,000	Services	Above Threshold	Procure under PCR15 rules commencing September 24, consider longer term contract
Lift Maintenance	Live	Orona	01/02/2024	31/03/2027	31/03/2027	£	7,920	Services	Below Threshold	Under FTS threshold - review for award in 2027
Reactive Repairs, Voids and Capital Replacements	Live	JCS		30/06/2025	05/06/2027	£	3,000,000	Works	Above Threshold	Procure under PA23 as an above FTS threshold contract up to 5 years
Electrical Services	Live	Ecolec	30/06/2024	30/06/2027	30/06/2029	£	1,375,000	Services	Above Threshold	Procure under PA23 as an above FTS threshold contract up to 5 years
Painting & Decorating	Live	Colin Woolner Decorators Ltd						Services	Below Threshold	Subject to a contract review in 2024
Insurance	Live							Services	Above Threshold	Subject to an annual premiums review
Cleaning	Live	PK Cleaning Services Ltd						Services	Below Threshold	Subject to a consolidation review in 2025