

**Decision Maker:** EXECUTIVE, RESOURCES AND CONTRACTS POLICY  
DEVELOPMENT AND SCRUTINY COMMITTEE

**Date:** Wednesday 5 January 2022

**Decision Type:** Non-Urgent Non-Executive Non-Key

**Title:** EXCHEQUER SERVICE - CONTRACT PERFORMANCE  
REPORT

**Contact Officer:** Claudine Douglas-Brown, Assistant Director: Exchequer Services  
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**Chief Officer:** Director of Finance

**Ward:** (All Wards);

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1. Reason for report

- 1.1 This report provides information regarding Liberata's performance in the provision of Exchequer Services for the period 1<sup>st</sup> April 2021 to 30<sup>th</sup> September 2021 with an updated position as at 30<sup>th</sup> November 2021.
- 1.2 A letter from Amanda Inwood-Field, Liberata's Contract Director, provides an update on each individual service and is attached at Appendix 1 with statistical data relating to the services shown in subsequent appendices.
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2. **RECOMMENDATION(S)**

**The Committee is requested to note the information contained within the report on Liberata's performance and the action taken to address any performance issues.**

## Impact on Vulnerable Adults and Children

1. Summary of Impact: None
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## Corporate Policy

1. Policy Status: Existing Policy
  2. MBEB: Managing Our Resources Well
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## Financial

1. Cost of proposal: Not Applicable
  2. Ongoing costs: Not Applicable
  3. Budget head/performance centre: Exchequer Service – Payment, Income and Charging
  4. Total current budget for this head: £1.91m
  5. Source of funding: Existing budget 2021/22
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## Personnel

1. Number of staff (current and additional): 4fte plus Liberata staff
  2. If from existing staff resources, number of staff hours: Not applicable
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## Legal

1. Legal Requirement: Statutory Requirement  
Public Health (Control of Disease) Act 1984  
Late Payment of Commercial Debts (interest) Act 1998  
The County Court Act 1984  
The Civil Procedure Rules  
Environmental Protection Act 1990  
Housing Act 2004  
The Care Act 2014  
The Public Contracts regulations 2015
  2. Call-in: Not Applicable
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## Procurement

1. Summary of Procurement Implications: None
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### Customer Impact

1. Estimated number of users/beneficiaries (current and projected): The services covered in this report affect those who owe general income to the Council, all the Council's suppliers and all adult social care clients. This amounts to an estimated 40,000 people
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### Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments: Not Applicable

### 3. COMMENTARY

- 3.1 This report provides information regarding the performance of the Exchequer Services provided by Liberata for the period 1<sup>st</sup> April 2021 to 30<sup>th</sup> September 2021 with an updated position as at 30<sup>th</sup> November 2021.
- 3.2 The Exchequer Client Unit monitor the contractor's compliance against the contract to ensure that services are provided to the required standard, meeting the agreed targets and performance standards. Where there are areas of concern or underperformance, the Assistant Director, Exchequer Services will agree an action plan with Liberata to address these issues. The team also ensures the services comply with current legislation, financial regulations, contractual obligations, and audit requirements.
- 3.3 To maintain the drive for improved service performance, monthly service review meetings are held with operational and senior Liberata management. To further illustrate the commitment to the continuous improvement agenda the Contract Director and Finance Service Delivery Director meets with Bromley regularly to deal with escalated issues, review policies and develop new ideas.
- 3.4 The Exchequer Services covered in this report are: -
- Sundry Debtors, Mortgages and Corporate Debt
  - Accounts Payable
  - Financial Assessment and Management
  - Appointee and Deputyship

### SERVICE PROFILE/DATA ANALYSIS

- 3.5 Sundry Debtors, Mortgages & Corporate Debt
- 3.5.1 The Sundry Debts performance is measured on the amounts recovered at the end of each reporting period. At the 30<sup>th</sup> September 2021, there were 4,922 invoices outstanding totalling £16.56m. Of the total amount, £4.48m (27.03%) had been outstanding for less than 30 days.
- 3.5.2 As at 30<sup>th</sup> September 2021, the amount recovered in respect of invoices raised between 1<sup>st</sup> April 2021 and 30<sup>th</sup> September 2021 was £21.63m or 70.72%. This increased to 78.90% as at 30<sup>th</sup> November 2021.
- 3.5.3 The table below the debts where Liberata were unable to pursue recovery action. In addition invoices totalling £3.09m, were raised within the last 14 days of the month which means recovery action would not have taken place yet. These factors adversely affected in-year collection and are shown in Table 1 below.

| Description   | No. of Invoices | Value of Invoices    |
|---|-----------------|----------------------|
| Invoices raised during the last 14 days of the month                            | 628             | £3,087,814.30        |
| Community Infrastructure Level (CIL) invoices due after the 30th September 2021 | 9               | £97,358.42           |
| Disputed and Escalated debts  | 148             | £1,277,050.81        |
| Debts placed on hold by LBB Departments   | 11              | £279,211.65          |
| Debts secured by Charging Order   | 3               | £63,404.96           |
| Debts referred for Write Off  | 6               | £6,072.50            |
| <b>Total</b>  | <b>805</b>      | <b>£4,810,912.64</b> |

3.5.4 Table 2 shows the in-year collection rate however to reflect Liberata's recovery performance it has been adjusted to take account of those debts where Liberata could not pursue payment. This gives a revised collection rate of 83.92% at 30<sup>th</sup> September 2021 and 84.38% at 30<sup>th</sup> November 2021.

Table 2

|                                   | As at 30/09/19 | As at 30/09/20 | As at 30/09/21 | As at 30/11/21 |
|-----------------------------------|----------------|----------------|----------------|----------------|
| <b>Unadjusted Collection Rate</b> | 83.57%         | 53.42%         | 70.72%         | 78.90%         |
| <b>Adjusted Collection Rate</b>   | <b>93.66%</b>  | <b>59.55%</b>  | <b>83.92%</b>  | <b>84.38%</b>  |

3.5.5 The suspension of enforcement action during the pandemic in addition to the increase in customers struggling financially affected the level of income collected as can be seen in the performance as at 30<sup>th</sup> September 2020. However, with the easing of restrictions earlier in the year and the implementation of an income recovery plan, the collection performance has increased significantly when compared to the performance at the same time last year.

3.5.6 **Appendix 2** shows the comparison between the levels of outstanding debt for each month from April to March for the years 2016-17 through to year to date for 2021-22. This shows that the level of outstanding debt continues to reduce and remains lower than the same time last year.

3.5.7 **Appendix 3** shows the comparison between the numbers of invoices outstanding each month from April to March for the years 2016-17 through to year to date for 2021-22.

#### Aged Debt as at 30<sup>th</sup> November 2021

3.5.8 The out-of-year collection rate across all financial years was 98.93% with £16.9m collected up to the end of September with this increasing to 99.03% and £18m by the 30<sup>th</sup> November 2021. The factors which continue to affect out-of-year collection are shown below.

Table 3

| Description  | Value of Invoices    |
|--|----------------------|
| Disputed and Escalated debts                         | £3,143,207.14        |
| Debts referred for Write Off & awaiting cancellation | £1,189,980.67        |
| Debts placed on hold by LBB Departments              | £132,674.25          |
| Debts with LBB's Legal Team                          | £80,407.98           |
| Debts secured by Charging Order                      | £318,654.92          |
| <b>Total</b>   | <b>£4,864,924.96</b> |

3.5.9 Table 4 shows the movement in the out-of-year debt for the year 1<sup>st</sup> October 2020 to 30<sup>th</sup> September 2021 along with the overall percentage reduction.

Table 4

| Reporting point | 30-Sep-20     | 30-Sep-21    | Reduction since 30/09/20 |
|-----------------|---------------|--------------|--------------------------|
| <b>Fin Year</b> | <b>£,000</b>  | <b>£,000</b> | <b>%</b>                 |
| <b>Pre 2016</b> | 1,038         | 1,001        | 4%                       |
| <b>2016/17</b>  | 394           | 377          | 4%                       |
| <b>2017/18</b>  | 741           | 709          | 4%                       |
| <b>2018/19</b>  | 809           | 584          | 28%                      |
| <b>2019/20</b>  | 4,102         | 1,165        | 72%                      |
| <b>2020/21</b>  | 13,002        | 1,256        | 90%                      |
| <b>Total</b>    | <b>20,086</b> | <b>5,092</b> | <b>75%</b>               |

3.5.10 **Appendix 4** shows the overall recovery position of debts in each financial year up to 30<sup>th</sup> September 2021. The total debt outstanding is £3.5m less than it was at the 30<sup>th</sup> September 2021 however the debts in dispute or on hold at the request of the service department continues to remain high. We are working with Liberata and the service departments to resolve queries and disputes as quickly as possible so that recovery action can continue.

3.5.12 Cases are escalated by Liberata to the Exchequer Client Unit who liaise with senior LBB officers regarding pursuing the debt or writing it off if it is uncollectable.

### Utilities

3.5.13 The total debt outstanding for Utilities was £264k as at 30<sup>th</sup> September 2021, which was £174k higher than the previous year. The increase was driven by the Utility companies taking longer to pay their invoices. For the period up to 30<sup>th</sup> September 2021 Liberata issued 249 invoices which was comparable to the amount issued the previous year however this year the number of invoices that remained outstanding at the end of the reporting period was over 100% more. Liberata are continuing to pursue payment and are liaising with the service department in respect of the disputed invoices.

3.5.14 **Appendix 5** shows a summary of Utility debts as at 30<sup>th</sup> September 2021.

### Income

- 3.5.15 The Income Team raised 5,633 sundry invoices (excluding the Trade Refuse service) with a value of £31.52m from 1<sup>st</sup> April 2021 to 30<sup>th</sup> September 2021.
- 3.5.16 During the same period, 705 invoices relating to all financial years with a total value of £4.4m were subsequently cancelled. This includes invoices for charges raised in advance where the service was subsequently cancelled.
- 3.5.17 **Appendix 6** shows the value of invoices raised month by month for the period from 1<sup>st</sup> April 2021 to 30<sup>th</sup> November 2021 compared to the same periods in the previous four financial years.
- 3.5.18 **Appendix 7** shows the number of invoices raised month by month for the period from 1<sup>st</sup> April 2021 to 30<sup>th</sup> November 2021 compared to the same periods in the previous four financial years.
- 3.5.19 The outstanding debt for Trade Waste was £627k as at 30<sup>th</sup> September 2021. The debt has since decreased to £411k as at 30<sup>th</sup> November 2021. Table 5 provides an analysis of the outstanding debt which has increased by £10k when compared to the same time last year. This is mainly due to the disputed debt which is being followed up by the service department.

Table 5

| Age Analysis of Trade Balance           | As at 30th<br>September 2020 | As at 30th<br>September 2021 | Variance     |              |
|---|------------------------------|------------------------------|--------------|--------------|
|   | £                            | £                            | £            | %            |
| Under 30 days old                       | 12,468                       | 7,107                        | -5,361       |              |
| Invoices 31-365 days old                | 511,993                      | 523,452                      | 11,459       |              |
| Invoices over 1 year old                | 92,605                       | 96,164                       | 3,559        |              |
| <b>Total</b>                            | <b>617,066</b>               | <b>626,723</b>               | <b>9,658</b> | <b>1.57%</b> |
| <b>Recovery Status of Trade Balance</b> |                              |                              |              |              |
| Payment arrangements/Direct Debits      | 436,870                      | 419,020                      | -17,849      |              |
| Invoices in dispute                     | 35,583                       | 65,582                       | 29,999       |              |
| Awaiting cancellation                   | 0                            | 10,287                       | 10,287       |              |
| Awaiting write off                      | 47,600                       | 37,823                       | -9,778       |              |
| Active Recovery                         | 97,013                       | 94,011                       | -3,001       |              |
| <b>Total</b>                            | <b>617,066</b>               | <b>626,723</b>               | <b>9,658</b> | <b>1.57%</b> |

#### Nightly Paid Accommodation Charges

- 3.5.20 The outstanding debt for Nightly Paid Accommodation charges as at 30<sup>th</sup> September 2021 was £8.5m for current and former occupiers. Table 6 gives a breakdown of the outstanding debt as at 30<sup>th</sup> September 2020 and 30<sup>th</sup> September 2021 which shows an increase of £1.48m.
- 3.5.21 The number of clients moving into Temporary Accommodation has increased throughout the pandemic. There number of Current Tenants increased from 932 in September 2020 to 1,160 in September 2021, a 24.5% increase. Consequently, the collectable rent also increased by a similar percentage. Although Housing Benefit payments increased in the same period by £1.1m (39.17%), the cash collected decreased by £45k (5.37%).

Table 6

|  | As at 30<br>September 2020 | As at 30<br>September 2021 | Variance      |
|--|----------------------------|----------------------------|---------------|
|  | £                          | £                          | %             |
| Charges raised for current year and arrears brought forward for previous years | 10,774,682                 | 13,442,607                 | 24.76%        |
| Payments received from debtors   | -829,013                   | -784,481                   | -5.37%        |
| Housing Benefit awards   | -2,902,307                 | -4,039,142                 | 39.17%        |
| <b>Sub total</b>   | <b>7,043,361</b>           | <b>8,618,984</b>           | <b>22.37%</b> |
| Less combined total debts written on/off                                       | -3,755                     | -102,991                   | 2642.70%      |
| <b>Total</b>   | <b>7,039,606</b>           | <b>8,515,993</b>           | <b>20.97%</b> |

- 3.5.22 The Coronavirus Act 2020 introduced on 26<sup>th</sup> March 2020 adversely affected the collection of rent charges with the prevention of any eviction proceedings. This meant that non-paying tenants were permitted to remain in temporary accommodation whilst continuing to accrue debt. Although the restrictions were lifted in August 2020, arrears levels had to reach the value of a minimum of 6 months' rent before notice could be given on grounds of non-payment.
- 3.5.23 Payment arrangements agreed with current and former tenants are frequently for very small instalments over long periods of time as tenants often have issues with affordability and do not possess the assets needed for successful enforcement of legal action. Where payment arrangements are offered, it is preferable to accept low repayments rather than submitting the debt for write off.
- 3.5.24 Liberata participated in the implementation of the Orchard Housing system along with Housing Officers and phase one went live on 18<sup>th</sup> December 2019. Liberata have been working with the Council to improve the functionality of this system. As a result, the issuing of SMS reminders and the ability to produce automated bulk statements and reminder letters have recently been introduced. The ability for tenants to make online payments is expected to be introduced within the next few months. Future projects will include the introduction of direct debit facilities and a customer portal. These measures should help to improve collection in this area.
- 3.5.25 Regular meetings are held with senior officers in Finance and Housing to ensure any issues affecting collections are resolved quickly and are escalated with the system provider where required.

### 3.6 Accounts Payable

- 3.6.1 Under the Public Contracts Regulations 2015 the Council is required to publish prompt payment data showing the percentage of undisputed invoices paid within 30 days.
- 3.6.2 A summary covering the period from 1<sup>st</sup> April 2021 to 30<sup>th</sup> September 2021 is shown below. This shows that the percentage of undisputed invoices that were paid within 30 days was 99%, against a target of 99%. This has reduced by 1% in November to 98% due to the transition to the new Care Management system and associated finance modules however this is being monitored and action is being taken to clear outstanding invoices as quickly as possible.

Table 7



| Target: 99%                 | Invoices Over 30 | Invoices Under 30 | Total         | %          | Invoices Over 20 | Invoices Under 20 | Total         | %          |
|-----------------------------|------------------|-------------------|---------------|------------|------------------|-------------------|---------------|------------|
| Manuals                     | 33               | 6,066             | 6,099         | 99%        | 66               | 6,033             | 6,099         | 99%        |
| I-Proc                      | 154              | 5,489             | 5,643         | 97%        | 244              | 5,399             | 5,643         | 96%        |
| Carefirst                   | 72               | 5,542             | 5,614         | 99%        | 121              | 5,493             | 5,614         | 98%        |
| Adults                      | 3                | 198               | 201           | 99%        | 13               | 188               | 201           | 94%        |
| <b>Cumulative YTD Total</b> | <b>262</b>       | <b>17,295</b>     | <b>17,557</b> | <b>99%</b> | <b>444</b>       | <b>17,113</b>     | <b>17,557</b> | <b>97%</b> |

3.6.3 Table 8 below shows the percentage split in the method of payments to suppliers. The percentage of suppliers paid by BACS from 1<sup>st</sup> April 2021 to 30<sup>th</sup> November 2021 was 96%. This is an increase in BACS payments of 1% compared to last year.

3.6.4 Officers recognise that it is more cost effective to make payments by BACS and are working with Liberata to continue to reduce the number of cheque payments further.

Table 8

| Month | 2020/21       |            |            |           | 2021/22       |            |            |           |
|-------|---------------|------------|------------|-----------|---------------|------------|------------|-----------|
|       | BACS          |            | Cheque     |           | BACS          |            | Cheque     |           |
|       | No.           | %          | No.        | %         | No.           | %          | No.        | %         |
| April | 2,917         | 97%        | 93         | 3%        | 2,454         | 96%        | 94         | 4%        |
| May   | 2,531         | 95%        | 134        | 5%        | 2,522         | 95%        | 123        | 5%        |
| June  | 2,566         | 95%        | 140        | 5%        | 2,874         | 96%        | 123        | 4%        |
| July  | 2,688         | 95%        | 140        | 5%        | 2,516         | 96%        | 105        | 4%        |
| Aug   | 2,220         | 95%        | 154        | 5%        | 2,242         | 96%        | 83         | 4%        |
| Sept  | 2,739         | 94%        | 161        | 6%        | 2,953         | 97%        | 99         | 3%        |
| Nov   | 2,702         | 95%        | 151        | 5%        | 2,315         | 95%        | 126        | 5%        |
|       | <b>18,363</b> | <b>95%</b> | <b>973</b> | <b>5%</b> | <b>17,876</b> | <b>96%</b> | <b>753</b> | <b>4%</b> |

### 3.7 Financial Assessment and Charging

3.7.1 The Key Performance Indicator figures for the team covering the period from 1<sup>st</sup> April 2021 to 30<sup>th</sup> September 2021 are shown in table 9 below. The performance as at 30<sup>th</sup> November remained at 100% for producing the charging file however the November performance for completing financial assessments is not yet available due to the implementation of the new system.

Table 9

| Indicator   | Target | Actual 2016/17 | Actual 2017/18 | Actual 2018/19 | Actual 2019/20 | Actual 2019/21 | Apr – Sep 21 |
|---|--------|----------------|----------------|----------------|----------------|----------------|--------------|
| Complete Financial Assessments within 10 working days | 100%   | 92%            | 95%            | 80%            | 65%            | 89%            | 93%          |
| Produce the charging file from CareFirst weekly       | 100%   | 100%           | 97%            | 100%           | 100%           | 100%           | 100%         |

- 3.7.2 Performance has improved significantly since April due to the implementation of an automated Workflow Manager on the Information@Work Document Management System (DMS). This enabled visibility and management scrutiny of documents which were about to fall outside of the SLA. As a result, this supported Liberata's ability to achieve the KPI month on month. However, the implementation of ContrOCC, the new Financial Assessment system in November has resulted in several technical issues leading to processing delays. These issues are being addressed and the expectation is that the performance will improve in quarter four.
- 3.7.3 Liberata have implemented benchmarks for the various activities undertaken by the team, which each team member is managed against. These benchmarks feed into Liberata's performance management framework and have played a key role in improving service performance.
- 3.7.4 Liberata's Quality and Appeals (QA) team continues to independently carry out quality checking of the assessments undertaken by the Financial Assessment team. Additional focus is targeted on new starters and upskilled employees to ensure that the training has been effective, with errors identified allowing managers to address any ongoing training needs. Liberata store all quality check outcomes on their central Quality Tool, with an output report provided to the Team Leader each month.
- 3.7.5 Liberata have created a new 'online smart' form for social care clients which will be able to make real time decisions based on the information provided by the client. This is ready to be implemented once ContrOCC has bedded in. Liberata are also currently investigating whether Robotic Process Automation (RPA) can assist with the assessment process, which will result in reduced processing days.

### 3.8 Appointee and Deputyship

- 3.8.1 The Key Performance Indicator figures for the team, covering 1<sup>st</sup> April to 30<sup>th</sup> November 2021, are shown in table 10 below which shows the service continues to perform well.

Table 10

| Indicator  | Target | Actual 2016/17 | Actual 2017/18 | Actual 2018/19 | Actual 2019/20 | Actual 2020/21 | Apr – Sep 21 | Nov 21 |
|--|--------|----------------|----------------|----------------|----------------|----------------|--------------|--------|
| Referral of applications to the Panel within 14 working days         | 100%   | 97%            | 100%           | 100%           | 100%           | 100%           | 100%         | 100%   |
| Raise invoices within 2 months of the anniversary of the court order | 100%   | 100%           | 100%           | 99%            | 100%           | 100%           | 100%         | 100%   |

## USER/STAKEHOLDER SATISFACTION

- 3.9 Complaints are treated as free intelligence to drive improvement and learning. Each complaint is used as a tool for improvement, with individual errors seen as an opportunity to put things right not just for the individual complainant but for the wider community.
- 3.10 The table below shows the number of complaints received since April 2016 split between justified and unjustified. For the range of services being provided the numbers of complaints are relatively low.

Table 11

|  | 2016/17   | 2017/18   | 2018/19   | 2019/20   | 2020/21   | Apr-Sept 21 |
|--|-----------|-----------|-----------|-----------|-----------|-------------|
| <b>Sundry Debtors/Income</b>                 |           |           |           |           |           |             |
| Justified                                    | 7         | 2         | 6         | 4         | 6         | 2           |
| Unjustified                                  | 4         | 2         | 8         | 3         | 2         | -           |
| <b>Total</b>                                 | <b>11</b> | <b>4</b>  | <b>14</b> | <b>7</b>  | <b>8</b>  | <b>2</b>    |
| <b>Accounts Payable</b>                      |           |           |           |           |           |             |
| Justified                                    | -         | -         | -         | -         | -         | -           |
| Unjustified                                  | 1         | 1         | -         | -         | -         | -           |
| <b>Total</b>                                 | <b>1</b>  | <b>1</b>  | <b>-</b>  | <b>-</b>  | <b>-</b>  | <b>-</b>    |
| <b>Financial Assessment &amp; Management</b> |           |           |           |           |           |             |
| Justified                                    | 14        | 20        | 6         | 13        | 7         | 7           |
| Unjustified                                  | 12        | 5         | 2         | 5         | 6         | 6           |
| <b>Total</b>                                 | <b>26</b> | <b>25</b> | <b>8</b>  | <b>18</b> | <b>13</b> | <b>13</b>   |
| <b>Appointee &amp; Deputyship</b>            |           |           |           |           |           |             |
| Justified                                    | -         | 1         | -         | -         | -         | -           |
| Unjustified                                  | 1         | -         | -         | -         | -         | -           |
| <b>Total</b>                                 | <b>1</b>  | <b>1</b>  | <b>-</b>  | <b>-</b>  | <b>-</b>  | <b>-</b>    |

## 4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

- 4.1 The Single Financial Assessment Unit are required to carry out timely and accurate financial assessments so that the adults receiving social care and support are informed as early as possible how much they are required to pay towards their care. When there are delays in completing financial assessments or providing information this can cause distress or anxiety for clients and their families.
- 4.2 The Accounts Payable Team are responsible for making direct payments to vulnerable adults, children with disabilities, foster carers and care homes. Making the correct

payments on time ensures there is no impact on vulnerable adults or children.

- 4.3 The Appointee and Deputyship Team provide services to vulnerable adults who lack the capacity to manage their finances. Prompt submission of court and DWP applications ensures that the risk of financial abuse is removed as early as possible.

## 5 POLICY IMPLICATIONS

- 5.1 One of the “Making Bromley Even Better” ambitions is to manage our resources well, providing value for money, efficient and effective services for Bromley’s residents. To achieve this, we will ensure robust contract management with a focus on efficiency and innovation to improve services for Bromley residents.
- 5.2 Although annual changes to the Council’s Personal Budget and Contribution’s policy impact on the work undertaken by the contractor these are generally not significant to affect the contract price.

## 6 FINANCIAL IMPLICATIONS

- 6.1 The services provided through the Exchequer Services Contract referred to within this report deal with significant financial transactions with examples illustrated below:
- Accounts Payable - £500m per annum
  - Sundry debts (income) - £65m per annum
  - Financial Assessments - £14m per annum
  - Appointee and Deputyship - £3m per annum
- 6.2 The contract is expected to be within the revenue budget for 2021/22 of £1.907m.

## 7 PERSONNEL IMPLICATIONS

None

## 8 LEGAL IMPLICATIONS

- 8.1 This report is a contract performance report for Exchequer Services and is submitted in compliance with rule 23 of the Contract Procedure Rules which requires an annual update report to be submitted when the value of the contract is in excess of £1 million.

## 9 PROCUREMENT IMPLICATIONS

None

|   |         |
|---|---------|
| <b>Non-Applicable Sections:</b>                       | 7 and 9 |
| Background Documents:<br>(Access via Contact Officer) |         |