

Commercial audit framework



Good practice guide

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We are the UK's independent
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Communications Team
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Introduction

The National Audit Office (NAO) commercial audit framework is designed to support value for money assurance relating to government's commercial and procurement activities. It is designed to allow us to structure our assessments in a consistent way and better identify common insights. This framework updates a previous version published in 2022 and is based on the lifecycle set out in our recently updated **Good practice guidance: Managing the commercial lifecycle**.

The framework is organised around six stages of the commercial lifecycle and the four supporting elements required throughout the lifecycle. Each of these ten sections includes:

- an explanation of the section and what it covers;
- relevant considerations for that section, with links to government and NAO guidance and particular risks to look out for;
- key questions to ask to understand performance; and
- sources of evidence which are likely to provide the means to answer the questions.

As well as using this framework internally, we are publishing it to provide insight into our approach and the types of questions we ask. Our assessments of individual commercial arrangements will depend on their own context and go wider than the questions covered in this document.

This 2025 framework has been updated to reflect expectations set out under the Procurement Act 2023.

The NAO scrutinises public spending for Parliament and is independent of government and the civil service. We help Parliament hold government to account and we use our insights to help people who manage and govern public bodies improve public services. The Comptroller and Auditor General (C&AG), Gareth Davies, is an Officer of the House of Commons and leads the NAO.

We audit the financial accounts of departments and other public bodies. We also examine and report on the value for money of how public money has been spent. In 2023, the NAO's work led to a positive financial impact through reduced costs, improved service delivery, or other benefits to citizens, of £1.59 billion.

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Commercial strategy

Commercial strategy represents the overall approach that a public body adopts to ensure that its commercial activities provide the intended outcomes in line with value for money requirements, public procurement regulations and wider policy objectives. Effective competition and transparency are key enablers of delivering value for money. Strategy reflects the specific functions of the body, its operating environment, and wider considerations including the approach to small and medium-sized enterprises (SMEs), innovation, the overall supplier landscape, social value and sovereign capability.

Considerations for auditors

Government expects departments to have commercial strategies in place which align to organisational objectives and policy priorities. It expects departments will monitor compliance with commercial policy requirements.

[\(Commercial Continuous Improvement Assessment Framework\)](#)

NAO also expects commercial agreements to align with wider strategic objectives and adhere to overarching principles of public procurement (transparency, proportionality, equality of treatment and mutual recognition). Business cases should be clear and contain realistic appraisals of options to meet those objectives. [\(Managing the commercial lifecycle – Commercial strategy\)](#)

Particular risks arise where it is harder to carry out considered commercial planning due to time pressures.

Key questions

How does the business case for the procurement demonstrate alignment with the client's key commercial and policy objectives, and expected outcomes specified in its commercial strategy?

- How does the business case demonstrate the input of operational and commercial teams on the commercial approach?
- How does the business case reflect learning from early engagement with the market and other parties?
- How have governance and review processes shaped the strategy and requirement?
- How does the business case test the robustness of options and the chosen route to market, considering how competition can be maximized to deliver value for money and improve the quality of bids across various criteria (for example, price, quality and innovation)?
- Has the business case considered how proposed arrangements might react under different scenarios?
- Has the business case considered the delivery, integration and stakeholder management risks?
- Has the business case set out desired outcomes, critical success factors and key performance indicators and how they shall be measured?

- Has the business case specified a bid assessment methodology that relates to the requirement and is proportionate to the contract?
- How does the business case address considerations of the innovation, the overall supplier landscape, social value, equality, diversity and inclusion, sustainability, and use of SMEs?



Sources of evidence

- **Annual Report and Accounts** and **corporate or category commercial strategies** should set out organisational approach to markets and policy priorities
- **Outline Business Cases** should document strategy at the point of authorising procurement
- **Full Business Cases** should document strategy at the point of approving award to the successful supplier
- **Contract Management Plans** should set out expectations for how delivery of policy priorities will be realised through the contract life.

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Commercial capability covers both organisational and personal effectiveness. Both will be vital to ensure effective operation of new requirements under the Procurement Act 2023. Organisational capability should be proportionate to scale, complexity and need for operational resilience. Investment in people and processes builds capability. Relevant knowledge and experience should be retained throughout the commercial lifecycle, recognising that contracts may last for many years.

Considerations for auditors

Government expects key staff to be accredited through the Government Commercial Function Assessment and Development Centre. Approaches to corporate knowledge retention are defined and succession plans in place for senior commercial leaders. Contract managers are also appropriately trained ([Commercial Continuous Improvement Assessment Framework](#)).

NAO also expects commercial capability to draw on policy, operational, business and commercial teams working together at levels appropriate to the risks and complexity identified in the strategy ([Managing the commercial lifecycle](#) – Capability)

Particular risks arise where levels of senior staff turnover are high, procurements use flexible structures and contracts are long-term arrangements.

Key questions

How has the client ensured appropriate skills will be in place throughout the lifecycle of the contract?

- How has the client demonstrated that commercial capability across the lifecycle reflects the complexity identified in the business case?
- How does the plan provide for the retention of cross-discipline knowledge and experience to optimise the commercial acumen available across the procurement and contract management phases of the commercial lifecycle?
- How has the client ensured adequate documentation of all aspects of the contractual arrangement for all phases will be available to it and the supplier throughout the contract?
- How has the client ensured that it has knowledge and skills comparable to those of its suppliers?
- Have key staff met the expected levels of skill and experience set out in the Commercial Continuous Improvement Assessment Framework for all stages of the lifecycle?
- How has the client ensured commercial staff at all levels of the organisation have the capability and awareness to manage effective commercial relationships under the Procurement Act 2023 regime?

- How does the plan provide for resilience of commercial capability in the face of unplanned developments or market challenges?
- How has the client assured itself that its staffing model remains effective and relevant throughout the procurement and contract management phases of the commercial lifecycle?



Sources of evidence

- **Workforce plans**
- **Commercial resourcing strategies and succession planning**
- **Data on staffing and vacancies**
- **Contract Management Plans** should set out anticipated make-up of key staff and capability throughout the contract lifecycle.
- **Contract governance reporting**

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Accountability supports organisations to fulfil their duties with respect to managing public money.

Governance supports this through oversight of commercial activity at an organisational level. Public bodies should demonstrate robust, effective, independent oversight of both their contractual arrangements and overall commercial portfolios. Leaders should promote the adoption of good practice and be accountable for whether this happens.

Considerations for auditors

Government expects a commercial governance framework to be in place, defining roles and responsibilities for the strategic and operational management of commercial activity. Expectations include a commercial oversight board or equivalent, and use of standard operating procedures ([Commercial Continuous Improvement Assessment Framework](#)).

NAO expects effective independent scrutiny of commercial decisions and activity, including supplier performance, drawing on reliable and timely management information.

Scrutiny should extend not only to the organisation's own performance against obligations but assessing the supplier's performance against agreed key performance indicators (KPIs). ([Managing the commercial lifecycle](#) – Accountability and governance).

Particular risks arise where services are complex or novel, are dependent on client obligations, or cannot be disrupted – with few alternative providers.

Key questions

Can the client demonstrate robust, effective, and independent oversight of their contractual arrangements?

- What assurance and approval regimes have been used in the development, procurement and management of the contract?
- Is transparency built into the contract, including NAO access?
- Are governance frameworks that are in place suitable to the scale of the organisation's contract?
- What independent scrutiny of commercial processes has the client demonstrated throughout the commercial lifecycle?
- How reliable, timely and understandable is the management information flowing to individuals/groups providing governance and control?
- What independence controls have been in place where external industry expertise has been used?
- Does oversight include advice with the required level of technical knowledge?
- What independent scrutiny is in place over the client's own contractual obligations and its performance against them?

- How does the organisation demonstrate lessons learned in the past are being used to improve future performance?
- Are appropriate arrangements in place suitable to ensure appropriate and regular assessment of supplier's performance against agreed key performance indicators?



Sources of evidence

- **Contract terms and any referenced documents**
- **Outline Business Case and Full Business Case**
- **Submissions for scrutiny including Cabinet Office and HM Treasury controls**
- **Contract Management Plans**
- **Minutes of meetings of boards, those charged with governance and other decision-making groups**
- **Submissions to commercial oversight boards or equivalent**
- **Performance and progress reports**
- **Contract details notice with agreed key performance indicators.**

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Transparency and data

Transparency helps improve market engagement throughout the commercial lifecycle, enhancing effectiveness and upholding market and public confidence. As well as complying with legal requirements to publish information, a significant opportunity exists for government to make better use of commercial data to improve value for money throughout the commercial lifecycle. This will require it to develop systems and processes to collect, assure and analyse data.

Considerations for auditors

Government expects departments to publish formal contract notices about each contract in a central system, the Central digital platform. The Procurement Act requires government bodies to publish information about a contract and procurement in formal contract notices, subject to any exemptions which may apply. These notices should provide public transparency over all stages of a contract's life, from initial market engagement and the process by which a contract was awarded, to its subsequent performance, modifications and ending.

The NAO also expects departments to collect data and use it to manage the contract and to learn lessons for improvement. The collection of data should be proportionate and timely, and subject to sufficient assurance processes ([Managing the commercial lifecycle – Transparency and data](#))

Particular risks arise where services are contentious, not subject to established processes, for example where they are procured under time pressure or in emergencies.

Key questions

How well is the department making use of commercial data and complying with transparency requirements?

- Have transparency rules and guidance been followed consistently and in full across the commercial lifecycle? This should include:
 - information on the procurement opportunity;
 - information on the contract award;
 - information about contract performance;
 - information on contract changes, extensions and terminations.
- Does the department have the data it needs to understand what drives cost and performance?
- How has the department specified its data collection to maximise opportunities for open data sharing and automation?
- How has the department quality-assured the data it receives for performance monitoring (particularly where it relies on supplier data or assessment)?
- How has the department included and used any possible open book access rights over costs or other data?

- How have the department and suppliers shared data and used appropriate expertise to triangulate and interpret data, and shared insight to improve contract outcomes?
- Has the department agreed clear and consistent principles with suppliers around transparency and commercial confidentiality?
- How has the department assured data protection mechanisms on contract data?



Sources of evidence

- **Documentation of key decisions in the process**
- **Published details on on the Central digital platform**
- **Contract registers and systems**
- **Contract management plan**
- **Contract performance data**
- **Contract documentation**

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Requirement

The requirement represents the outcomes the client is trying to achieve through any commercial relationship.

This may be the provision of a service or the procurement of an asset. Outcome-based requirements allow suppliers to propose innovative solutions such as new technologies, services, or business models in line with delivering value for money.

Overambitious requirements can reduce competition by limiting the potential supplier pool. Laying the foundations for effective competition at the requirement stage sets the underlying policy objectives for establishing the outcomes to be achieved.

Considerations for auditors

Government expects departments to engage with supplier markets when developing requirements at the preliminary-market stage. Sources of scrutiny and assurance over requirement development include Delivery Model Assessments and Project Validation Reviews. ([Commercial Continuous Improvement Assessment Framework](#)). Requirements should be developed by people with appropriate skills and in line with good practice ([Technical specifications](#)). Authorities should consider end users early in the process to ensure requirements meet obligations under Equality Act 2010 ([Sourcing Playbook](#)). Requirements need to be non-discriminatory in line with section 56 of the [Procurement Act 2023](#).

NAO also expects business cases to clearly define requirements and evidence all necessary reviews and approvals. Business cases should assess what flexibility is essential to continue meeting requirement as conditions change ([Managing the commercial lifecycle](#) – Requirement).

Particular risks arise where services are new, being outsourced for the first time, or are complex by nature, or where the aim is particularly high.

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Requirement *continued*

Key questions

Has the client developed clear outcomes for the service it requires and used these to define an evidence-based requirement?

- How has the client engaged service users and the market in development of the requirement?
- How has the client assured itself over the quality of service or asset data used in developing the requirement?
- How have governance and review processes shaped the requirement, including ensuring that it reflects the wider strategic objectives of the organisation?
- Has the technical specification been prepared in a way that ensures that competition is not limited unnecessarily, that suppliers are treated equally, and treaty state suppliers are not discriminated against?
- Do the procurement documents refer to performance or functional requirements rather than design, a particular licensing model or descriptive characteristics, unless it is not appropriate to do so.
- Has a Delivery Model Assessment been used to evaluate the full range of options for delivering the requirement (for example, in-house vs outsource) and how they align with the client's needs and its capabilities?
- How has the client developed a robust understanding of the likely cost of the requirement (for example, 'Should Cost Model?')
- How has the client considered and set up processes as needed for potential changes?
- How does the Full Business Case demonstrate analysis of the risks of the complexity and demands of the requirement?
- How has the client's understanding of the market and past performance across government been used in its requirement?
- Has the client undertaken a sustainability assessment that clearly demonstrates the consideration of risk, uncertainty and capability?



Sources of evidence

- The requirement or service specification
- Commercial pipeline information
- Strategic supplier management information
- Records of market engagement
- Project Validation Review material
- Outline Business Case and Full Business Case
- Delivery Model Assessment documentation



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Sourcing approach

Sourcing approach is the assessment of how the requirement will best be met, through in-house capability, external suppliers or a blend of both. Clients will consider how to apply procurement legislation, and the procurement approaches it adopts. The approach should reflect the overarching procurement principles of transparency, equal treatment and non-discrimination.

Considerations for auditors

Government expects commercial options to be developed and appraised with cross-functional input in accordance with Green Book principles. Pilots should be used in novel or complex outsourcing where information about requirements, markets or service risks may be limited ([Commercial Continuous Improvement Assessment Framework](#)).

NAO also expects commercial options to examine practices addressing equality, diversity and inclusion alongside social value objectives. When direct awards and/or urgent procedures are used, a robust justification for doing so should be recorded. ([Managing the commercial lifecycle – Sourcing approach](#))

Particular risks arise where requirements have not been clearly stated, where unconsidered assumptions about sourcing or benefits have been built into previous stages, or where the market cannot provide competition.

Key questions

How has the client assessed its sourcing alternatives, and used effective competition to support value for money?

- How clearly does the business case set out the nature of the service and the expected supplier relationship?
- Has a Delivery Model Assessment (Make vs Buy) considered the full range of options for delivering the requirement, and whether existing frameworks are well-enough matched to the requirement?
- Has a strong options appraisal been carried out which fully considers costs, deliverability and realistic benefits, including addressing barriers to competition between providers?
- If the client is taking a sourcing approach which exempts it from maximising competition, has it demonstrated that there is a robust justification. Examples would be:
 - Justification for invoking exemptions under the Procurement Act, for example due to national security concerns or the contract value being deemed below threshold;
 - Justification for using frameworks/Dynamic Purchasing System rather than approach the wider market;
 - Justification for using the competitive flexible procedure to reduce the number of bidders; or
 - Using a direct award (normally only justifiable in an emergency).
- How has the sourcing approach:
 - incorporated pilot schemes for first-generation or complex outsourcing?
 - considered equality, diversity and inclusion?
 - considered social value and national procurement priorities?



Sources of evidence

- **Outline Business Case** and **Full Business Case**
- **Governance submissions**
- **Planned procurement notices**
- **Framework contract tendering information**
- **Central digital platform**

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Market engagement & monitoring

Market monitoring involves engaging with potential suppliers throughout the commercial lifecycle, shaping requirements and process design as well as planning for future needs.

Market monitoring should consider the role of SMEs, and the overall financial resilience of the sector.

Considerations for auditors

Government expects market health and capability assessments to be undertaken during the planning stage and kept under review. (*The Sourcing Playbook*) Government encourages authorities to speak with the market before starting procurement, but where processes unfairly favour one supplier, the supplier must be excluded (*Preliminary market engagement*). Authorities must also consider mandatory and discretionary grounds for excluding potential suppliers (*Exclusions*).

NAO also expects authorities to avoid sole supply or low competition situations when other options may be available. The convenience of established relationships and framework agreements is balanced with developing competitive markets (*Managing the commercial lifecycle – Market monitoring*).

Particular risks arise where markets contain limited credible providers, or powerful incumbents, where there is an increased chance that relationships between buyers and suppliers become too familiar.

Key questions

How effectively is the client using market knowledge to support VFM through the commercial lifecycle?

Strategy and requirement

- How does the business case reflect the client's understanding of market capability and diversity, and its own role in it?
- What specialist commercial skills did the client use to develop its market engagement approach?
- How has the client given the market advance notice of its requirements?
- Has the client allowed sufficient time to maximise participation and allow for the process to adapt to reflect any learning?
- How has the client made sure its early engagement did not favour particular suppliers?
- How has the client made sure that its engagement with the market was informed and helped shape the requirement and risk allocation?
- How has market engagement helped inform client understanding of social value opportunities and their likely costs?

- How has the client's understanding of the market and past performance across government been used in shaping its procurement process?
- What monitoring does it perform to understand the financial health and sustainability of its suppliers throughout the commercial lifecycle?

Development

- How did the client keep itself informed of and act on any mandatory or discretionary exclusion factors affecting its suppliers?
- How did the client update its understanding of market capability before any decision to extend the contract?
- How does the client monitor the wider commercial landscape and depth of the market? Is this proportionate to the scale of commercial activity?
- How does the client make its future procurement requirements transparent (for example, via a pipeline of future opportunities)?

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Market engagement & monitoring *continued*

Sources of evidence

- Commercial pipeline publications, market engagement notes and related material
- Records of meetings/ industry days
- Outline Business Case
- Market Health and Capability Assessment
- Approval submissions for contract extension
- Procurement Assessment Summary reports
- Tender documents, review papers, and assessment frameworks or results



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Process, supplier evaluation and agreement

The procurement process runs from issuing documentation through supplier engagement, bidder evaluation, award decision and the formal notification and standstill processes that follow. Adherence to a strong process minimises the risk of supplier legal challenge.

The agreement is the legally binding contract that results from the process, setting out expectations and obligations, risk transfer, payment mechanisms and incentives.

Considerations for auditors

Government expects evaluation models to be developed before formally inviting offers from the market, with criteria informed by market engagement and bench marking similar procurement exercises issued by other contracting authorities. Supplier due diligence should be proportionate, with no conflicts of interest. Abnormally low bids should be referred to central scrutiny and can be rejected if not explained. Contracts should follow model terms with appropriate governance around variation. Contracts should be sufficiently adaptable to allow for development of requirements especially emerging technology such as AI, with costing of future options included where appropriate [Commercial Continuous Improvement Assessment Framework](#).

NAO also expects the process to balance speed and agility with the benefits of competition derived from participation of a range of capable suppliers. The process and agreement should encourage ways of working that deliver on social value objectives. Performance measures will focus on key outcomes driven by the requirement ([Managing the commercial lifecycle](#) – Process supplier evaluation and agreement).

Particular risks arise where procuring authorities fail to plan and prepare to conduct a conventional procurement process (for example, open procedure), seek to cut corners as a result of budgetary or timing pressures, or have a preference to choose a particular solution or supplier.

Key questions

Has the client adhered to established public procurement processes and timetables to secure the benefits of procurement, including competition?

- How has the client managed risks around fair treatment where the market was involved in shaping the requirement?
- How has the client identified, addressed and documented any potential conflicts of interest in the process?
- Has the client used a Should Cost Model to determine the whole life cost of a requirement prior to issuing a new procurement exercise?

- How has the client designed its process and evaluative criteria in ways that do not inadvertently disadvantage SME suppliers?
- How has the client ensured that suppliers were sufficiently informed of the relevant details of what they were bidding for?
- How has the process made provision for plans in the event of supplier failure or failure on the client's deliverables?
- Has the client set and maintained clear, specific and measurable evaluation criteria for arriving at a judgement of Most Advantageous Tender?
- Has the client modified any assessment criteria during a competitive flexible process, and was it done in accordance with Procurement Act guidance?
- How has the evaluation model provided for understanding and assessment of social value outcomes?
- How did the client assure itself that its evaluation model aligned with published criteria and would work as expected?
- How did the client investigate any abnormally/ unexpectedly low bids?
- How did the client maintain maximum competitive pressure throughout the stages of the process?

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Process, supplier evaluation and agreement *continued*

- How did the client assure itself over the robustness of its evaluation and award decision?
- Has the client complied with transparency requirements around contract award?
- How well does the client understand the expected and actual financial returns and relevant metrics (for example, profit and shareholder returns)?
- How does the client manage any disputes with suppliers and initiate dispute resolution process to ensure improvement to service delivery?

Has the client developed a contract that is clear on requirement, profit arrangements, risk allocation, flexibility and exit arrangements?

- How has the client assured itself that the risk allocation reflects each party's ability to manage risk?
- How effectively do KPIs represent the priority risks and outcomes for the client?
- How effectively do processes ensure that there is verifiable information and a 'single version of the truth'?
- How effectively does the contract incentivise the supplier to act in the interests of the client and the requirement?
- How effectively does the contract encourage ways of working to deliver the required social value outcomes?
- How well does the client monitor agreed social value outcomes to ensure suppliers are successfully delivering against them?
- How effectively does the contract incentivise provider performance during transition and exit phases of the contract lifecycle?



Sources of evidence

- Procurement records including assessment summary
- Evaluation model and documentation
- Independent review of low bids
- Resolution plans
- Final Business Case
- Contract material including:
 - payment mechanism
 - risk transfer
 - pricing schedule
 - KPIs



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Contract management covers all activities relating to the performance and monitoring of the contract. Building consistent knowledge and understanding of the contract is vital, as is ensuring this knowledge is maintained throughout the commercial lifecycle. There should be regular review of delivery and key performance indicators, with open book access used to scrutinise commercial performance and profit levels.

Considerations for auditors

Government expects contract management and mobilisation plans to be developed during procurement, with obligations on each side understood. Regular performance reviews are held with consequences for underperformance managed formally. The financial standing of suppliers is monitored on an ongoing basis. Contract reviews ensure agreements remain fit for purpose and governance processes exist around contract change ([Commercial Continuous Improvement Assessment Framework](#))

NAO also expects information provided for contract management to be subject to sufficient, targeted assurance. An appropriate contract management infrastructure allows for managers to draw on the right support including at a senior level ([Managing the commercial lifecycle](#) – Contract management).

Particular risks arise where authorities fail to invest sufficiently in the contract management function to ensure delivery meets contractual standards, for example quality, availability, timeliness, cost or price. This risk increases

where requirements are novel or complex, hard to monitor with reliable indicators or contracts are long term in nature.

Key questions

How has the client demonstrated active attention to the quality and delivery of performance throughout the contract lifecycle?

- How has the client assured itself that adequately trained and experienced staff are available to manage and deliver the contract throughout its lifetime?
- How clearly are client and supplier obligations, responsibilities and penalties set out in contract management documentation?
- How effectively does the compliance regime (KPIs, incentives and reporting requirements) align with client risks and priorities? How material are incentives to the contract?
- How effectively does the compliance regime incentivise the desired relationship between client and supplier?
- How has the client maintained assurance over the financial standing of the supplier throughout the life of the contract?
- How has the client monitored and acted on the extent of the supplier's dependency on public sector contracts? Has it assessed any resultant conflicts of interest?

- How effectively have other sources of assurance and insight been used to triangulate evidence from the formal compliance regime?
- How consistently and reasonably have incentives and penalties been used during the contract lifecycle?
- How good a knowledge base have contract managers been able to draw on when understanding and assessing variations to expected costs and performance?
- How has the client used strategic relationship management to support common understanding and collaborative behaviours, with the supplier alongside formal contract mechanisms?



Sources of evidence

- **Contract management plan**
- **Supplier performance information packs**
- **Internal performance reporting**
- **Financial monitoring documentation**
- **Contract review information**
- **Supplier market information and accounts**

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Review, transition and exit encompasses the factors that inform a decision in relation to the extension or re-procurement of a requirement. It also involves the process by which a contract is transitioned to a new supplier or ended.

It may also include contract extension for a short period if this flexibility provides clear benefits. Planning and preparation for transition arrangements are vital and should be evidenced from the outset of the contract and built into the cost estimation. Complex arrangements such as PFI contracts benefit from having transition preparations starting at least seven years before the expiry date.

Considerations for auditors

Government expects departments to plan early to allow orderly transitions to new service arrangements. The contract should include clear expectations for exit and transition, including obligations around data transfer at the end of the contract. There should be sufficient means to incentivise suppliers to perform up to the end of the contract, and burdens of managing transition processes should be planned for in commercial and operational staffing (*The Sourcing Playbook*). Transparency requirements around contract termination need to be met (*Contract termination*).

NAO also expects supplier performance to be benchmarked against market measures throughout the lifetime of the contract. Authorities need to have the information necessary to manage transitions to new arrangements, including reversion of assets, capabilities and data to the public sector (*Managing the commercial lifecycle* – Review, transition, exit).

Particular risks arise where markets are less competitive and contracts are long term. In short-term sequential contracts these processes are also particularly important.

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Review, transition and exit *continued*

Key questions

How effectively has the client planned for and managed decisions around contract extension and termination?

- What governance and reporting requirements does the client have in place for contract amendment, extension and termination?
 - How has the client ensured continuity (for example, alternative suppliers, intervention mechanisms, support payments to failing suppliers)?
 - What contingency plans are in place for provider failure and its wider impact across government?
 - How has the client planned and provided for the capability required to manage transition events (amendment, extension, re-procurement, framework update) on a timely basis alongside ongoing service delivery?
 - How has the client assured itself that any decision to extend the contract represents best value for money?
- How has the client assured itself that any changes to the contract do not represent grounds for a full re-procurement?
 - How has the client incentivised effective transfer of capability, data, learning and skills from outgoing suppliers?
 - How has the client assured itself of the condition of any assets the supplier is due to hand back?
 - How has the client maintained competitive pressure on the provider during any amendment/extension negotiations?
 - How has the client incorporated any lessons learned in any amended or new contractual arrangements?
 - Is the client familiar with the guidance Infrastructure and Projects Authority (IPA) contract management programme?
 - How has the client engaged with the IPA PFI expiry guidance in preparation for the expiration of contracts?



Sources of evidence

- **Governance submissions around contract development, extension, termination**
- **Contract management plans**
- **Resolution plans**
- **Contract material**
- **More recent business cases and procurement documents** which lessons learned exercises should feed into
- **Minutes of regular meetings with suppliers and contractors**
- **Final performance reports**
- **Market transparency reports**