

Equality of Opportunity and Sustainable Development in Public Sector Procurement

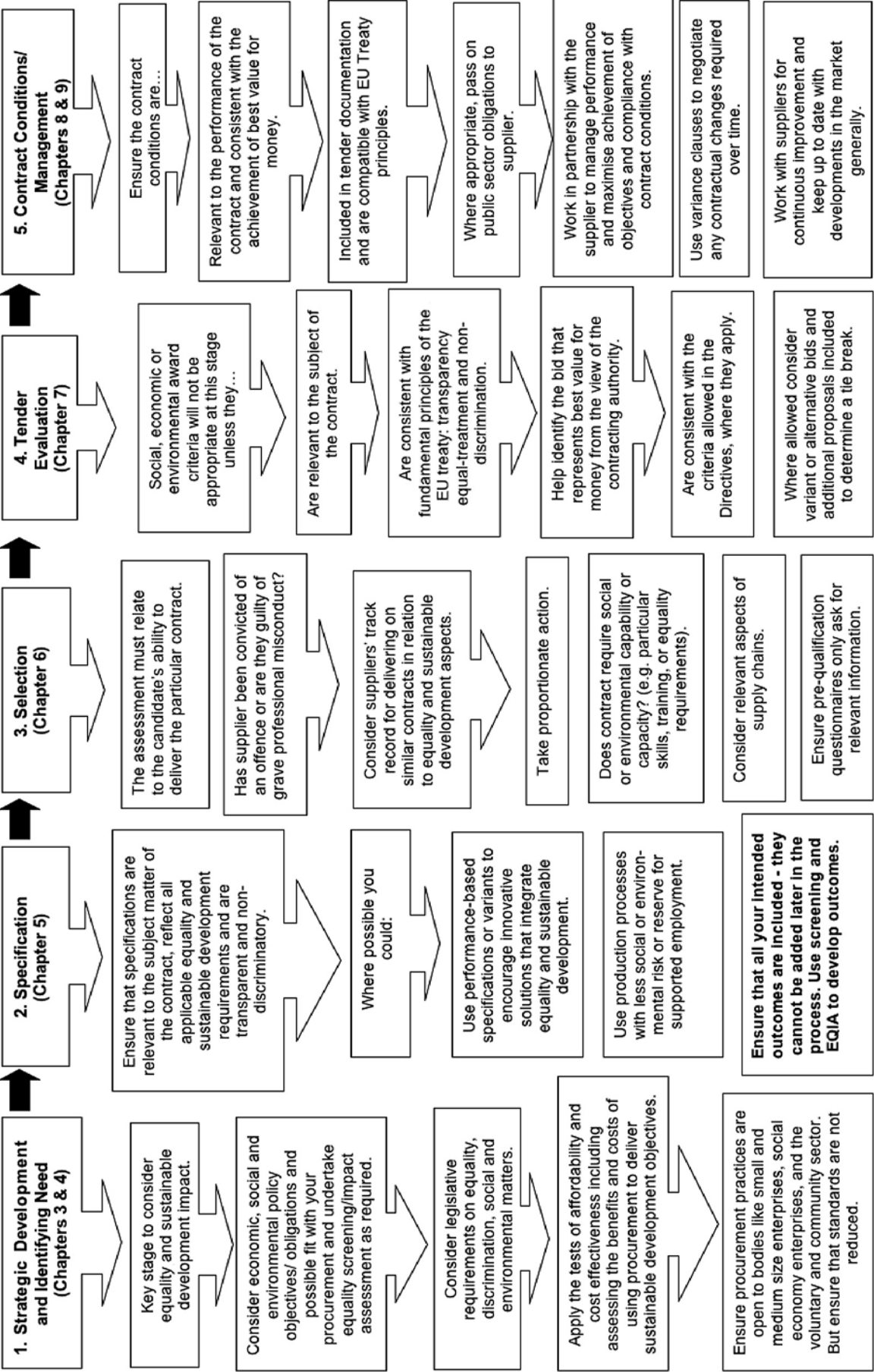
SUMMARY

This is a summary of guidance issued jointly by the Equality Commission for Northern Ireland and the Northern Ireland Central Procurement Directorate, based within the Department of Finance and Personnel.

*This summary should be used alongside the authoritative text of the full guidance, which provides in-depth advice, case studies and examples. The full guidance, **Equality of Opportunity and Sustainable Development in Public Procurement**, can be found at www.cpdni.gov.uk or www.equalityni.org*

**EQUALITY COMMISSION FOR
NORTHERN IRELAND AND THE
CENTRAL PROCUREMENT
DIRECTORATE**

This flow-chart illustrates how equality of opportunity and sustainable development can be addressed at each stage of procurement. It is extracted from the Equality of Opportunity and Sustainable Development in Public Sector Procurement guidance. The chapters referred to are in the full guidance which provides detailed advice on each stage.



THE CASE FOR EQUALITY OF OPPORTUNITY AND SUSTAINABLE DEVELOPMENT

Equality of opportunity and sustainable development are integral to government policy as a whole and are cross-cutting themes for all subsidiary policy and practice. Key drivers for integrating these goals into public procurement include the Government's strategic priorities and the public sector's legal obligations.

The **Programme for Government 2008 - 2011** sets out two cross-cutting themes which will underpin the approach to delivering the Executive's priorities. These are:

- **A shared and better future for all:** equality, fairness, inclusion and the promotion of good relations
- **Sustainability:** building a future that is sustainable - economically, socially and environmentally - will be a key requirement for all policies and programmes.

These cross-cutting themes are embedded in the **Investment Strategy for Northern Ireland 2008 - 2018** which has economic, societal and environmental objectives. These objectives "can be mutually reinforcing, helping to ensure that development is sustainable." The Strategy sets out the framework for creating a sustainable 21st century infrastructure delivering around £6bn of infrastructure in the next three years and approaching £20bn in the next 10 years.

Given how much public money is spent through procurement, and the range of infrastructure, services and goods covered by this spending, it carries enormous potential to achieve equality of opportunity and sustainable development.

The Programme for Government and Investment Strategy reinforce the importance of achieving these outcomes. They also provide the high-level context in which procuring authorities can identify the specific equality and sustainability goals to achieve from each procurement.

Mainstreaming equality of opportunity and sustainable development into procurement is not a protectionist code for "buy local". That would contravene European procurement rules. Moreover, delivering the Programme for Government and the Investment Strategy requires the Government to do business with

whoever will best achieve its objectives. Equally, the spending programme should encourage and challenge local businesses to apply their close understanding of the issues to put forward highly competitive offerings.

Northern Ireland Procurement Policy

Northern Ireland Procurement Policy recognises that the primary objective should be to achieve **Best Value for Money**, which is defined as *“the optimum combination of whole life cost and quality (or fitness for purpose) to meet the customer’s requirements”*. This definition was drawn up to stress that value for money does not mean lowest price. Any procurement would have to meet its requirements for equality of opportunity and sustainable development to be deemed good quality and fit for purpose.

Equality Duties: Section 75 of the Northern Ireland Act 1998 (s 75)

This legislation requires designated public authorities in carrying out all their functions, powers and duties relating to Northern Ireland to have due regard to the need to promote equality of opportunity and regard to the desirability to promote good relations between different groups of people. Authorities must screen their policies and where necessary carry out an **Equality Impact Assessment (EQIA)** of those that are likely to have a significant impact on equality of opportunity.

Fulfilling these duties clearly means going beyond avoiding discrimination - it requires a pro-active approach to **promote** equality of opportunity and good relations.

Sustainable Development Duty: Section 25 of the Northern Ireland (Miscellaneous Provisions) Act 2006 (s 25)

Northern Ireland government departments and district councils have a **statutory duty for sustainable development** under this legislation. They must act in a way they consider best calculated to contribute to the achievement of sustainable development in Northern Ireland, unless doing so would not be reasonably practicable, given all the circumstances of the case.

Sustainable development means meeting the needs of the present without compromising the ability of future generations to meet their own needs. It is not solely an environmental agenda. Fulfilling the duty requires an integrated approach to pursuing **economic, social and environmental well-being** and all three components are central to success.

HOW TO ACHIEVE EQUALITY OF OPPORTUNITY AND SUSTAINABLE DEVELOPMENT THROUGH PROCUREMENT

(Full guidance: Chapter 2)

An overview of key principles and good practice

Achieving equality of opportunity and sustainable development through public procurement is challenging. Success requires **all stakeholders** - political leaders and public authorities, contractors from the private and voluntary sector, community representatives and non-government organisations, trade unions and employees - to rise to the challenge.

It is crucial that all these stakeholders understand the nature of the challenge and their roles within it.

Identifying the equality of opportunity and sustainability requirements within a procurement

- This is a fundamental responsibility for the public sector “client-side”, from policy makers to practitioners. It will include:
- actively seeking out opportunities to promote equality of opportunity and sustainable development
- ensuring that the opportunities are **relevant** to the contract and **cost-effective** to incorporate
- focusing on the **outcomes** required, rather than the inputs or even outputs
- building in flexibility to accommodate changing requirements over the life of a project
- carrying out equality of opportunity and sustainability screening and engaging with service users and community groups.

Forming effective contractual partnerships

The results will only be achieved through imaginative and **committed partnership working** between clients and contractors. They need to be prepared to work as a team,

shoulder-to-shoulder, to manage the complex risks involved in outcome-based contracting.

All companies gain a competitive edge through responsible behaviour that contributes towards equality of opportunity and sustainability. For contractors wishing to win public sector business, there is also a yet more central requirement - to fulfil the objectives of equality of opportunity and sustainability that sit at the core of their contracts. To win the business, they must demonstrate that they have the commitment and skill to do this.

Following processes that comply with policy and legislation

The European procurement rules stipulate how to handle the procurement process to safeguard principles of fairness, non-discrimination and transparency. These rules permit the incorporation of sustainability and equality of opportunity, but this must be **compliant**.

Responsibilities under equality of opportunity and sustainability will help to shape planning processes and contractual arrangements. Policy and legislation require good handling of **workforce matters** in public contracting and this will also have a significant impact on procurement processes for construction and services.

Achieving equality and sustainability: good practice examples

- prioritising the limited number of places available on the Safer Routes to Schools initiative on the basis of clear social and environmental criteria
- using the s 75 process to plan a library refurbishment; designing the layout, signage and computer provision arrangements to meet the needs of elderly, disabled, Chinese and Indian people identified as significant service users
- project team evaluating which is more cost-effective: requiring Government estate management contract to provide on-site crèche facilities or, in a separate initiative, setting up local nursery scheme that is open to all children, not just the children of staff

- a hospital installing a wind turbine which achieves annual electricity savings worth over £90,000
- road maintenance contractor using recycled road materials to minimise land-fill and save cost of buying new aggregate
- public authorities together participating in an EU initiative to support authentic food
- Construction Industry Forum for Northern Ireland developing a Code of Practice for Industrial Relations and Health and Safety, for inclusion in contracts.

For further detail on these examples, see the full guidance. This can be viewed at www.cpdni.gov.uk or www.equalityni.org

STRATEGIC AND PROJECT DEVELOPMENT

(Full guidance: Chapters 3 and 4) Creating the foundations for success

It is often too late to start thinking about equality of opportunity and sustainable development mid-way through a procurement exercise. It can even be illegal for authorities to incorporate bright ideas “you wish you’d thought of earlier”.

Equality of opportunity and sustainability are relevant at every stage of procurement, but the **initial planning decisions** hold the widest scope for including them and the maximum potential for impact. For example, deciding on a “housing-led regeneration scheme” provides more scope than a “housing repairs contract”.

Effective “client-side” project boards

The procurement process spans from when needs are first identified through when a contract is being managed to the end of the contract life. Throughout this life-cycle, the public sector will need to bring together the relevant people into a **cohesive** “client-side” that is well equipped to handle each phase:

- preserving the ethos and priorities of the procurement at the “hand-over” points - from project planning to starting the tendering process and from awarding to managing and completing the contract - is pivotal to success
- clear governance is crucial for multi-agency projects
- project boards that represent all interests across all phases can safeguard vision and enhance accountability
- the board should consult equality of opportunity and sustainability experts and ensure all members understand s 75 and s 25 requirements.

Making the right strategic decisions

Decision-makers will find their task easier by focusing on the outcomes they are aiming to achieve. A sound grasp of what is **driving the need for action** - eg political commitments, public pressure, research findings - will point towards the equality of opportunity and sustainability goals.

Good process, including tools such as screening and both the equality impact assessment and integrated impact assessment tools can provide the mechanics for thinking through the issues, considering the evidence and providing an audit trail of decisions. The value of asking the right questions of the right people inside and outside government should never be underestimated.

Equality impact assessment (EQIA)

EQIA is a tool to examine policy systematically and embrace the promotion of equality of opportunity and good relations. Its seven step process is used to determine whether a policy would have adverse impacts on particular parts of the community (eg people of different age, gender, religion) and, where this is so, how any adverse impact could be mitigated or whether alternative policies might be more successful in promoting equality of opportunity.

Integrated impact assessment (IIA)

An Integrated Impact Assessment (IIA) has been developed as a good practice tool to help authorities to assess the impact of their policies and take full account of sustainable development. This tool supplements but does not replace equality screening through use of EQIA.

For further information on EQIA and IIA, refer to Chapter 2 of the full guidance.

Building equality of opportunity and sustainability into the scope of a project

Sound strategy and management will set the project board on course. They still need to be proactive and focused to identify the **genuine** opportunities which are relevant and cost-effective. These might include:

- locating a facility where it could bring communities together
- prioritising the allocation of resources to tackle inequality and multiple deprivation
- explicitly requiring service delivery to meet diverse community needs

- harnessing investment programmes to boost skills and employment
- ensuring procurement practices are open to small firms and the voluntary sector, while safeguarding standards
- minimising environmental impact and using materials in a sustainable way.

THE SPECIFICATION

(Full guidance: Chapter 5)

Specifying the requirements for equality of opportunity and sustainability

The specification sits at the heart of any procurement. Initial planning will have determined the need to procure and identified the “subject matter of the contract”. This is reflected in the specification that sets out the parameters of what will be delivered.

Why is the specification so important?

Under European public procurement rules, the client can only evaluate or compare bidders’ proposals against requirements in the specification. Similarly, they can only assess bidders’ competence to deliver what is in the specification. The specification is issued early in the tendering process, which is why authorities have to get their requirements “right first time”.

Authorities can build into their specification requirements to promote equality of opportunity and sustainable development, embracing economic, social and environmental goals, so long as these can be related to the subject matter of the contract.

Defining the subject matter of the contract, and therefore the specification, in terms of the **outcomes** to be achieved, maximises the scope to do this.

What’s permitted – some examples

- Requiring a contract cleaner to adopt the authority’s uniform policy that complies with dress requirements for certain religious groups.
- Requiring an outsourced contact centre to have high health and safety standards - and for employees to have equality training to meet the needs of specific user groups identified through the EQIA.

What's not permitted – some examples

- ✗ Requiring an outsourced contact centre, delivering online and telephone support (which could legitimately be provided from any location), to locate in a particular town.
- ✗ Issuing a specification for a housing management contract and then selecting bidders on the basis that they might also be able to purchase the houses in future, if the authority decided to privatise the housing.

Tips for a well-crafted specification

There may be more scope to incorporate equality of opportunity and sustainability into larger or complex projects, but regardless of the size, the specification should:

- be specific about the outcomes and outputs required and encourage bidders to use their skills and experience to develop solutions
- be sufficiently broad to allow bidders to add value, but not so broad that they feel exposed to risks that are difficult to quantify and therefore inflate their prices
- relate to the **subject matter of the contract** while taking account of appropriate policy goals, including cross-cutting policies and legal obligations, as well as market soundings about what industry can supply.

Discussions with the supplier community

Dialogue with potential bidders before finalising the specification can help to identify opportunities for promoting equality of opportunity and sustainability. These discussions can establish how best to scope requirements so that they are **commercially viable**, through sensible arrangements for allocating and managing risk. Soft market testing, to compare current services with what is provided elsewhere, can also help. Care should be taken in using these techniques to avoid giving advantage to any particular supplier.

Securing added value

Where an authority allows variants, it can take account of tenders submitted that not only meet but **exceed the minimum requirements** necessary to fulfil a contract. Authorities can then evaluate bidders' proposals for additional gains in equality of opportunity or sustainability and decide if these are affordable.

Sustainable timber

The minimum public sector requirement is that timber must be obtained from legal sources. Contracting authorities can procure timber from accredited sustainable sources. This is not currently a mandatory requirement but can be requested on an optional basis using a variant specification.

For further detail on this example, see the full guidance. This can be viewed at www.cpdni.gov.uk or www.equalityni.org

BIDDER SELECTION AND TENDER EVALUATION

(Full guidance: Chapters 6 and 7) Deciding who can best deliver

Having done the early work to “mainstream” the appropriate equality of opportunity and sustainability objectives into the subject matter of the contract, the task now is to award the contract to the bidder that can best deliver.

Advertising the contract

The advertisement or Notice summarises the contract and selection criteria. It should include any requirements for equality of opportunity and sustainability and state that the contract will be awarded to the ***most economically advantageous tender*** (MEAT), the European terminology for value for money.

Selecting or shortlisting bidders

Candidates can be excluded for specific failings, including criminal offences or failure to comply with fair employment legislation.

More positively, the selection process enables authorities to assess candidates’ ability to deliver the contract requirements. Pre-qualification questionnaires can provide a good format to assess economic and financial standing and technical or professional ability. The information required must be related and proportionate to the subject matter of the contract. This provides ample scope to **test candidates’ abilities** to meet requirements for equality of opportunity and sustainability. For example, authorities might ask for evidence of:

- complying with equality legislation
- building and sustaining partnering arrangements
- meeting the diverse needs of different service users and engaging with the local community
- embedding sustainability
- managing, motivating and training the workforce.

Evaluating bids

Candidates that passed the shortlisting can now be invited to submit tenders. The process for handling this phase will depend on which procurement procedure was chosen (and stated in the Notice) - restricted, competitive dialogue or negotiated.

The authority uses this phase to examine how well the bidders have responded to the requirements in the specification, including any requirements to promote equality of opportunity and sustainable development. Bid evaluation methodology should:

- test compliance against the specification and weight the answers depending on the importance of the criteria being evaluated
- require candidates to demonstrate that they understand the authority's needs and can develop appropriate solutions over the life of the contract
- be clear about how the **costs and benefits** of proposals will be measured
- provide a mechanism for feedback to bidders once the contract has been awarded.

Handling requirements which are not related to the contract specification

Where an authority wishes a contractor to achieve sustainability goals that do not relate to the specification, it can do so by using contract conditions. These conditions will form part of the "ground rules" for delivering the contract. They must be set out in the contract documentation. Because these conditions do not relate directly to the specification, bidders' proposals to fulfil them will not normally be evaluated as part of the award criteria. However, the winning bidder must carry out the commitments made in his bid for fulfilling such contract conditions.

Pilot project: assisting the unemployed back to work

A Northern Ireland pilot project, covering 15 procurements, encouraged employers to recruit and train people who had been unemployed for at least 3 months. Bidders for these contracts had to provide an employment plan with proposals on utilising the unemployed and evidence that they could implement their proposals. 51 people were employed through this scheme and 46 of them were still in work two years later.

For further detail on this example, see the full guidance. This can be viewed at www.cpdni.gov.uk or www.equalityni.org

Tips for bidders

Contractors need to understand not only the fine detail but also the “big picture” objectives of their potential customers, in order to grasp their requirements for equality of opportunity and sustainability. A wealth of publicly available information makes this research feasible. The authority’s equality scheme, sustainable development plan, **strategic priorities**, even its “way of speaking” about its agenda will all provide big clues. A public authority choosing a partner should expect no less.

CONTRACT CONDITIONS, PERFORMANCE MANAGEMENT AND PARTNERSHIP WORKING

(Full guidance: Chapters 8 and 9)

Fulfilling expectations and achieving outcomes

A robust contractual framework and a partnering commitment are equally necessary to fulfil the expectations inherent within a newly awarded contract. This is particularly so for procurements designed around complex issues, including those with equality of opportunity and sustainable development objectives.

Contract conditions

Contract conditions set out how the contract should be performed. Writing the requirements for equality of opportunity and sustainability into the contract will make the authority's expectations clear. A rigorous approach during the planning and tendering phases will make it easier to state these intentions in **specific terms**, which can influence performance management.

It is permissible to set additional contract conditions that are separate from the specification, selection and award criteria. These can include social and environmental conditions. They must comply with European rules and be advised in advance to candidates.

Illustrative clause: eg for a targeted recruitment and training requirement within a contract to build a new community centre

“10% of the person-weeks required to complete all of the works is to be delivered by new entrants that are engaged in a training programme within an apprenticeship, trainee or employment contract with the contractor or sub-contractor.”

Performance management regime

The performance management regime will set the terms for **assessing performance** and **taking action**. This could mean rewarding the contractor for good performance, addressing under-performance or working together to enhance delivery.

Key Performance Indicators translate objectives into measurable targets and stipulate what would constitute an acceptable

performance level. Monitoring arrangements should ensure that the right performance data is gathered and analysed effectively.

The payment mechanism provides the basis for ensuring that the contractor delivers to the required standard. It can provide financial disincentives for poor performance and incentives for exceeding baseline targets.

Improving performance in equality of opportunity or sustainability

The impetus for service improvement could come from poor Key Performance Indicator results or from a sense that, while targets are being achieved, there is scope to do even better. Either way, the contractor and client should **understand** what is creating current performance levels and to agree on how to improve results. Persistent failure by the contractor should invoke the contractual default conditions, though action must be reasonable. Equally, the analysis might lead to contractual variations, service redesign or innovation.

Service improvement: hospital catering

Contract caterer conducts annual patient satisfaction survey and analyses data by age, ethnicity and gender. Authority also initiates assessment of meals service following press research into malnutrition in geriatric wards. The combined evidence triggers contractual variations to improve the service to the geriatric ward by helping patients with feeding.

For further detail on this example, see the full guidance. This can be viewed at www.cpdni.gov.uk or www.equalityni.org

Do legal duties on equality of opportunity and sustainability transfer to the private contractor?

No, the authority will still be covered by its equality of opportunity and sustainable development obligations. The authority needs to ensure that it can meet its legal duties through any contract. This will influence, for example: target setting; service monitoring and reporting; workforce and community consultation; complaints handling; and changes over the lifetime of the contract.

Partnering culture

A partnering culture must underpin contract management. Clients and contractors can only manage down risks and achieve the best outcomes through **imaginative and committed team-working**. Evidence points to the best contractors responding well in such relationships, voluntarily taking on additional commitments, such as: basic skills programmes; community engagement; environmental innovation; and supporting small firms within their supply chain.

WORKFORCE MATTERS

(Full guidance: Chapter 10)

Requiring good employment in public procurement

There is an overwhelming case for ensuring that contractors who win public procurement contracts offer **good quality employment**. Authorities' responsibilities to comply with equality obligations and to meet sustainable development objectives extend to workforce matters. Moreover, only contractors with excellent track records in employment and workforce management will be able to achieve the **public service transformation** being sought by government.

Policy and legislative advances in recent years have introduced protections for workers and stressed the requirement to achieve best value for money.

TUPE - protecting transferring workers

The European Acquired Rights Directive and the UK TUPE legislation require that employees transfer, with their **terms and conditions protected**, when a business changes hands. The UK legislation and procurement guidance make it clear that these provisions apply when a public authority contracts out a service and repeatedly again when that contract changes hands or comes back in-house.

In particular, public authorities should not attempt to design service specifications for procurements so as to evade the application of TUPE when the procurement involves a contract changing hands between different external contractors.

Contractors are also required to offer staff who have transferred from the public sector a pension that is broadly comparable to their public sector scheme.

Code of Practice on Workforce Matters - protecting new starters

A Cabinet Office Code of Practice reiterates the importance of TUPE compliance, though its main focus relates to protecting new starter employees who are recruited by contractors to work alongside TUPE transferees on public sector contracts. It stipulates that these new starters should be recruited on **“overall no less favourable terms”** than the TUPE transferees. The precise package can differ from that of transferred staff, so

long as the overall package is no less favourable. These new starters must also be offered a good quality or stakeholder pension, with the employer matching employee contributions up to 6%.

Handling employment issues throughout the procurement process

More broadly, public authorities need to maintain a focus on workforce matters throughout the procurement process. Relevant matters extend beyond terms and conditions and might include issues such as: skills and career development; productivity and performance; employee engagement and morale; and health and safety. For instance:

- decisions on the **scope** of a project could include an assessment on the implications for service delivery staff, who would TUPE transfer if their activities were included or remain within the public sector if their activities were excluded
- a **specification** could require contractors to meet high health and safety standards in the delivery of their contract
- **selection** criteria could ask candidates to demonstrate a track record of offering career development to existing and potential supervisors and managers
- authorities should **provide bidders with information** they need to prepare and cost their proposals on workforce matters
- where TUPE applies, the initial outsourcing contract should include clauses that would require the incumbent to **provide subsequent bidders** with relevant and timely information when the service is being retendered
- **evaluation** criteria could assess bidders' methodologies for improving performance where there is a need to raise productivity and workforce morale
- contract **monitoring** should enable an authority to report on its s 75 obligations and could include reports of affirmative or positive action to improve workforce composition
- **voluntary commitments** by a contractor could include providing literacy and numeracy training and creating a climate that encourages employee take-up.

CASE STUDY: UPGRADING MAIN ROAD FROM A TO B

Promoting equality and sustainability at every stage of the procurement

This example illustrates that better outcomes can be achieved by maintaining a focus on equality of opportunity and sustainable development throughout the life-cycle of the procurement project.

Strategic and project development

A road building and maintenance programme, which had been equality screened in overall terms, identifies the need for a project to **upgrade the A to B road**.

This project is itself screened and assessed using EQIA, highlighting how part of the road cuts through a housing estate that includes family and sheltered housing. The EQIA identifies the following:

- groups affected by road upgrade will be primarily: disabled people; those with dependents; younger and older people
- opportunities: shorter and more reliable journeys for those wishing to travel between A and B, including as journey to work
- potential **adverse impacts**: increased traffic; health and safety risks; worsening access from housing to shops and health centre
- constraints on mitigation: planning regulations; alternative option of new road not feasible
- **outcomes** sought through project: safe and effective flow of traffic from A to B; effective access between residential area and local facilities.

Creating the specification

User groups are identified and consultation reveals:

- health centre serves wide area; housing estate provides pedestrian route to health centre and is used by significant numbers of disabled people, notably wheelchair users

- strong **community support** for underpass, which is built into the specification
- no single solution on issue of children playing locally, so specification requires outcome of safe environment and asks contractors for proposals on road features and landscaping.

Contractor selection

Candidates are asked for evidence of:

- workforce practices; policies and procedures on equality
- experience of creating safe environments in consultation with diverse local community.

Tender evaluation

Bid evaluation criteria place heavy emphasis on improving accessibility and safeguarding safety:

- Bidders are asked for proposals and evidence of how they will meet best practice standards on **design and accessibility** issues.
- Other criteria include sustainable use of roads materials.
- One bidder puts forward proposal during **competitive dialogue** for the junction by the residential area to allow both entry onto and exit from the road. This creates a new route for accessing B, decreasing travel to work times for residents who do not otherwise count in B's Travel to Work Area. This bidder has put forward best value for money (MEAT) bid and is awarded contract.

Contract conditions

Contract stipulates that:

- all road features, including footbridges and underpasses, are **fit for purpose**
- access from residential centre to health centre is maintained
- road is available for use.

Contract management and partnership working

Authority and contractor agree on robust monitoring arrangements:

- Contractor provides sign with telephone contact numbers for reporting complaints about road availability and safety issues. Data collated annually for authority.
- Authority surveys road usage every five years to measure number of vehicles.
- Periodic community consultation about public services in the neighbourhood includes feedback on access issues.
- Monitoring reveals a **perception that the underpass is unsafe**. Public authority and contractor discuss how to improve situation, eg more litter picking, swifter mending of broken lights.
- Roads authority explores how CCTV, in use for traffic monitoring, could be extended to add value to community safety; sees this as **opportunity** to promote good relations by working in partnership with others.

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FOR NORTHERN IRELAND



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