



Corporate Procurement Plan 2024 to 2026

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1. STRATEGIC SUMMARY	3
2. STRATEGIC VISION, PURPOSE AND ROLE FOR OCO'S PROCUREMENT	4
2.1 PROCUREMENT IN SUPPORT OF THE GOALS OF OCO	4
2.2 PROCUREMENT IN SUPPORT OF GOVERNMENT PROCUREMENT GOALS	4
2.2.1 PROCUREMENT VISION	5
2.2.2 MEASURING SUCCESS AND DEVELOPMENT PROGRESS	5
2.2.3 MANAGING CONTRACT PERFORMANCE	5
2.2.4 GREEN AND SOCIAL IMPACT CRITERIA	5
3. INTRODUCTION AND CONTEXT	6
3.1 EXPENDITURE SCOPE FOR THE CORPORATE PROCUREMENT PLAN	6
3.2 KEY PEOPLE TO WHOM PROCUREMENT IS IMPORTANT	7
3.3 OPERATING MODEL FOR OCO	8
3.3.1 KEY DEPARTMENTS AND PERSONNEL INVOLVED IN EXPENDITURE	8
4. APPROACH TO OPERATIONAL PROCUREMENT	10
4.1 COMPLIANCE WITH NATIONAL POLICY	10
4.2 SUMMARY GUIDELINES FOR PUBLIC PROCUREMENT OF SERVICES	11
4.3 MANAGING PROCUREMENT RISK	11
5. PROCUREMENT GOVERNANCE	12
6. PRIORITY OBJECTIVES ARISING FROM THIS PLAN	13
APPENDIX 1 – PROCUREMENT – ACTIONS FOR UNITS EXPLAINED	15

1. Strategic Summary

This document sets out a strategic approach to procurement for the Ombudsman for Children's Office, hereafter, ("OCO"). In doing so, it presents the aims for procurement at OCO, its vision and purpose with an explanation as to how this will be delivered, supported, improved and progress monitored.

Procurement is of vital importance to OCO, so it provides value for the public money spent and ensures all suppliers provide the required goods, services and works at the quality standard agreed. Achieving these aims requires the involvement of many stakeholders and the use of the knowledge, leverage and support that is available within the OCO as well as from central purchasing arrangements (e.g., Office of Government Procurement and other Central Purchasing Bodies, if relevant). This combined approach will help ensure that compliant agreements are made, suppliers that meet requirements are selected, strong and compliant contracts are put in place and a strong culture of supplier management endures through the contract management cycle. Good procurement outcomes are the result of effective collaboration between subject matter experts, internal clients, suppliers and using good compliant processes.

As purchasing is undertaken at present by OCO staff, it is necessary that all staff involved in sourcing goods, services and works understand and use the approved procurement processes and guidelines. This document helps inform and explain these requirements. All staff members with delegated authorities that allow them to procure, should therefore take the time to acquaint themselves with this Corporate Plan for Procurement.

Approved by the Ombudsman for Children at MTM on 9/12/2024

2. Strategic Vision, Purpose and Role for OCO's Procurement

2.1 Procurement in support of the goals of OCO

OCO's Mission statement: *We will use our independence and powers to bring about an Ireland where the whole of society actively hears and respects all children, and supports them to be safe and fulfilled in their lives.*

The purchasing of works, goods and services support and contribute to achieving this mission directly and indirectly.

In addition to meeting the mission of the organisation, all those working with expenditure responsibility should adhere to the values of the organisation. These are relevant and useful to purchasing activity:

OCO Value	Value in action
Respect	is a commitment to show kindness and respect to all of the people, child or adult, we engage with whether inside or outside of our Office. We also strive to maintain and support a diverse, inclusive and equal workforce.
Integrity	is a pledge to operate with honesty and transparency in all of our dealings within the Office and with everyone we deal with. We will strive to build trust and maintain clear and open communications with children, complainants, public bodies and staff.
Independence	is a commitment to cherish and protect our independence so that we can say, with authority, the things that need to be said and hold public organisations to account.
Courage	is the openness to push hard for the rights of children. It involves accepting pressure and knockbacks in that pursuit, but it also means we relish constructive challenge so that we can continue to be self-reflective around our work.
Fairness	is a promise to work at all times to be fair in all of our dealings with staff, children, complainants and public agencies. Fairness is the backbone of trust and integrity both within the Office and outside of it.
Fun/Joy	is a determination to allow for and encourage fun within the work environment. This is an important element of a positive work culture and one that helps us cope with the difficult and emotionally charged work we all engage in every day.

In living and delivering the values of OCO, there is a requirement for a compliance roadmap to allow OCO to become fully compliant with EU and national rules for procurement.

2.2 Procurement in support of Government procurement goals

As a publicly funded service provider with over 50% of its turnover provided by public funding, OCO is defined as a "Contracting Authority" which imposes the requirement to comply with The Public Procurement Directive and its associated national implementing laws, OCO has a responsibility to manage its budget, deliver value for money and to comply with public procurement regulations. By following the good procurement practice as laid out by the Office of Government Procurement (OGP), good value for money will follow from leveraging public sector purchasing scale and competition from an open and fair tendering processes. Compliance is a necessity to ensure suppliers are treated fairly, monies being spent in line with government policy, competition is encouraged to drive value money.

By aligning with national policy and good practices, we help all public bodies benefit from economies of scale with central suppliers.

2.2.1 Procurement Vision

OCO aims to drive procurement compliance to a best-in-class standard. It recognises its legal responsibilities and duty to be good stewards of public funding as a body working with the public with duties that include investigations, a high standard of compliance is appropriate for the OCO.

The vision for OCO's Procurement is ***to be a deeply embedded way of working that is fully aligned to the goals of the organisation and brings the supplier capability, performance and value required for the organisation's success.***

2.2.2 Measuring Success and Development Progress

A Mission and Vision are useful directive indicators and help both internal and external stakeholders understand the future ambition for the OCO. They also act as important definitions that ensure everyone is aligned with the destination ahead. A detailed contract register is maintained centrally and it is used to drive procurement activity and compliance.

2.2.3 Managing Contract Performance

As part of this corporate plan a concerted emphasis is placed on strong supplier relationship management (SRM) practices. This arises from the active management of suppliers using clear **service level agreements** that have key performance measures and through **regular contract reviews**.

2.2.4 Green and social impact criteria

Each procurement process takes green and social impact criteria into account as appropriate. The GPP Criteria are used for the key categories that are carbon intensive. Unless sustainability is core to the contract, it is otherwise covered using selection criteria questions.

Given the mission and mandate of OCO, it also seeks to include social impact where relevant as either selection or award criteria.

3. Introduction and Context

3.1 Expenditure Scope for the Corporate Procurement Plan

The scope for this plan is to cover the management of all external purchasing spend that arises from the day-to-day operations of OCO. This includes expenditure such as professional services, managed services, ICT, facilities management, and other costs. Capital expenditure costs (e.g. for new developments) fall into the remit of this strategy but are low in nature. All non-pay expenditure for OCO falls under the rules for national and EU procurement and so must be included in the scope of this strategy.

Summary Spend Table 2020-2023 (4 Years)

Procurement Categories	Expenditure	% Of Total	Comments
Professional Services	€1,509,003	37.6%	The key categories include audit and accountancy, governance, communications, investigations, general consultancy, recruitment and training / development.
Advertising, promotion, marketing, media & print	€777,490	19.4%	The key categories include advertising, design & print, event management, and photography.
Technology	€562,360	14.0%	The key costs include database management, IT costs & licences Telephone costs, Website Maintenance and Development.
Facilities Management	€383,330	9.5%	The key costs include cleaning and the canteen, light and heat, General maintenance, Office furniture & fitouts, Stationery supplies & equipment
Legal	€206,641	5.1%	Key costs include legal fees.
Managed services	€180,377	4.5%	Key managed services include travel management, translation / interpretation and supply of agency staff
Education	€173,262	4.3%	The key costs include a Consultation with Children and Young People, Participation Projects, Research expenses and Rights Education Workshops for Children.
Research	€156,872	3.9%	
HR	€65,123	1.6%	Analysis is required to determine if procurement is applicable to memberships / subscriptions and/or staff wellbeing.
Banking	€1,541	0.0%	Banking costs are contained in this lump sum.
Grand Total	€4,016,001	100%	

3.2 Key People to whom procurement is important

In developing this Corporate Plan, it has been necessary to engage external Public Procurement Consultants with the support and sponsorship of OCO’s Head of Corporate Governance, Compliance and Services. The Head of Corporate Governance, Compliance and Services has overall responsibility for procurement compliance within the organisation. Other key stakeholders play a role in procurement compliance activities across the organisation as budget holders of categories outlined below. A review of who these stakeholders are follows with a summary of their interests:

Key Stakeholders		
Location	Description	Key Interests
External	Department of Children, Equality, Disability, Integration and Youth	Compliance, contractual obligations, business process alignment, value for money, public service delivery
	Office of Government Procurement (OGP)	Compliance to good procurement practices and adherence to / usage of available frameworks
	Other central purchasing bodies	Compliance to good process and adherence to available frameworks if / where relevant
	Suppliers	Fairness, clear information, opportunity
	Service users	Quality as it relates to their interaction with the organisation and its services
	Broader community	Clear link of green and social criteria into supplier selection, value for money from procurement compliance and competitive tendering.
Internal	Ombudsman / Oireachtas	Support of OCO’s goals, alignment with mission/values, collaboration across departments, compliance with government rules, budget, and service
	Management Team	Service and support from OGP, compliance needs met, value for money
	Units	Operational requirements met, assistance in following processes/rules, contract management support, supplier capability, efficiency through tenders/transactions
	OCO staff	Availability of goods / services / works as needed
	Associated	Other government agencies
	Procurement support consultant	Engagement/time available, good working relationship, clear communication/exchange, supporting action / follow-up

Reference will be made to these different interests and contributors to the success of OCO’s procurement through this document and thus taking a bearing on the plans that are arrived at.

3.3 Operating Model for OCO

Relative to other organisations subject to procurement compliance requirements, OCO has a modest expenditure footprint. Over the 48 months of expenditure reviewed, the average annual spend is around €1m over the 2020 – 2023 period.

The current set-up for expenditure lends itself towards what is known as a commissioner model (not a buyer model). In a commissioner (or distributed) model, a Procurement resource manages compliance and ensures good practice and procedure is followed but responsibility for supplier selection is made by budget holders (with the advice and support of procurement).

The budget holding units are responsible for their own procurement processes including any administrative actions required from them. External procurement consultancy services help the OCO with being compliant with procurement regulations and provide advice and assistance with some parts of procurement processes above €25,000. [For more details, please refer to Appendix 1 – Procurement: Actions for Units Explained.](#)

OCO can use the commonly purchased / centrally managed frameworks put in place by central purchasing bodies like the Office of Government Procurement, the Local Government Operational Procurement Centre who develop a minor works frameworks of contractors for all public bodies and other bodies like the HSE (if relevant). There are options to manage the tenders required to access these arrangements in-house or ask central bodies like the OGP to undertake the tasks on behalf of the contracting authority where spend meets the level they require to provide coordinating support.

3.3.1 Key Departments and Personnel involved in expenditure

Senior Executive & Division	Business Unit	Key contracts held
Ombudsman	Audit and Risk Committee Management Team	- Strategic Legal Advice - Corporate Strategy - External Advice as Required
Head of Corporate Governance, Compliance and Services	HR & Facilities Manager ICT Manager Corporate Services Project Manager Finance & Compliance Manager	- OPW insurance - Legal services for OCO office - Recruitment and Temp staff - Consultancy: HR, ICT, Finance - ICT: hardware, software - Audit: internal and statutory - Payroll, accountancy, secretarial - Facilities: cleaning, phones, travel etc. - Company Secretarial
Director of Investigations	Complaints and Investigations Unit	- Panel of Investigators - C&I Database (ICT)
Head of Policy	Policy and Research Unit	- Data Protection Consultancy - Research

Head of Communications	Communications Unit	<ul style="list-style-type: none">- Design and Print- Website- Events- Translators and Interpreters- Media Monitoring- Advertising- Research- Consultancy
Head of Participation and Rights Education	Participation and Rights Educations Unit	<ul style="list-style-type: none">- Research- Consultancy

4. Approach to operational procurement

All compliant formal tendered procurement processes follow the processes included in this strategy. Procurement processes either follow a formal tendering process or a quotes process for lower value procurement. We outline briefly below what this means:

Category of process	What this means
Procurement process	<ul style="list-style-type: none"> • The use of a common arrangement in place for public bodies <u>or</u> • Running a standalone process – typically an open process, open to any tenderer to apply via the state tendering portal.
Quotes process	<ul style="list-style-type: none"> • Seek at least three quotes from a suitable supplier for goods or services • If the quote is between €5k and €50k, the quotes process is used. • If the quote is below €200k and for works, a minimum of five suppliers must be invited to quote.

There are three phases to a procurement process as the process maps outline. These are:

- **Pre-tender / quotes phase:** the key control point during this phase is the approvals process for the tender / quote itself. There are delegated authorities in place within OCO that govern the approvals with some approvals reserved to the Management Team and/or the Ombudsman. Another control point is the development of the specification for the requirement and where relevant (in quotes processes), the identification of suitable potential suppliers.
- **Tender/quotes phase:** the key control points during this phase are the approval to publish the final tender documents based on the selected strategy and process for the tender in question. There are other processes but the control points for them, remain consistent with this document as where there are multi-stage processes, how they are operated is outlined in the first (i.e., pre-qualification) stage documents. The other control points and risk mitigators are the deadlines and the clarifications and responses which help to ensure what is being sought is understood by tender participants.
- **Post-tender / quotes phase:** the key control points during this phase start with identifying the evaluation panel and obtaining conflicts declarations from them. The scoring of tenders / quotes against the criteria (assuming it is not 100% price based), is a control. Evaluation teams undertake due diligence on the submissions of the bidders as it relates to the subject matter of the tender. A final control is the maintenance of an Article 84.1 file to govern the process in EU level processes. An article 84.1 file document is used within OCO to ensure consistency and compliance in procurement activities. A version of this is used for lower value tender processes for good governance purposes.

The checklist following a procurement process includes records detailing how the process has been run from start to finish.

4.1 Compliance with national policy

- Public buyers are accountable for their procurement decisions and must abide by the [National Public Procurement Policy Framework](#) where applicable.
- Procurement of Goods and Services by public buyers in Ireland follow the guidelines set out by the Office of Government Procurement (OGP). It provides guidance and templates for buyers to use on its [website](#). The OCO also maintains a suite of templates to support its own procurement activities.
- Guidance on construction related procurements can be found on the Capital Works Management Framework website: <https://constructionprocurement.gov.ie/guidance-notes/>

4.2 Summary [Guidelines for Public Procurement of Services](#)

The key principles are that Procurement transactions and decisions must in all respects be:

- non-discriminatory, transparent, fair, equitable, proportionate and ensure value for money,
- contracting authorities must be able to justify decisions made and actions taken,
- and generally, a competitive process carried out in an open and transparent manner delivers best value for money.

Estimated Value	Summary Procurement Requirements
Under €1k	Can be awarded on the basis of one written quote.
€1-€5k	Can be purchased on the basis of verbal quotes from one or more competitive suppliers. It is best practice to seek a minimum of three quotes confirmed by email. Where price is not the deciding factor, the reason for awarding to a supplier must be documented.
€5 - €50k	Business case needed and purchase requisition authorised in line with OCO authorisation matrix. Must be awarded on the basis of written/email responses to specifications sent to at least three suppliers or service providers. A contract award notice is mandatory when a quote is worth over €25k.
€50k to EU Threshold	Must follow formal tender process, detailed specifications, clear evaluation with criteria in line with terms of reference. Pre-notification and award advised via official state tender portal.
>EU Threshold (Works >€5.538m, Services >€221k)	Tenders above the EU threshold for public procurement need to choose the correct (and follow) from one six types of procedures available to contracting authorities

4.3 Managing procurement risk

The maintenance of a detailed contract register and strong financial controls on processes is the primary driver of risk management. Supply risk is generally mitigated through the following key steps:

- Using central purchasing body developed frameworks wherever possible, especially those developed by the Office of Government procurement. As these are, generally, multi-supplier frameworks, it reduces exposure to supply side risks.
- Considering the applicability of Brexit criteria (e.g. at national level contracts) where necessary. There are two aspects to this, Government Procurement Agreement (GPA) terms for contracts below EU/WTO level and also, the relative risk of the contract.
- Ease of substitution is another consideration that is factored in as referenced in the spend analysis section of this document. Priority contracts and/or those where ease of substitution is more complex are managed as higher risk contracts.

5. Procurement Governance

Continued alignment and engagement with EU and national procurement requirements is achieved through:

- Preparation of and annual sign-off of a Corporate Plan for Procurement,
- Development of a plan and resourcing for compliance,
- Regular reports on procurement to the Ombudsman to have at hand,
- Regular reviews with key sponsors, relevant personnel and departments,
- Regular cross-unit briefings on procurement to reinforce mission, objectives and actions required for successful and compliant service, and
- Training in best practices, procedures and through-contract supplier management carried out as required.

It is a matter for individual contracting authorities to ensure that their public procurement activities are discharged in line with procurement rules and procedures. The OGP supports contracting authorities in this regard by making them aware of their legal and policy obligations in respect to public procurement. These are clearly outlined in the Corporate Governance Standard for the Civil Service, the [Code of Practice for the Governance of State Bodies](#), the Public Spending Code, procurement guidelines and framework documents published by the OGP, and in EU and National legislation. OCO must take further account of any specific requirements it may be required to follow. [Government Circulars](#) must also be followed by OCO.

OCO uses third party support to assist compliance with procurement regulations. They obtain support as follows:

- Involvement in the review and updating of this Corporate Plan for Procurement,
- Advice in the preparation stage of tenders, where required, to ensure best/most appropriate procedure is followed and through the tendering process,
- Continued involvement for contract agreement support and change/implementation management as required,
- Regular service reviews between service providers and the procurement officer with department managers as required,
- Formal knowledge transfer to the procurement function and internal units, and
- Mentoring & training.

6. Priority Objectives arising from this plan

We identify the following priority objectives for OCO below.

No.	Objective	Purpose	Responsibility	Frequency
1	Save all procurement records in Unit Procurement folder in eDocs	To be compliant with procurement regulations. Save all documentation on an ongoing basis.	Purchasers/budget holders	Ongoing
2	Review the Corporate procurement register monthly to ensure: <ul style="list-style-type: none"> contracts are renewed on time or new contracts put in place. expenditure under contracts is in line with estimates. 	<ul style="list-style-type: none"> Contracts are extended or re-tendered in a timely manner. Expenditure under a contract does not exceed the estimated value of the contract or breach thresholds. 	External procurement consultancy services/Procurement Officer	Monthly
3	Remind each Business Unit when a contract is up for renewal or replacement.	Contracts will be put in place in a timely manner.	External procurement consultancy services/Procurement Officer	Monthly
4	Update the expenditure on the contract register	For monitoring expenditure under contract is in line with estimates	Finance	Quarterly
5	Publish a list of all purchase orders over €20,000 on the OCO website with associated details.	Increased transparency and compliance with the Public Sector Reform Plan.	Finance	Quarterly
6	Publish award notices for OCO tenders on eTenders.	<ul style="list-style-type: none"> Publication of award notices for all OCO tenders are up to date. Tenders are closed as appropriate. 	Purchasers/Budget holder	Monthly
7	Review the Corporate Procurement Plan.	<ul style="list-style-type: none"> The Corporate Procurement Plan is updated in Q1 	<ul style="list-style-type: none"> External procurement consultancy 	Annually

		<ul style="list-style-type: none"> The Management Team approves the updated CPP and it is updated on the OCO website 	<p>services/Procurement Officer</p> <ul style="list-style-type: none"> Management Team 	
8	Review the OCO's Procurement policy and procedures manual.	<ul style="list-style-type: none"> Check/review the current version saved in eDocs is up to date. Approve by the review date specified, or earlier if required in line with changes in best practice or relevant legislation. 	<ul style="list-style-type: none"> External procurement consultancy services/Procurement Officer Management Team 	Annually

Appendix 1 – Procurement – Actions for Units explained

