

**Bid Pack – Better Business Cases Programme**

**Attachment 2 – How to bid**

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1. **How to make your bid**
	1. Your bid must be made by the organisation that will be responsible for providing the goods and/or services if your bid is successful.
	2. Ensure you read Attachment 1 (About the Contract).
	3. Your bid must be **entered into the eSourcing suite.** We can only accept bids that we receive through the eSourcing suite.
	4. Upload ONLY those attachments we have asked for. Do not upload any attachments we haven’t asked for.
	5. Make sure you answer every question.
	6. You must submit your bid before the bid submission deadline.
	7. It will be our decision whether we will accept bids submitted after the bid submission deadline.
	8. You must regularly check for messages in the eSourcing suite throughout the competition. You must log on to the eSourcing suite and access your message inbox for this competition to check for messages.
	9. If anything is unclear, or you are unsure how to complete your bid submission, you can raise a question before the clarification question deadline, via the eSourcing suite. Read paragraph 6 “When and how to ask questions” in Attachment 1 - About the contract.
2. **Selection stage**
	1. We may require you to clarify aspects of your bid in writing and/or provide additional information. Failure to respond within the time required, or to provide an adequate response will result in the rejection of your bid and your exclusive from this competition.
	2. At the selection stage, we evaluate bidders’ technical, professional and financial capabilities. We will ask a range of questions appropriate to the procurement. It is important that you answer these questions accurately.
	3. If you are relying on any key subcontractors to provide the answers to the technical and professional ability or you are relying on a guarantor to pass the financial assessment, they must complete these parts themselves.
	4. We are providing the ‘Information and declaration’ workbook (attachment 4) to enable you to collect and submit this data to us, whether from organisations on whom you are relying (for example a key subcontractor or a guarantor) or from other members of a consortium.
3. **Selection process**
	1. After the bid submission deadline, we will check all bids to make sure we have received everything we have asked for.
	2. We may ask you to clarify information you provide, if necessary. Don’t forget to check for messages in the eSourcing suite throughout the competition. You must log on to the eSourcing suite and access your message inbox for this competition to check for messages.
	3. If your bid is not compliant, we will reject your bid and you will be excluded from the competition. We will tell you why your bid is not compliant.
	4. Not all selection questions need guidance as the questions are self-evident. However, some questions such as the financial question, require a process to be undertaken before we can assess your response. In those instances, we have told you what we will do in the **evaluation guidance**.

1. **Selection criteria**
	1. We may exclude you from the competition at the selection stage if:
		* you receive a ‘fail’ for any of the evaluated selection questions.
		* any of the information you have provided proves to be false or misleading.
		* you have broken any of the competition rules in attachment 1 - About the contract, or not followed the instructions given in this ITT pack.
		* having applied the policy set out in Procurement Policy Note 01/22 ([PPN 01/22](https://www.gov.uk/government/publications/procurement-policy-note-0122-contracts-with-suppliers-from-russia-and-belarus)), you (or any of your subcontractors named in your tender) are deemed as constituted or organised under the law of Russia or Belarus, or whose ‘Persons of Significant Control’ information states Russia or Belarus as the place of residency.
	2. If we exclude you from the competition, we will tell you and explain why.
2. **Selection questionnaire**

Please refer to Selection questionnaire (Attachment 2a). Remember you must complete the questionnaire online in the eSourcing suite (qualification envelope).

1. **Award stage**

If you have successfully passed the selection stage, you will proceed to the award stage.

We have tried to make our award stage as simple as possible, whilst achieving the best possible commercial outcomes.

Your bid must deliver what our buyers need.

When completing your bid you must:

* Read through the entire ITT packcarefully, and read more than once.
* Read each question, the response guidance, marking scheme and evaluation criteria.
* Read the attachments.
* If you are unsure, ask questions before the clarification questions deadline See ‘Timelines for the competition’ and ‘When and how to ask questions’ in the attachment About the framework.
* Allow plenty of time to complete your responses; it always takes longer than you think to submit.
1. **Award criteria**

The Award Stage consists of a quality evaluation only.

The weighting for the quality evaluation is 100 marks

1. **Award process**
	1. What YOU need to do
* answer the quality questions of the quality questionnaire in the eSourcing suite in the technical envelope.
	1. What **WE** will do at the award stage

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| 1. | **Compliance Check**First, we will do a check to make sure that you completed the questions in line with our instructions.  |
| 2. | **Quality Evaluation**We will give your responses to our evaluation panel. Each evaluator will independently assess your responses to the quality questions using the response guidance and the evaluation criteria. Each evaluator will give a mark and a reason for their mark for each question they are assessing. Each evaluator will enter their marks and reasons into the eSourcing suite. |
| 3. | **Consensus** Once the evaluators have independently assessed your answers to the questions we will arrange for the evaluators to meet and we will facilitate the discussion. At this consensus meeting, the evaluators will discuss the quality of your answers and discuss their marks and reasons for that mark. The discussion will continue until they reach a consensus regarding the mark, and a reason for that mark, for each question. These final marks will be used to calculate your quality score for each lot you have bid for.  |
| 4. | **Quality Threshold**If you have received a zero for any of the quality questions or if you have not met a minimum quality score of [50], we will reject your bid and you will be excluded from the competition. We will tell you that your bid has been excluded from the competition and why.  |
| 7. | **Award** Awards will be made to the successful bidders following the standstill period, subject to contract. |

1. **Quality Evaluation**

All questions are mandatory question and will be evaluated PASS / FAIL. If you answer no to these questions, we will reject your bid and you will be excluded from the competition. We will tell you that your bid has been excluded and why.

Each question must be answered in its own right. You must not answer any of the questions by cross referencing other questions or other materials for example reports or information located on your website.

Each of the quality questions of the quality questionnaire will be independently assessed by our evaluation panel.

When the consensus meeting has taken place and the final mark for each question has been agreed by the evaluators, your final mark for each question will be multiplied by that question's weighting to calculate your weighted mark for that question.

Each weighted mark for each question for each lot you have submitted a bid for will then be added together to calculate your quality score.

Please see the table below for an example of how your quality score will be calculated.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Question** | **Weighting (%)** | **Maximum Mark Available** | **Your Final Mark** | **Your Weighted Mark** |
| A1 | Scale of operations | 5 | 100 | 100 | 5.00 |
| A2 | Implementation and previous experience | 5 | 100 | 100 | 5.00 |
| A3 | The requirement | 45 | 100 | 100 | 45.00 |
| A4 | Continuous improvement and service growth  | 20 | 100 | 100 | 20.00 |
| A5 | Open book | 5 | 100 | 100 | 5.00 |
| A6 | Intellectual property | 2.5 | 100 | 100 | 2.5 |
| A7 | Security breach | 2.5 | 100 | 100 | 2.5 |
| A8 | General security | 2.5 | 100 | 100 | 2.5 |
| A9 | Data protection legislation | 2.5 | 100 | 100 | 2.5 |
| A10 | Social Value | 10 | 100 | 100 | 10.00 |

1. **Award quality questionnaire**
	1. A summary of all the questions in the quality questionnaire, along with the marking scheme, and weightings for each question is set out below.
	2. All bidders must answer this question.
	3. In all responses, you must be limited to, and focused on, each component part of the question. You must not make generalised statements or give irrelevant information.
	4. Please attend to layout, spelling, punctuation, and grammar. Address each of the component parts in the order they are listed in this response guidance. State which part you are responding to.
	5. You must not exceed the character count within the e-Sourcing suite. Responses must include spaces between words. No attachments are permitted; any additional documents submitted will be ignored in the evaluation of this question.

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|  | **Marking Scheme** | **Weighting (%)** |
| A1 | Scale of operations | 100/75/50/25/0 | 5 |
| A2 | Implementation and previous experience | 100/75/50/25/0 | 5 |
| A3 | The requirement | 100/75/50/25/0 | 45 |
| A4 | Continuous improvement and service growth  | 100/75/50/25/0 | 20 |
| A5 | Open book | 100/75/50/25/0 | 5 |
| A6 | Intellectual property | 100/75/50/25/0 | 2.5 |
| A7 | Security breach | 100/75/50/25/0 | 2.5 |
| A8 | General security | 100/75/50/25/0 | 2.5 |
| A9 | Data protection legislation | 100/75/50/25/0 | 2.5 |
| A10 | Social Value | 100/75/50/25/0 | 10 |

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| **Section A – Quality Questions** |
| **A1 Scale of Operations**As detailed in Attachment 11 – Statement of requirements, there is a requirement for the bidder to have sufficient scale of operations to manage current demand, and to grow and develop this service both in UK and internationally. |
| **A1 Response Guidance** Please describe:1. How you will work with the Authority and relevant stakeholders to effectively understand the current level of service demand.
2. How you will design a solution that has sufficient scale and experience to effectively deliver the current level of service demand.
3. Your strategy for growing and developing the service in the UK and internationally.

Maximum character count – 6,000 characters including spaces and punctuation. |

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| **Marking Scheme 100/75/50/25/0** |
| **Marking Scheme** | **Evaluation Criteria** |
| **100** | An excellent comprehensive response that meets the requirements. Indicates an excellent response with detailed supporting evidence and no weaknesses resulting in a high level of confidence. |
| **75** | A good response that meets the requirements with good supporting evidence. Demonstrates good understanding. |
| **50** | Meets the requirements – the response generally meets the requirements, but lacks sufficient detail to warrant a higher mark. |
| **25** | A poor response with reservations. The response lacks convincing detail with risk that the proposal will not be successful in meeting all the requirements. |
| **0** | Failed to provide confidence that the proposal will meet the requirements. An unacceptable response with serious reservations. |
| \*Please note that if you receive a score of 0 or if you have not met the minimum quality score of 50, we will reject your bid and you will be excluded from the competition.  |

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| **A2 Implementation and previous experience**The bidder must provide the Authority with a draft implementation plan detailing the key milestones and steps to build, create (or transfer) and take over the business case accreditation and examination services. The Authority expects the bidder to ensure continuity of services throughout the implementation, so wishes to test your expected approach to this. If there is a transition of suppliers, we expect this process to take around three months, with some expected contingency time.Please describe how you will deliver this requirement by addressing the deliverables of the Implementation Plan, as highlighted in the component parts in the Response Guidance below. |
| **A2 Response Guidance** **All bidders must answer this question.****You need to insert your response into the text fields in the eSourcing suite.**Please describe how you will deliver the above requirement ensuring you address the point below:1. what actions you will undertake during the transition period to maintain the current provision of service without interruption.
2. As part of your answer, please set out how you will work with the existing supplier and Authority to ensure a smooth process and handover.
3. Please also outline what previous relevant experience your organisation has in delivering similar requirements to those required by the Authority, as outlined in the statement of requirements.
4. Please outline whether you are accredited to the relevant standards by the United Kingdom Accreditation Service (UKAS) or your plans to do so (see Section 11 of Attachment 11 - Statement of requirements).

Maximum character count – 10,000 characters including spaces and punctuation. |

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| **Marking Scheme 100/75/50/25/0** |
| **Marking Scheme** | **Evaluation Criteria** |
| **100** | An excellent comprehensive response that meets the requirements. Indicates an excellent response with detailed supporting evidence and no weaknesses resulting in a high level of confidence. |
| **75** | A good response that meets the requirements with good supporting evidence. Demonstrates good understanding. |
| **50** | Meets the requirements – the response generally meets the requirements, but lacks sufficient detail to warrant a higher mark. |
| **25** | A poor response with reservations. The response lacks convincing detail with risk that the proposal will not be successful in meeting all the requirements. |
| **0** | Failed to provide confidence that the proposal will meet the requirements. An unacceptable response with serious reservations. |
| \*Please note that if you receive a score of 0 or if you have not met the minimum quality score of 50, we will reject your bid and you will be excluded from the competition.  |

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| **A3 The requirement**The bidder is expected to fulfil the requirements listed under section 6 of ‘Attachment 11 - Statement of requirements. With direct reference to this document, please describe how you will fulfil these requirements, excluding points 6.4 and 6.5. |
| **A3 Response Guidance** Please describe how you will meet the criteria set out in section 6 ‘titled: the requirement’ within ‘Attachment 11 - Statement of Requirements’ document. Please clearly set out where each of your actions links to points 6.1 to 6.18. Please do not consider point 6.4 and 6.5 (see next question).Maximum character count – 16,000 characters including spaces and punctuation. |

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| **Marking Scheme 100/75/50/25/0** |
| **Marking Scheme** | **Evaluation Criteria** |
| **100** | An excellent comprehensive response that meets the requirements. Indicates an excellent response with detailed supporting evidence and no weaknesses resulting in a high level of confidence. |
| **75** | A good response that meets the requirements with good supporting evidence. Demonstrates good understanding. |
| **50** | Meets the requirements – the response generally meets the requirements, but lacks sufficient detail to warrant a higher mark. |
| **25** | A poor response with reservations. The response lacks convincing detail with risk that the proposal will not be successful in meeting all the requirements. |
| **0** | Failed to provide confidence that the proposal will meet the requirements. An unacceptable response with serious reservations. |
| \*Please note that if you receive a score of 0 or if you have not met the minimum quality score of 50, we will reject your bid and you will be excluded from the competition.  |

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| **A4 Continuous improvement and service growth**The bidder is expected to provide a scheme that will replicate the functions of the existing scheme in the UK and internationally; there is international potential for growth in the provision of accreditation and training and there are already organisations advocating its use abroad. The Authority would like to see the continued development and growth both at a national and international level through the Better Business Cases Programme.Please describe how the bidding organisation would provide this requirement in line with each of the component parts (within the Response Guidance below). |
| **A4 Response Guidance** Please describe how you will: 1. Fulfil the requirements set out in Section 9 of the Statement of requirements
2. Create a system for gathering feedback from training participants, including detail on who you will survey, how you will administer a survey, how regularly you propose to carry out a survey, and how you propose designing any survey, including an outline of questions that you would ask. Please clearly set out where each of your actions links to points 6.4 and 6.5.
3. Utilise feedback gathered from participants to improve the system in future, including how you propose displaying quality ratings and pricing information on your website of approved training organisations to improve transparency, and how frequently you will be able to update this. Please clearly set out where each of your actions links to points 6.4 and 6.5.

Maximum character count – 10,000 characters including spaces and punctuation. |

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| **Marking Scheme 100/75/50/25/0** |
| **Marking Scheme** | **Evaluation Criteria** |
| **100** | An excellent comprehensive response that meets the requirements. Indicates an excellent response with detailed supporting evidence and no weaknesses resulting in a high level of confidence. |
| **75** | A good response that meets the requirements with good supporting evidence. Demonstrates good understanding. |
| **50** | Meets the requirements – the response generally meets the requirements, but lacks sufficient detail to warrant a higher mark. |
| **25** | A poor response with reservations. The response lacks convincing detail with risk that the proposal will not be successful in meeting all the requirements. |
| **0** | Failed to provide confidence that the proposal will meet the requirements. An unacceptable response with serious reservations. |
| \*Please note that if you receive a score of 0 or if you have not met the minimum quality score of 50, we will reject your bid and you will be excluded from the competition.  |

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| **A5 Open Book Accounting**Attachment 11 – Statement of requirements, requires the bidder to provide open book accounting and manage a Development Fund.Please describe how you will deliver this requirement by addressing component parts in the Response Guidance below. |
| **A5 Response Guidance** Please describe how you will: 1. Fulfil the criteria set out under Section 8 of Attachment 11, Statement of requirements.
2. Maintain an open book accounting system with the Authority; and
3. Account for and manage the Programme Fund that results from the Authority Revenue.

Maximum character count – 8,000 characters including spaces and punctuation.  |

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| **Marking Scheme 100/75/50/25/0** |
| **Marking Scheme** | **Evaluation Criteria** |
| **100** | An excellent comprehensive response that meets the requirements. Indicates an excellent response with detailed supporting evidence and no weaknesses resulting in a high level of confidence. |
| **75** | A good response that meets the requirements with good supporting evidence. Demonstrates good understanding. |
| **50** | Meets the requirements – the response generally meets the requirements, but lacks sufficient detail to warrant a higher mark. |
| **25** | A poor response with reservations. The response lacks convincing detail with risk that the proposal will not be successful in meeting all the requirements. |
| **0** | Failed to provide confidence that the proposal will meet the requirements. An unacceptable response with serious reservations. |
| \*Please note that if you receive a score of 0 or if you have not met the minimum quality score of 50, we will reject your bid and you will be excluded from the competition.  |

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| **A6 Intellectual Property**The bidder will work closely with the Authority to develop its intellectual property into a set of training syllabuses and examinations at foundation and at a more advanced practitioner level.Please describe how you will deliver this requirement by addressing component parts in the Response Guidance below. |
| **A6 Response Guidance** Please describe how you will: 1. work closely with the Authority to develop its intellectual property to the appropriate level;
2. protect the intellectual property that is loaned to you by the Authority as part of the agreement (i.e. primarily the Business Case Guidance).

Maximum character count – 6,000 characters including spaces and punctuation.  |

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| **Marking Scheme 100/75/50/25/0** |
| **Marking Scheme** | **Evaluation Criteria** |
| **100** | An excellent comprehensive response that meets the requirements. Indicates an excellent response with detailed supporting evidence and no weaknesses resulting in a high level of confidence. |
| **75** | A good response that meets the requirements with good supporting evidence. Demonstrates good understanding. |
| **50** | Meets the requirements – the response generally meets the requirements, but lacks sufficient detail to warrant a higher mark. |
| **25** | A poor response with reservations. The response lacks convincing detail with risk that the proposal will not be successful in meeting all the requirements. |
| **0** | Failed to provide confidence that the proposal will meet the requirements. An unacceptable response with serious reservations. |
| \*Please note that if you receive a score of 0 or if you have not met the minimum quality score of 50, we will reject your bid and you will be excluded from the competition.  |

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| **A7 Security Breach**For any suspected or actual security breaches related to customer data/information, bidders are requested to set out their approach to Security addressing each of the 5 component parts within the Response Guidance below. |
| **A7 Response Guidance**Please describe how you will:1. monitor for any such security breaches; and
2. provide initial notifications of such breaches to affected customers, and to the Authority; and
3. investigate identified security breaches; and
4. report on security breaches to affected customers and the Authority, both during investigation and post- investigation; and
5. ensure that lessons are learnt, and the causes of security breaches are appropriately addressed.

Maximum character count – 6,000 characters including spaces and punctuation. |
| **Marking Scheme 100/75/50/25/0** |
| **Marking Scheme** | **Evaluation Criteria** |
| **100** | An excellent comprehensive response that meets the requirements. Indicates an excellent response with detailed supporting evidence and no weaknesses resulting in a high level of confidence. |
| **75** | A good response that meets the requirements with good supporting evidence. Demonstrates good understanding. |
| **50** | Meets the requirements – the response generally meets the requirements, but lacks sufficient detail to warrant a higher mark. |
| **25** | A poor response with reservations. The response lacks convincing detail with risk that the proposal will not be successful in meeting all the requirements. |
| **0** | Failed to provide confidence that the proposal will meet the requirements. An unacceptable response with serious reservations. |
| \*Please note that if you receive a score of 0 or if you have not met the minimum quality score of 50, we will reject your bid and you will be excluded from the competition.  |

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| **A8 General Security** Please describe your approach to security in general including copies of any relevant security related certification held as an attachment in response to this question. Please address both component parts as set out in the Response Guidance below. |
| **A8 Response Guidance**Your response must describe:1. your approach to security (e.g. including, but not limited to, personnel and physical security);
2. whether you hold current independent security certification (e.g. ISO 27001). This must be included as part of your description and clearly state the scope of any such certification held.

Your response **must include** copies (as an attachment to this question) of any relevant security related certification.Maximum character count – 6,000 characters including spaces and punctuation. |
| **Marking Scheme 100/75/50/25/0** |
| **Marking Scheme** | **Evaluation Criteria** |
| **100** | An excellent comprehensive response that meets the requirements. Indicates an excellent response with detailed supporting evidence and no weaknesses resulting in a high level of confidence. |
| **75** | A good response that meets the requirements with good supporting evidence. Demonstrates good understanding. |
| **50** | Meets the requirements – the response generally meets the requirements, but lacks sufficient detail to warrant a higher mark. |
| **25** | A poor response with reservations. The response lacks convincing detail with risk that the proposal will not be successful in meeting all the requirements. |
| **0** | Failed to provide confidence that the proposal will meet the requirements. An unacceptable response with serious reservations. |
| \*Please note that if you receive a score of 0 or if you have not met the minimum quality score of 50, we will reject your bid and you will be excluded from the competition.  |

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| **A9 Data Protection Legislation** Please describe in detail the measures you currently have in place to ensure compliance with relevant Data Protection Legislation, addressing both component parts as set out in the Response Guidance below. |
| **A9 Response Guidance**Your response must describe in detail the measures you currently have in place to ensure compliance with:1. the Data Protection Act (DPA) 2018;
2. the UK General Data Protection Regulation (GDPR) 2018.

Your response must clearly state in which country (or countries), any Authority data processed / stored as part of your proposed solution will be hosted.Maximum character count – 6,000 characters including spaces and punctuation. |
| **Marking Scheme 100/75/50/25/0** |
| **Marking Scheme** | **Evaluation Criteria** |
| **100** | An excellent comprehensive response that meets the requirements. Indicates an excellent response with detailed supporting evidence and no weaknesses resulting in a high level of confidence. |
| **75** | A good response that meets the requirements with good supporting evidence. Demonstrates good understanding. |
| **50** | Meets the requirements – the response generally meets the requirements, but lacks sufficient detail to warrant a higher mark. |
| **25** | A poor response with reservations. The response lacks convincing detail with risk that the proposal will not be successful in meeting all the requirements. |
| **0** | Failed to provide confidence that the proposal will meet the requirements. An unacceptable response with serious reservations. |
| \*Please note that if you receive a score of 0 or if you have not met the minimum quality score of 50, we will reject your bid and you will be excluded from the competition.  |

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| **A10 Social Value**1. Please describe the commitment your organisation will make to ensure that opportunities under the contract deliver the Policy Outcome: Increase supply chain resilience and capacity under Theme 2 of the [Social Value Model](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/940826/Social-Value-Model-Edn-1.1-3-Dec-20.pdf) with a particular focus on MAC 3.4? (**Weighting**: 50% of available amount)
2. Please describe the commitment your organisation will make to ensure that opportunities under the contract deliver the Policy Outcome: Effective stewardship of the environment under Theme 3 of the [Social Value Model](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/940826/Social-Value-Model-Edn-1.1-3-Dec-20.pdf) with a particular focus on MAC 4.2? (**Weighting**: 50% of available amount)
 |
| **A10 Response Guidance**\*Maximum of 4,000 characters for each question not exceeding 1 side of A4 |
| **Marking Scheme 100/75/50/25/0** |
| **Marking Scheme** | **Evaluation Criteria** |
| **100** | An excellent comprehensive response that meets the requirements. Indicates an excellent response with detailed supporting evidence and no weaknesses resulting in a high level of confidence. |
| **75** | A good response that meets the requirements with good supporting evidence. Demonstrates good understanding. |
| **50** | Meets the requirements – the response generally meets the requirements, but lacks sufficient detail to warrant a higher mark. |
| **25** | A poor response with reservations. The response lacks convincing detail with risk that the proposal will not be successful in meeting all the requirements. |
| **0** | Failed to provide confidence that the proposal will meet the requirements. An unacceptable response with serious reservations. |
| \*Please note that if you receive a score of 0 or if you have not met the minimum quality score of 50, we will reject your bid and you will be excluded from the competition.  |

1. **Final decision to award**

We will add together your final weighted quality score for each question to calculate your final mark. Question scores are multiplied by the applicable weighting as per Section 9 Quality Evaluation.

Please note for this contract there is no price evaluation therefore your final score will be based on the result of your quality score alone.

* 1. Intention to award

We will tell you if you have been successful or unsuccessful via the eSourcing suite. We will send intention to award letters to all bidders who are still in the competition i.e. who have not been excluded.

At this stage, a standstill period of ten (10) calendar days will start, the term stand still period is set out in regulation 87(2) of the Regulations. During this time, you can ask questions that relate to our decision to award. We cannot provide advice to unsuccessful bidders on the steps they should take, and they should seek independent legal advice, if required.

If during standstill we do receive a substantive challenge to our decision to award and the challenge is for a certain lot, we reserve the right, to conclude a framework contract with successful bidders for the lot(s) that have not been challenged.

Following the standstill period, and if there are no challenges to our decision, successful bidders will be formally awarded a framework contract subject to signatures.

* 1. Framework contract

You must sign and return the contract within 7 days of being asked. If you do not sign and return, we could withdraw our offer of a contract.

The conclusion of a framework contract is subject to the provision of due ‘certificates, statements and other means of proof’ where bidders have, to this point, relied on self-certification.