

*Jones Lang LaSalle*

**Whole of Australian Government**

**Property Services**

# **Procurement and Downstream Contract Management Strategy**

**Provision of Property Services - Work Packages 1 & 3**

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Procurement and Downstream Contract Management Strategy | May 2024

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## 1.0 PDCM Strategy Overview

### 1.1 Introduction

The Procurement and Downstream Contract Management Strategy (PDCM Strategy) aims to establish and provide oversight with respect to Jones Lang LaSalle’s (JLL’s) approach, delivery and implementation of Procured and Managed services under the Whole of Australian Government (WoAG) Deed. The methodology to procure services, supplemented by the sourcing strategies and applicable timelines, are further explored within the document. As per the requirements under the Deed, the Strategy paper will be reviewed in conjunction with the Department of Finance (DOF) on a 6 monthly basis (May and November) for approval and ultimate endorsement.

### 1.2 Ownership of Document:

Owner	s47F	Account Executive (WoAG)
Author		Strategic Client Manager Procurement (WoAG)

### 1.3 Change Summary Table

Version	Date	Description	Author
0.1	November 2018	Initial Submission to DOF for review	s47F
1	April 2019	Final Approved and Client Endorsed Submission v.1	
2	October 2019	Submission v.2	
3	April 2020	Submission v.3	
4	October 2020	Submission v.4	
5	April 2021	Submission v.5	
6	October 2021	Submission v.6	
7	April 2022	Submission v.7	
8	November 2022	Submission v.8	
9	May 2023	Submission v.9	
10	November 2023	Submission v.10	
11	May 2024	Submission v.11	

## 2.0 Procurement and Downstream Contract Management Strategy for the Services

### 2.1. Expiring Contracts & Strategy

The list of contracts that may be impacted was considered fluid until transitions of Entities was complete. It was determined early in the (Property Services Coordinated Procurement) PSCP arrangement that any contracts that were active during transition to the (Property Services Provider) PSP that the entity had in place, was not to be novated by JLL, and instead those contracts and vendors continued to be engaged through JLL Work Order terms and conditions, until the formal PDCM process had been finalised and implemented for the relevant service type.

### 2.2. Proposed Subcontractor Services

All services are expected to be delivered by Subcontractors (Vendors) and not self-delivered by JLL. Where a further downstream subcontractor is required, JLL proposes to review all necessary subcontract management plans as provided by the vendor and ensure that there is only one additional layer of subcontracting permitted (e.g. Vendor 1 may, when approved by JLL and DOF, subcontract services to Vendor 2 – no further subcontracting past Vendor 2 may occur), JLL, in line with any WoAG Deed requirements, will then seek formal endorsement from DOF to proceed with engaging any proposed further downstream subcontractors.

### 2.3. Terminating Contracts

JLL does not intend to terminate any subcontractors to then deliver the services directly. In the instance of transitioning in a new vendor, the JLL transition lead will release any required termination letter and notice where applicable (typically 30 days). Similarly, where a Subcontractor is not providing a Value for Money (VFM) outcome and not performing to the required performance standards as determined by JLL (and remediation efforts have failed), the JLL Vendor Management (VM) space will release any required termination notices in conjunction with the Sourcing and Procurement (S&P) team, to ensure continuation and minimal disruption of services.

### 2.4. JLL Self Delivery

JLL does not intend to deliver any building services directly.

### 2.5. Pending Procurements

JLL completed sourcing activities at a package level for the following top spend categories as a first priority, referred to as Phase 1, and for lower spend categories as second priority, referred to as Phase 2:

#### Phase 1

- Cleaning and Janitorial Services
- Waste Services
- Mechanical, Electrical and Fire Services (MEF)
- Handyman Services
- Consumables
- Landscaping Services
- Energy

#### Phase 2

##### Group A

- Auto Doors
- Secure Waste
- Lifts
- Water Units
- Relocations
- Emergency Power

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### Group B

- Emergency Management
- Land Management
- Security

Please refer to section 2.13 and 2.14 for further details specific to the strategies and timelines for each procurement.

### 2.6. Communication and Entity Engagement Strategy

JLL S&P has developed a strategy to ensure both in house operational teams, as well as entities, are being provided with clear and concise communications with respect to any upcoming or ongoing procurement activities, as well as any upcoming changes to current PDCM vendors. This approach is tiered as per the following:

- Generalised communications - is provided to each of the entities monthly with respect to any upcoming or ongoing procurement activities. This is distributed in the monthly operational reports, and reported on verbally in the respective monthly operational meetings. This provides entities with an overview of current procurement activity and allows entities to prepare for any upcoming activity, such as preparing internal delegation, requesting additional briefing, etc.
- Formal Procurement Communications – During any formal procurement activity, the JLL S&P team provide both regular updates as to progress as well as formal documentation. This formal documentation is presented as either procurement timelines, formal procurement plan / subcontract plans and eventually a Recommendation to Award (RTA) document. This level of communication, as well as regular and required briefing sessions, allows a level of oversight and buy-in from the entities during any formal procurement process.
- During the Formal Procurement Communications phase, JLL also hold briefing sessions (provided as an option at request of the entities) to discuss the procurement program, timelines and work through any Scope negotiations. The service Scope is also provided by JLL S&P directly to the JLL account team for further input and clarification with their respective entities, to ensure any Scope requirements are agreed to and finalised before approaching the market.

### 2.7. Transition In and Out of Vendors

- Managing Transition in – The JLL VM team, which incorporates a transition function and lead, are responsible for managing all incoming and outgoing vendors. When looking at transition in of a new vendor, the JLL transition lead will work with both the incoming and outgoing vendors, utilising vendor specific matrix and Gant charts, to ensure all timelines are adhered to. This includes all relevant tasks and timings, including vendor resourcing activities, security clearance requirements, supply of compliance documentation and any additional onboarding requirements.
- Managing Transition out – Transition out of both incumbent PDCM vendors and incumbent Non PDCM vendors is managed closely by the transition team. There is generally some overlap with the transitioning in vendor (specifically in the case of Cleaning where there are certain Modern Award factors to consider around reappropriating employees where possible) which is also managed by the JLL transition lead in conjunction with the relevant Facility Management (FM) team. The transition lead is also responsible for administering any termination notices (generally 30 days), working with the outgoing vendor to determine any key dates and requirements to ensure stability of service, organising for handover of documents/keys where required and lastly deactivating the vendor when required within Corrigo and reappropriating the relevant preventative maintenance schedules.

### 2.8. Conflicts of Interest

For the purposes of this document, a conflict of interest (COI) refers to situations where personal or financial interests interfere or may be perceived to interfere with the objective decision-making process. There is no perceived COI from the perspective of self-delivery as JLL does not intend to self-deliver any building services. However, the JLL Code of Ethics clearly outlines and dictates how actual and perceived COI should be managed with respect to the procurement and ongoing management of services. This includes both direction on how to avoid conflicts of interest, examples of potential conflicts, and how to manage perceived and actual conflicts. JLL actively provides training programs to its staff, ensuring

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they can proficiently identify and manage COIs. These training initiatives are regularly updated to align with the JLL Code of Ethics, reinforcing ethical practices within the organisation.

Where the interests of a JLL vendor conflict with those of JLL or its customers (including WoAG) the Vendor must take appropriate action to ensure that the conflict is either removed, or managed, to avoid detriment to JLL or its customers. If there remains some doubt about whether a conflict exists, or how a conflict should be dealt with, the Vendor must bring the issue to the attention of JLL for further input and management. Vendors working with JLL are expected to promptly address COIs that arise between their interests and those of JLL or its customers. They should take appropriate measures to remove or effectively manage conflicts, thereby safeguarding the best interests of JLL and its customers. In instances where COIs are complex or require further guidance, vendors are encouraged to promptly bring the matter to the attention of JLL. By doing so, the issue can be appropriately escalated, allowing for additional input and management to ensure a fair and unbiased resolution.

JLL and the Department of Finance (DOF) collaborate to maintain a consolidated COI register. This register, accessible through the JLL Client portal, serves as a central repository for recording and monitoring conflicts of interest. New conflicts are added to the register and discussed in the Monthly contract management meeting between DOF and JLL. The COI register promotes transparency and enables effective management of COI between JLL, its vendors, and customers. The COI Register is currently managed by JLL's WoAG Communication and Training Manager S47F.

### 2.9. Security Clearance Considerations

The centralised management of security clearances within JLL sits with our in-house Security Clearance Management team, led by our WoAG designated Security Clearance Manager. This allows JLL to centralise the security clearance process and have a clear and defined set of processes to ensure security clearances are being actioned in a timely and efficient manner. Understanding that the Security Clearance requirements of each agency differ substantially, JLL maintain processes to ensure clearances (including Australian Government Security Vetting Agency (AGSVA) Clearances, Police Checks and Entity Specific Clearance types) are managed on a specific / entity by entity level.

During the Procurement process specifically, the S&P team work directly with the JLL Security Clearance Manager and relevant Operational stakeholders to determine the entity specific requirements. This information is distributed through different channels including, but not limited to:

- Briefing sessions with each of applicable tenderers on security clearance requirements.
- Detailing of security clearance requirements within our Standard Services Agreement template.
- A detailed security clearance matrix which provides oversight and steps required to gaining all applicable clearances across the contract.
- Centralised points of contact vendors can utilise while applying for, and working through, the security clearance process.
- Training is also provided directly to Service Providers via the Security Management team and the Vendor Management space to ensure clarity of respective requirements across entities i.e., AGSVA, (Employee Suitability Clearance) ESC, Police checks.

JLL create and maintain their internal Clearances Management Framework (CMF) document. This document outlines all entity-specific processes and requirements and is the main point of reference for JLL team members and external vendors engaged for services under the Deed. Security compliance is tracked within an internal WoAG Master Clearances Register, capturing compliance for internal team members and all engaged external vendors under the Deed. This tracker is manually updated by the JLL WoAG Protective Security Team in an ongoing capacity, and liaises directly with vendors, team members and Entity stakeholders on a regular basis to ensure all clearances recorded are monitored for validity timeframes, progress updates and/or the outcome of a clearance applicant's assessment.

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Note – JLL currently utilise the Microsoft Azure platform for data and information storage and management. Microsoft Azure and the Microsoft365 suite of applications, including SharePoint, is an IRAP-certified platform that permits the handling of digital information up to, and including, PROTECTED classification levels.

JLL's ICT arrangement is conformant with the DISP Information and Cyber Security obligations as defined as "Entry Level". JLL's information security systems are aligned with the below four points of the Australian Signals Directorate 'Essential 8' maturity mode:

- Application control,
- Application patching,
- Patching of operating systems, and
- Validation and restricted administrative privileges.

Further information to these accreditations can be obtained in the Defence Security Principles Framework (DPSF) Control 16.1: Defence Industry Security Program.

JLL does not handle or store PROTECTED information internally – all sensitive information stored within JLL platforms have a maximum classification of OFFICIAL: Sensitive.

In addition, JLL and the Department of Finance are collaborating to pilot the Defence Industry Security Program (DISP) implementation into the WoAG agreement. The pilot implementation is expected to allow enhanced efficiencies with the management and delivery of security clearances for JLL staff and vendors. This allows greater transparency to JLL and all Entity stakeholders regarding personnel security compliance of all incumbent staff and vendors.

The DISP Pilot implementation project began 1 June 2023, and was expected to reach Initial Operational Capacity (IOC) by October 2023. The total DISP implementation will run for a minimum specified time of 12 months, with options for Department of Finance to request extensions to this program where required. As of November 2023, this DISP program has been put on hold until further notice due to additional considerations around requirements flagged by AGSVA.

### 2.10. Compliance Management

The JLL VM team is responsible for the ongoing management and relationship management of the vendors, in a Business-as-Usual setting, post go live and transition of any new contracts. As part of the VM remit, there is a requirement to ensure all vendors (PDCM and non PDCM) are abiding by any applicable legislation and laws with respect to compliance, as well any additional criteria as determined as relevant to assist in ensuring compliance across the contract.

The ability to ensure this from the PDCM perspective, first relies on the ability to enforce requirements within JLL's Specialist Services Agreement (SSA). The SSA includes the requirement of Vendors to acceptance to all JLL's terms and conditions, as well as any terms and conditions as a result of any flow down terms from the WoAG Deed, including compliance against any relevant laws and policies. From here, the VM team is responsible for collating the applicable compliance data as part of the onboarding process, and holding regular meetings to ensure compliance is being managed and audited where necessary (monthly vendor management meetings and ongoing supplier reviews - undertaken every 2nd year for cleaning suppliers & annually for Handyman providers),

The Supplier reviews provide a holistic overview of the current vendor's compliance, including looking at corporate framework items such as insurances, corporate governance, health and safety, modern slavery policies, codes of conduct, and additional items as relevant. This supplier review also allows the VM team to closely monitor our vendor compliance to a granular level to ensure compliancy across all relevant aspects of the business. The VM team also conducts random audits of the vendors on items such as the use of JLL's Onsite tool, which ensures vendors are clocking in when on site and complying with any relevant requirements.



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Additionally, to these manual supplier reviews and ongoing monthly meetings, JLL's Corrigo platform also tracks compliance across the lifespan of the contract. For example, when a certificate of insurance is due to expire within 30 days, this will be picked up and flagged within Corrigo and the vendor will receive an automated email advising them to provide updated copies to ensure compliance is maintained.

In addition, through the use of our Corrigo platform, JLL have an increased compliance across the contract through the implementation of Recipient Created Tax Invoice's (RCTI's) for vendors. RCTI method has allowed JLL to streamline the payment process across vendors which also enables JLL to ensure timely payment to vendors in line with any requirements under the Deed.

### 2.10.1 Modern Slavery Considerations

Modern slavery is a critical issue that requires proactive measures to prevent and address its occurrence within global supply chains. As part of our commitment to combatting modern slavery, JLL has developed a comprehensive procurement strategy that assesses suppliers and manages associated risks effectively. This section outlines JLL's approach to reducing instances of modern slavery by leveraging various initiatives and policies throughout the service delivery lifecycle.

- **Assessing Supplier Risks:** JLL recognises that certain factors increase the inherent risk of modern slavery within supply chains. By considering indicators such as hazardous workplaces, low-skilled labour, multi-tiered supply chains, limited regulation in specific regions, and sudden changes in price or demand, we identify suppliers with higher vulnerabilities to modern slavery risks.
- **Supplier Screening:** JLL implements a rigorous supplier screening process to ensure ethical practices throughout the supply chain. This includes comprehensive prequalification assessments that incorporate ethics-related questions, corporate profile and conflict of interest declarations, and certifications of compliance with our Supplier Code of Conduct. To enhance this process, JLL utilises industry-leading screening tools such as Refinitiv's Supplier World-Check One and Sphera (previously Riskmethods) Screening to identify any potential red flags associated with modern slavery risks.
- **Due Diligence:** JLL places great emphasis on due diligence to assess supplier risk profiles comprehensively. This involves a tiered approach to supplier risk assessment, examining factors like insurance compliance, financial viability, legal searches, and subcontracting practices. By considering these criteria, JLL ensures that suppliers align with our commitment to prevent modern slavery.
- **Contracting:** JLL incorporates specific contractual obligations within our agreements with supply partners, which explicitly commit them to abide by our global Human Rights Policy and Vendor Code of Conduct. Standard contract templates are provided, incorporating ethics clauses to further enforce our stance against modern slavery. Through sustainable procurement policies and charters, JLL fosters a culture of responsible sourcing.
- **Monitoring and Compliance:** JLL's commitment to combating modern slavery extends beyond initial assessments. Ongoing compliance monitoring is carried out through activities such as supplier performance management, audits, supplier questionnaires, and the use of a whistleblower hotline known as the Ethics Everywhere Helpline. These initiatives promote transparency and ensure that modern slavery risks are continually addressed throughout the supplier relationship.
- **IntegrityNext Platform:** To further enhance our visibility and understanding of supply chain sustainability, JLL adopted the IntegrityNext platform in 2024. This tool allows us to perform initial assessments of more than 50,000 suppliers based on their country and industry, focusing on potential risks related to discrimination, forced labour, mistreatment, and child labour. By leveraging the IntegrityNext platform, JLL proactively addresses sustainability challenges in our supply chain.



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- **Training and Education:** JLL recognises the importance of training and education in preventing and combatting modern slavery. Employees and supply partners undergo comprehensive training programs that cover topics such as identifying and reporting modern slavery, forced labour, human trafficking, and child labour. Annual training assignments through JLL's learning management system and in-person training sessions are made available to ensure a well-informed workforce.
- **Incident Response:** In the event that modern slavery is identified or suspected, JLL follows a structured incident management approach. This involves immediately escalating the incident, conducting thorough investigations, and establishing an Incident Management Team comprised of relevant stakeholders from various business lines and corporate functions. The team works together to support impacted individuals, manage the incident, communicate regularly, and implement remedial actions. Continuous improvement and lessons learned are documented to prevent future incidents.

JLL's procurement strategy incorporates a comprehensive set of measures to address modern slavery risks within our supply chain effectively. By implementing supplier assessments, screening tools, rigorous due diligence, contract obligations, monitoring mechanisms, and extensive training programs, JLL is committed to preventing and combating modern slavery. The adoption of the IntegrityNext platform further enhances our ability to proactively manage ESG risks and promote sustainable sourcing practices.

### 2.11. Vendor and Contracts Performance Management

Any servicing undertaken by the PDCM vendor pool will be managed and monitored for performance by both the FM and VM space, utilising the requirements of, and conformance to, the JLL SSA. JLL manages this performance against both a set of Key Performance Indicators and Service Level Agreements, which allows the VM team to have both a level of oversight and direction when managing vendor performance.

JLL also records vendor performance feedback in regular vendor performance evaluations and scorecards (scored by the JLL account teams), this information is fed back to the vendors during their monthly vendor management reviews to ensure increased levels of performance and remediation take place when necessary.

JLL has also recently implemented a Quarterly Business Review (QBR) function with each of the onboarded PDCM Vendors. As the PDCM vendor base presents both the highest level of risk across account (providing servicing for the bulk of works across the business), as well being locked into a JLL SSA, this allows us meet quarterly (in person) with the vendors to review their current business functions, innovations, scorecards and additional items as required, this again adds an additional layer of vendor management to ensure JLL and our vendors are hitting our required targets under the Deed.

An example of the Vendor and Contracts Performance Management and Remediation framework includes the following step by step process:

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A recent example of when JLL initiated the vendor and contracts performance management and remediation framework includes the recent transition of Rentokil (Hygiene / Pest / Plant provider) to 3 new providers – Flick (Hygiene), Orkin (Pest) and Frenchams (Plant). The above step by step process was utilised and followed by the engaged parties listed, through to eventual escalation / intervention by JLL Sourcing and Procurement, who determined that the response and ongoing (systemic) issues being faced by JLL and the Commonwealth with respect to Rentokil’s performance, coupled with their significant requested cost increases in November 2022, resulted in JLL formally moving to transition the vendor off account. This was managed through a formal procurement activity lead by JLL Sourcing and Procurement to find suitable alternatives to back fill Rentokil and was also socialised with each of the impacted entities through to resolution, as of May 2024 the transition process for this vendor is currently underway, with a formal go live date expected for June 2024.

## 2.12. Sustainability Initiatives

In line with recent directive from the Commonwealth in both the Sustainable Procurement Guide and recent amendments to the Commonwealth Procurement Rules (CPRs), JLL has seriously considered the environmental and sustainable impacts of both their current and previous procurement activities and have also committed to further expanding on these set of principles.

To demonstrate our continued support of DOF and the applicable entities under Work Packages 1 & 3 (as well as the PSCP approach as a whole and all respective entities), During September-December 2022, JLL explored a Renewable Energy Procurement exercise, in a two staged approach as follows:

1. The first stage covered an initial Expression of Interest exercise (EOI) which tested market sentiment and provided further data in the form of a comprehensive market analysis back to the Commonwealth (Services Australia as the lead agency due to the highest spend per entity), to assist in discussion around further exploring renewable options
2. Based on feedback and approval of the methodology contained with the market analysis, the second stage was intended to allow agencies to opt-in to a formal approach to market through a Request for Tender (RFT) to procure a 100% renewable option on their behalf. This switch to Renewable energy across the contract was projected to result in a substantial decrease in carbon emissions of between 70-80% (approximate) pending property type and spend. While JLL considered this a tangible step in assisting the Commonwealth in further limiting their Scope 1 emissions, and ultimately hitting their Net Zero targets, it was determined by Services Australia that the renewable energy option, in the current energy climate (in the wake of the war in the Ukraine which resulted in significant increases to energy costs) that this option did not represent a Value for Money outcome

As a result, JLL instead approached the market for standard grid energy contracts however, in the spirit of sustainable operations, offered the entities a grid energy “black power” solution, with a percentage of renewable energy “green power”

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which could be opted in for. Data on projected costs, as well as benefits, were provided to entities to assist in their decision on whether to opt-in to a percentage of green power, and as a result the following entities opted into a green power solution:

Entity	Market (large/small)	Power Split
NDIS Quality and Safeguards Commission	Small	10% Green, 90% black
The Office of the Commonwealth Ombudsman	Small	10% Green, 90% black
Digital Transformation Agency	Small	10% Green, 90% black
Department of Agriculture, Fisheries and Forestry	Large & Small	10% Green, 90% black
Department of Veterans' Affairs	Large & Small	10% Green, 90% black

In addition, JLL are currently reviewing the prospect of implementing strategies to further limit Scope 2 and 3 emissions. This will be considered through a range of activities such as optimisation of current works as well as investigating current site assets and determining eco-friendly alternatives where applicable.

2.13. Strategies for Phase 1 categories

Analysis of the financial year spend was conducted as part of the development of the strategy on the following Entities:

- DHS
- HA
- PM&C
- AFP
- DAWR
- DOEE
- DSS
- IP Australia

The analysis indicated that 90+% of all controllable spend is contained within the following categories. Along with Electricity, these confirmed the categories in Phase 1 as priorities to deliver:

- Cleaning and Janitorial Services
- Waste Services
- MEF Services
- Handyman Services
- Consumables
- Landscaping Services

Analysis was then done on the breakdown of vendor numbers and spend profile which highlighted the significant opportunities to rationalise vendor numbers to remove duplication, deliver efficiencies and value for money to the Commonwealth.

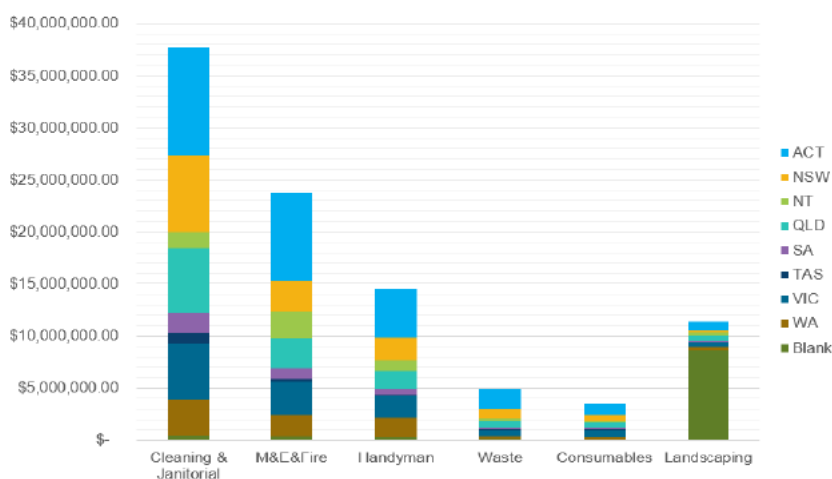
Total Spend Per vendor	No. of Vendors	Average Spend per Vendor
------------------------	----------------	--------------------------

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\$1,000,000 +	1	\$3,062,323.20
\$500,000 - \$1,000,000	2	\$712,867.03
\$100,000 - \$500,000	8	\$225,645.49
\$50,000 - \$100,000	7	\$55,507.48
\$10,000 - \$50,000	2	\$24,230.78
\$1,000 - \$10,000	3	\$4,209.
\$0 - \$1,000	1	\$470.

We then analysed the indicative spend profile by Category and State which confirmed the significant spend in Cleaning and Janitorial services. Again, the spend labelled blank we are working to categorise.

Location Profile – Category & State



By analyzing the indicative spend and vendor profile in several ways it became clear that there were four high level sourcing strategy options available to deliver the procurement outcomes expected. The table below outlines the advantaged and disadvantages of each strategy:

Sourcing Strategy	Advantage	Disadvantage
Per Entity	Easier to capture Entity specific requirements Plus for Entity Management	Status Quo Reversion to previous operating environment Ignore volume bundling opportunities Re-specification will be difficult Inefficient to deliver
Per Asset Class	Captures specialist suppliers and potential savings Will be required for some specialist sites (AFP, Home Affairs)	Inefficient, not enough specialist assets in portfolio Only suitable for limited sites Duplicate Supply chain

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Per Clearance Level	High level clearance levels it provides volume which helps with retention of staff	Only suitable for limited sites Lack of visibility from Entities on clearance levels required
Per Category & Geography	Volume Bundling Co-Sourcing for smaller Entities Re-specification possible Matches DoF goals Largest opportunity for savings	Limited subcontracting allowed under the contract without approval

Conducting the procurements by category and geography breakdown was selected as the strategy. This strategy then, and now, best achieves the contract goals of leveraging Commonwealth buying power, removing duplication in geographical regions, coordinated approaches to market, efficiencies and standardisation in service delivery standards. It also presents the greatest opportunity for VFM outcomes and savings for the Commonwealth.

Below are the individual strategies developed and implemented for each of the seven categories identified as Phase 1 procurements. Each strategy contained the following:

- Project Overview
- Market Synopsis
- Indigenous assessment
- Assumptions and Considerations
- Strategy & Benefits summary (Including timelines)

### 2.13.1. Cleaning and Janitorial Services

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Indigenous

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Four of the top 15 incumbent vendors were Indigenous. All were invited to submit proposals. We looked to retain and grow the service offering where possible in line with the overall state-based strategy. Indigenous businesses being used by JLL on other accounts were also invited to submit proposals.

### Assumptions and Considerations

CAF as currently written has not been implemented on multi-site / asset class portfolio. Some subcontracting will be required. Some regional and remote sites may be removed from overall strategy, especially in specialist locations.

### Strategy & Benefits

Benefit Type: Cost Reduction and VFM outcome through streamlining services and leveraging buying power across the Commonwealth while providing additional opportunities to Indigenous providers

Strategy: Competitively Bid

Timing: Staggered Rollout Nov 18 – Jan 19

Completed / Ongoing: Completed (pending finalisation of Phase 1 Refresh, Tranche 5 – transition of Services Australia and NDIA sites)

## 2.13.2. Waste Services

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### Indigenous

There were limited vendors in the market, mostly dealing in industrial waste and metal recycling.

### Assumptions and Considerations

Broker will act as a 3rd party intermediary between JLL and vendors, creating significant efficiency gains. Will have access to preferred rates for unusual Reactive Maintenance requests (skips etc.) for short term events such as elections, MOG changes etc. Environmental reporting will be handled by Broker based on the “real weight” data provided to drive environmental improvements and will work with JLLs Energy and Sustainability Solutions (ESS) team to develop further initiatives.

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### Strategy & Benefits

Benefit Type: Cost Reduction and Avoidance and VFM outcome through streamlining services and leveraging buying power across the Commonwealth

Strategy: Preferred Supplier

Timing: Staggered Rollout Nov 18 – Feb 19

Completed / Ongoing: Completed (pending finalisation of Phase 1 Refresh, Tranche 5 – transition of Services Australia and NDIA sites)

### 2.13.3. Mechanical, Electrical & Fire Services

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### Indigenous

2 of the top 10 incumbent vendors were Indigenous. There was limited depth in this category with Indigenous businesses.

### Assumptions and Considerations

Environmental efficiencies were an important touch point for ESS throughout the contract. Given this, the recommended vendor needed to demonstrate a proven track record of National Australian Built Environment Rating System (NABERS) adherence and improvements. Some subcontracting will be required to achieve SLA requirements.

### Strategy & Benefits

Benefit Type: Cost Reduction and VFM outcome through streamlining services and leveraging buying power across the Commonwealth



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Strategy: Competitively Bid

Timing: Staggered Rollout Nov 18 – Jan 19

Completed / Ongoing: Completed (pending finalisation of Phase 1 Refresh, Tranche 5 – transition of Services Australia and NDIA sites)

### 2.13.4. Handyman Services

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#### Indigenous

There were several medium and small Indigenous Businesses that we are exploring in this space. We may specifically target some tier 2 cities to determine capacity for dedicated resourcing and grow business and capacity from there.

#### Assumptions and Considerations

Ability to scale and enhance labour utilisation if expanded across Packages. Not all sites will be included, this will be determined by proposals.

#### Strategy & Benefits

Benefit Type: Cost Reduction and VFM outcome through streamlining services and leveraging buying power across the Commonwealth while providing additional opportunities to Indigenous providers

Strategy: Competitively Bid

Timing: Staggered Rollout Nov 18 – Jan 19

Completed / Ongoing: Completed (pending finalisation of Phase 1 Refresh, Tranche 5 – transition of Services Australia and NDIA sites)

### 2.13.5. Consumables

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### Indigenous

Opportunities exist with Indigenous businesses and preferred vendors. A number already had supply arrangements in place that we investigated.

### Assumptions and Considerations

Some regional and remote sites may be removed from overall strategy, especially in specialist locations such as Christmas and Thursday Islands. Ability to role in all packages to leverage complete Commonwealth purchasing power and standardise consumables being used.

### Strategy & Benefits

Benefit Type: Cost Reduction and VFM outcome through streamlining services and leveraging buying power across the Commonwealth while providing additional opportunities to Indigenous providers

Strategy: Preferred Vendors

Timing: Staggered Rollout Nov 18 – Jan 19

Completed / Ongoing: Completed (pending finalisation of Phase 1 Refresh, Tranche 5 – transition of Services Australia and NDIA sites)

### 2.13.6. Landscaping Services



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Indigenous

We currently engage 15 Indigenous vendors. In addition, there were a large number of small Indigenous landscaping businesses that we explored to assess if they could deliver services on the scale required.

Assumptions and Considerations

Some subcontracting will be required. Some regional and remote sites may be removed from overall strategy, especially in specialist locations such as Christmas and Thursday Islands. Land Management is not covered in this strategy and may result in some specialist sites being removed.

Strategy & Benefits

Benefit Type: Cost Reduction and VFM outcome through streamlining services and leveraging buying power across the Commonwealth while providing additional opportunities to Indigenous providers

Strategy: Competitive Bid

Timing: Staggered Rollout Nov 18 – Jan 19

Completed/ Ongoing: No Longer Required. Feedback from entities requiring Landscaping requirements resulted in JLL direct engaging the incumbent vendors here opposed to formally approaching the market, noting this has been tracked and further looked into with respect to engagement of local vendors through the remote and regional strategy. Given the vast bulk of work required at remote and regional locations involves a level of Landscaping Services, JLL has instead proposed these services be managed on a case by case basis through the remote and regional procurement strategy that is currently being delivered.

2.13.7. Energy

JLL conducted procurement activities for Energy, noting the strategy for the efficient delivery of these procurements required specific discussion between JLL and Finance. As a Managed Service, the most efficient way of procuring Energy is via cooperative procurements. We discussed Finance acting as the Lead Agency for these procurements. We also explored the viability of alternate methods of procuring electricity via Power Purchase Agreements and Preferred Supply Agreements that will require further discussion with Finance. As a result a separate business case for energy procurement was provided to Finance. Ultimately, JLL adopted a hybrid approach for procurement of electricity at a WoAG level, acting as agent on behalf of each of the entities to procure their electricity and gas needs (Large and Small Market Gas and Electricity). In order to achieve the greatest outcome for the entities a number of separate procurement activities were required to be undertaken.

As of May 2024, JLL has completed refreshed procurement activities to procure electricity for all entities under JLL’s WoAG contract remit. These procurement activities covered Small and Large Market provision of electricity and Gas, and were run through the 2022 and 2023 Calendar years. The new contracts have been established as per the following:

Current Contract Name	Awarded Vendor	Start Date	End Date	No. of NMI/MIRN	Type
s47E(d)	ActewAGL	1/07/2021	30/06/2024	approx. 150	Electricity
	Shell Energy	1/01/2023	31/12/2024	333	Electricity
	Shell Energy	1/01/2023	31/12/2024	206	Electricity
	Origin	1/01/2023	31/12/2024	1	Gas
	Origin	1/01/2023	31/12/2024	1	Gas
	ActewAGL	1/01/2023	31/12/2024	13	Gas
	Origin	1/01/2023	31/12/2024	15	Gas
	BAC	1/01/2024	31/12/2024	44	Embedded Network

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s47E(d)	Synergy	1/01/2024	31/12/2025	18	Electricity
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Due to the ongoing conflict in the Ukraine at the time of these procurements, as well as additional cost pressures such as significant CPI increases, the procurement activities resulted in a cost increase when compared to the previous contract, however, did also result in a significant cost reduction when compared to potential default rates had the procurement activity not been undertaken.

As of May 2024, JLL continue to work with DOF and the entities with respect to the ongoing handover of procurement of electricity contracts to the Commonwealth. This includes assisting s47E(d) with respect to their refreshed ACT Energy procurement activity, as well as preparing for the eventual handover of these procurement activities to DOF in line with the following (subject to change at DOF’s discretion as is JLL’s understanding):

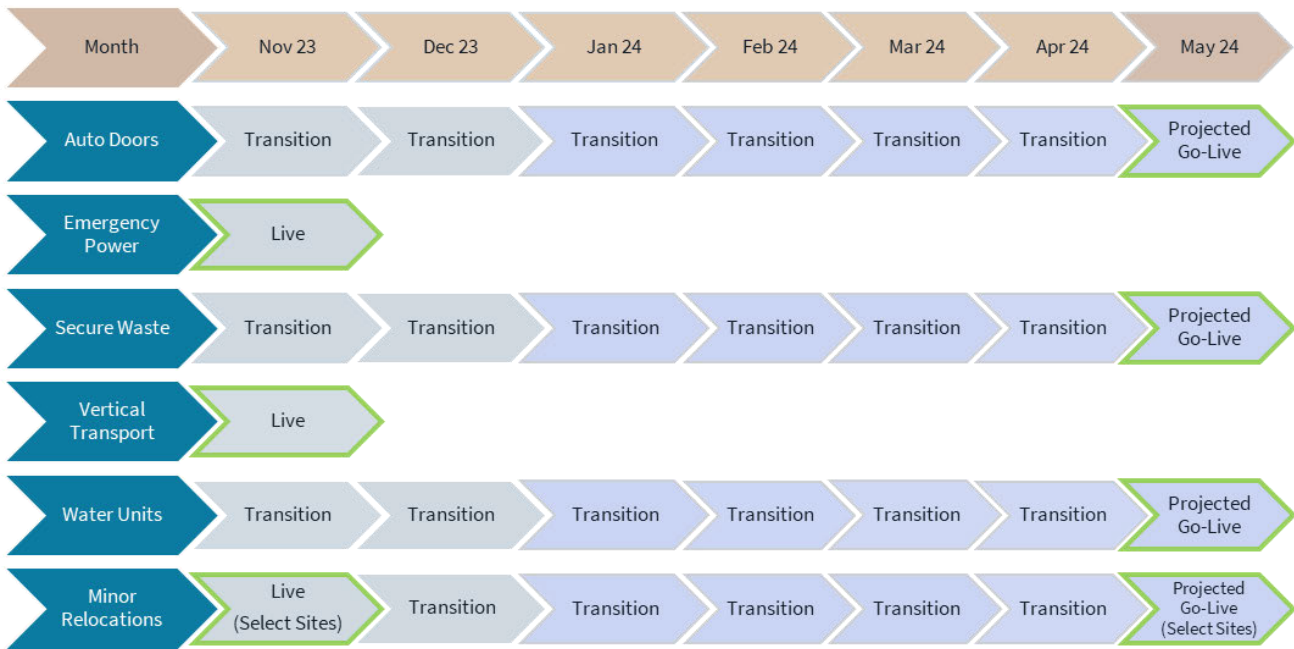
WoAG Electricity Contract	Contract in place by
Northern Territory	01/09/2024
Western Australia	01/12/2024
Tasmania	01/01/2025
NSW, ACT, VIC	01/07/2025
South Australia	01/10/2026
Queensland	01/01/2029

## 2.14 Strategies for Phase 2 (Group A and B) Categories

### Group A

JLL has completed sourcing activities at a package level for the following spend categories, also called the Phase 2, Group A procurement strategy. Consultation with entities occurred in May 2022 for Group A of the Phase 2 strategy, and award with vendors occurred in November 2022 upon approval/endorsement from entities. The rollout of the phase 2, Group A categories was expected to be finalised by April 2023, however due to the AGSVA Portal shutdown period which occurred in November 2022, is now expected to be finalised in in Q2 FY2023. As a result of the new AGSVA system upgrade, JLL Security is aware that AGSVA is experiencing significant delays with respect to clearance processing times, sometimes taking longer than the expected 90 days to turn around a Baseline Clearance. As a result, the new timeline is as per the following (noting the transition is scheduled for a staggered ‘go live when ready’ model, where once a vendor’s employee base is finalised with entity specific security clearances and mapped for go live for that entity, they will move into formal transition and go live for that entity):

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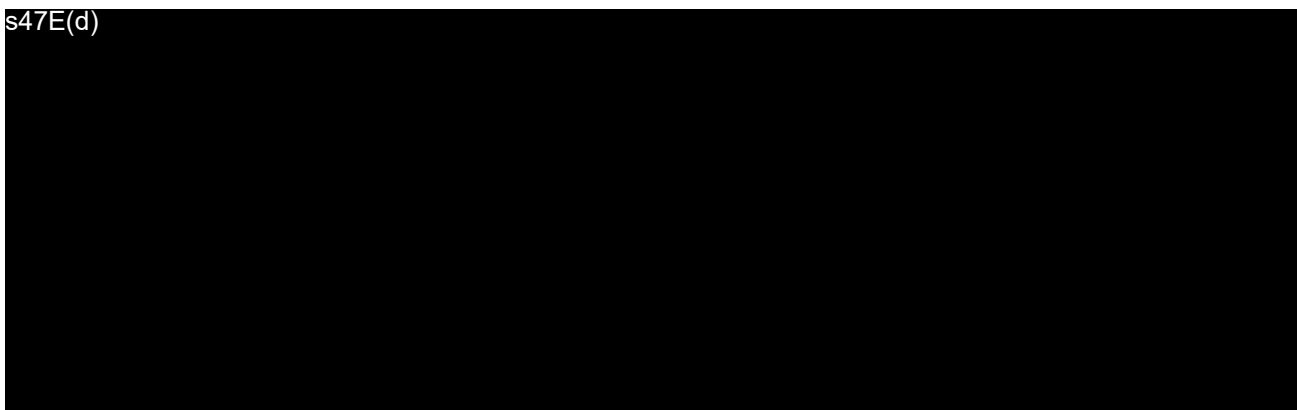


**Group B**

The Phase 2, Group B procurement strategy will incorporate the following service

- Emergency Management – Released to market 9 December 2022 for applicable Schedule 12 entities (NIAA, NDIA, SA, DVA, DSS), and transitioned by Q2 FY2023-24
- Security Management – Expression of Interest (EOI) released to market in September 2022 through to December 2022. RFT to be released to market after an in-depth review of entity security requirements takes place in Q1/2 FY2023-24.
- Land Management – Land Management requirements were reviewed with each applicable account team and entity in late 2022/early 2023, and it was determined that Land Management requirements, as defined under the deed, are not currently required under the current iteration of the Whole of Australian Government contract. This was confirmed between S&P and each respective account team/entity.

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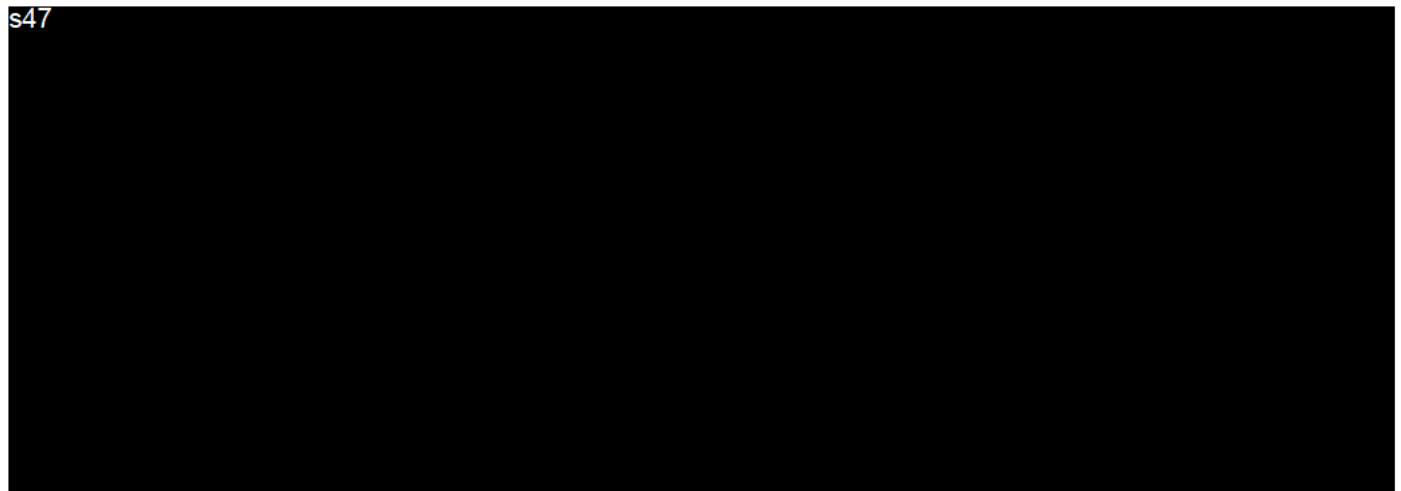
A high-level overview of the Procurement lifecycle and engagement process is detailed below. The proposed Department of Finance Sponsor role would be to provide feedback and guidance to JLL where appropriate, ensuring entity objectives are aligned to the overall PDCM strategy, approving final sourcing strategies and sourcing outcomes and final recommendation as required. The Department of Finance sponsor role, with respect to management of items and risk as per Step 4 below is reflective of Department of Finances involvement where the procurement activity may be inhibited by direction from the entities (e.g., not providing formal endorsement to progress procurement activities). Risk related to the procurement exercise itself (including any compliance, probity, and management) will be managed by JLL.

### Phase 2 - Value for Money Considerations

VFM considerations for Phase 2 were reviewed and evaluated in order to achieve the following outcomes:

- Consolidate the vendor base across the portfolio to achieve synergy.
- Optimise and streamline efficiencies, processes, and rates,
- Identify Value for Money and provide a minimum of 5-10% cost reduction where possible,
- Increase spend with Indigenous vendors (where reasonably practicable)
- Formalise specifications and Key Performance Indicators (KPI's)
- Establish formalised Specialist Services Agreements in line with Commonwealth Flow Downs
- Ensure a high level of compliance requirements are met and subsequently managed via scheduled PPMs in Corrigio

### Phase 2 - Procurement Lifecycle



The strategy for each category is shown below. Three strategies still under develop, to be reviewed and progressed in early 2023, are Emergency Management, Land Management and Security. These form part of the second group of categories JLL is completing sourcing activities for as part of Phase 2.

It is JLL's intention to continue providing visibility of the outcomes of the Phase 1 and Phase 2 procurement activities through the provision of the Monthly PDCM Consolidated reports as well as the Quarterly Performance reports to look at the percentage of transitioned services across the account, the specifics around security clearance numbers and applications, and the overall impacts from a price perspective with respect to the new contracts.

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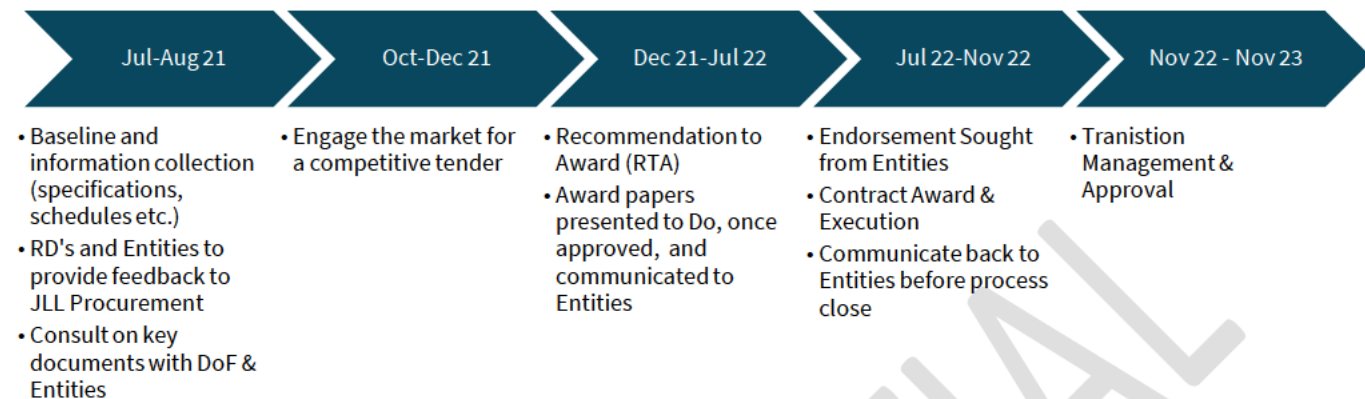
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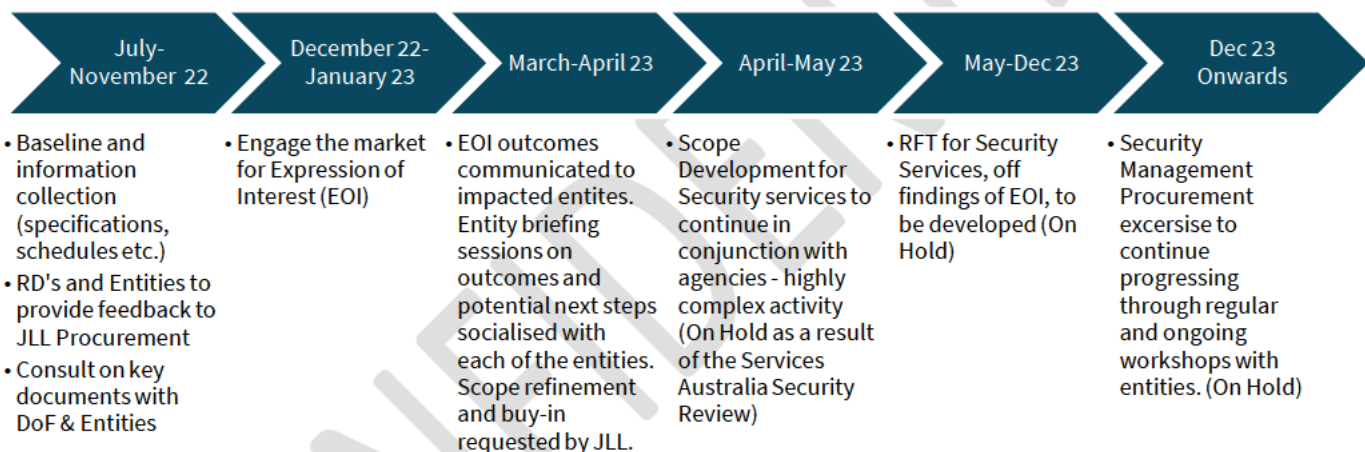
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The final and updated Phase 2 Sourcing timeline for each service category (split into Group A and Group B), covering planning, scope, needs and requirements gathering, sourcing strategy approval, competitive market quote/tender process and final recommendation, approval and business contract award, is illustrated below.

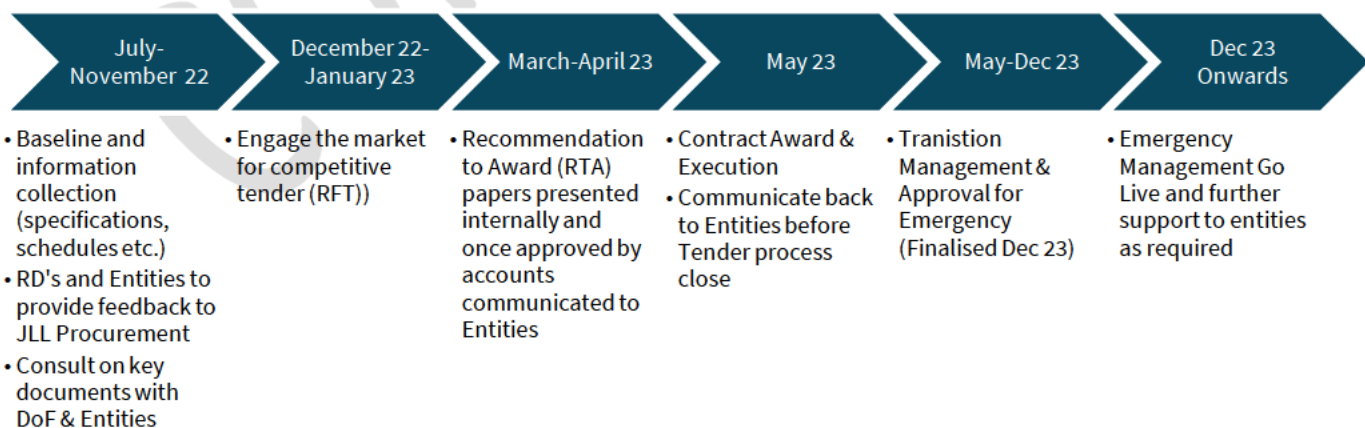
Phase 2, Group A Timeline (Excluding Security Services, Emergency Management, Land Management)



Phase 2, Group B Timeline (Security Services)



Phase 2, Group B Timeline (Emergency Management)



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### Notes

- No timeline has been provided for Land Management due to this not being required as confirmed in early 2022 (reference 2.14 Strategies for Phase 2 (Group A and B) Categories)
- Security timeline to be refreshed upon recommencement of activity at direction of impacted entities.

The Phase 2, Group B Sourcing timeline for Emergency Management and Security Services is illustrated above.

Security Services in-scope are those considered as “Core” under the Commonwealth Deed, including Security Infrastructure and Systems, Concierge/Escort for Access Control and Locksmith and Lock Management Services. In 2023 it had been confirmed that JLL would approach the market for Additional security services for Services Australia, the National Indigenous Australians Agency, Department of Veterans' Affairs, Department of Social Services and potentially Department of Agriculture, Fisheries and Forestry within the same procurement process. This was expected to increase the time required to complete the process, however, would provide greater buying power and commercial outcomes.

As a part of the security process, several considerations and requirements were addressed as part of the planning process with this initially estimated to be completed within 4-6 months. Since kicking off the engagement process with each of the entities, JLL did have some difficulty in receiving client endorsement within a timely manner with respect to buy in, as well as endorsement to participate in the activity. This coupled with ongoing AGSVA delays due to their system upgrade over November/December 2022 impacted the timeline into 2023. Since this time, there were also a number of other critical items, such as the *Security Risk Management Review for Services Australia* announced in May 2023, which further pushed out the potential procurement activity here. The review resulted in 44 recommendations to be implemented as part of the remediation process. JLL believe the outcomes of this review had a ripple effect throughout other agencies, and since then the procurement activity has been put on hold until such time entities are ready. JLL intend to continue working with entities with respect to their security management processes, however note as of recently, there has been little engagement or appetite expressed by the entities to recommence this activity.

### 2.15. Department of Finance Requirements

No additional requirements have been outlined to JLL.



### 3.0 Opportunities to Improve VFM Outcomes

Due to the significant number of contracts and vendors in place it was not possible in the original Strategy to provide an individual opportunities assessment. However, based on the analysis of the indicative spend, vendor numbers and knowledge of the packages the following improvement opportunities were identified across all categories:

- Rationalise vendor numbers.
- Remove geographical and category duplication.
- Bundling of services.
- Greater labour utilisation.
- Re-specification and standardisation.
- Volume bundling.
- Lease v buy contracts.

Between April 2019 – June 2021 most entities and geographic regions transitioned, and VFM benefits were generally realised as forecast. However, several entities have experienced service delivery issues with the PDCM vendors which prompted the June 2021 review of the PDCM Phase 1 Procurement Strategy. The specific entities included within the review were Services Australia (SA), Department of Home Affairs (DHA), National Indigenous Australians Agency (NIAA) and Department of Agriculture, Water and Environment (DAWE).

The purpose of the review was to understand systemic and continued non-performance issues by certain PDCM vendors and make recommendations for an update to the implementation methodology to ensure issues are resolved and benefits are realised. The review included analysis and workshops based on the following:

- Feedback and specific requests from entities
- Vendor Assessment Review (or “Heat Map”) completed and analysed which utilised RD feedback on Phase 1 PDCM vendors by category, by state and by entity to determine what is working and what is not working. This was done to help identify entities which required changes to PDCM vendors (i.e., rated as not working) and understand the specific PDCM vendors and regions that needed to be addressed in the recommendations.
- Complaint analysis completed which reviewed two years of complaint related work orders logged in Corrigo. This was done to help identify entities which required changes to PDCM vendors (i.e., complaint numbers exceeded set threshold) and understand complaint trends for entities, vendors and regions that needed to be addressed in the recommendations. Summary of the key findings is at Appendix A.
- Lessons learnt from Phase 1 implementation – collected through the PricewaterhouseCoopers (PwC) review, DoF performance reviews and JLL internal reviews. A selected summary of these and operational initiatives to address them is at Appendix C.

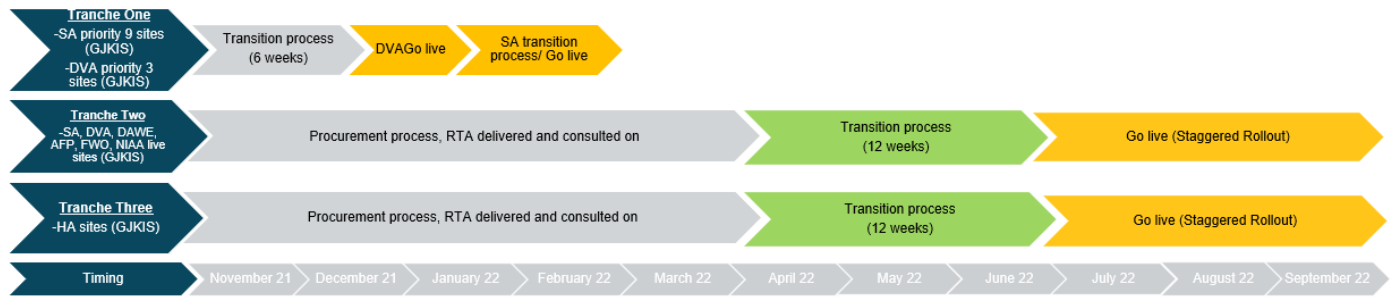
The result of the review was:

- JLL determined that the core Phase 1 Procurement Strategy of conducting Procurement activity by category and geography breakdown would remain the same. Instead, the implementation methodology will be tailored and optimised to geographic considerations – based on entity feedback and performance analysis of PDCM vendors. Specific changes were recommended mainly relating to cleaning vendors. These changes were implanted as part of the Phase 1 Cleaning refresh program. current scope and schedule are below:

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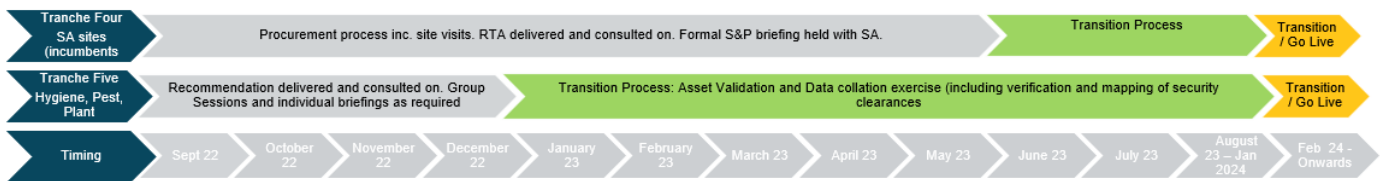
**Phase 1 Refresh Scope and Schedule**

Items Completed to Date:



- JLL did not change PDCM vendors for entities, and in locations, where they were performing well. Instead, JLL focused on optimisation – for example through clear scope alignment, managing time and attendance, ensuring Specialist Supplier Agreements (SSA’s) are in place where needed and ensuring the Corrigo work order platform is being utilised efficiently and effectively.

Ongoing Items:



In late 2023, JLL reviewed the outcomes of the Phase 1 Refresh activity and found that complaint Work Orders raised to JLL in relation to the new cleaning vendors for the refreshed Qld sites had significantly dropped since transitioning away from original vendor. JLL believe this is further testament to success of the refresh model and will look to implement similar in the future if and where required. JLL will also report on these outcomes in the PAG meetings moving forward.

Since noting the success of the Qld cleaning refresh model and understanding some of the difficulties being faced with respect to Hygiene, Pest and Plant activities, JLL also added a **Tranche Five** to the refresh program, which covers the transition of Hygiene, Pest, and Plant vendors from the incumbent JLL PDCM Vendor Rentokil Initial to three new incoming vendors (Flick for Hygiene, Orkin for Pest, and Frenchams for Plant services). These vendors were market tested and the result presented to DOF and the account teams, endorsement to transition was also sought. This Tranche was added due to pressure being applied by Rentokil to both JLL and client account teams with respect to a requested cost increase, which JLL S&P felt would result in a poor outcome for the Commonwealth. Previous feedback from entities was also considered in this decision, where JLL had noted performance feedback on Rentokil had not been positive. JLL socialised these changes with the account, and has been providing regular updates since, noting the formal transition officially kicked off 1 April 2024.

In addition to the refresh efforts, the Regional and Remote Procurement Strategy will also improve the procurement and delivery of services for regional and remote sites. The Strategy has three parts as below and is currently being finalised before going live in late 2021/ early 2022. While the strategy has formally gone live as of March 2023, the Remote and Regional team continue to provide regular updates to those entities involved in the strategy through a combination of the monthly Program Advisory Group (PAG) meeting, monthly operational reports (which include updates specific to the strategy), as well as more target communications pieces. The strategy was initially engaged for a 12-month period under the Schedule 12 mechanism it is attached to, and was solidified and implemented over 2023. Noting the extension of the WoAG Deed this was again further extended through to July 2024 and will be further considered in upcoming PAG meetings.

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## 4.0 Contractual Improvements

### PDCM Strategy (Phase 1): Procurement and Contract Establishment Process

PwC undertook an audit in Q3 and Q4 2020 on the design and implementation of JLL's procurement and contract management framework, and the operating effectiveness of identified key controls through sample testing.

The sample testing covered the following key service categories and PDCM contractors from the Phase 1 Procurement activity:

- Cleaning (Contractors: G.J.&K. Cleaning Services Pty. Limited & Netronix Pty Ltd (trading as G.J.&K. Indigenous Services)
- Handyman (Contractor: Modus Projects Pty Ltd)
- Waste Management (Contractor: Sandra and John Wright Consulting Pty Ltd (trading as Waste Options)
- Hygiene (Rentokil Initial Pty Ltd)
- Mechanical, Electrical and Fire (Precise Air Group Pty Ltd)

PwC considered JLL's processes and key sources of information underpinning the PDCM Strategy to be appropriate in meeting the requirements of the Deed. However, in some instances, there were documentation gaps as to why a certain procurement method was selected by JLL (for example, approaching preferred vendors for proposals or sole sourcing), and it was not clear how Small-to-Medium (SME) businesses were considered in the sourcing strategies.

The outcome of the design, implementation and operating effectiveness of the procurement and contract management framework is shown below.

PwC Outcome: Design, implementation and operating effectiveness of the procurement and contract management framework:

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Outcome	Symbol	Design assessment	Implementation and operating effectiveness
Sound	●	There is a sound framework of internal control and processes designed and clearly documented to meet the desired outcomes of the PDCM Strategy and the Arrangements.	Controls and processes are being consistently applied as evidenced from documentation provided.
Limited	●	There are elements of a sound framework of internal control and processes designed and documented, however, missing elements may place meeting the desired outcomes of the PDCM Strategy and the Arrangements at risk.	Controls and processes are being inconsistently applied from the documentation provided, which may put the desired objectives at risk.
None	●	There is no framework documented which puts meeting the desired outcomes of the PDCM Strategy and the Arrangements at risk.	There is no documentation to support compliance with controls and processes which puts the desired objectives at risk.

There were some inconsistencies identified that were addressed as part of the Phase 2 Sourcing process. The key gaps include, but are not limited to:

- Procurement Process - Planning Phase (Design, Implementation and Operating Effectiveness): Clearly document for each service category the client entity needs assessment, risk assessment, value-for-money considerations and market research to determine potential tenderers.
- Procurement Process - Evaluation Phase (Design, Implementation and Operating Effectiveness): Clearly document and provide the sample evaluation assessment method and evidence of the final evaluation scorecard outcome, including who all the evaluators are.
- Procurement Process – Award & Transition Phase (Design, Implementation and Operating Effectiveness): Clearly document business award recommendation papers, inclusive of transition-in plans.
- Contract Establishment Process – Negotiation Phase (Operating Effectiveness): Clearly document for each service category a table of contractual departures between JLL and nominated PDCM vendors and the final agreed outcome.

Additional key lessons learnt from the Phase 1 PDCM Procurement process and corresponding mitigations for Phase 2 include, but are not limited to:

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- Stakeholder alignment (in particular, Client Entities) to the procurement process and keeping all Entities informed and engaged prior, during and at the end of the procurement process.
  - Phase 2 Countermeasure: JLL Relationship Directors, with the support of JLL S&P will begin engaging clients early in the procurement process to gather their feedback via a structured and documented process.
  - Phase 2 Countermeasure: Client Entities will be provided formal activity updates via a Procurement tracker on the Federal Government Domestic Portfolio (FDGP) client portal.
- Key risks are identified prior to engaging the supplier market as well as ensuring the entities are aligned to the specifications and services that will be delivered.
  - Phase 2 Countermeasure: JLL will ensure detailed information gathering is completed before engaging the market.
  - Phase 2 Countermeasure: DOF formally endorses or approves each service category sourcing strategy and the final sourcing outcome and recommendation, on behalf of Entities.

**PDCM Strategy (Phase 1): Implementation Process - Key Lessons Learnt & Mitigations**

Implementation is defined as transition activity (transition out of incumbent vendors and transition in of PDCM vendors) to achieve “Go-Live” of services and subsequent commencement of delivery of services, in full and as obligated by JLL as the contract principal on behalf of the Commonwealth.

Some of the key PDCM implementation challenges faced and lessons learnt are listed in the table below. These lessons learnt were addressed in the remaining go-live transitions for Phase 1 and further incorporated in the implementation part of Phase 2 service categories.

Area	Challenge	Lesson Learnt
Communication & Engagement	Entities have different requirements for different transitions which this can result in changing the requirements for suppliers. Example: NIAA did not require all suppliers to have security clearances, and this was not understood until 3 weeks pre-go live. This would have reduced the work effort across all involved in the transition process.	Earlier engagement with client entities around needs, requirements and wants.
Change Direction Notice (CDN) Process	Variations being submitted post go-live of services with changes to scope, sites and services directed via email, resulting in loss of information, potential for missed changes and potential for supplier commercial claims being submitted where work has been delivered but the formal change notice was not documented.	JLL National Facility Managers & Relationship Directors to review client entity data and confirm services 60 days pre-go-live (inclusive of site inspections). Any changes will result in a formal CDN via JLL Procurement.
Security Clearances	Volume of applications required, at times, has been underestimated. Accuracy of security clearance submissions, supplier readiness and the ability to track and maintain clearances has been challenging.	Earlier applications: Standard timeframes have not been adequate due to high volume of applications. Consider creating online training modules for suppliers in completing their applications and security packs.
Transition	30 days' time to transition is a stretch. Vendors on both sides (incumbent and PDCM) need a	JLL relationship Director's to seek approval from Client Entities for PDCM inspections to commence from day 60. Look to coordinate with incumbent

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	minimum of 60 days to recruit and meet the security requirements.	staff following notification of intent. Meeting to be had with PDCM vendor and operations team at or before day 60 to review site list and current delivery. In addition, develop agreed stakeholder list for communication Strategy Engagement with Feedback/Communication Loop to be established.
Site Listing & Final Pricing Validation	Pricing not confirmed by the Client Entities prior to go live.	JLL S&P to provide final pricing, based on agreed PDCM vendor and JLL Operations site and asset listing at day 60, to JLL Relationship Directors to present to Client Entities at day 30 (4 weeks prior to Go-Live).

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#### 4.2. IPP and SME Targets

The current Deed between Department of Finance and JLL stipulates the required contracted spend JLL is to achieve via the implementation of the PDCM model for Indigenous Providers and Small to Medium Enterprises (SME). For the purpose of this document, Indigenous Providers are referenced via the Indigenous Procurement Policy (IPP) requirements. The following breakdown this level of engagement as well the required contract spend for the previous reporting period (noting this is 3 monthly):

ITEM	STATUS	REQUIRED CONTRACT SPEND
IPP Spend	Exceeding Requirement	<u>10%</u>
SME Spend	Exceeding Requirement	<u>10%</u>

Note – data reflective of Q3 FY23/24 Reporting Period

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