



Northern Ireland Audit Office

Contract award and management of Project Stratum



REPORT BY THE COMPTROLLER AND AUDITOR GENERAL
14 December 2021



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This report has been prepared under Article 8 of the Audit (Northern Ireland) Order 1987 for presentation to the Northern Ireland Assembly in accordance with Article 11 of the Order.

K J Donnelly CB
Comptroller and Auditor General

Northern Ireland Audit Office
14 December 2021

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For further information about the Northern Ireland Audit Office please contact:

Northern Ireland Audit Office
1 Bradford Court
Upper Galwally
Belfast
BT8 6RB

email: info@niauditoffice.gov.uk
website: **www.niauditoffice.gov.uk**

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List of abbreviations

BACS	Bankers Automated Clearing System (now known as Bacs Payment Schemes Limited)
BDUK	Building Digital United Kingdom is part of the Department for Culture, Media and Sport (DCMS) and is responsible for delivering broadband to the UK
BT	British Telecom / Openreach NI
COVID-19	Coronavirus
CPD	Construction and Procurement Delivery
DAERA	Department of Agriculture, Environment and Rural Affairs
DCMS	Department for Culture, Media and Sport
DfE	Department for the Economy (Northern Ireland)
DfI	Department for Infrastructure (Northern Ireland)
DoF	Department of Finance (Northern Ireland)
EU	European Union
FBC	Full Business Case
Fibrus	Fibrus Networks Ltd
FTTC	Fibre to the Cabinet
FTTP	Fibre to the Premises
FWA	Fixed Wireless Access
Gbps	Gigabit-capable connection, defined by the UK government as a connection that can support 1 gigabit per second download or upload speeds. 1Gbps is equal to 1,000 Megabits per second (Mbps), and is a measure of bandwidth on a digital data transmission medium. Gbps speeds can be delivered by “full fibre” infrastructure, where fibre optic cables connect all the way to residential / business premises.
ITT	Invitation to Tender
Mbps	Megabits is the unit used for expressing a quantity or amount of data. Broadband speeds are expressed as an amount of data downloaded per second, usually in megabits per second.
MEAT	Most Economically Advantageous Tender
NAO	National Audit Office
NBS	National Broadband Scheme
NGA	Next Generation Access
NIAO	Northern Ireland Audit Office

NIBIP	Northern Ireland Broadband Improvement Project
NICS	Northern Ireland Civil Service
NISRA	Northern Ireland Statistics and Research Agency
OBC	Outline Business Case
OFCOM	The Office of Communications (UK government-approved regulatory and competition authority for the broadcasting, telecommunications and postal industries of the UK)
OJEU	Official Journal of the European Union
OMR	Open Market Review
PAC	Public Accounts Committee
PfG	Programme for Government
PME	Pre-Market Engagement
PQQ	Pre-Qualification Questionnaire
RHI	Renewable Heat Incentive
SIB	Strategic Investment Board
SOC	Strategic Outline Case
SRO	Senior Responsible Owner
SRP2	Superfast Rollout Project Phase 2
The Executive	The Northern Ireland Executive
UK	United Kingdom
UPRN	Unique Property Reference Number
VFM	Value for money

Executive Summary

Background

1. Across Northern Ireland, commercial operators are rolling out superfast, ultrafast and full fibre broadband where it is profitable to do so. In urban areas, where population density is high, operators invest in infrastructure because it is likely that they can generate additional income by increasing their customer numbers. The commercial case for improving broadband services in the remaining, primarily rural, communities is less attractive because of the low population density.
2. In order to improve connectivity across the United Kingdom (UK), the Government offers public subsidies to suppliers willing to provide superfast broadband in commercially unattractive areas. Up to 2020, the Department for the Economy¹ ('the Department') had invested £78 million to improve broadband provision across Northern Ireland.
3. While broadband access in Northern Ireland has improved significantly over the past 10 years, it lags behind all other UK regions in terms of access to broadband speeds of up to 30Mbps (high-speed broadband). However, the Department told us that in terms of ultrafast broadband (300Mbps) and full fibre (at 67 per cent), current rates in Northern Ireland exceed those in other areas of the UK (24 per cent average).
4. Considering broadband access at a Northern Ireland level, however, masks disparities between urban and rural rates. By 2020, while 100 per cent of urban premises were able to achieve speeds of least 2Mbps (basic broadband), the figure was 91 per cent for rural residential premises. Access to 10Mbps (decent broadband) was also lower in rural areas, at 78 per cent compared to 100 per cent in urban areas. The Department has told us that the latest figures show that full fibre is available to 82 per cent of urban residential premises in Northern Ireland compared to 31 per cent for rural residential premises.
5. In 2018, the Department commenced its plans to introduce Project Stratum to extend Next Generation Access (NGA) broadband infrastructure across Northern Ireland. Funding was secured under the Confidence and Supply Agreement² (£150 million), with additional assistance (£15 million) from the Department of Agriculture, Environment and Rural Affairs (DAERA). The contract also includes an additional £35 million '*headroom provision*', which can be brought into play subject to obtaining relevant approvals and securing additional government funding.
6. The £165 million Project Stratum contract was awarded to Fibrus Networks Limited ('Fibrus') in November 2020. Under the terms of the contract, Fibrus will roll out a full fibre broadband solution to pass 76,233 premises over a four year period. Fibrus is contributing £46m to

1 Telecommunications is a United Kingdom (UK) reserved matter which has not been devolved to the Northern Ireland Executive ('the Executive') but is controlled centrally by the UK Department for Digital, Culture, Media and Sport (DCMS). Building Digital UK (BDUK), a directorate within DCMS, has responsibility for the management, governance and oversight of programmes delivering improved broadband across the UK. Under the Communications Act 2003 (Clause 149), the Department for the Economy (DfE) in Northern Ireland ('the Department') has limited powers to intervene where there is evidence of market failure. Any intervention must avoid distorting the telecommunications market.

2 A Conservative and Democratic Unionist Party (DUP) agreement and UK financial support for Northern Ireland.

network build costs, which will be measured and monitored under the terms of the contract. This brings the overall network build cost of Project Stratum to £211 million.

7. The first premises were connected in early 2021. Full deployment of the new broadband infrastructure is expected to be completed by March 2024.

Scope of our report

8. Our report considers the Project Stratum procurement process, contract award and the arrangements in place to manage the contract. It does not consider the various other procurements used to support the wider project, for example, external consultancy contract awards. As the contract was only signed in late 2020, we are not yet in a position to conclude on whether the contract has, or will, achieve value for money. However some of the issues identified, especially those highlighted in paragraph 11 below, mean that it will be difficult for the Department to prove that value for money has been maximised.

Report Findings

9. Positively, the report recognises that the Department:
 - engaged with infrastructure providers and the public to inform the Project Stratum intervention area;
 - complied with Department of Finance (DoF) guidance in terms of completing each stage of the business case process and obtaining relevant approvals throughout;
 - procured the contract using an Open Procurement with a Restricted Procedure³, pursuant to Regulation 28 of the Public Contracts Regulations 2015;
 - advertised a technology-neutral⁴ “single lot” approach in the Official Journal of the European Union, to encourage interest and competition across the European Union;
 - relied on expertise from various external consultants when necessary (from Construction and Procurement Delivery (CPD) within the DoF, the Strategic Investment Board (SIB), BDUK and the private sector);
 - examined the project management arrangements in place for Project Stratum through an internal audit, subjected the procurement process to review by BDUK, and completed a number of Gateway Reviews;

³ A Restricted Procedure refers to a two stage procurement procedure conducted in accordance with Regulation 28 of the Public Contracts Regulations 2015, where the second stage is restricted to those bidders who have passed the previous selection questionnaire stage.

⁴ In other words, the procurement documentation didn’t specify what technology needed to be used.

Executive Summary

- ensured transparency over the costs incurred by the contractor through open book accounting; and
 - has contractually required Fibrus to conduct benchmarking reviews of ‘wholesale access prices’ in its tender against those on other comparable UK and EU projects.
10. We also welcome the steps taken by the Department to ensure that the basis for identifying the intervention area was robust, the procurement route promoted competition, the categories and weightings used were compliant with the National Broadband Scheme (NBS) guidance issued by BDUK in 2016, and that it has adequate inspection rights.
11. However we have concerns relating to the project procurement which are outlined further below. Issues surrounding the scoring methodology used for the coverage proposed by the bids, and whether some of the properties included within the intervention area would have been commercially viable without subsidy, were of particular concern.

The procurement of the contract

12. The procurement was carried out in three stages – Pre-Qualification (Stage 1), Invitation to Tender (ITT, Stage 2) and finally, Contract Award (Stage 3).
13. The Department has told us that Stage 1 of the process was an assessment to confirm that bidders had the appropriate technical and professional ability to meet the requirements of the project. At this stage there were four potential bidders and one was excluded on the basis of the checks made.
14. At Stage 2, one bidder elected not to submit the various bid documents and was therefore also excluded, leaving two bidders, BT (British Telecom / Openreach NI) and Fibrus, with tender documents to be assessed.
15. The scoring evaluation model for the tenders was set out in the ITT documentation and the Department has told us that the categories and weightings used were compliant with the National Broadband Scheme (NBS) guidance issued by BDUK in 2016⁵. Under this model, 40 per cent of the marks were allocated to an assessment of quality while 60 per cent were allocated to price. **Appendix 5** provides the detail on all of the sub-categories and weightings used within both the quality and price categories.

5 National Broadband Scheme for the UK Guidance: Procurement Guidance, BDUK, August 2016.

The proposed coverage of the solution

16. When the bids were received, both bids planned to utilise the full £165 million subsidy available in addition to also making their own contribution. However the solution proposed by BT covered 100 per cent of the intervention area specified by the Department, while the proposal from Fibrus covered almost 97 per cent. This meant that the Fibrus solution omitted around 2,500 properties from approximately 79,000 properties in the intervention area. The Department has since estimated that the cost of providing a solution to these properties is likely to be around £24 million, although it will be keeping this figure under review.
17. The automated scoring mechanism for allocating the 30 percentage marks available for solution coverage awarded the full 30 marks to BT and 29.04 to Fibrus (calculated simply as 97 per cent of the 30 marks available). The Department has told us that this scoring methodology was completely in line with what was set out in the ITT documentation and the requirements set by BDUK and the 2016 State Aid Decision⁶. However, given the reduced coverage in the most rural areas of Northern Ireland, and the potential cost of completing the coverage, we were very surprised that the solution proposed by Fibrus only resulted in a loss of one mark in the coverage related element of the price scoring criteria.
18. In our view, there was a problem with the methodology adopted to award the marks available for coverage in that it did not make sufficient reduction in the scoring to account for the impact of delivering less than 100 per cent coverage. While we accept the Department's assurance that this was the agreed scoring method that had been included in the procurement documentation sent to bidders, it means that it will be very difficult for the Department to demonstrate that value for money has been maximised by the process.

The commercial viability of premises within the intervention area and the overall level of public subsidy afforded to this project

19. In September 2020, shortly after the Department had issued the letters intending to award the Project Stratum contract to Fibrus, the unsuccessful bidder (BT) submitted details to the Department of already built and planned further investment to extend fibre coverage providing speeds above 30 Mbps to premises across Northern Ireland. Within this submission, it provided a spreadsheet which indicated that a BT fibre solution was either already in place or was planned to be in place for 740,000 premises. These included 16,000 premises which had been identified within the Project Stratum target intervention area and which initially were part of BT's bid. BT has told us that this updated premises data reflected changes to its commercial build and future plans that had occurred since its last Open Market Review (OMR) submission.

⁶ This was the decision undertaken by the European Commission to approve the NBS guidance that was issued by BDUK in 2016. The term "State Aid" refers to any advantage granted by public authorities through state resources on a selective basis to any organisations that could potentially distort competition and trade in the European Union (EU). In principle, State Aid is not allowed in the EU. However, State Aid rules allow for good aid, which is necessary to deliver growth and other important objectives. The rules over State Aid are complex and failure to comply can result in recovery of funds and suspension (or withdrawal) of aid schemes.

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20. The Department consulted with BDUK, and formed the view that as the new information had been provided after closure of the OMR and the State Aid public consultation, it should proceed to award the contract as planned, drawing on the 'line in the sand principle', set out in the National Broadband Scheme 2016 (NBS 2016).
21. In April 2021, BT further announced that it intended to invest £100 million before the end of March 2022 to expand the availability of 1Gbps broadband to a further 100,000 premises and maintain its current network. BT confirmed that the investment would cover rural villages across Northern Ireland and while it did not include details of precise premises covered, it did include villages featuring in the Project Stratum intervention area.
22. The intention of Project Stratum was to provide high speed fibre broadband to the target intervention area on the basis that this was commercially unviable. In our view, the fact that, shortly after becoming aware that the contract was to be awarded to Fibrus, BT shared changes to its commercial coverage plan which had occurred since its last OMR submission (January 2020) and included a large number of premises in the intervention area, raises questions about the overall level of public subsidy afforded to this project.
23. The Department has told us it is satisfied that without the Project Stratum investment, the broadband connectivity gap between Northern Ireland and the rest of the UK would continue to exist. It also pointed out that BT had included premises in rural towns within in its bid that now appeared to be covered in its latest investment and that BT had indicated that those premises were commercially uneconomical and requiring subsidy. The Department added that the issue of the intention to award letters to Fibrus could have impacted on BT's overall commercial case for those areas.

Around 900 properties which were excluded from the intervention area because of data provided by BT in its OMR submission of January 2020 may not now get NGA broadband from BT, and are not within the scope of the Project Stratum contract

24. The Department has told us that premises data provided by BT after the contract for Project Stratum had been awarded indicates that the supplier is no longer intending to provide NGA broadband to around 900 premises that had been de-scoped from the Stratum intervention area on the basis that data submitted from BT had indicated that those premises formed part of its commercial roll-out plans. It has also told us that it is considering how to address this and will continue to assess the broadband landscape with all providers, with the aim of ensuring that no premises are left behind. BT has told us that it is normal that premises can drop out of their commercial plans from time to time because of a range of factors including operational issues identified after planning and survey.
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The exclusion of new build properties from the contract

25. The Department has begun discussions with both the Department of Finance (DoF) and the Department for Infrastructure (DfI) to assess if legislation can be introduced in Northern Ireland that will place obligations on developers to work with network operators to provide superfast broadband for all new build homes.

Verifying the actual costs incurred by Fibrus, confirming its profit margins and interpreting the results of benchmarking exercises

26. Under the terms of the Project Stratum contract, Fibrus must submit annual audited project accounts to the Department. The Department will review these annual accounts, and clawback measures will be applied where build costs are less than anticipated or customer take-up exceeds expectations. In the past, the Northern Ireland Assembly Public Accounts Committee has been critical of departments which secured open book accounting but failed to routinely examine contractors' accounts. This is therefore an important control and we welcome the steps that the Department has taken to address issues that have been raised on similar projects in the past. We expect the Department to ensure that staff responsible for performing checks on this financial information presented by Fibrus, and for reviewing the work undertaken by any external consultants brought in to assist with these checks, have the requisite qualifications and experience to interpret the information presented accurately.

Ensuring continuity within the Project Team

27. In Project Stratum, in the two year period prior to contract award, four SRO⁷'s have been in place. The RHI Inquiry⁸ and our report on Capacity and Capability in the Northern Ireland Civil Service⁹, highlighted the risk of changes to key personnel during a project life cycle. The Department accepts that frequent personnel changes within a team are not ideal and advised that, given the size and complexity of Project Stratum, it had appointed a Deputy SRO who has been in post since the outset of the project in 2018.

7 The Senior Responsible Owner (SRO) has ownership of a project at a senior level. Their responsibilities are strategic rather than day to day.

8 *The Report of the Independent Public Inquiry into the Non-domestic Renewable Heat Incentive (RHI) Scheme*, Recommendation 24, RHI Inquiry, March 2020.

9 *Capacity and Capability in the Northern Ireland Civil Service*, NIAO, November 2020.

Executive Summary

Pricing arrangements for broadband subsidised by Project Stratum and the potential impact on take-up rates

28. A BDUK Value for Money (VFM) assurance report was provided to the Department prior to contract award, which highlighted the risk any price increases on the part of the contractor could have on take-up. We believe it will be important for the Department to monitor the impact of any price increases on customer take-up within the Project Stratum intervention area, given that any poor take-up may impact on the VFM achieved.
29. The Department has told us that, while Fibrus may be the only wholesale provider in some publicly subsidised locations, it is subject to the same obligations as any other subsidised provider in the same situation, i.e. to provide its network on an open access basis, and to provide non-discriminatory terms and conditions to other providers to enable their retail provision.
30. It also advised that under the terms of the contract, and in line with State Aid rules, the Department is required to benchmark and control the prices of wholesale products that Fibrus offers to other broadband providers. This wholesale pricing will be subject to regular review by both the Department and BDUK, and will provide a safeguard to consumers by ensuring that a supplier is neither able to exploit its monopoly position to charge too much, nor undercut other broadband providers by charging too little. In simple terms, it will encourage fair competition between various broadband providers and, in turn, facilitate customer choice.
31. The Department informed us that pricing and customer discount and promotions are commercial matters for broadband providers, and it is in the interests of both the contractor and it, as the contracting authority, to ensure that all measures are in place to encourage take-up on the open access network. It confirmed that the established Project Board¹⁰ would be monitoring this area going forward.

¹⁰ A Project Board is essentially the decision making body within a project. It meets periodically to provide strategic direction and ensure the effective and timely progress of the project. In relation to Project Stratum, it includes representation from BDUK, DAERA, CPD and DfE Telecoms Branch. During the implementation phase of the contract, the contractor has been appointed to the Project Board but the option exists to hold meetings without them in attendance.

Conclusion

32. Project Stratum is an ambitious project to bring Northern Ireland further ahead of the rest of the UK in terms of access to full fibre to the premises broadband. However, while there are many things to be commended in how the contract has been awarded and is intended to be managed (see paragraphs 9 and 10), we do also have some concerns. These mainly relate to the fact that the project to be delivered by Fibrus will not have 100 per cent coverage, and also the implications of changes made to broadband installation plans by the other bidder after the project was awarded. As the project has only recently commenced, we consider that it is too early to conclude definitively on value for money. However some of the issues we have identified mean that it will be difficult for the Department to prove that value for money has been maximised.
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Part One: Introduction and Background

Telecommunications in Northern Ireland is a reserved matter and has not been devolved to the Northern Ireland Executive

- 1.1 Telecommunications is a United Kingdom (UK) reserved matter which has not been devolved to the Northern Ireland Executive (the Executive) but is controlled centrally by the UK Department for Digital, Culture, Media and Sport (DCMS).
- 1.2 Building Digital UK (BDUK), a directorate within DCMS, has responsibility for the management, governance and oversight of programmes delivering improved broadband across the UK.
- 1.3 In Northern Ireland (NI), under the Communications Act 2003 (Clause 149), the Department for the Economy (the Department) has limited powers to intervene in cases where there is evidence of market failure. Any intervention must avoid distorting the telecommunications market.

The Government may provide public subsidies in cases where it is not financially viable for private sector suppliers to invest

- 1.4 Across NI, commercial operators are rolling out superfast, ultrafast and full fibre broadband where it is profitable to do so. In urban areas, where population density is high, operators invest in infrastructure because it is likely that they can generate additional income by increasing their customer numbers. The commercial case for providing superfast broadband services to the remaining, primarily rural, communities is less attractive because of the low population density. In order to improve connectivity across the UK, the Government offers public subsidies to suppliers willing to provide superfast broadband in such commercially unattractive areas.
- 1.5 Government intervention and investment in broadband typically involves either:
 - **Investing in availability:** providing public subsidies to suppliers to build new or upgrade infrastructure in areas where it is not commercially viable; or
 - **Subsidising take-up:** offering vouchers to customers to help with the cost of installing improved broadband services.

Project Stratum is the largest publicly funded investment in broadband infrastructure in Northern Ireland to date

- 1.6 Up to 2020, the Department had invested £78 million in various projects to improve broadband provision across Northern Ireland. By 2020, approximately 89 per cent of Northern Ireland premises¹¹ had access to, at least, superfast broadband services¹². The most significant of these projects were:

¹¹ *Connected Nations Report (NI)*, The Office of Communications (OFCOM), December 2020.

¹² Superfast broadband is defined as a connection from 30 Mbps up to 300 Mbps, with ultrafast broadband extending between 300 Mbps and 1000 Mbps – better known as one gigabit per second, or 1 Gbps. Those citizens who are unable to access superfast broadband will likely be using standard broadband, defined as 2 Mbps to 8 Mbps, or high-speed broadband which is defined as that up to 30 Mbps.

- **Next Generation Broadband Project (public subsidy £19.6 million):** ensuring that 85 per cent of businesses in Northern Ireland had minimum access to next-generation (NGA) broadband speeds (up to 10 Mbps). The contract for the project was awarded to BT and covered urban and rural areas across Northern Ireland. It involved upgrading a number of existing telephone exchanges and deploying fibre optic telephone lines to a number of new street cabinets. The project was completed in December 2013;
- **Northern Ireland Broadband Improvement Project (NIBIP) (public subsidy £17.7 million):** part of a larger, national Broadband Improvement Programme, which involved laying fibre optic telephone lines from existing exchanges to new, small broadband exchanges in rural areas. The contract was awarded to BT and the build phase was completed in December 2017; and
- **Superfast Rollout Programme (SRP2) (public subsidy £17.4 million):** an extension of the NIBIP which involved laying new fibre optic telephone lines to cabinets (green cabinets at the side of roads), and in some cases to premises, in areas across Northern Ireland. Again the contract was awarded to BT. The build phase was completed in September 2018.

- 1.7 More detail on these projects is contained in our **Broadband Investment in Northern Ireland** report.
- 1.8 The benefits of improved access to good broadband were referenced within the draft Programme for Government (PfG) 2016-2021. Funding to progress Project Stratum was secured through the Confidence and Supply Agreement¹³ which provided £150 million to improve access to the broadband infrastructure and high-speed broadband across Northern Ireland. A further £15 million was made available by the Department of Agriculture, Environment and Rural Affairs (DAERA), under its Tackling Rural Poverty and Social Isolation initiative, increasing the overall public funding package to £165 million, the largest investment in broadband infrastructure in Northern Ireland to date.
- 1.9 With so many people forced to stay and work at home because of the coronavirus (COVID-19) pandemic, the need to have a fast and reliable broadband connection has never been clearer. The impact on those living in rural areas with access to poorer broadband services was significant, particularly in Northern Ireland where the rural population is more evenly spread than in other parts of the UK. DfE has told us that approximately 97 per cent of the premises targeted by Project Stratum are located in rural areas¹⁴.

¹³ A Conservative and Democratic Unionist Party (DUP) agreement and UK financial support for Northern Ireland.

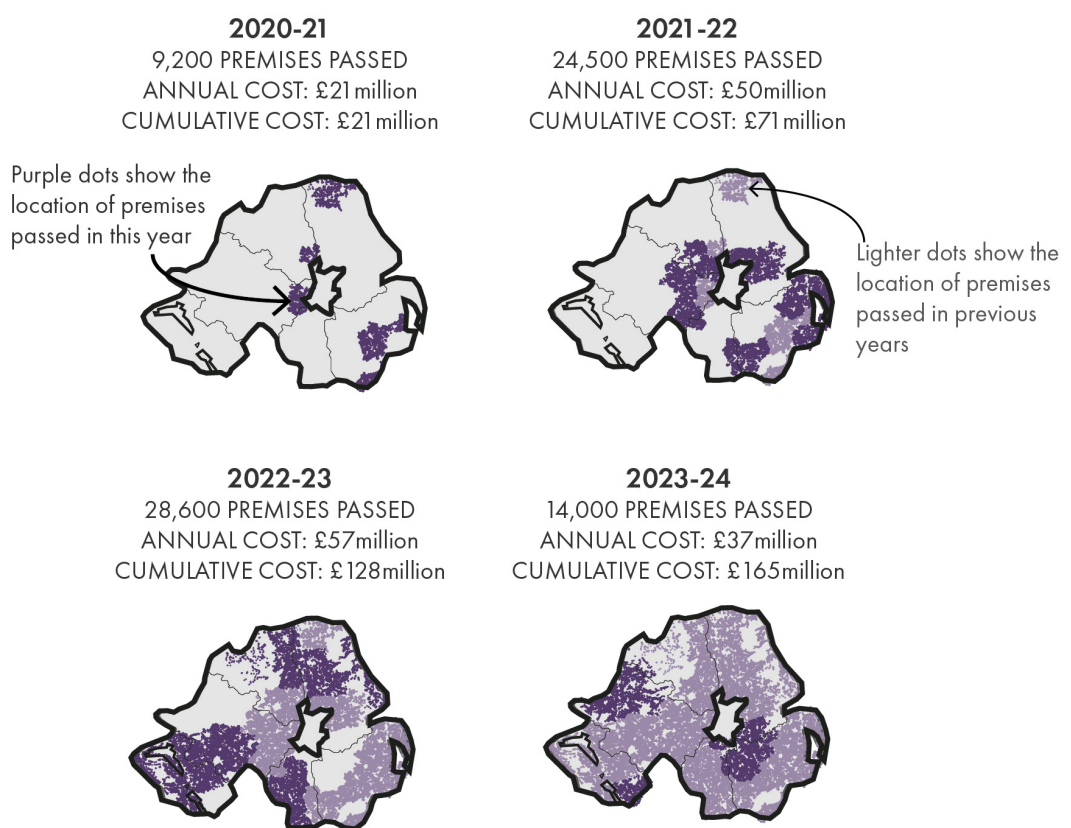
¹⁴ These are NISRA (Northern Ireland Statistics and Research Agency) Band H rural areas, otherwise defined as areas of open countryside or in communities of fewer than 1,000 people.

Part One: Introduction and Background

The Project Stratum contract was awarded to Fibrus Networks Limited in November 2020

- 1.10 In November 2020, the £165 million Project Stratum contract was awarded to Fibrus Networks Limited ('Fibrus'). Under the terms of the contract, Fibrus will roll out a full fibre broadband solution to pass 76,233 premises over a four year period. Fibrus is contributing £46 million to network build costs, which will be measured and monitored under the terms of the contract. This brings the overall network build cost of Project Stratum to £211 million.
- 1.11 **Figure 1** shows the anticipated spending profile and geographical spread of Project Stratum each year to 2024. The first premises were connected in early 2021 and, in line with the funding timetable, full deployment of the new broadband infrastructure is expected to be completed by March 2024.

Figure 1: Over four years, Project Stratum will roll out full fibre broadband infrastructure that will pass 76,233 premises across Northern Ireland



NOTES

Each dot represents an individual premise in Northern Ireland.

Due to clustering of dots there are some postcodes within areas where there are solid blocks of colour signifying connection to the network.

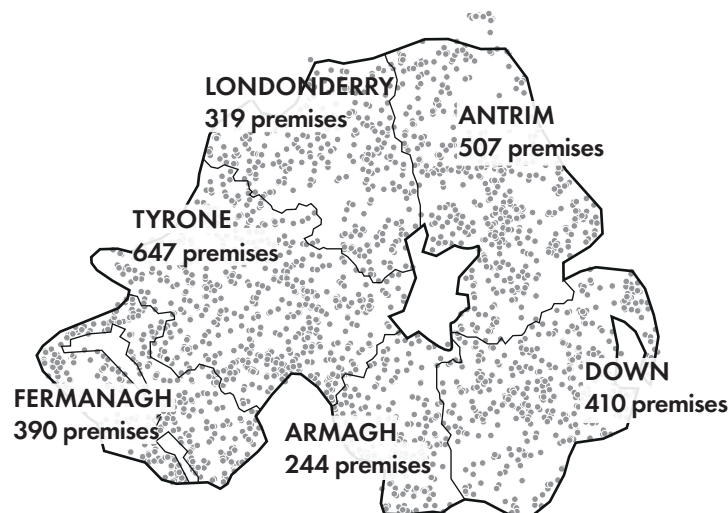
Costs have been rounded to the nearest million.

Source: NIAO (based on DfE data)

- 1.12 **Appendix 1** provides more detail of the premises which can avail of improved services over the four year implementation period, analysed by county. Over 2,500 premises, which were initially identified in the Project Stratum target intervention area, are not included in the contract. A further broadband solution will be required to cater for these premises. The Department currently estimates that providing broadband access to the 2,500 premises not included in the contract will cost in the region of £24 million and it is hopeful that any broadband solution for these premises can be delivered using the additional £35 million of 'headroom provision' included in the contract. This will be subject to obtaining relevant approvals although we note additional UK funding of £25 million was announced in the local press in late August 2021.
- 1.13 **Figure 2** shows the spread of these 2,500 premises across the six Northern Ireland counties.

Figure 2: Over 2,500 premises across Northern Ireland are not covered by the Project Stratum contract

Each dot represents an individual premise not included within the Project Stratum contract



Source: NIAO (based on DfE data)

Part One:

Introduction and Background

- 1.14 New build planning applications approved within the intervention area are also excluded from the contract. We note that in both 2018-19 and 2019-20¹⁵, over 2,000 new build planning permissions were received in rural areas in Northern Ireland. The Department told us it has begun discussions with both the Department of Finance (DoF) and the Department for Infrastructure (DfI) to assess if legislation can be introduced in Northern Ireland to obligate developers and broadband suppliers to work together to provide access to superfast broadband in all new build homes. In the meantime however, it is exploring whether new builds can be offered a solution by Fibrus, based on a self-build arrangement which Fibrus is currently in the process of finalising. It will be for Fibrus, however, to determine whether or not the economic viability of any proposed solutions can be considered in advance of further deployment.

An internal audit along with BDUK and Gateway Reviews have indicated that Project Stratum is being well managed and BDUK has provided an assurance that the successful bid will deliver acceptable value for money

- 1.15 In June 2020, the Department's Internal Audit issued a report on the management, control and governance arrangements for Project Stratum. The report concluded that the project was being well managed and that the associated documentation was of a high calibre¹⁶.
- 1.16 In September 2020¹⁷, BDUK provided a value for money (VFM) assurance that the successful Fibrus bid would "deliver acceptable VFM" and awarded the project an overall VFM rating of "amber/green".
- 1.17 Two Gateway Reviews have been completed for Project Stratum to date (Gateway 2 and Gateway 3 (**Appendix 2**))¹⁸. These relate to the 'Procurement Strategy' and the 'Investment Decision' stages respectively and were completed after the Outline Business Case (OBC) and the Full Business Case (FBC) had been considered and assessed. They expressed concerns over the security of the Confidence and Supply funding and project timescales, whilst also highlighting gaps in key project documentation. All of these issues were subsequently addressed by the Project Team.

¹⁵ *Northern Ireland Planning Statistics: Annual Statistical Bulletin* (April 2019 – March 2020), Department for Infrastructure, July 2020.

¹⁶ Due to the timing of the review, Internal Audit did not examine the tender evaluation documentation, the full business case or the implementation phase consultancy business cases.

¹⁷ *Broadband Delivery Phase 3, Value for Money Risk Considerations, Final, Stratum, Fibrus*, BDUK, September 2020.

¹⁸ Gateway Reviews are independent peer reviews that are normally completed at key stages of the project lifecycle to help ensure its successful delivery. A Gateway 1 Review that considered the 'Strategic Assessment' was deemed unnecessary given that the need for the project had already been demonstrated (paragraph 1.8).

Scope and structure

- 1.18 This report considers the Project Stratum open procurement process, contract award and arrangements established to manage the contract. It does not consider other procurements used to support the wider project, for example, the various external consultancy tenders.
- 1.19 As the contract was only signed in late 2020, we are not in a position to definitively conclude on whether the contract has, or will, achieve value for money.
- 1.20 Our report is structured as follows:
- **Part Two** - Award of the Project Stratum contract; and
 - **Part Three** - Arrangements to measure performance and ensure cost transparency throughout the implementation phase.
- 1.21 Our review used a range of investigative and research methods. Our audit methodology is set out in **Appendix 3**.
-

Part Two:

Award of the Project Stratum Contract

The Department identified two clear options for Project Stratum at the outset of the project

- 2.1 At the outset of the project (mid-2018), the Department identified two potential options for Project Stratum, based primarily on the provision of a largely copper-based, full coverage 'Fibre to the Cabinet' (FTTC) solution, and the provision of future-proofed NGA solutions such as 'Fibre to the Premises' (FTTP), whilst also recognising the potential for Fixed Wireless Access (FWA) solutions for some premises:
- **Full coverage:** providing 30Mbps broadband services to all of the remaining 11 per cent of premises in Northern Ireland that could not currently access such speeds (paragraph 1.6). The Department estimated that this option, based primarily on a copper line-reliant FTTC solution, would cost approximately £94 million, and proposed using the remainder of the Project Stratum budget to future-proof as many premises as possible.
 - **89 – 95 per cent coverage:** The second option involved increasing access to 30 Mbps services from the existing 89 per cent to 95 per cent of premises, using future-proofed NGA technologies, including FTTP. This option would result in approximately 5 per cent of premises in Northern Ireland (approximately 45 per cent of the premises in the target intervention area) not benefiting from the project. The Department concluded that this option had the potential to be significantly more expensive, with an estimated cost of approximately £151 million.
- 2.2 The Project Team met with industry groups and engaged with political parties and concluded that the £94 million full coverage option was preferred, given that it would ensure that no premises were left behind.
- 2.3 However, subsequent to this, in July 2018 the UK Government introduced a policy change that ruled out reliance on FTTC solutions for future public interventions, in order to align with the Government's strategy to invest in fibre/gigabit capable broadband technology solutions¹⁹. This approach set out the UK Government's long-term broadband connectivity ambitions, and effectively ruled out FTTC solutions and set the landscape for future bidders only submitting proposals primarily based on future-proofed, NGA-compliant solutions, including FTTP.

Prior to the procurement process, the Department engaged with the market and the public to determine the target intervention area and approach for Project Stratum

Open Market Review

- 2.4 During June and July 2018, the Department conducted an Open Market Review (OMR), during which telecoms infrastructure providers were invited to provide details of their existing and planned deployments for the forthcoming three year period.

¹⁹ Future Telecoms Infrastructure Review, DCMS, July 2018.

- 2.5 When considered along with the Department's own data, this information resulted in the creation of a detailed list of premises where broadband improvements were not expected to be delivered by the market in the forthcoming three years, and allowed an initial 'target intervention area' for Project Stratum to be determined.

Pre-market engagement

- 2.6 During the period from September to November 2018, the Department engaged with 13 potential broadband suppliers and infrastructure providers in a pre-market engagement (PME) process. The purpose of this exercise was to test some of the project assumptions, with potential bidders providing information on 'lotting' preferences²⁰, timeframes, resources, value for money considerations and likely supplier contributions.
- 2.7 The Department told us that this stage improved market awareness, stimulated competition and provided additional information to inform the project approach.

Mandatory Public Consultation

- 2.8 Following on from the OMR, the Department conducted its Mandatory Public Consultation²¹ from December 2018 to January 2019, at which time interested stakeholders were invited to comment on delivery proposals to target premises in the intervention area.
- 2.9 The Department received 1,149 responses from broadband providers, local councils, elected representatives and members of the public. In December 2019, the Department published its response to the consultation²², confirming that approximately 97,000 premises, largely in rural areas, were eligible to benefit from improved broadband connectivity under Project Stratum.
- 2.10 Shortly after publishing its response, the Department became aware of a data refresh exercise completed in January 2020 by an infrastructure supplier (BT). In correspondence, the Department was informed that the supplier had, or would be, providing a predominantly NGA broadband commercial solution to approximately 18,000 of the premises in the intervention area, over a three year period. After consideration and consultation with BDUK, the Department reduced the number of premises requiring intervention under Project Stratum from 97,000 premises to just below 79,000. This amendment was formally announced (in an addendum to its response to the OMR and public consultation for Project Stratum²³) in February 2020.

20 Lotting is the concept of dividing a procurement into a set of geographical 'lots'. Further information on this is provided in paragraph 2.19.

21 As required by the National Broadband Scheme 2016 guidelines.

22 *Extending broadband across Northern Ireland - Project Stratum*, DfE, December 2019.

23 *Addendum to Department's Response to Open Market Review and Public Consultation Regarding Project Stratum*, DfE, February 2020.

Part Two:

Award of the Project Stratum Contract

The Department followed established business case procedures

- 2.11 Each of the expected stages of a business case, as required by the DoF, were completed for Project Stratum (**Appendix 4**).

Strategic Outline Case (SOC)

- 2.12 DoF guidance sets out that the Strategic Outline Case (SOC) *"should contain only enough detail to support an informed decision on whether to proceed, with a preliminary consideration of strategic fit, options, affordability, achievability and value for money"*. In September 2018, the SOC for Project Stratum was completed. DoF Supply provided conceptual approval for the project in November 2018, confirming that sufficient justification existed for the Department to move to the Outline Business Case (OBC) stage.

Outline Business Case (OBC)

- 2.13 The Outline Business Case (OBC) provides the basis for DoF Supply approval and *"should include a thorough assessment of strategic fit, option appraisal, affordability, achievability and value for money"*. It should determine a preferred option and recommend a procurement route.
- 2.14 The OBC²⁴ for Project Stratum, which was completed in January 2019, set out four objectives for the project:
- **address market failure:** whilst maintaining and promoting competition within the market;
 - **maximise high-speed broadband coverage:** in a way that is balanced and supportive of rural areas and communities;
 - **extend digital infrastructure:** in a way that supports evolving consumer and industry demands; and
 - **choose procurement and delivery options:** which seek to maximise value for money (in terms of a balance of quality of technology/products, coverage, timescale and cost to government), mitigate risk, incentivise performance and meet affordability criteria for government and for end users.
- 2.15 The OBC identified FTTP²⁵, rather than FTTC²⁶, as the preferred technology for the project based on cost, quality, deliverability and future-proofing. This focus on FTTP and future-proofed full fibre technologies was a shift in position from the preferred objective established at the

24 Analysys Mason is a management consultancy company which focuses on telecoms, media and technology. The Department appointed Analysys Mason to develop the OBC. Analysys Mason in turn appointed KPMG to support it with the financial analysis and affordability aspects of the OBC.

25 **'fibre to the premises'** (FTTP) - with fibre optic cables running directly to your home. It is faster than fibre to the cabinet and can offer speeds of up to 1Gbps (i.e. 1,000Mbps). FTTP technology is becoming the industry 'norm'.

26 **'fibre to the cabinet'** (FTTC) - with fibre optic cables running from the telephone exchange to street cabinets before using standard copper telephone wires to connect to homes. Most fibre connections in the UK are fibre to the cabinet services, and are typically advertised as offering speeds of 'up to' 38Mbps or 76Mbps. Amounts are rounded to the nearest million.

outset of the project (see paragraph 2.1) and was in line with the change in national UK broadband policy (see paragraph 2.3). Four FTTP options were shortlisted for assessment in the OBC (**Figure 3**).

Figure 3: OBC consideration of Options

Option	Description	Estimated total capital subsidy ²⁷
1	Do nothing.	Nil
2	95 per cent FTTP coverage to premises in Northern Ireland.	£94 million
3	Budget-determined FTTP coverage to premises in Northern Ireland, increasing the number of premises able to access superfast broadband from 89 per cent (in 2020) to 97 per cent.	£157 million
4	100 per cent FTTP coverage target to all Northern Ireland premises providing universal superfast broadband coverage across Northern Ireland.	£363 million

Note: Percentages indicated refer to total broadband coverage in Northern Ireland realised by each of the different options.

Source: DfE

- 2.16 **Option 3** was identified as the preferred option on the basis that it was affordable, in terms of the £165 million budget available, and would provide improved services to an estimated 74,000 premises. DoF approved the OBC in April 2019, enabling the Department to commence the procurement stage of the project.
- 2.17 In line with DoF guidance, the Full Business Case (FBC) was completed after the procurement stage (see paragraph 2.47).

The Project Stratum contract was let using an Open Procurement with a Restricted Procedure by means of a 'single lot' approach

- 2.18 The DCMS Framework Agreement, which had been used to appoint the supplier for the NIBIP and SRP2 schemes (see paragraph 1.6), lapsed in 2016, several years before Project Stratum was procured. Instead, Project Stratum used the procurement framework provided for under the National Broadband Scheme for the UK for 2016-2020²⁸ ('NBS 2016'). Based on advice from CPD, Project Stratum was procured using an Open Procurement with a Restricted Procedure, pursuant to Regulation 28 of the Public Contracts Regulations 2015.

²⁷ Amounts are rounded to the nearest million.

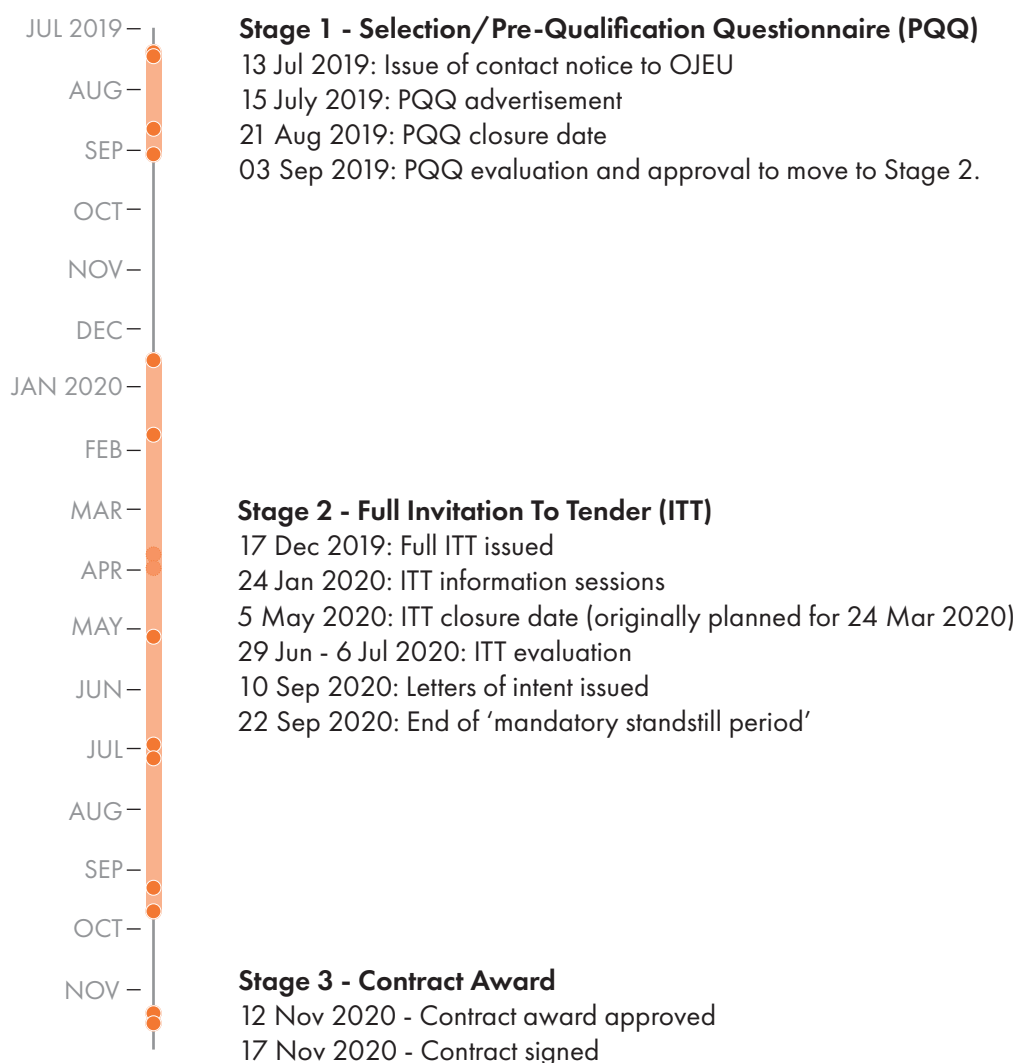
²⁸ National Broadband Scheme for the UK Guidance: Procurement Guidance, BDUK, August 2016.

Part Two:

Award of the Project Stratum Contract

- 2.19 The Department opted for procurement using a ‘single lot’ on the basis that it would promote competition between broadband providers, improve the quality of bids, simplify the procurement process, yield economies of scale and ensure project completion by March 2024. The technology-neutral contract²⁹ was advertised in the Official Journal of the European Union (OJEU)³⁰ to encourage interest and competition across the European Union (EU).
- 2.20 **Figure 4** sets out the key stages of the procurement process.

Figure 4. Timeline of the Project Stratum procurement process



Source: NIAO (based on DfE data)

²⁹ In other words, the procurement documentation didn’t specify what technology needed to be used.

³⁰ When a public sector body within the EU wants to buy any goods, works, or services over a certain value (“threshold”) it must advertise in the OJEU. This advertisement takes the form of a contract notice, also known as a tender notice. The OJEU is the online journal in which all such tenders are published daily in every EU official language.

Stage 1: Selection / Pre-Qualification Questionnaire (PQQ)

- 2.21 At Stage 1, interested bidders completed a Selection/Pre-Qualification Questionnaire (PQQ) demonstrating how they fulfilled certain criteria. This stage of the procurement was open to all potential bidders. Four completed questionnaires were received by the submission deadline of 21 August 2019. The Department told us that Stage 1 was used to confirm that bidders had the appropriate technical and professional ability and the economic and financial standing to meet the requirements of the project.
- 2.22 A tender evaluation panel, chaired by the Project Director and attended by the Project Manager, representatives from Telecoms Branch within the Department and representatives from Analysys Mason (technical expertise), was provided with an assessment of Financial Standing by an adviser within SIB, based on the PQQs and supporting material. The panel concluded that three of the four potential bidders “met the minimum thresholds for technical and professional ability and passed the overall financial and compliance checks”. These three bidders progressed to the second stage of the procurement. The unsuccessful potential bidder was eliminated from the competition.

Stage 2: Full Invitation To Tender (ITT)

- 2.23 At Stage 2, the procurement was restricted (see paragraph 2.18), with only the three successful bidders from Stage 1 permitted to submit tenders. BT, under the terms of a code of conduct agreement³¹, shared information on its existing infrastructure across Northern Ireland with the other potential bidders.
- 2.24 The original closing date for Stage 2 was 24 March 2020. This was later extended to 31 March 2020, and eventually to 5 May 2020, when new information from the data refresh exercise came to light (see paragraph 2.10). One of the three bidders sought a further extension to the revised 5 May 2020 deadline for COVID-19 related reasons. This was not approved by the Department, given that the other bidders, facing similar issues, could meet the deadline.
- 2.25 The Department told us that it had concerns that any delay in awarding the contract might result in withdrawal of the Confidence and Supply funding. Furthermore, in order to align to the State Aid³² cover of the NBS 2016, contracts under this scheme needed to be signed by no later than 31 December 2020, and the Department stated it was worried that any further delays, or an open-ended extension to the ITT process, could jeopardise State Aid cover during the period in which Great Britain was exiting the EU. The bidder seeking the further extension to the ITT timeline withdrew from the competition, leaving only two potential bidders (BT and Fibrus).

31 This was a requirement set out in the NBS 2016 that places an obligation upon all infrastructure providers (that participate in a procurement and have broadband infrastructure in the intervention area) to share the information with the other potential bidders.

32 The term “State Aid” refers to any advantage granted by public authorities through state resources on a selective basis to any organisations that could potentially distort competition and trade in the European Union (EU). In principle, State Aid is not allowed in the EU. However, State Aid rules allow for good aid, which is necessary to deliver growth and other important objectives. The rules over State Aid are complex and failure to comply can result in recovery of funds and suspension (or withdrawal) of aid schemes.

Part Two:

Award of the Project Stratum Contract

- 2.26 Prior to the evaluation of the tenders, the Department obtained confirmation from DCMS that both tender responses were State Aid compliant.
- 2.27 The tender evaluation panel established for Stage 2 was the same as Stage 1 (see paragraph 2.22), but included an additional Telecoms Branch representative from DfE, with KPMG serving as financial advisers to the panel. The panel considered both tenders using a pre-determined, overall weighting scheme which allocated 60 per cent of the overall score to price and 40 per cent to quality, as set out below (additional detail is provided in [Appendix 5](#)).

Figure 5: Summary of overall tender scoring categories and weightings

Stage 2 Criteria	Marks available %
Price	
Commercial sustainability/viability and financial model used	30
Coverage proposed by solution (at NGA speeds)	30
Quality	
Solution design/pricing/implementation plan/contract management	40

- 2.28 These tender scoring categories and weightings used in Project Stratum were compliant with the NBS 2016 State Aid guidance.

The tenders submitted by the two final bidders were evaluated against the award criteria and scoring methodology set out in the ITT documentation, and resulted in significant differences in the pricing scoring

- 2.29 Both tenders that were assessed by the panel offered full FTTP solutions and used phased implementation plans to enable project completion by the end of 2023. The bids proposed similar contractor network build contributions and had the same proposed completion dates.
- 2.30 While both bids tendered for the full £165 million subsidy as well as providing their own contributions, differences in the proposed solutions led to some variances in scoring throughout a number of the tender categories. The key differences in the tender scoring arose in the pricing scoring, which comprised the 'commercial sustainability and viability of the bid' and 'the financial model used', along with 'solution coverage at NGA Speeds' ([Figure 5](#)).

Commercial sustainability and viability of the bids and financial model used

- 2.31 BT scored lower in both the 'commercial sustainability and viability of the bids' and 'the financial model used' categories, while Fibrus was awarded full marks in both.
- 2.32 We asked the Department for an explanation of this, given that BT had been awarded several previous government broadband projects whereas Fibrus had not, having only been recently formed. The Department told us that the BT and Fibrus tender submissions were scored in accordance with the scoring methodology set out in the ITT. They added that details provided in bidders' tender submissions were evaluated by specific reference to that award criteria and scoring methodology, not any knowledge that the evaluators might have of a bidder's prior experience or prior win rate on similar procurements. The Department further stated that Fibrus scored higher under these criteria based upon the bid viability detail submitted, and that the NBS 2016 criteria did not refer to including assessment on trading duration or prior projects awarded. As such, it would have been inappropriate to draw scoring conclusions based on those factors.
- 2.33 The Department further explained that higher marks were awarded to bid documentation that provided sufficient financial information, fully explained methodologies and deviations from national baseline data, and giving greater transparency and detail of its model inputs. All of this was required in the published award criterion.

Proposed coverage of the solutions at NGA speeds

- 2.34 As set out in **Figure 5** above and in more detail at **Appendix 5**, the tender evaluation weightings at Stage 2 allocated 30 per cent of the marks available to the proportion of the intervention area (i.e. the 79,000 properties identified by the Department) that would be covered by the proposed solution from each bidder.
- 2.35 In the two bids that were received, BT offered a solution at NGA speeds that covered 100 per cent of the intervention area, while Fibrus's proposed solution covered close to 97 per cent (meaning approximately 2,500 properties would be left out).
- 2.36 Under the agreed scoring formula³³, BT received all of the 30 percentage marks available, however Fibrus scored 29.04. Given the physical loss of coverage in some of the most rural areas in Northern Ireland, we were surprised that this had such a small impact on scoring for this criterion.
- 2.37 The Department has confirmed that the calculations for the award of marks for coverage were correctly carried out in line with the criterion set out in the Invitation to Tender document. It also reiterated that its overall Stage 2 evaluation was based on the Most Economically Advantageous Tender (MEAT) across all criteria, which included, but was not limited to, solution coverage.

33 An automated scoring mechanism taken from the BDUK template procurement documentation.

Part Two:

The Department identified two clear options for Project Stratum at the outset of the project

- 2.38 Whilst we note this position, and agree that the percentage weighting given to coverage was sufficiently high overall and in line with State Aid requirements, it is our view that the scoring mechanism for awarding percentage marks was not sophisticated enough³⁴ to provide sufficient consequences for solutions which did not provide full coverage.
- 2.39 This is important, given the Department has since estimated that the cost of providing an additional solution to address the 3 per cent (or 2,500 premises) excluded from the Fibrus bid will be in the region of £24 million.
- 2.40 The Department told us that the NBS 2016 coverage evaluation criterion has been used for a range of procurements³⁵ across the UK, and that BDUK has indicated that receiving bids with coverage of 97 per cent and 100 per cent respectively was a very positive outcome, and not fully representative of coverage outcomes in other geographic areas across the wider UK (where a range of coverage outcomes in the intervention area have been achieved through procurement processes). Both bids were therefore considered by the Department to be high coverage solutions and were scored accordingly, based on the established mechanism set out in the ITT documentation.

Wider consideration of the solution coverage issue

- 2.41 Prior to contract award, at its September 2020 meeting, the DfE Casework Committee³⁶ sought clarity on the VFM implications of the successful bid, given that it did not offer a 100 per cent coverage solution across the intervention area, and it asked how the VFM evaluation had “shifted” from the OBC. Assurance was provided by the Project Director that Fibrus’s committed coverage of 76,233 was more than the 74,000 outlined in the OBC under the preferred budget-determined coverage option (see paragraph 2.16). After discussion around the wider criteria assessed, the Casework Committee accepted this alignment with projected coverage referenced in the OBC. An estimate of £10 million to £14 million was provided to the Committee as being potentially needed to address the remaining premises, whilst acknowledging that final estimates would be subject to a high level design to be prepared by the supplier, taking into account the harder-to-reach nature of a number of premises that were out of scope of the contract. We note that this estimate subsequently increased to £24 million (see paragraph 1.12), and is subject to further review by the Department.
- 2.42 At its September 2020 meeting, the independent Advisory Panel³⁷ also questioned the VFM implications of awarding a contract to a supplier that did not offer a 100 per cent coverage solution. The Department highlighted to the Advisory Panel the evaluation process adopted

34 The scoring mechanism for awarding coverage marks was based on the percentage of properties in the target intervention area covered, multiplied by 30 marks available i.e. for Fibrus, 97 per cent of the 30 marks available.

35 For overall budgets of up to £1.2 billion and for projects with varying coverage objectives.

36 The Casework Committee is a sub-committee of the DfE Departmental Board. Its role is to challenge all expenditure proposals on the grounds of deliverability, affordability and value for money. It consists of a number of senior civil service staff from within various directorates within the Department.

37 An independent Advisory Panel was established, consisting of specialists from the telecommunications and technology industry, business and academia. The panel provided advice to the Project Board, through the Project Director. The Advisory Panel was stood down following award of the contract.

under the NBS 2016 State Aid Decision, which required Project Stratum to be awarded by reference to a specified set of award criteria that included much more than coverage, with specified minimum and maximum weightings for each criterion.

- 2.43 The Project Director also advised that following the evaluation of bids, BDUK had prepared a VFM report and a bid comparison report and assigned an amber/green rating to the successful bidder. This report stated that the Fibrus solution would “*deliver acceptable VFM*”. The Department has said the Advisory Panel accepted the rationale provided in the context of the evaluation process and governance protocols in place that resulted in the ranking of tenders submitted.
- 2.44 We welcome the questions introduced by both the Casework Committee and Advisory Panel, however, in our view, awarding the contract for less than 100 per cent coverage of the intervention area will make it difficult for the Department to demonstrate that the process ensured that coverage and value for money were maximised. This is disappointing, given that both were key objectives of the Project Stratum OBC and FBC (see paragraphs 2.14 and 2.48).

Letters outlining the intention to award the contract were issued on 10 September 2020, with all contract documentation being signed on 17 November 2020

- 2.45 Stage 3 of the procurement related to the contract award (**Figure 4**).
- 2.46 ‘Intention to award’ letters were issued to both bidders on 10 September 2020. This was followed by the ten day ‘mandatory standstill period’³⁸. No challenge to the decision to award the contract to Fibrus was received.
- 2.47 Following issue of the intention to award letters, the Department received BDUK State Aid VFM assurance on the Fibrus bid³⁹ (see paragraph 2.43) and confirmed with DoF that the funding would remain available until March 2024. The FBC, produced by Analysys Mason (with financial appraisal support from KPMG), was finalised (September 2020) and approved by the Minister on 12 November 2020.
- 2.48 While the objectives within the FBC were consistent with those outlined in the OBC (see paragraph 2.14), a number of key changes to the contextual position were made, as follows:
- a reduction of approximately 20 per cent in the number of premises requiring intervention following the data refresh exercise undertaken by an infrastructure provider (see paragraph 2.10). This led to the target intervention area reducing in size from approximately 97,000 premises to approximately 79,000 premises;

38 The mandatory standstill period is a period of at least ten calendar days following the notification of an award decision in a contract tendered via the OJEU, before the contract is signed with the successful supplier(s). Its purpose is to allow unsuccessful bidders to challenge the decision before the contract is signed.

39 The Department has said it should also be noted that State Aid and Value for Money assurance ran in parallel to the issuance of the ‘intention to award’ letters, with final assurance being given by BDUK after the issue of the letters.

Part Two:

The Department identified two clear options for Project Stratum at the outset of the project

- an increased demand for high-quality broadband, resulting from increased levels of working and learning from home as a result of the COVID-19 pandemic; and
- an increasing focus on full fibre connectivity, with the government adopting a more aggressive timescale for delivery of nationwide gigabit broadband.

2.49 All relevant contract documentation was signed on 17 November 2020.

Recommendation 1

2.50 One of the four objectives of Project Stratum (outlined in both the OBC and FBC), was to maximise the coverage of the solution in a way that is balanced and supportive of rural areas and communities. Further, the OBC and FBC both specified that the successful procurement and delivery option should maximise value for money.

2.51 We accept that coverage was only one element of a number of pre-agreed criteria and also the Department's assurance that the scoring was carried out in line with the criteria and methodology set out in the ITT. However, we consider that there was a problem with the scoring methodology in that it only made a very small reduction in respect of coverage in relation to the Fibrus bid. Ultimately this will impact on 2,500 of the most hard to reach premises, which the Department estimates will cost around £24 million to complete. As a result, it will be difficult for the Department to demonstrate that either coverage or value for money were maximised.

2.52 **We recommend that, for future procurements, care is taken to ensure that the methodology used for calculating the scores fully reflects the objectives of projects.**

Following issue of the 'intention to award' letters, BT submitted premises data to the Department, indicating that it had either already delivered or there was the potential for it to extend superfast broadband access speeds to 16,000 premises within the Project Stratum intervention area that had initially been included as part of its bid

2.53 On 29 September 2020, 19 days after the intention to award letters were issued, the unsuccessful bidder (BT) indicated to the Department, through the DoF 'eTendersNI' platform⁴⁰, that it planned further investment in (and in some cases had already built) superfast broadband access to premises across Northern Ireland. The submission included a spreadsheet referencing FTTP plans at a UPRN (Unique Property Reference Number) level, which indicated that a BT fibre solution was already in place, or planned, for some 740,000 premises. Of those, some 16,000 were within the revised Project Stratum intervention area. No detail on the timed phasing of this investment, or other information, was provided.

40 'eTendersNI' is the online portal for public sector bodies in Northern Ireland to advertise and manage their tender opportunities.

- 2.54 All 16,000 premises were included in BT's Project Stratum bid, and none were identified in BT's January 2020 data refresh exercise (paragraph 2.10)⁴¹. BT has told us that the revised premises data reflected changes made to its commercial build and plans that had occurred since its OMR submission in January 2020.
- 2.55 In relation to these developments, BDUK referred the Department to State Aid guidance set out in NBS 2016, known as the 'line in the sand principle', which states that 'Implementing bodies are not required to take into account any investment plans announced by network providers following the conclusions of the public consultation, save where the implementing body wishes to do so'. The Department has told us it consulted with a number of key stakeholders on this point, including BDUK, OFCOM, and CPD, in order to help draw conclusions. On the basis of this, it formed the view that, given the time constraints around State Aid cover and in light of the fact that this new information had been provided beyond closure of the OMR and State Aid mandatory public consultation, it should proceed to the contract award as planned. BDUK confirmed that this was in full alignment with State Aid rules. The issue was highlighted in the Department's submission papers accompanying its request for Ministerial and investment approval (paragraph 2.47).
- 2.56 On 13 April 2021 BT formally announced its intention to invest £100 million in the 12 month period to March 2022, creating 100 new apprentice roles in 2021-22. It stated that the funding would be used to:
- help expand the availability of its 1Gbps FTTP broadband to a further 100,000 premises; and
 - maintain its existing copper and fibre networks.
- 2.57 BT confirmed that this additional investment will cover premises in rural towns and villages from Castledawson in County Londonderry to Aughnacloy in County Tyrone. While we do not have precise details of individual premises which will be included in this investment, both of these villages feature in the Project Stratum intervention area and so there could potentially be at least some building across premises already included in the Fibrus solution (otherwise known as an 'overbuild'⁴²).
- 2.58 BT, like all bidders, sought public funding to deliver a solution across 100 per cent of the Project Stratum intervention area on the basis that providing improved broadband access to these areas was commercially unviable. In our view, the fact that, shortly after becoming aware that the contract was to be awarded to Fibrus, BT shared details with the Department of changes made to its commercial plans which had arisen since its last OMR submission (January 2020) and that impacted on the intervention area, raises questions about the overall level of public subsidy afforded to this project.

41 Detail is not available on how many of the 16,000 premises identified as a result of the BT correspondence dated September 2020, form part of the BT investment announcement made in April 2021.

42 Building broadband network infrastructure in an area where a broadband network already exists is called 'overbuild'.

Part Two:

The Department identified two clear options for Project Stratum at the outset of the project

- 2.59 In response to this, the Department told us that it maintains its view that without a public subsidy, the broadband connectivity gap that exists in Northern Ireland compared with the rest of the UK would continue to exist. In particular, it is satisfied that if Project Stratum funding had not been made available to address this gap, then it would continue to have been acutely felt across a deeply rural intervention area (97 per cent rural). It said that the issue of intention to award letters (identifying Fibrus as the successful bidder) could have impacted BT's overall commercial case for those areas, leading to their inclusion in subsequent BT delivery plans, although BT has told us that its decision to expand planned commercial coverage in Northern Ireland was made prior to the issue of the intention to award letters.
- 2.60 It also advised that it will continue to assess premises-level data made available by suppliers, and examine the potential for any overbuild. Within the contract there are mechanisms to request changes and de-scope premises where necessary or appropriate, but any such changes could have a wider impact which would need to be assessed rigorously, and balanced with a requirement to preserve the commercial viability of the awarded contracted, in line with State Aid guidance set out in NBS 2016.

Around 900 properties, which were among 18,000 premises removed from the intervention area because of data provided by BT after the commencement of the tender process, are no longer in BT's commercial plans, and remain outside the scope of Project Stratum

- 2.61 The Department has also told us that premises data provided by BT after the contract for Project Stratum had been awarded now indicates that BT is no longer intending to provide superfast broadband to around 900 premises that had been de-scoped from the Project Stratum intervention area⁴³. This potentially leaves 900 premises without access to NGA broadband. The Department has told us that it is considering how to address this and will continue to assess the broadband landscape with all providers, with the aim of ensuring that no premises are left behind. BT has explained that it is normal for premises to periodically drop out of its commercial plans due to a range of factors including operational issues identified following planning and survey.

43 This de-scoping had taken place when data submitted from BT had indicated that 18,000 premises which had formed part of the original Project Stratum intervention area were removed in January 2020 (see paragraph 2.10) as they either formed part of BT's commercial roll out plans or updates to the supplier's speed estimates for currently connected premises meant that they no longer qualified for the 'target intervention area'.

Recommendation 2

- 2.62 The fact that BT shared details with the Department of changes made to its commercial plans which had arisen since its last OMR submission (January 2020) and that impacted on the Project Stratum intervention area, very soon after the contract was awarded, raises questions about the need for public subsidy in the first place for a large number of properties which were included in the project.
- 2.63 **We recommend that the Department continues to engage with all broadband infrastructure providers to form an accurate view of the premises-level data landscape in Northern Ireland, along with commercial deployment plans. This will help ensure that no premises are left behind and that the potential for overbuild and any implications for the contract can be properly assessed.**
-

Part Three:

Arrangements to measure performance and ensure cost transparency throughout the implementation phase

Part Three:

Arrangements to measure performance and ensure cost transparency throughout the implementation phase

The Project Stratum Team includes several members of staff with infrastructure development, digital media and telecommunications experience

- 3.1 Since 2018, the Project Stratum team has been assigned a Senior Responsible Owner (SRO)⁴⁴ within the Department. An SIB-appointed Project Director, with experience in infrastructure development, digital media and telecommunications, is responsible for the day-to-day running of the project. The Project Director's contract commenced in mid-2018 and expires in the spring of 2022.
- 3.2 The Project Director is supported by a Project Manager with many years' experience in broadband initiatives. Remaining team members are 'Telecoms Branch' officials who have worked on previous broadband projects in Northern Ireland. This Project Team brings in external legal, technical and financial expertise as required. The additional resource cost of this external support was just under £1 million for the three year period 2018-19 to 2020-21.
- 3.3 Both the RHI Inquiry⁴⁵ and our report on Capacity and Capability in the Northern Ireland Civil Service⁴⁶, highlighted the risk of changes to key personnel during a project life cycle. In Project Stratum, in the two year period prior to contract award, four SROs have been in place. The Department accepts that frequent personnel changes within a team are not ideal and advised that, given the size and complexity of Project Stratum, it had appointed a Deputy SRO at the outset of the project in 2018. This is welcomed. We note that the Deputy SRO, Project Director and Project Manager roles have remained consistent throughout the project to date.

Performance throughout the implementation phase will be monitored at various levels within the Department, with risks being managed accordingly

- 3.4 The Department told us that the project logistics will be discussed on a regular basis with Fibrus or, in line with the contract arrangements, through weekly and monthly operational meetings, monthly finance meetings and quarterly performance meetings. Any significant operational, finance or performance issues arising will be brought to the attention of the Project Board⁴⁷ at its quarterly meetings.
- 3.5 In line with established Departmental processes, any significant corporate or strategic issue will be escalated or raised verbally through line management or through the stewardship process (in the quarterly assurance statements provided to the Accounting Officer).
- 3.6 The Department told us that a Risk Register has now been produced for the implementation phase of the project. Given the size and complexity of the project, and the political and public

44 The Senior Responsible Owner (SRO) has ownership of a project at a senior level. Their responsibilities are strategic rather than day to day.

45 *The Report of the Independent Public Inquiry into the Non-domestic Renewable Heat Incentive (RHI) Scheme*, Recommendation 24, RHI Inquiry, March 2020.

46 *Capacity and Capability in the Northern Ireland Civil Service*, NIAO, November 2020.

47 A Project Board is essentially the decision-making body within a project. It meets periodically to provide strategic direction and ensure the effective and timely progress of the project. In relation to Project Stratum, it includes representation from BDUK, DAERA, CPD and DfE Telecoms Branch. During the implementation phase of the contract, the contractor has been appointed to the Project Board but the option exists to hold meetings without them in attendance.

interest in its success, Project Stratum also features in the Department's Corporate Risk Register⁴⁸. The Departmental Board will have ongoing oversight of the implementation of Project Stratum through its periodic review of risks contained within this Risk Register.

- 3.7 The Department also expects that periodic updates on the implementation of Project Stratum will be provided to the Northern Ireland Assembly Committee for the Economy.

Information on planned phasing and deployment is available to key stakeholders

- 3.8 A web-portal has been developed by Fibrus to provide information to citizens on key aspects of implementation, including planned phasing and full deployment of the broadband infrastructure across the target intervention area. The information will be updated on a regular basis.
- 3.9 Fibrus has also held a number of 'virtual townhall meetings'. At these meetings, information on key dates and implementation plans across rural and regional areas is provided. To date, meetings have taken place for the Ballycastle, Coalisland, Killyleagh, Rostrevor, Kilkeel, Castlewellan, Cullybackey, Maghera, Castlederg, Warrenpoint, Enniskillen, Fintona, Keady, Castlerock, Ballymoney, Crossmaglen, Carnlough and Newtownstewart areas.
- 3.10 The Department has a communications plan in place which sets out arrangements for informing key stakeholders of progress during the implementation phase of the project. This plan confirms that the Department will provide progress details on social media and on its website. Information will also be available on the NI Direct website.

The Department has introduced controls to monitor milestone achievement, verify grant paid and gain assurance over the quality of work completed

Milestone payments and claim verification

- 3.11 Project Stratum will be delivered by Fibrus in 49 phases or 'milestones' over a three year period. Target dates have been set for milestone completion, and funding will only be released when the Department is assured that individual milestones have been achieved.
- 3.12 Following completion of a milestone, Fibrus will submit a '*Milestone Achievement Certificate*' outlining the work completed and showing total expenditure incurred. Costs will be supported by invoices, receipts, timesheets, payroll records and other supporting information (including sub-contractor records). Fibrus will also be required to confirm that part apportionment, or allocation of the network build cost between this contract and other contracts or services, is accurate and a fair reflection of the work carried out. Given that Fibrus has other projects running in tandem with this project, this is an important part of the milestone payment process.

48 A Corporate Risk Register records the risks and opportunities that may affect the delivery of an organisation's strategic or corporate objectives.

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- 3.13 The Department's 'Vouching and Verification Team' will examine all documentation received and verify that the expenditure has actually been incurred, by reviewing payment or bank records and statements, BACS lists etc. This team is headed by a middle management grade member of staff. He is supported by a team supervisor with a team of five staff. We had some initial concerns that this team may not have sufficient skills and expertise for these tasks, however, the Department told us that most of the team members have financial, audit and inspection experience. The head of the Vouching and Verification Team has access to individuals at higher grades within the Project Stratum team with established broadband vouching and verification management experience, including the Project Manager and Assurance Manager for Project Stratum.
- 3.14 The final milestone ('retention') payment (£8.25 million) is payable on completion of the project. The Department can withhold this if any part of the implementation has not been completed satisfactorily or if take-up from customers does not reach 20 per cent of the forecast take-up figure. The Department advised that it did not come up with this percentage, rather it was part of the contract documentation provided by BDUK.

Open book accounting

- 3.15 Under the terms of the contract, Fibrus must maintain project accounts⁴⁹. On an annual basis and on the anniversary of the contract signature (November 2020), a copy of these annual project accounts and accompanying narrative (certified by a suitably qualified finance representative or the external auditor of Fibrus) will be forwarded to the Department for consideration.
- 3.16 The Department will review these annual accounts and identify if any 'clawback' is due. We discuss the issue of clawback in more detail at paragraphs 3.22 – 3.23. The Department has told us that this process is in line with the process adopted for both NIBIP and SRP2 (paragraph 1.6), in that contracts required the supplier to provide annual project accounts in the same format as required of Fibrus in the Project Stratum contract. These accounts were provided annually by BT and reviewed by the Department. However the take-up clawback review dates for NIBIP and SRP2 are bi-annual.
- 3.17 The Department told us that it had appointed Analysys Mason and KPMG for a period of five years, to provide technical and financial advice and support it in the review of the annual accounts for the project. In its report on digital transformation in the NICS and the NI Direct contract⁵⁰, the Public Accounts Committee (PAC) noted its concerns in relation to the consideration of project accounts, stating that "*where open book accounting was secured, contract management procedures did not extend to routinely examining BT's books. Therefore, DoF had little idea of BT profit margins and the Committee was concerned these could be large. It is very clear that BT "ran rings round civil servants"*". This technical and financial support for Project Stratum should help address that criticism.

49 The project accounts will include a summary income and expenditure statement, a record of network assets created or deployed, details of any repayments made to the Department, all supporting notes and take-up of premises that have subscribed to the new full fibre broadband service.

50 *Joint Report on Management of the NI Direct Strategic Partner Project – helping to deliver Digital Transformation and The LandWeb Project: An Update*, Public Accounts Committee, January 2021.

Recommendation 3

- 3.18 We welcome the variety of controls put in place by the Department in order to verify Fibrus project costs, milestone achievements and payment claims. **Given the concerns expressed by the PAC over previous contract management arrangements in the NICS, we recommend that the Department ensures that all staff responsible for these verification checks, and for reviewing the work of external consultants, have the requisite qualifications, skills and experience.**

Quality Checks

- 3.19 The Department has developed checks to assess the quality of the service provided by Fibrus and has confirmed that these checks were fully introduced during the summer of 2021. These include random physical checking of the infrastructure claimed for and checks to confirm the broadband speed available to subscribers. It said that these checks build on previous processes and systems the Department used to audit prior projects and are a refinement of these.
- 3.20 The Department has contracted independent technical and financial experts Analysys Mason and KPMG, for a period of five years, to quality assure the robustness of this checking regime.

Recommendation 4

- 3.21 **We recommend that the Department finalises its arrangements for verifying the quality of work completed by Fibrus and quality assuring its own work. To the extent that any retrospective quality checking is required, this should be undertaken as a matter of urgency.**

The Project Stratum contract includes clawback arrangements which come into play where contractor costs are lower than anticipated or take-up is higher than expected

- 3.22 Clawback comes into play where:
- **Network build costs are less than anticipated:** The anticipated build cost for Project Stratum is £211 million (paragraph 1.10). If actual costs are less than this, DfE will be contractually entitled to clawback.
 - **Customer take-up exceeds predictions:** In this case, the additional financial gain will be shared between both parties. Actual take-up rates will be disclosed in the annual project accounts (see paragraph 3.15)⁵¹.

⁵¹ Where a greater liability is shown in Fibrus's audited project accounts for anticipated re-payment of clawback than would otherwise be repayable at that time to the Department, Fibrus is also contractually obliged to re-pay the higher amount to the Department.

Part Three:

Arrangements to measure performance and ensure cost transparency throughout the implementation phase

- 3.23 The Project Stratum contract outlines exactly how clawback will be calculated. Amounts due are required to be paid to the Department within 20 working days. We welcome this challenging timeline.
- 3.24 We note that the BDUK VFM assurance report (see paragraph 2.43) provided prior to contract award highlighted the risk associated with any increase in pricing throughout the contract period, and the impact this could have on projected take-up. It will be important for the Department to monitor the impact of any price increases on customer take-up within the Project Stratum intervention area, particularly in light of any poor take-up and the impact such a scenario would have on the VFM achieved.
- 3.25 The Department told us that pricing and customer discount and promotions are commercial matters for broadband providers and it is in the interests of both the contractor and the contracting authority to ensure that all measures are in place to encourage take-up on the open access network. It confirmed that the established Project Board would be monitoring this area going forward.

Recommendation 5

- 3.26 We note the BDUK concerns over the potential risk associated with the impact of pricing increases on take-up. **We recommend that the Department closely monitors the impact of any pricing increases imposed by Fibrus, in order to assess whether BDUK's concerns are justified.**

Under the terms of the contract, Fibrus is required to complete a 'wholesale access price' benchmarking comparison at least annually

- 3.27 Fibrus is contractually required (at least annually⁵²) to conduct a benchmark of the wholesale access prices provided in its tender, against those used in other comparable broadband projects within the UK or the EU ('benchmark data') and formally report its findings to the Department, explaining any cost variations. Where variations cannot be justified, Fibrus is required to revisit and propose amendments to its project prices.
- 3.28 This benchmarking report is required to be with the Department within 20 working days of Fibrus undertaking the comparison. Once received, the Department told us that its Project Team will consider the report provided, with advice being sought from a range of experts, including BDUK and OFCOM, on any significant pricing variations. If agreement cannot be reached on any potential pricing changes arising from this benchmarking process, the Department reserves the right to apply the 'dispute resolution procedures' that are outlined in the contract.

⁵² Specific dates for this review are not set in advance in the contract – they need to be agreed between the Department and Fibrus on an ongoing basis.

- 3.29 The Department told us that this process will help provide a safeguard to consumers, and form acceptable foundations for retail pricing and associated services to be marketed to the consumer by providers. The Department has said it will do everything in its power to encourage fair competition between various broadband providers and, in turn, facilitate customer choice.

The Project Stratum contract sets out how amendments to the contract can be made

- 3.30 Either party may request a change to the terms of the contract at any time during the contract period by issuing a change request to the other party. Irrespective of who issues the change request, a 'Change Impact Assessment'⁵³ will be completed by Fibrus and shared with the Department.
- 3.31 Both parties have the right to approve or reject the change request. The Department told us that the Project Team will manage contract variations as they arise during the contract period. In cases of significant contract variation, the Department will obtain advice from BDUK prior to taking a decision on whether to approve or reject the change request.

⁵³ A 'Change Impact Assessment' identifies the potential consequences of a change, or estimates what needs to be modified to accomplish a change.

Appendix One:

Project Stratum rollout over the four year implementation period, analysed by county (Paragraph 1.12)

Individual number of premises passed per year per county

County	2020-21	2021-22	2022-23	2023-24	Total
Antrim	1,567	5,257	6,450	1,860	15,134
Armagh	106	2,156	5,468	1,390	9,120
Down	4,847	9,430	0	4,384	18,661
Fermanagh	0	0	6,890	1,559	8,449
Londonderry	1,001	2,786	3,858	79	7,724
Tyrone	1,684	4,839	5,942	4,680	17,145
Total	9,205	24,468	28,608	13,952	76,233

Cumulative number of premises passed per year per county

County	2020-21	2021-22	2022-23	2023-24
Antrim	1,567	6,824	13,274	15,134
Armagh	106	2,262	7,730	9,120
Down	4,847	14,277	14,277	18,661
Fermanagh	0	0	6,890	8,449
Londonderry	1,001	3,787	7,645	7,724
Tyrone	1,684	6,523	12,465	17,145
Total	9,205	33,673	62,281	76,233

Source: NIAO (based on contract information provided by the Department)

Appendix Two:

Project Stratum - Gateway Reviews (paragraph 1.17)

Gateway	Review Date	Rating	Gateway Comments
2 – OBC - Delivery Strategy	November 2018	Amber: Successful delivery appears feasible but significant issues already exist requiring management attention. These appear resolvable at this stage and if addressed promptly, should not present a cost/schedule overrun.	<p>This Gateway Review identified two significant risks to the Project, namely the stability of the Confidence and Supply Agreement, and the release of the necessary funding through it, and the need for the endorsement of a longer delivery timeframe/funding profile in the region of four years (as opposed to the two initially offered).</p> <p>NIAO Comments These issues were addressed by the Project Stratum team. In September 2020, they obtained confirmation that the Confidence and Supply funding would still be received (paragraph 2.47) and DoF, on behalf of DfE, also negotiated an extension for the project until March 2024.</p>
3 – FBC - Investment Decision	September 2020	Amber/Green: Successful delivery appears probable however constant attention will be needed to ensure risks do not materialise into major issues threatening delivery.	<p>The recommendations arising from this Gateway Review were documentation focused. It identified three significant risks to the Project, namely that resource and benefit realisation plans should be concluded, that a detailed stakeholder communication plan be developed, and finally that an action plan is created in the event that any form of legal challenge was received.</p> <p>NIAO Comments These issues were addressed by the Project Team, with documentation being created for all three issues.</p>

Source: NIAO

Supporting Notes:

- ¹ A Gateway 1 Review (Business Justification) was not undertaken on the SOC (see paragraph 1.17 and footnote 18).
- ² Gateway 4 (Readiness for Service) and Gateway 5 Reviews (Operations Review and Benefits Realisation) have not yet been scheduled.

Appendix Three:

Study Methodology (paragraph 1.21)

Our approach included a combination of quantitative and qualitative methods, including:

1. A review of key documents and publications produced by the Department, including all tender documentation, and that produced by other relevant organisations such as OFCOM, DCMS and DoF, etc.
 2. Meetings, workshops and email discussions with various NICS staff, specifically with the Project Stratum Project Team and representatives from DfE Internal Audit and DAERA.
 3. Review of departmental minutes or discussions with other key stakeholders such as the Casework Committee, the Project Advisory Panel, CPD and BDUK.
 4. Review of previous NAO (National Audit Office) and NIAO broadband reports to provide an understanding of issues facing this area of work within the UK.
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Appendix Four:

Project Stratum Business Cases and Approvals (paragraph 2.11)

Business Case	Completed (Yes/No)	Approvals							
		Gateway Review	DfE Economist	SRO	Project Board	Casework Committee	Accounting Officer	DoF Supply	Minister
Strategic Outline Case	Yes	N/a ¹	14-06-18	03-07-18	N/a ²	04-09-18	N/a ³	26-11-18	N/a ³
Outline Business Case	Yes	07-12-18	31-01-19	09-01-19	31-01-19	08-02-19	07-03-19 ⁴	04-04-19	N/a ⁴
Full Business Case	Yes	11-09-20	21-09-20	23-09-20 ⁵	29-09-20	24-09-20	N/a ⁶	N/a ⁷	18-11-20

Source: NIAO

Supporting Notes:

- 1 A Gateway Review 1 was not undertaken for Project Stratum (paragraph 1.17 refers).
- 2 The first Project Board meeting was held in November 2017. A SOC was not discussed at this meeting nor at the next meeting held in October 2018 as it had already been submitted to DoF for approval (in September 2018).
- 3 Accounting Officer and Ministerial approvals are not required for a SOC.
- 4 The OBC was approved in 2019 in the period when the Northern Ireland Assembly was suspended. In the absence of Ministerial approval, the DfE Accounting Officer approved the OBC.
- 5 Taken as the date that papers were circulated to the Project Board.
- 6 No Accounting Officer approval was required for the FBC. Rather, the decision to invest was taken by the DfE Minister.
- 7 No DoF Supply approval was required on the FBC as it already had been provided for the OBC.
- 8 The Advisory Panel also reviewed the business cases. Whilst formal approval was not needed, they did provide related commentary to the Project Board.

Appendix Five:

Tender evaluation weightings used on Project Stratum (paragraph 2.27)

Criterion	Weighting
Price	60%
Financial Model	15%
Commercial Sustainability and Viability	15%
Solution Coverage at NGA Speeds	30%
Quality	40%
Solution Design Quality	16%
Wholesale Network Design/Wholesale and Retail Pricing	8%
Implementation Plan	12%
Contract and Stakeholder Management	4%

Source: DfE

NIAO Reports 2020 and 2021

Title	Date Published
2020	
Injury on duty schemes for officers in the Police Service of Northern Ireland and the Northern Ireland Prison Service	10 March 2020
Governance issues in Sport Northern Ireland	11 March 2020
Reducing costs in the PSNI	28 April 2020
The National Fraud Initiative: Northern Ireland	11 June 2020
The LandWeb Project: An Update	16 June 2020
Raising Concerns: A Good Practice Guide for the Northern Ireland Public Sector	25 June 2020
Addiction Services in Northern Ireland	30 June 2020
Workforce planning for nurses and midwives	31 July 2020
Impact Review of Special Educational Needs	29 September 2020
Generating electricity from renewable energy	13 October 2020
Capacity and Capability in the Northern Ireland Civil Service	17 November 2020
Managing Attendance in Central and Local Government	23 November 2020
Managing Children who Offend: Follow-up Review	01 December 2020
2021	
Management and Delivery of the Personal Independence Payment Contract in Northern Ireland	23 March 2021
Closing the Gap - Social Deprivation and links to Educational Attainment	05 May 2021
Broadband Investment in Northern Ireland	17 June 2021
Sports Sustainability Fund	22 June 2021
The NI Budget Process	29 June 2021
A Strategic Approach to the Use of Public Sector Assets	21 October 2021
Grant Fraud Risks	28 October 2021
Design and Administration of the Northern Ireland Small Business Support Grant Scheme	8 December 2021



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