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Report of the Director of Resources and Housing

Report to Executive Board

Date: 19th December 2018

Subject: New Procurement Strategy

Are specific electoral wards affected? If yes, name(s) of ward(s):	Yes	⊠ No
Are there implications for equality and diversity and cohesion and integration?	☐ Yes	⊠No
Is the decision eligible for call-in?	⊠ Yes	□No
Does the report contain confidential or exempt information? If relevant, access to information procedure rule number:	Yes	⊠ No

Summary of main issues

- 1. The Council is currently drafting its updated procurement strategy (the New Procurement Strategy). This report sets out the proposed key areas of the New Procurement Strategy which includes both a statement of the aims to be achieved through procurement and a review of governance. The report sets out the programme for consultation and implementation.
- 2. This report also outlines the progress to date in respect of delivering social value through procurement, which it is intended to further develop, particularly in relation to promoting better pay and conditions among our contractors.
- 3. Finally, this report considers the issues raised by Scrutiny and at Council in relation to the use of Council waivers of the Council's Contracts Procedure Rules (CPRs). This report highlights how the Council is currently working to minimise the inappropriate use of waivers of CPRs and proposes further process amendments which should help to further improve the situation.

Recommendations

Executive Board is recommended to:

- (i) support the proposed key areas which will form the New Procurement Strategy;
- (ii) note the intention to consult further regarding the New Procurement Strategy before returning to Executive Board with a final strategy in Apr 2019;
- (iii) note the progress to date in respect of social value aspects of procurement and the proposals to further strengthen this work;
- (iv)note the work that has been undertaken to date in respect of minimising the inappropriate use of waivers of CPRs; and
- (v) support the proposals in this report for changes to processes to ensure greater control over waivers of CPRs.

1. Purpose of this report

The purpose of this report is to set out proposals to review the Council's procurement strategy with a view to supporting more fully the Council's aims. The report also includes a review of governance to clarify the procedures relating to waivers.

2. Background information

- 2.1 The Council's current procurement strategy has been in place since 2011. The strategy focuses on the following key aims:
 - Efficiency: Ensuring the council gets maximum value from every pound that is spent through best value and innovative procurement practice; a consistent approach and one council approach to commissioning; a clearly identified and practised savings strategy and the implementation of a category management approach to procurement.
 - Governance: Ensuring the council has appropriate and proportionate controls, systems and standards to manage procurement risk and to comply with legal requirements.
 - Improvement: Seeking new ways to develop and improve the council's procurement and commissioning activities, and exploring how those activities can deliver the council's wider strategic outcomes.
- 2.2 In 2018, the Local Government Association updated and published their National Procurement Strategy for Local Government in England (the National Procurement Strategy). The National Procurement Strategy identified three themes for focus which its consultation has shown reflects local government's priorities for the next four years:
 - showing leadership;
 - behaving commercially; and
 - achieving community benefits.
- 2.3 In addition to the above themes, the National Procurement Strategy identifies four procurement 'enablers':
 - developing talent;
 - exploiting digital technology;
 - enabling innovation;
 - embedding change.
- 2.4 The National Procurement Strategy is accompanied by a self-analysis toolkit which has been developed to support its delivery by helping councils to understand their maturity levels in key areas of procurement strategy, to set appropriate objectives in relation to those maturity levels and to assess their own progress against those objectives.
- 2.5 **Social Value:** Social value is becoming an increasingly more important aspect of procurement at a local level and as part of the National Procurement Strategy. Work

has been ongoing within the Council for a number of years to embed social value into procurement culture, and most recently this has resulted in the development of the Social Value Framework in order to seek to focus on a discrete list of social value outcomes, and develop a city wide picture of what impact this work will make towards achieving city priorities.

- 2.6 **Waivers:** The CPRs set out the processes which should be followed when the Council is procuring contracts. However, certain of the processes in the CPRs may be waived in exceptional circumstances.
- 2.7 Exceptional circumstances which may justify the waiver of CPRs may include, for example, where software is embedded into council systems meaning there is only one party capable of providing maintenance to that software (e.g. for technical reasons). In such circumstances, it would be appropriate to waive the need to seek competitive tenders (CPRs 8.1, 8.2, 9.1 and 9.2)
- 2.8 Waivers of CPRs cannot be made retrospectively in any circumstances and failure to comply with CPRs may result in disciplinary action. A waiver report is required in order to meet the Council's obligations of transparency and openness, and to show that the matter referred for consideration properly falls within CPRs. Officers are also recommended to seek advice from the Chief Officer Financial Services when completing a waiver report, however this is currently not obligatory before the decision to waive CPRs has been taken.
- 2.9 Over several years, officers have provided annual reports into the use of waivers of CPRs to both the Strategy & Resources Scrutiny Board and Corporate Governance and Audit Committee.

3. Main issues

3.1 New Procurement Strategy

- 3.1.1 The existing Council procurement strategy is heavily focused on best value and procurement processes. This seeks to achieve efficiencies in the procurement process through a number of approaches, including:
 - (i) Category Management by grouping our related purchasing together, rather than individual services separately purchasing, we are able to take advantage of better intelligence of our buying needs and of what providers have to offer, and to support bulk buying where appropriate, in order to improve quality, savings and efficiency;
 - (ii) Considering changes in the market since we last went through a procurement exercise to determine whether new or better suppliers have become available thereby ensuring the Council is obtaining the most up to date goods and services available;
 - (iii) Where contracts have not been renewed or re-negotiated for some years (such as long-term equipment or IT maintenance etc.), ensuring that thorough reviews of the Council's requirements are undertaken and a new procurement exercise undertaken where appropriate; and
 - (iv) Making sure procurement/commissioning officers understand the market and which products or services the market can offer most cost effectively.

- Measures such as those referred to above have facilitated procurement savings to the value of £28.56m over the term of the Council's current procurement strategy.
- 3.1.2 While clearly these remain essential aspects of procurement and the Council relies on continuing procurement efficiencies to support the achievement of a balanced budget each year, it is equally clear that the procurement strategy must be further developed in order:
 - to fully reflect the Council's best city ambitions of "a strong economy and a compassionate city", and "an efficient and enterprising organisation"; and
 - to keep pace with the National Procurement Strategy.
- 3.1.3 Consequently, Procurement officers are currently in the process of producing the New Procurement Strategy. This has involved taking account of significant current procurement related issues, such as social value, robustly challenging the maturity level of the Council in respect of procurement by way of the National Procurement Strategy self-analysis toolkit and setting appropriate targets for improvement.
- 3.1.4 The following five priority areas have been identified in the New Procurement Strategy:
 - Value for money and efficiency. We will seek to ensure the Council gets maximum value from every pound that is spent through best value and innovative procurement practice; a consistent corporate approach to commissioning; a clearly identified savings strategy and the continued implementation of a category management approach to procurement.
 - Governance. Ensuring compliance with the Contract Procedure Rules, the Constitution and the Public Contracts Regulations 2015 in order to manage procurement risk and to comply with legal requirements. This includes matters relating to 'on-contract' expenditure and the use of waivers (see paragraph 3.3, below).
 - <u>Social Value</u>. We will seek to improve economic, social and environmental wellbeing from our contracts over and above the delivery of the services directly required at no extra cost (see paragraph 3.2, below).
 - <u>Commercialisation.</u> Seeking new ways to develop and create commercial opportunities through procurement and commissioning activities, not just by promoting revenue generation, but by looking at how we engage with, and influence, the marketplace and potential suppliers in order to drive innovation and develop new ideas around service delivery.
 - <u>Strategic Suppliers.</u> Effectively manage our strategic supplier relationships through continuous engagement with them through effective management of all contracts from beginning to end in order to control costs, obtain the quality outcomes and performance levels set out in the contract and minimise the level of risk.
- 3.1.5 These are all areas where procurement can make a major contribution. However, we recognise this will only be achieved through strong leadership (including regionally) and best use of resources, by working closely with commissioners, budget holders, suppliers and through working in collaboration with our partners in the wider public sector and other stakeholders.

- 3.1.6 The National Procurement Strategy has also identified a number of "procurement enablers" which are the cross-cutting issues that we will need to address if we are to realise our ambitions in the priority areas identified at paragraph 3.1.3 above. These enablers cover:
 - ensuring we develop talent by supporting staff to obtain professional qualifications and for apprenticeships;
 - exploiting digital technology such as electronic tendering, Procure 2 Pay systems, electronic invoicing and using technology to enhance our knowledge management by accessing paper and electronic sources to build comprehensive intelligence about contracts, markets and trends;
 - embracing an innovative approach across all Council procurements; and
 - embedding change in the organisation by ensuring that senior managers recognise the importance of procurement and contract management, and promote it as a way of leading and managing organisational change.
- 3.1.7 A copy of the draft New Procurement Strategy is appended to this report at Appendix 1. While initial consultation has been commenced with the corporate commissioning group, the people's commissioning group and the public health board, a single "Masterclass" workshop will be held with all commissioners early in New Year to work through the New Procurement Strategy. A final version of the New Procurement Strategy is proposed to be presented to be brought back to Executive Board in April 2019 for final approval.
- 3.1.8 Alongside the New Procurement Strategy, the following is proposed:
- 3.1.8.1 A review and update of the Council's standard tender documentation to ensure they are "user friendly" for commissioners, encourage bidder participation and focus on innovation and opportunities. Feedback from officers during recent consultations has indicated that the procurement toolkits on Insite, and in particular Category Management and Exit Plans all need updating to make them fit for purpose. As currently drafted, officers are sometimes not using them effectively or not using them at all. It is anticipated these will be reviewed and updated over the next 6 months.
- 3.1.8.2 CPRs are reviewed annually and were last updated on the 2nd July 2018 following consultation with all Council directorates. A further review will also be undertaken to coincide with the adoption of the New Procurement Strategy.

3.2 Social Value

- 3.2.1 Social Value from procurement is a key element of the Council's wider aspirations for inclusive growth in conjunction with local communities and businesses. Social Value outcomes are monitored by the Council around some key areas of activity, and the beneficial outcomes include the following:
- 3.2.1.1 expenditure with local suppliers and SMEs equated to 55.17% of total expenditure in 2017/18, with associated employment and skills outputs from procurement activity and planning agreements;
- 3.2.1.2 commissioning the projects on the Learning Places Programme through either the YORbuild framework or existing Leeds Local Education Partnership (LLEP) arrangements. While delivering the required number of school places for Leeds, this has also created over 2,300 new apprentice and employment positions for local people in Leeds up to June 2017, and ensured that the firms employed

have recycled or reused 99% of waste generated during the construction process;

- 3.2.1.3 the Council is committed to the Unison Ethical Care Charter and has been working towards compliance with its principles in relation to externally commissioned home care services. Consequently, in relation to its externally commissioned home care services, the Council has committed to working towards the living wage promoted by the Living Wage Foundation (referred to as the Real Living Wage), by increasing support to home care providers with a request to them to improve basic pay by injecting an additional £0.9 million into these contracts. Additionally, the new home care fee includes payment for travel time and travel costs, in accordance with the Charter. This has had a significant impact on increasing staff pay rates and we estimate this has benefitted approximately 1,150 care staff. In addition, £0.6m has been provided to enable all the providers who are contracted to deliver care within Extra Care schemes (delivering care services to people living in supported housing) and Direct Payment recipients to pay their staff above the national minimum wage. The council's Initial Budget Proposals for 2019/20 includes provision to enable a continuation of the improvement of terms and conditions through the Ethical Care Charter.
- 3.2.1.4 Aspire, the spun out social enterprise from the Council's in-house service, in accordance with their stated aims to move towards the Real Living Wage, also pays above the minimum wage to its care staff thereby, benefitting up to approximately 220 additional staff;
- 3.2.1.5 Establishing a Dynamic Purchasing System (**DPS**) with the Council's Employment and Skills section which is a totally electronic system providing simple access to contracts for suppliers. The DPS is divided into categories thereby opening up opportunities to smaller, local organisations as well as new entrants to the market. In addition, the Education and Skills Funding Agency (**ESFA**) "pound plus" initiative, and the Leeds strategy to add value to ESFA funded activity, will be reflected in the future commissioning of DPS category 3 "Ofsted Regulated Adult Learning";
- 3.2.1.6 The Council has developed a collaborative and systematic approach to engaging with anchor institutions. Anchor institutions are public and private organisations which make a significant contribution to the local economy through the services they provide, the large amount of money they spend and the number of local people they employ. Through a progression framework we are promoting collective action on employment, low pay and social responsibility through the Leeds Anchors Network currently made up the largest publicly funded organisations. The programme will be rolled out to private sector businesses in the new year guiding work with a range of city partners to achieve a long term commitment to being an inclusive Anchor, with organisations looking at how they operate, deliver services, buy goods and interact with other local organisations and the community to significantly add to local employment opportunities, business growth, skills, incomes, health and wellbeing to deliver on the city's Inclusive Growth Strategy.;
- 3.2.1.7 Adopting use of YORscep (supply chain engagement programme) as one of the YORhub framework ambitions. Its purpose is to open up opportunities on the framework to sub-contractors and to improve visibility of projects. This is achieved by framework contractors posting opportunities on the YORhub website and these being open to all sub-contractors registered, and reducing

onerous barriers such as lengthy pre-qualification processes. This in turn should result in even greater values of expenditure being spent locally as a consequence of local SMEs working on large projects, and quality opportunities becoming available to local businesses and people. YORhub also run events aimed at supporting sub-contractors. One such event, held at the end of October 2018, was in the format of a 'meet the buyer event'. It was organised by Leeds City Council and well supported by the YORhub team (other local authorities that manage the framework). The event hosted 40 contractors and around 260-300 sub-contractors. The event was very well received by both framework contractors and sub-contractors. It is anticipated that this will be a yearly event, with training presentations for sub-contractors on areas such as working with local authorities. NEC contracts. PAS 91, and others to be determined.

- 3.2.2 Social value next steps:
- 3.2.2.1 The Council's standard tender documentation and terms and conditions include obligations to ensure that:
- 3.2.2.1.1 Where appropriate, contracts are broken down into lots thereby encouraging SMEs to tender for work. Our ambition in this area is to be more proactive in meeting with small SMEs and ensure that they fully understand to process of tendering for Council business and are fully able to do so;
- 3.2.2.1.2 SMEs (when compared with other potential sub-contractors) are given fair, equal and proportionate access to sub-contracting opportunities;
- 3.2.2.1.3 Environment requirements of the Council are considered and if appropriate are factored into all Council procurements (such as conserving energy, water, wood, paper and other resources, reduce waste; phasing out the use of ozone depleting substances; and minimising the release of greenhouse gases, volatile organic compounds and other substances damaging to health and the environment);
- 3.2.2.1.4 The contractor has appropriate policies and arrangements in place in respect of anti-slavery and human trafficking, non-discrimination, human rights, safeguarding, training of staff and requiring main contractors to pay subcontractors within 30 days; and
- 3.2.2.1.5 Opportunities for additional social value/corporate social responsibility are fully considered. This may include (where relevant) seeking to recognise through appropriate method statement questions and evaluation weighting the added benefits that organisations which are embedded in the local community may bring to a delivery of a service to the community through (for example) local knowledge and volunteering. Examples of where the council has already incorporated such good practice in its contracts include:
- 3.2.2.1.6 The Adult Social Care Commissioning Team have required providers to sign up to the DV Quality Mark and commitments to Child Friendly Leeds, Dementia Friendly Leeds and Leeds Carers, as appropriate. The team has incorporated peer mentoring as part of tender requirements where service users can go on to volunteer in a supported way and add value to the contract.

- 3.2.2.1.7 On a very practical level, a recent tendering exercise to procure Kitchens and Bathrooms, encouraged contractors to demonstrate social value.
- 3.2.2.1.8 The higher scoring bids have resulted in support to the local economy with placement of over 90% of supply chain opportunities with SMEs (with an aim to reach 75% of services within the City), 65% contract value with local suppliers, and over 300 staff with LS postcode are employed. It provides dementia awareness training, works with schools as Construction Ambassadors, mentors social enterprises/ third sector organisations, has committed £5k to support local communities (fun days, sponsorships, projects etc.) and will be refurbishing 8 properties per year (with Kitchens Bathrooms and Rewires) as identified through community led housing organisations.
- 3.2.2.1.9 There is an opportunity to ensure that good examples such as these become standard as we go forwards.

3.3 Living Wage

- 3.4 The Council began paying above the national minimum living wage rates in 2016 and met the Real Living Wage promoted by the Living Wage Foundation for all its employees in April of this year. The Living Wage Foundation promotes the Real Living Wage as a minimum wage for employers to adopt, which they set each year based on their calculation of what people need to live on. The current Real Living Wage rate (outside London) is £9.00 per hour. In April 2019 the Council will be paying its current employees a minimum of £9.18 an hour and new starters a minimum wage of £9.00 per hour at grade A1. The Council is committed to promoting the Real Living Wage across the city through not only its example but by using its influence with businesses in the city to promote this initiative. Procurement can play a part in furthering the ambition. To this end we will seek to implement a procurement policy that explicitly encourages businesses to pay the Real Living Wage to all their employees as a minimum. We will take into account the payment of the Real Living Wage by a bidder in deciding to award a contract where quality and price is not compromised.
- 3.5 In addition, where appropriate, we propose a "social value" method statement question around the economic benefits contractors provide to their employees. Such an approach would give us the opportunity to consider (amongst other social value proposals) how contractors could contribute to improving the lives of their employees (which may include the Real Living Wage, but may also include other financial benefits such as travel expenses or pension/health contributions, or non-financial employment benefits such as flexible working etc.). Further, we can encourage employers to ensure that payment of their staff includes increased monitoring of market rates and greater transparency as to how much they pay their staff. However, it should be noted that there are limits on considering workforce matters in procurement and award of contracts, and requiring payment of the Real Living Wage may not be practicable in particular circumstances, for example:
- 3.5.1 where a contractor is only providing a small proportion of its services to the Council, which may result in different tiers of employees in the same organisation, if those providing services to the Council were paid more; or

- 3.5.2 where a tender, by an organisation which is not paying the wage, is clearly better against the published criteria of price and quality. To disbar organisations in such circumstances is likely to be illegal.
- 3.6 It is also necessary for the council to be mindful of the "affordability" impacts of asking our contractors to pay the Real Living Wage to all their employees as a minimum, if this is passed on as a cost to the Council in their pricing models. As can be seen from paragraph 3.2.1.3 above, the financial impact of paying the Real Living Wage can be significant. The Council receives no extra funding for paying the Real Living Wage, therefore the emphasis is upon organisations to deliver the Real Living Wage, whilst offering affordable services to the Council.
- 3.7 Monitoring of wider social value outcomes and pulling together the wide ranging social value initiatives in contracts across the entirety of the Council is a complex area, albeit one of increasing focus and importance for the Council. Consequently, the Council has been developing a Social Value Framework and commissioning social value guidelines, which will be referenced in the New Procurement Strategy. This will enable the Council to focus commissioning activity on a discrete list of social value outcomes and develop a city wide picture of what impact this work will make towards achieving city priorities. A draft copy is appended to this report at Appendix 2.
- 3.8 Procurement officers will play a pivotal role in the process of delivery of even greater social value outcomes and monitoring their impact.

3.9 Waivers

- 3.9.1 The issues relating to the inappropriate use of waivers of CPRs have been the subject of scrutiny over many years.
- 3.9.2 Procurement Officers have recently adopted a more robust, automated process for capturing waivers from the decision register, which consequently allows officer resource to concentrate on seeking to understand the detail of each particular waiver, rather than finding and logging the information. This should ensure that the register of waiver decisions is, in future, as accurate as possible.
- 3.9.3 Procurement Officers have also been focusing on the issue of waivers that have not also been registered on the Council's e-tendering system "YORtender". The Procurement Service has been assisting the directorates in setting up these records and this has seen a rise from just 5% of waivers previously having been recorded on YORtender, to a figure of 91%. This area of work provides a lot of information that has previously been missing, including supplier names, waiver periods and amounts. This also ensures that the Council is in line with its own policies and the Public Contract Regulations 2015 for the publication of public contract awards.
- 3.9.4 Recent analysis, utilising the more effective search tools referred to above, has identified 100 waivers of CPRs in the current financial year. Of these, only 21 were recorded as being related to timing and resource issues (i.e. there was insufficient time to procure the contract in accordance with CPRs). This indicates that the majority of waivers in the current year have either been raised in line with CPR requirements or (in some circumstances) were not necessary (e.g. where contract value is below £10,000 a direct award is permissible without the need to waive CPRs).
- 3.9.5 In addition, the latest figure for "on-contract" spend for the 2018 year to date (October 2018) is **97.6%** of orders are on contract or compliant with CPR's. This

- figure shows an increase for the fourth consecutive year, and the volume of orders placed that were non-compliant has also reduced.
- 3.9.6 The evidence therefore suggests that the CPR waiver regime is (for the most part) being utilised in an appropriate fashion. However, it is recognised that there is still room for improvement in respect of the waiver process, in particular with regard to record keeping, consultation with procurement officers before taking a decision to waiver CPRs, clarity of rationale behind a waiver and officer understanding of the waiver process. In respect of trying to improve officer understanding of how waivers of CPRs should properly be utilised, information on the Council's intranet (Insite) has recently been reviewed and amended to make the process of waivers easier to follow and clearer to understand, and a flow chart of the process has also been published. In addition, a single format of contract register linked to the Yortender system has been adopted which includes clear dates in relation to contract expiry and a series of early warnings as to key procurement and decision making dates.
- 3.9.7 In addition, internal Audit has recently carried out a review of the use of waivers and key recommendations from this include:
- 3.9.7.1 changing the process for issuing waivers to allow final check and challenge by Procurement officers to ensure integrity and the correct use, and for them to be centrally recorded;
- 3.9.7.2 a more robust template (tick-list) is to be produced and made available in order to make the rationale for raising the particular waiver clear on the face of the waiver report;
- 3.9.7.3 full training to be provided to decision makers and those responsible for signing waivers.
- 3.9.8 These changes will strengthen the current procedure and allow a greater level of check and challenge, and present the opportunity for Procurement officers to give advice and have visibility of the proposed waiver before the relevant decision is made. From the change in process there will also be greater detail in the reporting information gathered and the reason for the waiver being raised should be easier to identify.
- 3.9.9 Appropriate use of waivers of CPRs will be addressed further in the New Procurement Strategy as part of the commitment to good governance.

4. Corporate considerations

4.1 Consultation and engagement

- 4.1.1 There has been consultation on the draft procurement strategy and social value framework and guidance. In particular, consultation has taken place with the People's Commissioning Group, Public Health Programme Board and the Corporate Procurement Group. Comments from these briefings have been incorporated into the strategy and social value framework documentation.
- 4.1.2 There will be further consultation prior to bringing back the final strategy to Executive Board in April.

4.2 Equality and diversity / cohesion and integration

4.2.1 An equality impact assessment screening has been completed that shows the measures set out in this report would be beneficial in seeking to improve the living

- standards for the people of Leeds in low income groups. In particular, it is considered that the measures would benefit BAME groups, people with disabilities and women who represent a disproportionately high percentage of people on low incomes in the city.
- 4.2.2 CPRs seek to ensure that, regardless of value, the purchase of goods, works or services by the Council is undertaken in an open and transparent way thereby giving all organisations, including SMEs etc, the same opportunity to participate in tendering exercises for goods, works or services.

4.3 Council policies and best council plan

4.3.1 The vision from the Best Council Plan is for Leeds to be a compassionate, caring city that helps all its residents benefit from the effects of the city's economic growth. These values frame the New Procurement Strategy which will seek to deliver the Council's best city ambitions.

4.4 Resources and value for money

4.4.1 This report outlines ongoing work within PACS to ensure the council is spending money wisely. By giving training and by challenging non-compliant orders Procurement staff are seeking to ensure that the number of waivers sought is kept to a minimum and the council is getting value for money.

4.5 Legal implications, access to information, and call-in

- 4.5.1 This report is eligible for Call-In. There are no grounds for keeping its contents confidential under the Access to Information Rules.
- 4.5.2 The Council's approach to procurement satisfies all necessary legal and regulatory obligations.

4.6 Risk management

4.6.1 The New Procurement Strategy will improve the Council's risk management when conducting procurements and managing contracts.

5. Recommendations

- 5.1 Executive Board is recommended to:
 - i) support the proposed key areas which will form the New Procurement Strategy;
 - ii) note the intention to consult further regarding the New Procurement Strategy before returning to Executive Board with a final strategy in Apr 2019;
 - iii) note the progress to date in respect of social value aspects of procurement and the proposals to further strengthen this work;
 - iv) note the work that has been undertaken to date in respect of minimising the inappropriate use of waivers of CPRs; and
 - v) support the proposals in this report for changes to processes to ensure greater control over waivers of CPRs.

6. Background documents¹

None

Appendices

Draft New Procurement Strategy - Appendix 1

Draft Social Value Framework Guidance document - Appendix 2

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¹ The background documents listed in this section are available to download from the Council's website, unless they contain confidential or exempt information. The list of background documents does not include published works.