

SSRO

Single Source
Regulations Office


Appendix 4 – Compliance activities guidance

1 July 2019


1. Proposed guidance

1.1 The following sets out our proposed changes to the existing guidance on compliance activities. New guidance is highlighted in yellow, deletions in grey and moved text in blue.

Existing para ref	Current guidance	New para ref	Proposed new guidance	Rationale for change
2.35	Issues raised by the SSRO or MOD which relate to whether contracting companies or designated persons are meeting their reporting requirements are able to be communicated and responded to within DefCARS. The guidance below explains how contractors can review and respond to these issues within the system. This functionality supports a three-way dialogue about reports between the contractor, the SSRO and the MOD and enables issues with reports to be resolved in a timely and transparent way.	2.35	The SSRO and MOD raise issues in DefCARS about compliance by contractors with reporting requirements, which contractors may respond to in the system. This user guidance explains how contractors can review and respond to issues raised by the SSRO or the MOD within the system. This functionality supports a three-way dialogue about reports between the contractor, the SSRO and the MOD and enables issues with reports to be resolved in a timely and transparent way.	Opening sentence of the paragraph improved. Clarity provided on which parties raise compliance issues in DefCARS.
2.36	DefCARS shows the number of reports relating to a contract which have active issues. The number of active issues relating to each individual report is also shown (see Exhibit 4).	2.36	The DefCARS homepage shows the number of reports relating to a contract which have current open issues. All current open issues in a report will subsequently be carried forward in future correction reports (they are not carried forward into a new report submission) and the number of 'reports with open issues' counter will reflect this (see paragraph 2.44). The number of current open issues and the current SSRO/MOD review status relating to each individual report is also shown (see Exhibit 4).	Replaces the term 'active issues' with 'current open issues' to reflect the labelling in DefCARS. Confirms that open issues are carried forward in future correction reports.
Exhibit 4	Report Issues Screenshot	Exhibit 4	Report Issues Screenshot	

Existing para ref	Current guidance	New para ref	Proposed new guidance	Rationale for change
2.37	By selecting the view icon (see Exhibit 4) the user will be taken to the Report Home page for that report where the individual active issues will be listed (see Exhibit 5). The Report Home page will only show active issues as once issues are closed by the SSRO or the MOD they will be removed from the Report Home page (although the audit trail remains within individual pages within a report). The user can also download the report to see all active and resolved issues relating to that report.	2.37	<p>Identifying and reviewing issues</p> <p>By selecting the view icon (see Exhibit 4) the user will be taken to the Report Home page for that report where the individual issues will be listed (see Exhibit 5). The Report Home page will display two blue status boxes which indicate the overall stage the report is at in the SSRO and the MOD review process (stages are explained in paragraph 2.52). The page will also show both current open issues and current resolved issues. These issues will have separate headings with current open issues under a red heading and current resolved issues under an amber heading (see Exhibit 5). The user can also download the report to see a summary of current open and current resolved issues as shown on the Report Home page.</p>	Clarity provided on the information which is visible on the Report Home page and how contractors can print the issues which relate to a report.
Exhibit 5	Report Home Page Issues List	Exhibit 5	Report Home Page Issues List	
2.38	Issues which appear in the issues list are 'clickable' which will take the user to the relevant report page. Every issue on a page can be accessed via a pop-up window which appears on the top right of the page (see Exhibit 3). If the issue relates to a particular field an issues icon  will appear in the relevant field (see Exhibit 6). If the issue relates to a page the user will only see the issue by clicking on the pop-up window.	2.38	<p>There are three ways to view the details associated with an issue:</p> <ol style="list-style-type: none"> a) Issues which appear in the issues list on the Report Home page are 'clickable' and will take the user to the relevant report page and, where pop-ups are enabled in the user's browser, a pop-up window will appear which contains all the information relating to that issue (see Exhibit 8). 	Confirmation of the different ways in which users can access issue details in DefCARS.

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Existing para ref	Current guidance	New para ref	Proposed new guidance	Rationale for change
			<p>b) Where pop-ups are not enabled in a user's browser, clicking on an issue on the Report Home page will take the user to the page where the issue has been raised. If the issue relates to a particular field, an issues icon  will appear in the relevant field (see Exhibit 6). This icon can be clicked to open a window showing all the details relating to the issue (see Exhibit 8). If the issue has been raised at page level, there will be no issue icon next to any field. The 'Comments, Issues and Supporting Information' pop-up on the relevant page will indicate how many issues, comments and supporting files have been added. The issue information can be accessed through the 'Comments, Issues and Supporting Information' pop-up as explained in (c).</p> <p>c) Every issue on a page can also be accessed by clicking the 'Comments, Issues and Supporting Information' pop-up at the top right-hand corner of the page (see Exhibit 3). Clicking this pop-up opens a new window (see Exhibit 7) which contains the Issue Log for that page where all the issues relating to the page will be visible along with any comments and supporting files relating to the data entered on that page. The two icons on the right-hand side of the issue in the 'Response' column (see Exhibit 7) indicate whether any comments have been raised against the issue or whether there are any supporting files attached. Users should note that this is the same window as that shown in Exhibit 3.</p>	

Existing para ref	Current guidance	New para ref	Proposed new guidance	Rationale for change
Exhibit 6	Issues Icon on Individual Fields	Exhibit 6	Issues Icon on Individual Fields	
2.39	Once an individual issue is selected (either by clicking on the icon or via the pop-up window), a new window will open (see Exhibit 7) where the issues relating to the page will be visible along with any comments and supporting files relating to the data entered on that page. Please note this is the same window as that shown in Exhibit 3.			Paragraph deleted as covered in new paragraph 2.38.
Exhibit 7	Issues, Comments and Support files window	Exhibit 7	Issues, Comments and Support files window	
2.40	Users can click on individual issues to see all the information associated with them. The two icons on the right-hand side of the issue (see Exhibit 7) indicate whether any comments have been raised against the issue or whether there are any supporting files attached. The window which includes all the information associated with an issue is shown in Exhibit 8 and will enable the contractor to see a full audit trail of the information relating to each issue.	2.39	When a contractor opens an issue on the issue log another window will open (see Exhibit 8) which will display all the details associated with the issue such as: <ul style="list-style-type: none"> a) a description of the issue; b) whether the issue is linked to an automated validation rule in DefCARS; c) the issue 'category' (whether it is a reporting or pricing issue); d) the status (e.g. open or resolved); e) the person who raised the issue; 	Each field relating to an issue has been identified.

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			f) when the issue was released; and g) the person who released the issue.	
Exhibit 8	Issue fields	Exhibit 8	Issue fields	
2.41	Contractors will be able to add their response to the MOD or SSRO issue by clicking show/hide new comment (see Exhibit 9). All comments on an issue whether made by the contractor, SSRO or MOD will be included in a list in the comments log which appears below the issue details once they have been added.	2.40	Responding to an issue Contractors will be able to review issues raised in a report and provide a response in DefCARS. The response can be provided in the same submission. If the contractor wishes to correct a report to address a compliance issue they may do this via a correction report. Paragraph 2.33 explains how to make corrections to reports.	Guidance indicating that the contractor has a choice about how to respond to an issue raised in DefCARS.
		2.41	Contractors will be able to add their response to the MOD or SSRO issue by clicking show/hide new comment in the Comments Log, entering a comment in the box and clicking the 'add new comment' button (see Exhibit 9). Paragraph 2.45 explains how responses are approved.	Provides assistance on responding to an issue in a report which has already been submitted.
		2.42	If a contractor wishes to provide a correction report in response to any issue raised by the SSRO or the MOD, the contractor can provide a comment against an individual issue (via the show/hide new comment button in the issues pop-up window) to highlight that the data has been updated, or where they consider a comment would be useful in providing further clarification for the SSRO/MOD.	The contractor is asked to indicate where they are amending data in a correction report.

Existing para ref	Current guidance	New para ref	Proposed new guidance	Rationale for change
		2.43	All comments on an issue, whether made by the contractor, SSRO or MOD will be included in a list in the Comments Log which appears below the issue details once they have been added, with the most recent comment shown first. The comments log enables the contractor to see a full audit trail of the information relating to each issue.	Explanation of the Comments Log feature which provides an audit trail of all comments relating to an issue.
		2.44	All current open issues in a report will subsequently be carried forward in future correction reports, this includes current resolved issues which will be shown under the 'current resolved issues' heading. Any new issues raised in subsequent correction reports will not be retrospectively applied and therefore will not be visible in earlier reports.	Explanation of which reports issues are carried forward in.

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Existing para ref	Current guidance	New para ref	Proposed new guidance	Rationale for change
Exhibit 9	Responding to an Issue	Exhibit 9	Responding to an Issue	
2.42	Users with Administration User, Submitter or Editor permissions can draft responses in DefCARS to issues raised by the SSRO or MOD. All draft responses require approval by an Administration User or Submitter. Responses to issues which have been drafted by an Editor, or by an Administration User or Submitter and not yet approved, will be indicated with a tick in the 'Draft changes requiring approval' column of the issues list in the Report Home page (see Exhibit 5). Administration Users and Submitters can draft responses but will need to approve their own responses (see next paragraph). All responses will remain in draft and can still be edited or deleted without being visible to the SSRO or MOD until they have been approved.	2.45	Contractor users with Administration User, Submitter or Editor permissions can draft responses in DefCARS to issues raised by the SSRO or MOD. Exhibit 12 details the different actions a user can undertake based on their permission level. DefCARS requires all draft responses to be approved by an Administration User or Submitter. Responses to issues which have been drafted by an Editor, or by an Administration User or Submitter and not yet approved, will be indicated with a tick in the 'Draft changes requiring approval' column of the issues list in the Report Home page (see Exhibit 5). Individual draft responses can also be seen in the comments log where the approval date will show as N/A. Administration Users and Submitters can draft responses but will need to approve their own responses (see next paragraph). All responses will remain in draft and can still be deleted without being visible to the SSRO or MOD until they have been approved.	<p>New exhibit included to show the actions that can be taken by a DefCARS user depending on their permissions.</p> <p>New screen shot added to provide clarity on action which is needed to draft and approve responses to issues.</p>

Existing para ref	Current guidance	New para ref	Proposed new guidance	Rationale for change
2.43	To seek approval for a draft response an Editor will need to click on the 'Notify Approver' button which is located at the bottom of the Report Home page. Clicking this button will send an email notification to the Administration User and Submitter, informing them that responses require approval. If the Editor is making draft responses on a number of issues at the same time, they may wish to consider only clicking on the 'Notify Approver' button after all responses are drafted.	2.46	To seek approval for a draft response an Editor will need to click on the 'Notify Approver' button which is located at the bottom of the Report Home page (see Exhibit 11). Clicking this button will send an email notification to the Administration User and Submitter, informing them that responses require approval. If the Editor is making draft responses on several issues at the same time, they may wish to consider only clicking on the 'Notify Approver' button after all responses are drafted.	Screen shot added to provide additional clarity.

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Existing para ref	Current guidance	New para ref	Proposed new guidance	Rationale for change
2.44	<p>Once an Administration User or Submitter wishes to approve a response they will need to access each individual issue from the Report Home page and select 'Approve' at the bottom of the issue details. Once approved the response will be visible to the SSRO and MOD. In order to make the SSRO and MOD aware that the contractor has responded the Administration User or Submitter will need to select 'Notify Externally' on the Report Home page. This will send an email to notify the SSRO and MOD.</p>	2.47	<p>Once an Administration User or Submitter wishes to approve a response they will need to access each individual issue from the Report Home page. The draft response will be visible in the Comments Log and to the right of the draft comment there will be a green tick and a red cross icon. To approve the draft response, click the green tick button. A pop-up window will appear, the user should click the 'approve response' button (see Exhibit 10).</p>	Explains how to approve draft responses.
		2.48	<p>Once approved, the response will be visible to the SSRO and MOD. In order to make the SSRO and the MOD aware that the contractor has responded, the Administration User or Submitter will need to select 'Notify Externally' on the Report Home Page. This will send an email to notify the SSRO and the MOD.</p>	New paragraph to explain that the MOD and SSRO will not be aware of responses to issues unless the 'Notify Externally' button has been selected.

Existing para ref	Current guidance	New para ref	Proposed new guidance	Rationale for change
2.45	Issues that have been forwarded to the MOD by the SSRO will be indicated in the last column of the issues list on the Report Home Page with a tick (see Exhibit 5). The contractor is still able to raise comments against these issues after they have been forwarded to the MOD.			Paragraph deleted
		2.49	To reject a draft response, approved users will need to click the red cross button to the right-hand side of the draft comment in the Comment Log. A new window will appear, and the user will need to click the 'Reject Response' button. Rejected comments will remain visible to contractor users in the Comment Log but will not be visible to the MOD or the SSRO. Up to the point of approval, comments can be edited by Editor Administrator or Submitter users, using the 'edit' button.	Guidance on how to reject and edit responses which have been drafted.
			Exhibit 10 – Approving draft responses	New screenshots to provide clarity on action to be taken
			Exhibit 11 – Notifying approver button	
		2.50	Issues that have been forwarded by the SSRO to the MOD, in accordance with its compliance methodology, will be indicated in the 'Has been forwarded to the MOD?' column of the issues list on the Report Home page with a tick (see Exhibit 5). The contractor is still able to create correction reports and raise comments against these issues after they have been forwarded to the MOD.	Indicates how DefCARS records when the SSRO has forwarded an issue to the MOD and clarifies that the contractor is still able to deal with the issues in DefCARS after the issues have been forwarded to the MOD.

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Existing para ref	Current guidance	New para ref	Proposed new guidance	Rationale for change
			Exhibit 12 – Contractor permissions relating to compliance activities	New table setting out permissions relating to compliance activities
		2.51	Changes to report status The MOD and the SSRO can set the status of the report independently to reflect the overall stage the report is at in their respective review processes. Once a report has been submitted there are three different stages in the review process that will be shown by the status boxes on the Report Home page.	Explains the different status tags that a report can have in DefCARS.
		2.52	On submission of a report, the status will change from 'Draft' to 'Under review by SSRO' and 'Under review by MOD'. If issues are raised by the SSRO or the MOD, the status will change to 'Issues identified by the SSRO' or 'Issues identified by the MOD' respectively. When the MOD/SSRO is satisfied that an issue it has raised has been fully addressed, it will mark respective issues as resolved. Resolved issues will move from 'Current Open Issues' on the Report Home page to 'Current Resolved Issues'.	
		2.53	When there are no issues to be addressed in a report (either because the issues raised in a report have been addressed, or because there are no issues to raise on the report) the SSRO and MOD can set their own status of the report to 'No Current Issues identified by the SSRO' or 'MOD verification complete' respectively. The current status of a report will be visible on the Report Home page.	

Existing para ref	Current guidance	New para ref	Proposed new guidance	Rationale for change
2.46	If the contractor chooses to alter information originally submitted in the report or to add further supporting information a correction report (see paragraphs 2.32 and 2.33) will need to be submitted.			Paragraph deleted as not required.
2.47	All active issues in a report will subsequently be carried forward in all future correction reports. Any new issues raised in subsequent correction reports will not be retrospectively applied and therefore will not be visible in earlier reports.			Paragraph deleted as covered in paragraph 2.37.
2.48	Once all issues in a report have been resolved, the SSRO and MOD can set their own status of the report to 'No Further Issues' or 'MOD verification complete' respectively. If no issues are raised in the report the status can still be set to 'No Further Issues' or 'MOD verification complete' in the same way. The current status of a report will be visible on the Report Home page and any status changes to a report will be communicated to all parties via an automatic email notification.			Paragraph deleted as covered in paragraphs 2.54 – 2.56.

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Existing para ref	Current guidance	New para ref	Proposed new guidance	Rationale for change
		2.54	<p>Email notifications</p> <p>DefCARS will communicate changes to the status of a report to all parties associated with a contract via an automatic email notification. Where issues have been raised in a report by either the MOD or the SSRO, an automatic email notification will be sent out entitled 'Feedback Available'. The feedback will not be listed in the email. To access and respond to the feedback the user must login to DefCARS and open the specified report. The email will detail:</p> <ul style="list-style-type: none"> a) which organisation has completed its review; b) the contract name; c) the type of report; d) the submission number which the feedback relates to. If feedback was provided on the first correction report of submission 1, the email would detail the submission number as 'S1C1'; and e) the date and time the review was completed. 	Explains the email notifications which are sent by DefCARS.
		2.55	<p>Where the MOD sets its status to 'MOD Verification Complete', DefCARS will automatically generate a 'MOD Report Status Change' email. The email will detail (a) – (e) as above and the status 'MOD Verification Complete'. Where the SSRO sets its status to 'No Current Issues Identified by SSRO', an 'SSRO Status Change' email will be automatically generated. The email will detail (a) – (e) as above and the status: 'No current issues on report'.</p>	

Existing para ref	Current guidance	New para ref	Proposed new guidance	Rationale for change
		2.56	Where issues have remained open for over 30 days since initial release, DefCARS will send automated email notifications to all parties associated with the contract as a reminder to review any open issues and/or responses to issues and to action these accordingly. This email notification will continue to be sent every 30 days until the issue is resolved.	