SSRO

Single Source
Regulations Office

Consultation on DefCARS enabling change proposals

January 2023

Contents

1. Introduction

1.1 The Single Source Regulations Office (SSRO) is an executive non-departmental public body, sponsored by the Ministry of Defence (MOD). We were established by the Defence Reform Act 2014 (the Act), which also created a regulatory framework for single source defence contracts, placing controls on the pricing of qualifying contracts and requiring greater transparency on the part of defence contractors.

1.2 We carry out a range of statutory functions in support of the regulatory framework. When exercising our functions, we aim to ensure that good value for money is obtained in government expenditure on qualifying defence contracts, and that persons who are parties to qualifying defence contracts are paid a fair and reasonable price under those contracts.

1.3 We are consulting on the 'enabling changes' that we propose to implement to the Defence Contract Analysis and Reporting System (DefCARS), to better enable the system to be adapted as changes are made to reporting requirements including as a result of the MOD's Review of Legislation. In doing so, we have prioritised work which we consider will be needed to support changes to the Act and Single Source Contract Regulations (the Regulations), which we anticipate will be made by the MOD during the next two financial years.

1.4 The enabling changes being consulted on were described in the **DefCARS Future Technology Strategy** (technology strategy) published in October 2021 and cover:

a. data upload capability;

b. access to historic reports and corrections to reported data;

c. data validation and compliance; and

d. user feedback.

1.5 Data capture is central to the user experience. We wish to receive input from stakeholders before implementing any programme of change to ensure that user requirements are well understood. We will manage any changes implemented in order to achieve value for money.

2. SSRO Data Strategy

2.1 In July 2019, we published a **data strategy** for information provided in statutory reports under the Act. The strategy set out the following vision:

"*The data submitted by contractors in statutory reports is fully utilised in procurement decisions, contract management and the development of the regulatory framework to deliver value for money and fair and reasonable prices*".

2.2 The strategy confirmed that DefCARS would continue to be our primary tool for collecting, storing, managing and providing secure access to the information submitted in reports. It also said that the SSRO would work closely with stakeholders to further develop the system to obtain relevant and high-quality data, minimising any burden for industry while supporting analysis and reporting.

3. DefCARS Future Technology Strategy

3.1 This strategy set out a roadmap for the development of the technology that underpins DefCARS. It explained how we would seek to develop system capabilities to support the regulatory framework for single source defence contracts, meeting stakeholder needs and addressing the strategic objectives set out in our corporate plan and data strategy.

3.2 The technology strategy explained that development of DefCARS would need to be undertaken over a period of years and it set out a number of change priorities:

- ***Priority 1*** *- Safely and securely move the hosting of DefCARS to the public cloud. We consider this is a necessary first step before we can embark on delivering other priority changes.* **[Completed in July 2022 when DefCARS was successfully migrated to the public cloud]**
- ***Priority 2*** *- Improving the analytical capability of DefCARS. We need to improve the technology first before we can provide MI to improve data utilisation and compliance.*
- ***Priority 3*** *- Improvements to data upload including upload templates. We consider that this is the biggest improvement we can make to continuing to reduce the cost of reporting and help improve 'right first time'.*
- ***Priority 4*** *- Improvements to the data entry user interface. The solution will provide the capability to continuously improve the DefCARS service as a whole (including the graphical user interface (GUI)) using an agile, DevOps approach and external partners to deliver changes to the GUI. Timing of major changes will depend on the SSRO's corporate plan priorities, but we should have the capacity to continue with minor changes as part of business as usual.*
- ***Priority 5*** *- All other changes not initiated under the first four priorities.*

3.3 In line with change priority 2, we have established an improved analytical capability for DefCARS. We will also be focussing on enabling users within the MOD to make greater use of the data held in DefCARS and we intend to develop Management Information (MI) products for MOD users.

3.4 This consultation primarily covers the work we intend to perform in 2023/24 and 2024/25 to deliver change priority 3, improvements in the upload capability of the system. This work will also support our aim, as set out in the technology strategy, for it to be simple and cost effective to make the required changes to DefCARS that result from updates to reporting requirements. These improvements may also facilitate incidental changes identified under change priority 4 of the technology strategy.

4. Review of Legislation

4.1 In April 2022, the MOD published its **Defence and Security Industrial Strategy: reform of the Single Source Contract Regulations** identifying headline proposals for intended changes to the Act and the Regulations. The proposals relating to contractor reporting requirements are the most relevant to this consultation as both DefCARS and the SSRO's reporting guidance will need to be amended to align with these changes.

4.2 The changes to the Act are being facilitated by Schedule 10 of the Procurement Bill (the Bill). The MOD expects to receive Royal Assent for the Bill in 2023 and is planning to implement changes to the Regulations in two tranches, with the commencement of the first tranche coinciding with implementation of Schedule 10 in Autumn 2023 and the second tranche commencing in Spring 2024.

4.3 We aim to develop and implement some of the enabling changes set out in this consultation in advance of the two tranches of legislative change explained above. Any further enabling work subsequently required in response to legislative changes will be dependent on available development budget and may be aligned to commencement dates. If necessary, we may implement interim data capture solutions within the system. This will allow contractors to meet their regulatory reporting requirements until the necessary changes to DefCARS can be completed. Implementation considerations are covered as part of this consultation document. We will continue to keep stakeholders aware of the impact that any changes in the MOD's legislative timetable may have on our plans via the Operational Working Group and Reporting and IT sub-group.

5. Proposed enabling changes in DefCARS

5.1 In this section we have set out proposals relating to planned enabling changes. For each enabling change we set out the background to why this change is necessary, the proposed change and how we would go about implementing the change. There are consultation questions associated with each enabling change.

Data upload

Background

5.2 The technology strategy set out the SSRO's intent in relation to the provision of a data upload capability.

> *We will make it easier for contractors to submit reports in DefCARS. Industry users have expressed strong support for the introduction of upload templates. Some already create their own templates which they complete and then type or copy and paste values from these into the DefCARS web-forms. We see merit in building templates that can be completed locally and then uploaded into DefCARS. This can save time in submitting reports and provide another way to prepare reports before a contract has been signed, although we want to retain the current ability for contractors with potential QDCs/QSCs to register and draft reports in the system. We will continue to explore templates as a way to improve upload. Our work on templates will include looking at whether we can design the data in a way that could support more automated transfer in the future if that becomes a priority*.
>
> *The SSRO needs to be able to adapt DefCARS in an agile way to changes in requirements driven by legislation, guidance or the MOD's need for management information. We want to ensure that contractors can meet their reporting obligations and DefCARS can deliver relevant information to the MOD for decision making. We aim to establish DefCARS in a way that the data capture and storage structure can all be changed simply and cost effectively.*

5.3 Contractor feedback during the development of the technology strategy confirmed that, while there was a familiarity with how the system operated, there was support for the SSRO moving to a consolidated upload template where much or all of the required data could be input into the system in this way. Contractors indicated that a data upload capability within DefCARS would reduce the preparation time for reports and we would be interested in receiving feedback from contractors on whether the proposals set out in the consultation would reduce the preparation and submission time for reports.

5.4 The original version of DefCARS (DefCARS 1) was established in 2015 and was based on Excel spreadsheets that were uploaded by contractors to a secure server which limited access as well as the facility to review submissions. In 2017 the system was updated to a web-based GUI, with contractors manually entering data into a pre-established structure by completing a series of data fields or tables for the most part, or by attaching 'non-standard' reports.

5.5 There are two features of the current system which reduce manual data entry:

a. auto-population of data fields based on previous submissions or master data maintained by Administration Users; and

b. copy and paste capability where contractors use an Excel template to populate large amounts of data in shorter time than if it were manually entered.

5.6 Appendix 1 shows some examples of these two current features of the system.

5.7 Many users value the auto-population feature because it allows data from previous reports to be automatically included in subsequent reports. Without this functionality, the time required to prepare reports would increase. Despite its usefulness, the auto-population feature has limitations when considering the number of pages that can benefit from this functionality.

5.8 Auto-population is not something that can currently be adapted to users' own needs – for example, some users may wish for a page to be auto-populated, but others who need to change the data may not. Auto-population also relies on users to perform actions in a set order which, if deviated from, can cause difficulties or confusion. For example, the current rules defined in the system bring forward data from the last report of the same type for Interim Contract Report (ICR) submissions, even where there may have been a more recent Quarterly Contract Report (QCR) submission.

5.9 Making the auto-population functionality more flexible will increase its complexity and potentially introduce new points of failure, particularly as reporting requirements change over time. As such, an alternative approach is required.

5.10 Many users are familiar with the current data capture methods but have expressed support for an upload capability and we consider that moving to an upload capability will improve the ability of DefCARS to adapt to changes in reporting requirements. Currently, when data is loaded into the database, it must be converted from its raw form as captured in the GUI. It can be costly to continue to build this conversion process and adapt the web-based GUI data entry pages as requirements change, particularly as previous GUI pages need to continue to be retained.

5.11 DefCARS should be a flexible system that can easily adapt to changes to legislative reporting requirements and the SSRO's reporting guidance, and in which changes can quickly be implemented without affecting the user experience. A data upload feature will give us the necessary flexibility to manage future changes to DefCARS while minimising disruption for users.

5.12 We have considered other regulatory regimes where there is a need to submit data, such as the Cost Assessment Data Enterprise (**CADE**) in the US, and found that organisations have successfully transitioned to using data upload as the mechanism by which reporting requirements are met.

Proposed approach

5.13 We are proposing to introduce a data upload capability in DefCARS in areas where we consider this method of providing data will be simpler and more efficient than using manual entry in the GUI.

5.14 We have taken account of lessons learned from the approaches for data input we have used in the past. We have ruled out returning to the DefCARS 1 upload approach due to the difficulties stakeholders experienced in doing so. Instead, an upload template using a 'flat file' approach for the data is proposed. A 'flat file' in this context is a collection of records in which the data follows a uniform format and follows rules on value types where applicable. The data is flat because every line only holds one data input, depending on the categorisation of the columns.

5.15 Appendix 2 shows an example of how data would be captured in a flat file format. The file would be uploaded to DefCARS rather than the data being manually input and presented in the GUI as is the current approach. The upload file would remain available to download.

5.16 We propose that the following would apply in developing our approach:

- We will issue standard templates in Excel to be used in a flat file format, rather than allowing contractors to upload data in their own format;
- There will be one way of uploading each data item. Data entry for each different reporting requirement will be specified by the SSRO as either data upload in a standard template, or manual data entry to the GUI, but not both;
- DefCARS will still retain the capability to accept upload of files (as attachments) needed for the non-standard reports[1];
- The upload file format will be a series of columns of headings and rows of data, meaning the data can be easily appended to database tables; and
- Guidance will be provided on how to complete the standard templates.

5.17 Implementing a flat file structure will make it easier for contractors to extract and include data from their own systems or other sources in reports. It is challenging to present multi-dimensional data in a tabular, pivoted structure. Users have told us that they currently create much of the data they report on in Excel and then manually enter it into the GUI. With the flat file approach, contractors will be able to report contract-specific information in more detail, if necessary.

5.18 Data upload in this way will additionally result in the removal of the current copy and paste functionality in specific pages, replacing it with the improved report preparation process. If using an upload template, contractors will be able to copy data from a previously submitted template or from other data sources into a new upload template, again reducing the amount of manual entry required to complete a report.

5.19 The implementation of data upload in a flat file format will also reduce the need for pop-up notifications in the system. System performance would improve because the data in upload templates would no longer need to be manually typed into the GUI in pop-up boxes, improving the responsiveness of the system for users. Furthermore, data upload has better compatibility with modern cloud security applications, which can view large bodies of data uploaded manually or copied and pasted into a form.

1 These are reports where the data structure is unique to the individual report to allow the MOD greater flexibility in terms of the information which is reported. The Contract Costs Statement is an example of a non-standard report.

5.20 Where there are changes to legislation or reporting guidance, it will be easier to adapt the flat file template rather than making costly and complex changes to the GUI and to the conversion process that loads data into the database.

5.21 While the data upload proposals outlined in this document will not immediately affect the submission of non-standard reports, it may be possible to standardise some elements of these reports in the future and provide them in a flat file structure.

Implementation approach

5.22 The SSRO plans to implement data upload on a prioritised set of pages initially, and then introduce this capability gradually across all standard reports to give users time to become familiar with this method of data capture. We will specify the flat file structure required and provide guidance on how to complete the template to ensure it passes data validation. Our goal is to have a single upload template for non-GUI elements of a report, but we will start by building the upload capability on a page-by-page basis. Individual report templates will need to be different because the reporting requirements for each report are not the same.

5.23 We consider the priority areas for introducing this functionality should be those where we know more efficient reporting would be welcomed, before any legislative reporting change. We will then focus on the reporting requirements where existing data entry will need to be changed due to new or amended reporting requirements being introduced by the MOD. We will be able to provide further clarity on which existing data entry pages will be affected when we consult on the specific reporting guidance and DefCARS changes which are needed to support legislative changes.

5.24 Subject to stakeholder views expressed during this consultation, we consider that it would be sensible to begin to implement this capability on a single existing page in DefCARS to ensure that any issues relating to data upload using a flat file format can be easily identified and addressed. We intend to test our preferred approach to data upload in early 2023/24 to ensure its efficiency and effectiveness before rolling it out more widely within the system.

5.25 We are considering the upload of cost information by contractors' own reporting structure in the QCR as a way to test data upload. This page within the QCR is one with large volumes of data and we would gather feedback from the number of contractors who are subject to this reporting requirement. If there are significant issues identified during testing that require us to reconsider our approach, we will inform stakeholders.

5.26 We plan to make data upload templates available to contractors within DefCARS or on our website, and the template itself will contain guidance on how to complete it.

5.27 The upload templates will form part of the SSRO's statutory reporting guidance, which is updated periodically. Where upload templates are replaced or revised, contractors will need to use the correct version (the most recently published) at the time of submission. Contractors choosing to save templates locally before uploading to DefCARS will need to take care to verify they are using the correct template before attempting to upload the data to the system to avoid file rejection.

5.28 We would like to hear from stakeholders about whether they support the SSRO transitioning to data capture in this way and whether they have any concerns about their ability to provide data using this approach.

Consultation question 1: Do you support the SSRO's preferred approach for selected data to be uploaded to DefCARS using a data upload template and the remainder via the current GUI? If not, could you explain why?

Consultation question 2: Do you agree that the SSRO should roll out the introduction of file upload incrementally (page by page over time) rather than by making significant changes in one development phase? If not, could you explain why?

Consultation question 3: Do you agree that cost data using a contractor's reporting structure in QCR submissions would be a good candidate to test upload capability? If not, could you explain why?

Consultation question 4: What training and/or other support do you think the SSRO would need to provide to enable flat file data upload to proceed most effectively?

Consultation question 5: Do you agree that the upload functionality proposed in this consultation document would reduce the preparation and submission time for reports? If not, could you explain why?

Historic report access and report corrections

Background

5.29 The technology strategy sets out the SSRO's intent in relation to access to historic reports.

We will look for opportunities to keep the system design simple, for example while we will continue to give users access to previously submitted reports, in future older reports may be available as downloads, rather than viewable in the data entry user interface.

5.30 DefCARS retains copies of all reports which have been submitted and there are two ways to access this information. Data can be viewed in the GUI directly or the report can be downloaded from the GUI, after submission, into Excel. Submissions made in DefCARS 1 were transferred to the web-enabled system in 2017. This data is visible both in the GUI, as well as the original Excel submission being stored in the system available for download.

5.31 There are multiple versions of a page if it has evolved over time, which creates complexity. Data submitted in a GUI page format which has since been updated is still viewed in the version of the GUI in which it was submitted. An example of this is the Reporting Plan page where the 'Yes/No' option was added for the reporting of QCR submissions, a separate 'Yes/No' option for ICR was subsequently added and the structure of the page was then also improved to capture data on on-demand reports. This creates complexity because the data must be presented in different ways depending on the timing of the original submission.

5.32 As well as being able to view the data, contractors are separately able to correct data within the GUI either because they have identified an error themselves, or in response to a compliance issue that has been raised by the MOD or the SSRO. The user can create a correction report which is auto-populated with the data from the original submission, including any attachments, amend the data and resubmit the report. DefCARS recognises this as a separate submission and records it accordingly in order to maintain an audit trail. Some correction reports are submitted following the amendment of a single data item in a report, others correct multiple data items and there are also instances where there can be multiple corrections of the same report type. This results in many copies of an almost identical data set, including duplicate file attachments, being stored in the database.

Proposed approach

5.33 We intend to retain access to historic reports but propose to change the way in which historic information is accessed. We wish to reduce the number of GUI versions held as existing pages. We intend to generally only have the latest version of a page retained in the GUI and remove the ability to view data submitted in previous versions after a period of time, with this data being accessible via Excel download instead.

5.34 We propose that users will be able to view and download data in the following ways:

- In the GUI contractors will:
  - » View data entered in the current format of the page.
  - » Access historic data in Excel downloads.
- In Excel report downloads contractors will see:
  - » The whole report as an Excel download in the existing format for data entered prior to upload capability being available.
  - » Partial report downloads in the existing format for sections of the report that have been entered via the GUI.
  - » For data that entered via the upload template, the totality of this data can be downloaded into the same spreadsheet template format as used in the upload.

5.35 Increasing the use of upload templates will require an alternative method to correct data. We propose the following:

- Only data submitted in the GUI would be visible and be able to be corrected in that format and only if it is the latest GUI format of the page. Correcting data in the GUI would be performed as per today.
- Correcting data which is submitted in an upload template will require a new upload of the template.

5.36 For MOD users, the SSRO intends to develop MI reports from DefCARS which will allow them to view contractor submitted data in a more engaging format. The Excel downloads available to contractors would also be available to MOD users.

5.37 Whilst the current way of correcting data in the GUI will be retained, there will need to be a point where the previous version of the GUI is retired. It will then not be possible to correct data in the version which has been retired.

5.38 For data submitted in an upload template, we propose that the contractor would download the submitted template, make the required correction(s) and re-upload the template. The contractor would not need to specify the data in the template they had corrected. The corrected data would be transferred into the database and held alongside the original data.

5.39 Before finalising an approach to corrections we would like to get views from stakeholders on what aspects of corrections they believe are important to be retained. For example, we are keen to understand to what extent the MOD requires contractors to correct data in historic reports as well as more recent submissions. The value of correcting historic data needs to be clear for the SSRO to ensure this capability is retained.

5.40 We consider that if a report is being submitted late, the time available to correct that report should be limited to a reasonable time period and, in any case, should be no longer than one year from the report due date. We are particularly interested in views the MOD may have views on this approach by reference to Regulation 49, which sets out the time limits for issuing a compliance notice.

Implementation approach

5.41 We intend to make the GUI changes proposed in phases, as data upload templates are introduced. Where a GUI page is replaced by data upload capability, data entered would only be available in an Excel download. Where data entry is being retained in the GUI we would remove previous versions of the GUI on a page by page basis over time.

5.42 The ability to make corrections in the GUI would no longer be available for pages replaced by data upload templates. Subject to consultation responses, we intend to implement a cut-off for making corrections to retained GUI pages, retired GUI pages and upload data templates.

Consultation question 6: Do you support the SSRO's preferred approach for the availability of data in historic reports to be limited only to an Excel download? If not, could you explain why?

Consultation question 7: Do you agree that a correction functionality should only be available for a limited period of time? If not, could you explain why?

Data validation and compliance

Background

5.43 DefCARS currently performs validation checks[2] on data prior to submission to help improve the quality of the contractor's report submission with the aim of supporting contractors to submit reports right first time. Red validation errors prevent the contractor from submitting a report if they are not addressed prior to submission and therefore must be corrected. There are a small number of red validation errors in DefCARS. Amber validation warnings should be reviewed by the contractor but, if not addressed, will not prevent submission. The SSRO or the MOD are likely to raise compliance issues on the aspects of the report for which those amber validation warnings remain outstanding. These messages do not appear in a pop-up but via an inline[3] message. The SSRO's current approach to raising compliance issues is to only do so where there are data validations within a contract report. The SSRO publishes information on all the **validation checks** in DefCARS and its **compliance methodology** on its website, as well as a **compliance report** on an annual basis.

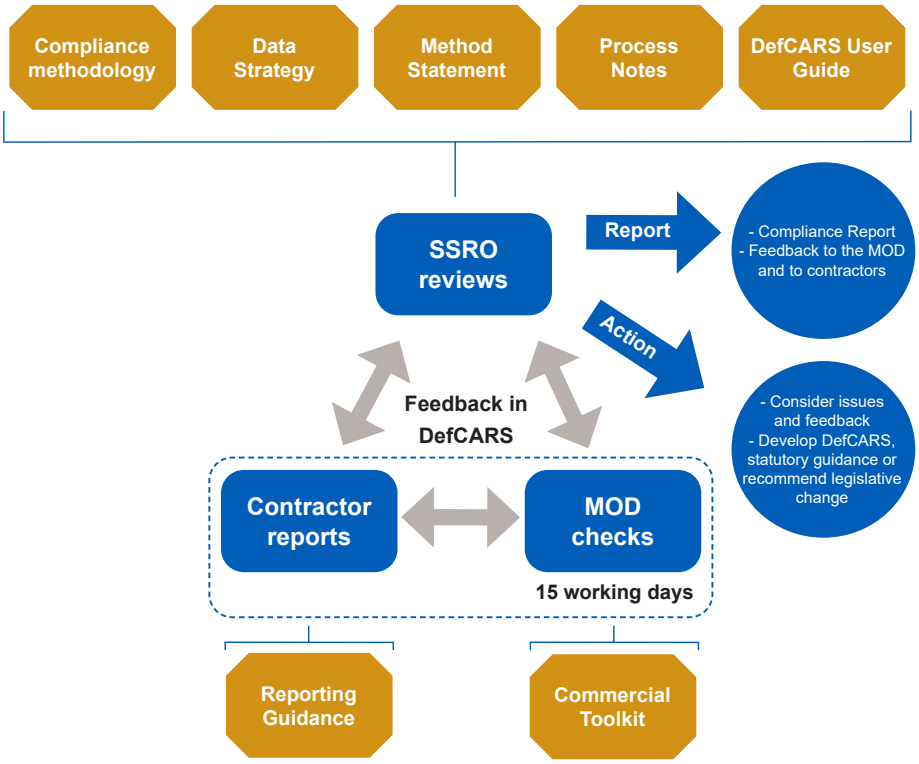
5.44 We consider whether reports are right first time, whether subsequent submissions are correct, and the number and type of issues raised on each report. The SSRO and MOD may raise an issue directly within the system on an individual report submission with a contractor and this helps to inform the SSRO's understanding of the extent to which reporting requirements are being met. Issues are directed to individual fields within individual submissions and an audit trail is maintained of when an issue was raised, whether it is linked to a validation warning, what action is needed to resolve the matter, and when the matter was resolved is logged as well. The SSRO or MOD will generally raise an issue with a contractor if it appears that a report appears to be incomplete, inconsistent, erroneous or lacking in detail, having regard to the reporting requirements. This approach provides a broad assessment of the quality of submissions.

5.45 Figure 1 summarises the current compliance review process (in respect of which the SSRO has recently consulted on changes) and demonstrates how the SSRO, MOD and contractors all have a role to play. DefCARS currently facilitates this process so that an audit trail of all actions is retained in one place.

2 The system has been developed to carry out a range of automatic validation checks at the point of report submission, automatically highlighting completeness and consistency issues within submissions.

3 An 'inline' message automatically appears on the screen highlighting an action to be taken or a warning to be considered, without the need for 'pop-up'.

Figure 1 – Compliance review process



Proposed approach

5.46 The proposed approach to data validation and compliance includes:

- Where data is provided in the GUI, existing validations which relate to those data fields will continue to apply.
- The SSRO would follow Government guidance for digital services on the use of **error messages** and **data validation** in its design.
- Where data is provided via a file upload:
  - » a data upload template would be validated by DefCARS upon upload and either accepted or rejected by the database;
  - » where validation fails, contractors would be provided with an error message explaining the validation errors to be corrected or reviewed by the contractor prior to submission;
  - » we will ensure that validation messages meet best practice. We expect that the validation messages are likely to be very similar to those currently in use today; and
  - » validation will include checks against data completeness and also format.
- The existing approach to viewing and responding to compliance issues within DefCARS will be retained.

5.47 As we introduce more data upload capability within DefCARS, the approach to validation of data submitted via upload may evolve but will continue to support the current principle of facilitating data being submitted right first time.

5.48 The SSRO is not planning to build data validation directly into the upload templates. This requires macros to be included within the file which can make upload difficult, be time consuming and may introduce file inaccessibility in some secure environments. We propose that data upload template would be validated by DefCARS upon upload and either be accepted or rejected. If necessary, the contractor would then be able to make changes to the report prior to uploading again.

5.49 The SSRO does not expect major changes to the compliance functionality within DefCARS as a result of the changes set out in this consultation. DefCARS will continue to notify users of relevant compliance activity and contractors will remain responsible for ensuring that the data is accurate and submitted in a timely manner.

5.50 Both MOD and the SSRO will still be able to raise compliance issues in DefCARS, and contractors will be able to respond to these. Compliance activity will still require users raising issues to 'tag' an issue to a particular piece of data. At the moment, in DefCARS, compliance issues can be tagged to individual data fields that are relevant to that page. This will work in exactly the same way in the future for data entered via the GUI. Where data is uploaded we currently anticipate that the only difference will be that a user raising an issue will need to tag a worksheet within the data upload template, and then a data field within that worksheet. It may be helpful to indicate an exact cell reference in some circumstances.

Implementation approach

5.51 As data upload templates are introduced a new mechanism for data validation and raising compliance issues against that data will be implemented simultaneously. The SSRO would amend the validation information it publishes if new validations are included or existing validations are removed or replaced.

Consultation question 8: Do you have any views about the approach to data validation?

Consultation question 9: Do you have any comments on the approach to raising compliance issues against data in upload templates?

User feedback

Background

5.52 The SSRO currently captures feedback from stakeholders in a number of ways. The SSRO's helpdesk receives queries from the MOD and contractors on a daily basis. We also undertake a stakeholder satisfaction survey every two years which enables us to measure some of our performance across our functions and we receive ad hoc feedback in the multiple engagements we have with stakeholders at other times.

Proposed approach

5.53 The SSRO would like to obtain data on an on-going basis about users' experience of the reporting regime, the SSRO's guidance and DefCARS to facilitate continuous improvements. As part of implementing the other enabling changes explained in this consultation, we will also look at the best mechanism for capturing regular user feedback. Examples of the type of feedback we might ask for include the performance of DefCARS; the cost of preparing and submitting reports (as explained in the technology strategy); reporting requirements which warrant guidance development; and on the reporting guidance itself. We also intend to gather feedback from the MOD on data utilisation.

5.54 To place the minimum burden on users, where possible, this feedback mechanism will be built within DefCARS. The feedback captured would allow the SSRO to measure our performance in real time rather than at infrequent intervals.

Implementation approach

5.55 Approaches to implementation being considered include gathering feedback:

- at the end of a DefCARS session as a user logs out;
- following the submission of a report;
- when responding to issues raised on a report; and
- while the user is using the system.

5.56 The SSRO would also consider and manage the number of times users were asked for feedback to ensure this is appropriate and proportionate.

5.57 The SSRO plans to begin to implement this proposal ahead of any changes it makes to the system in response to changes to the legislation.

Consultation question 10: Do you have views on the mechanism by which and the frequency at which to seek feedback from users?

6. Future consultations

6.1 The expected changes to reporting requirements arising from the programme of legislative reform will mean that the data, and format of data, which contractors need to provide will change in some areas. The SSRO will be consulting on what these changes mean for its reporting guidance and DefCARS ahead of expected implementation dates. In these consultations we will explain any changes to how contractors need to meet their reporting obligations, based on our understanding of the proposed amendments to the current reporting requirements. Once consultations have concluded and input has been considered we will finalise the format of the data upload templates and associated guidance.

6.2 In cases where there are constraints on the development time needed to fully implement DefCARS changes, we will need to develop interim data capture solutions before a more permanent development can be implemented. We expect there to be a period during which contractors attach the data required for some pages in a report, including the upload capability for that page, before the changes needed in response to legislative change can be developed.

7. Consultation questions

7.1 The SSRO has raised ten consultation questions within this document which we would welcome responses to. All questions have been included at Appendix 3 for ease. Stakeholders can also comment on any other aspect of this document in their response.

8. Conclusion

8.1 This consultation document has been issued to members of the SSRO's Operational Working Group and Reporting and IT sub-group. It will also be published on the SSRO's website. The consultation period for this set of proposals is 24 January 2023 to 21 March 2023. The SSRO will hold a consultation workshop where attendees can ask questions about the consultation and the proposals. This workshop will be held from 10.30am to 12.30pm on Monday 20 February for members of the SSRO's Operational Working Group and Reporting and IT sub-group. Stakeholders can confirm attendance at the workshop or ask questions about the consultation by emailing simon.mccullough@ssro.gov.uk or telephone 0203 771 4794.

8.2 When responding to the consultation, stakeholders are asked to indicate if they have any objections to the SSRO publishing their consultation response on the SSRO's website alongside its feedback on the changes which have been made following consultation.

8.3 Written feedback on the consultation proposals should be sent to consultations@ssro.gov.uk. There is no specified format for response.

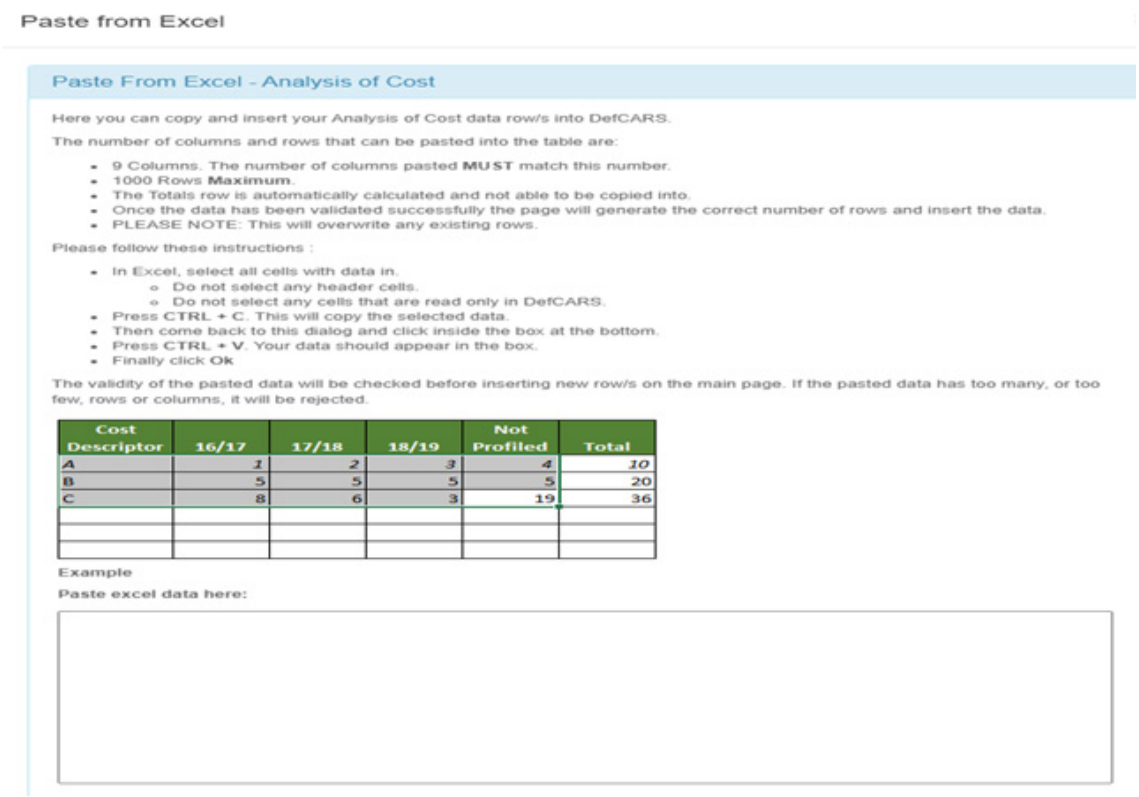
8.4 We expect to publish the outcome of the consultation in late May 2023.

Appendix 1 – Examples of data entry in the GUI

Figure 1 illustrates an example of how data is entered in a tabulated, pivoted format based on a contractor's own reporting structure in the "analysis of cost by supplier breakdown" page within a Quarterly Contract Report (QCR) in DefCARS. To complete this table structure, the contractor must manually add the individual cost categories and enter each cost figure, without the need to complete any pop-up screens. The data can also be entered using the copy and paste function, following a defined structure as shown in Figure 2.

Figure 1 - Manual entry of cost data in the analysis of cost by supplier breakdown page

Figure 2 - Copy and paste entry of cost data in the analysis of cost by supplier breakdown page



Appendix 2 – Example of how data would be captured in a flat file upload format

Figure 3 shows how the data in Figure 1 would be captured in a file upload format.

Figure 3 – Cost data from Figure 1 in file upload format

Cost Descriptor	Financial Year	Status	Amount (£m)
A	2022/23	Estimate	150
A	2023/24	Estimate	150
A	2024/25	Estimate	150
A	2025/26	Estimate	150
A	2026/27	Estimate	150
A	2027/28	Estimate	150
A	2028/29	Estimate	150
B	2022/23	Estimate	75
B	2023/24	Estimate	75
B	2024/25	Estimate	75
B	2025/26	Estimate	75
B	2026/27	Estimate	75
B	2027/28	Estimate	75
B	2028/29	Estimate	75

Appendix 3 – Consultation questions

Consultation question 1: Do you support the SSRO's preferred approach for selected data to be uploaded to DefCARS using a data upload template and the remainder via the current GUI? If not, could you explain why?

Consultation question 2: Do you agree that the SSRO should roll out the introduction of file upload incrementally (page by page over time) rather than by making significant changes in one development phase? If not, could you explain why?

Consultation question 3: Do you agree that cost data using a contractor's reporting structure in QCR submissions would be a good candidate to test upload capability? If not, could you explain why?

Consultation question 4: What training and/or other support do you think the SSRO would need to provide to enable flat file data upload to proceed most effectively?

Consultation question 5: Do you agree that the upload functionality proposed in this consultation document would reduce the preparation and submission time for reports? If not, could you explain why?

Consultation question 6: Do you support the SSRO's preferred approach for the availability of data in historic reports to be limited only to an Excel download? If not, could you explain why?

Consultation question 7: Do you agree that a correction functionality should only be available for a limited period of time? If not, could you explain why?

Consultation question 8: Do you have any views about the approach to data validation?

Consultation question 9: Do you have any comments on the approach to raising compliance issues against data in upload templates?

Consultation question 10: Do you have views on the mechanism by which and the frequency at which to seek feedback from users?