

COHERENCE AS CONTROL

A Procurement Leadership Playbook

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**One year into the Procurement Act
2023: the leadership playbook for
reducing challenge risk without
adding bureaucracy**

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Executive Summary

The Procurement Act 2023 (PA23) came into force on 24 February 2025 and introduced a new transparency rhythm supported by an enhanced Find a Tender service as the Central Digital Platform. ^{[1][2][3]} A year into the regime, many organisations have focused on mechanics: new notices, new terminology, revised templates, and retraining panels. Those changes are necessary. But, are they sufficient? We think not. Our approach has been to materially shift behaviour:

public procurement is increasingly judged not only by whether the process was followed, but whether the decision-making is coherent, consistent, and evidence-led throughout.

In our experience coherence reduces challenge exposure by preventing contradictions before publication creates an external clock. It is a practical quality discipline that improves explainability under scrutiny, without slowing delivery.

A practical example is standstill. Under PA23, publication of a Contract Award Notice triggers standstill where applicable, rather than the previous outcome letters. ^[4] The Act also sets conditions for standstill, including a minimum of eight working days beginning with the day the award notice is published. ^[5] This places a premium on earlier readiness: evaluation rationales, moderation outcomes, governance decisions, notices, and supplier communications must align sooner.

This paper sets out Lumensol's operating model: **treat coherence as a control.** Coherence means requirements, criteria, scoring, written rationales, approvals, notices and supplier communications must all line up. Most avoidable disputes, rework and challenge exposure arise from internal contradictions and uneven standards, not dramatic rule breaches.

Lumensol utilise the Coherence Loop: three short checks embedded in live procurements (design, evaluation, communications), supported by a real-time rationale and learning log. The outcome is a stronger audit trail without adding bureaucracy: fewer late rewrites, fewer escalations, clearer feedback, faster governance, and a more defensible record when scrutiny arrives.

If you lead an organisation buying services, works or goods at scale, PA23 year one is the moment to shift from compliance to confidence. Confidence is what lets you move at pace while being able to explain decisions clearly, consistently, and fairly. This paper describes how Lumensol achieve this with minimal additional processes.

The Coherence Loop

Three lightweight checks with high leverage





1 | Why this matters to Chief Executives, S151s and Monitoring Officers

Procurement is where strategic delivery meets legal risk, reputational risk, financial stewardship and service outcomes. In year one of PA23, senior leadership teams have typically seen two competing dynamics: an urgent need to deliver at pace in difficult markets, and a rising expectation that decisions can be explained clearly and evidenced consistently through the audit trail and published transparency outputs. ^{[1][2]}

The scale of the stakes is not abstract. The House of Commons Library reports gross spending on public sector procurement of £434 billion in 2024/25 across the UK. ^[8] At that scale, even small improvements in decision quality, rework reduction and dispute avoidance translate into material savings of officer time, reduced legal spend, faster mobilisation and improved market confidence.

Meanwhile, the opportunity side of PA23, improved access and competition, remains live. SMEs account for 99.9% of the UK business population, yet direct public sector procurement spend with SMEs has remained at around 20% in recent years. ^{[10][9]}

For leaders, this is both a strategic and a reputational question:

can the organisation demonstrate that its routes to market are accessible, proportionate and fair, whilst still achieving robust assurance?

When procurements wobble, it is rarely because someone forgot a step. It is usually because the record is vulnerable in one of five ways: (i) rationale is unclear or inconsistent; (ii) narrative does not match the score; (iii) bidders were not treated consistently; (iv) communications added reasons not supported by the evaluation record; or (v) governance decisions were made with incomplete or unclear evidence. These are not merely procurement issues; they are leadership issues that trigger delay, cost, scrutiny and internal friction.

The leadership goal is therefore simple: create a system where quality decisions are produced predictably. Not perfect decisions every time, but decisions that are coherent, explainable and defensible. That is what reduces the risk of challenge, and shortens delivery cycles because teams spend less time reworking documents late in the process.

The fix within Lumensol is not more governance – it is a repeatable quality discipline applied inside live procurements, before documents harden into published commitments.

2 | The year-one context: what PA23 changed that affects behaviour

Transparency is now operationally binding and time-critical

Procurement Act 2023 (PA23) legislated for a Central Digital Platform, and an enhanced Find a Tender Service was launched on the same date as that platform. ^[2] The practical implication is that transparency is no longer a postscript; it is part of the operating rhythm. More of the procurement lifecycle is now structured around what is published, when it is published, and how consistently it aligns with the underlying file.

Notice sequencing creates an external clock

For procurements starting in the PA23 regime, publication creates a hard external timeline. ^[3] When internal documentation is not coherent before publication, teams are forced into late reconciliations, often under pressure, at the point where the cost of change is highest. That is why PA23 year one feels different: the outside world sees more, earlier, and in a more structured way.

Standstill readiness arrives earlier

Under PA23, publication of the contract award notice triggers standstill where applicable. ^[4] Voluntary standstill is also provided for under the Act, with requirements including a minimum of eight working days beginning on the day the award notice is published. ^[5] This changes behaviour. Organisations can no longer rely on tidying up through letters at the end: the evaluation narrative, approvals and communications must align earlier to prevent avoidable exposure.

Oversight routes remain real

Suppliers have access to oversight mechanisms. The Procurement Review Unit describes how the Public Procurement Review Service (PPRS) investigates procurement processes in response to supplier complaints and publishes annual reports and case resolutions. ^[6] In the 2023/24 progress report, complaints received increased from 19 to 28 cases for central government and from 51 to 59 for the wider public sector compared to the previous year. ^[7] While these volumes are not necessarily high, they demonstrate that escalation routes are active and that defensible documentation is a practical safeguard.

The shift is from 'compliance' to 'explainability'

Most organisations can teach a team how to run a compliant process. The PA23 year one challenge is different:

can the organisation explain its decisions in a way that a supplier, an auditor, a senior decision-maker and an external reviewer all recognise as logical and fair?

Explainability depends on coherence. If your record is coherent, it becomes easier to explain. If it is incoherent, no amount of policy will rescue it at the end.



3 | The recurring problem: avoidable risk is usually incoherence

Across public bodies, the repeatable sources of procurement rework and challenge exposure tend to be familiar and operational rather than theoretical:

- » **Score–narrative mismatch:** the score suggests one level of quality, the written rationale reads like another.
- » **Uneven standards:** one bidder is held to a different standard of specificity, evidence or interpretation than another.
- » **Contradictions across documents:** evaluator notes, moderation outcomes, governance papers, notices and feedback do not align.
- » **Retrospective rationalisation:** reasons are added after moderation or after supplier queries, undermining credibility.
- » **Uncontrolled clarifications:** multiple responders and channels create subtle differences in interpretation and treatment.

These issues do not necessarily mean the outcome is wrong. But they may create the impression that the process was irrational or unfair. Under PA23, perception is risk because it triggers escalation, delay and organisational cost. The goal is not to build more process. It is to build a quality discipline that prevents incoherence at source.

For Lumensol's procurement leaders, our working assumption is this:

the single biggest controllable driver of challenge risk is not the complexity of the market, but the quality of your written record.

If the record reads as coherent and even-handed, the organisation is more likely to resolve supplier concerns quickly. If the record reads as contradictory, concerns escalate because suppliers assume there is something to find.

In procurement terms, this is coherence failure: when requirements, criteria, scoring and communications are not aligned, teams spend the last 10–15% of the timeline translating, reconciling and defending decisions instead of delivering outcomes.

25%

A BRE observational study across 27 construction sites identified 501 "quality related events"; around 25% were categorised as arising from "unclear or missing project information" (with a further 17% attributed to "lack of care")*

Source: <https://getitright.uk.com/live/files/reports/4-giri-literature-review-revision-3-599.pdf>





4 | Coherence as a control: the definition and the mechanism

Definition

A coherent procurement record is one where requirements, criteria, scoring, written rationales, moderation outcomes, governance decisions, notices and supplier communications align in meaning and evidence. Coherence creates both quality (the record reads as credible) and control (it prevents the repeated causes of rework and dispute).

Practical test: if you cannot trace a decision from requirement → criterion → score → rationale → comms without translation, coherence is weak.

Why coherence works

Coherence works because it targets the failure modes that are most common and most avoidable: contradiction, ambiguity and retrospective storytelling. It also improves delivery. When rationales are coherent, governance decisions move faster because senior stakeholders can understand the logic without repeated explanation. When communications match the record, supplier follow-ups reduce and standstill periods are less likely to be consumed by avoidable clarify-the-feedback requests.

The cost of dispute is material

Even where a formal legal challenge is not pursued, the organisational cost of disputes is material: officer time, delayed mobilisation, legal review cycles, and reputational risk. For higher-value claims, court fees can also be significant (*for example, one practitioner summary notes a court issue fee of £10,569 for claims valued at £200,000 or more*).^[11] This is before internal time, external advice, and the operational cost of delay. The leadership implication is straightforward: investing in coherence is often the most cost-effective form of risk prevention.

Coherence is compatible with innovation

Some teams fear that stronger documentation creates bureaucracy and slows innovation. In our experience, coherence supports innovation. When you are clear about outcomes, expectations and how you will evaluate, you can run outcome-based specifications, pilots, dynamic markets and partnership models with more confidence. Coherent does not mean rigid. It means explainable.

5 | The Coherence Loop: three lightweight checks with high leverage

Lumensol embed the Coherence Loop as a control into live procurements without slowing them down. It comprises three short checks that create focus on the points where incoherence is most likely to arise: before tender release, before evaluation finalisation, and before award communications or publication.

Check 1 - Design Coherence (pre-release)

Purpose: prevent incoherence being designed into the tender.

Leadership question: are we genuinely testing what we need to deliver?

- » Do questions test outcomes (mobilisation, governance, performance management), not only intent?
- » Are scoring anchors clear enough that two evaluators would interpret them similarly?
- » Are pass/fail requirements clearly separated from scored criteria (to avoid double punishment)?
- » Are evidence prompts built in (examples, constraints, timescales, proof points)?
- » Is the clarification route controlled and documented, including what will not be clarified?

Quick wins at this stage are usually small changes, but have big impact: adding a single evidence prompt, removing duplicated criteria that invite double-counting, and writing one sentence for what good looks like to achieve top scores.

When Lumensol want a fast maturity leap, this is where we start. A well-designed question set reduces downstream debate, makes scoring fairer, and reduces the temptation to add reasons later.

- ✔ **Do requirements map cleanly to evaluation criteria (no orphan requirements; no criteria without a requirement)?**
- ✔ **Are criteria measurable and evidence-based (not writing style or confidence)?**
- ✔ **Would a supplier understand “what good looks like” without interpretation?**

Check 2 - Evaluation Coherence (pre-final moderation)

Purpose: ensure the evaluation record will stand up under scrutiny.

Leadership question: would we be comfortable reading this rationale to the bidder?

Use the **Score–Narrative–Evidence Triangle**. For each criterion, confirm: (i) Score: what number did we give? (ii) Narrative: does the written rationale read like that number? (iii) Evidence: what in the bid supports the rationale?

If any side is missing, coherence is weak. The fix is normally to tighten the narrative, not to inflate or deflate the score.

Lumensol utilise a 90-second readability test: We pick one rationale at random and ask whether a neutral reader can understand why it scored X in 90 seconds. We ensure weaknesses are linked to requirements, not preferences; strengths are specific and evidenced. The objective is clarity, not volume.

Moderation discipline that prevents later rework: record why a score changed (not only that it changed); capture how disagreements were resolved and what evidence was relied upon; and avoid pattern critique (for example, repeating lack of detail across many questions regardless of what was asked), which reads as formulaic marking.

Leaders do not need to review every evaluation. But a senior spot-check of a small sample (for example, five rationales) is often enough to signal the standard expected and prevent drift.

- ✔ **Does each score have a rationale that matches the score level (no ‘excellent’ language with a middling score)?**
- ✔ **Is every claim backed by evidence from the bid (quote/page ref or clearly referenced attachment)?**
- ✔ **Default fix: rewrite rationale to match score; change the score only if the rationale cannot be made truthful and evidenced.**

Check 3 - Communication Coherence (pre-award publication and supplier comms)

Purpose: ensure what you publish and tell suppliers matches the evaluation record and governance decisions.

Leadership question: are we about to communicate anything we cannot evidence?

Because award notice publication triggers standstill, where applicable, under PA23, communications readiness must arrive earlier. ^{[4][5]}

Before publication or issue, we run five questions: (i) do assessment summaries reflect the moderated rationale (same meaning)? (ii) are highlighted weaknesses evidence-led and criterion-linked? (iii) have we avoided introducing new reasons not in the record? (iv) are clarifications and responses consistent and centrally logged? (v) is language precise (avoiding ambiguity that creates contractual confusion)?

Common traps: adding new weaknesses in feedback; overstating failures (did not versus did not sufficiently evidence); inconsistent phrasing across bidders; and uncontrolled use of conditional language that undermines clarity.

Lumensol's golden rule: if it is not in the evaluation record, do not invent it for communications. If the evaluation record is not clear enough to communicate, fix the record first.

- ✓ **Do award comms use the same story as the evaluation record (no new reasons, no fresh language)?**
- ✓ **Does feedback say “did not evidence” rather than implying “did not do” where delivery is unknown?**
- ✓ **Would an independent reviewer reach the same conclusion using only the published record?**





6 | The real-time rationale and learning log (a control, not admin)

Static policies are important, but they do not manage dynamic delivery. A lightweight, real-time rationale and learning log is one of the most effective controls we use because it captures key decisions while evidence is fresh and turns learning into action.

Lumensol's headings (one page, updated weekly):

- » Decision point (what was decided?)
- » Rationale (why?)
- » Evidence relied upon (where recorded?)
- » Coherence risk spotted? (score/narrative/comms/governance)
- » Fix + owner + deadline

The discipline is simple: if a decision is not captured, it cannot be improved. The log also creates a defensible narrative if challenged later: decisions were reasoned and recorded contemporaneously, not reconstructed after the event.

This also supports organisational learning. For example, if clarifications repeatedly focus on one question, that is a design signal. If moderation repeatedly rewrites a certain type of rationale, that is a capability signal. If governance repeatedly asks the same assurance questions, that is a governance-pack signal. The learning log turns those signals into actions.

Storing the real-time rationale and learning log with the procurement file and referencing it in governance papers so the audit trail is visible and reusable.

7

Lumensol's approach to leadership focus

Chief Executive: delivery assurance and organisational confidence

Primary concern: can we deliver outcomes without procurement becoming a bottleneck or headline risk?

- » Ask for a pipeline view that highlights high/medium/low risk projects and the reasons (market sensitivity, complexity, stakeholder profile).
- » Sponsor no-surprises escalation: coherence risks identified before publication / award, not after supplier queries.
- » Ensure service leadership understands that evaluation quality is a delivery dependency, not an administrative layer.
- » Champion proportionate routes to market that reduce friction for SMEs while preserving assurance (clear questions, clear evidence asks, controlled clarifications).

What to ask in the meeting:

- » Show me the Coherence Loop evidence (Checks 1–3) for this procurement in one page.

S151: financial stewardship and value-for-money defensibility

Primary concern: do we have a robust, auditable trail of why we selected the solution and how it delivers value?

- » Ask for explicit linkage between award rationale and the value case (outcomes, cost drivers, performance measures).
- » Require evidence that scoring is consistent with narrative and criteria (a sample-based check is usually enough).
- » Watch for hidden cost: repeated rework cycles, delayed mobilisation, and prolonged governance escalations.
- » Use a small set of indicators (rework rate, escalation rate, supplier friction trend) to spot risk early without building a heavy KPI layer.

What to ask in the meeting:

- » Show me three rationale excerpts where score, narrative and evidence align – and one that was corrected.

Monitoring Officer: legality, fairness and defensible decision-making

Primary concern: equal treatment, rationality and integrity of process – especially around communications and clarifications.

- » Require a controlled clarifications register with a single approval route and audit-ready record.
- » Ask for assurance that feedback and assessment summaries are evidence-led and do not introduce new reasons.
- » Require the Communication Coherence check before any award publication or standstill communications.
- » Encourage a culture of contemporaneous recording: decisions captured as they are made, not reconstructed later.

What to ask in the meeting:

- » Confirm the published award comms use no language that isn't anchored in the evaluation record.

Head of Procurement: capability and consistency at scale

Primary concern: how to achieve consistent evaluation and communication quality across teams, categories and mixed evaluator experience.

- » Embed the Coherence Loop into project plans and training; make it the default, not a nice-to-have.
- » Use quarterly coherence clinics using anonymised extracts from live evaluations to build skill quickly.
- » Keep tooling lightweight: one-page checklist, scoring anchors, clarifications register and the real-time log.
- » Create a peer review rota for high-risk procurements (a short pre-release and pre-award check by a second procurement lead).

8 | Board-ready measures: oversight without KPI overload

To provide leadership oversight without drowning in KPIs, Lumensol monitor a small set of indicators that signal whether coherence is being achieved in practice.

Indicator	What it tells you	Simple evidence source
Rework rate	How often evaluation / comms require material rewriting after moderation or governance.	Change log, moderation notes, document version history
Escalation rate	How often legal / SMT escalation is triggered by evaluation/comms quality (not substance).	Escalation log, governance minutes
Clarification control	Whether clarifications are centrally logged and approved through a single route.	Clarifications register; sample audit
Coherence checks completed	Whether the three Coherence Loop checks are being run consistently.	Completed checklists stored on file
Supplier friction trend	Whether post-award follow-ups or formal complaints are increasing or reducing.	Email logs, complaints register, PPRS referrals where relevant ^{[6][7]}

These indicators offer a clear line of sight: are you winning quietly (smooth delivery) or accumulating hidden risk that will surface later?

9 | Coherence maturity model: benchmarking where you are

A simple maturity model helps leadership teams benchmark where they are after PA23 year one and what good looks like without a major restructure.

Level	What it looks like	Typical symptoms
1 – Reactive	Coherence issues discovered late; fixes are rushed and tactical.	Repeated rewrites; last-minute legal review; unclear feedback
2 – Repeatable	Templates exist but quality varies; success depends on a few experts.	Inconsistent evaluator rationales; mixed standards across panels
3 – Managed	Coherence Loop embedded in plans; clarifications controlled; rationales consistently evidenced.	Lower rework; faster approvals; fewer supplier follow-ups
4 – Optimised	Low rework; strong supplier comms discipline; learning loop drives continuous improvement.	High confidence; stable market engagement; reduced disputes

Most organisations sit around Level 2. The pragmatic goal is Level 3: achievable without major system change, and typically the point where governance confidence and delivery pace start reinforcing each other. Once you are at Level 3, you can pursue broader ambitions (more innovation, more SME access, more outcome-based models) from a stable foundation.

10

Implementation: Lumensol's 30-60-90 day Transformation approach



First 30 days: establish the Coherence Loop

- » Assign a Coherence Owner for each procurement (usually the procurement lead) to run the three checks at the right points.
- » Add the checks into the plan: pre-release; pre-final moderation; pre-award publication/communications.
- » Implement the one-page real-time rationale and learning log.
- » Pick one live procurement as a pilot and run the checks openly to demonstrate the approach.



Days 31–60: standardise tools (without bloating templates)

- » Introduce a one-page Coherence Checklist for evaluators and moderators, aligned to your scoring methodology.
- » Add short scoring anchors and evidence prompts to the most material questions (especially those that historically attract clarifications).
- » Create a single clarifications register and a single approval route; stop ad hoc responses.
- » Build a small library of exemplar rationales (what good looks like for scores of 2/5, 3/5, 4/5).



Days 61–90: embed governance and learning

- » Ensure governance papers include a short decision rationale and evidence section, referencing the evaluation record and key moderation outcomes.
- » Align comms templates to the structure of the evaluation record to prevent accidental drift.
- » Run a short post-award review using the learning log: where did incoherence appear, why, and what will we change next time?
- » Report early outcomes to leadership: reductions in rework, faster approvals, fewer clarifications or follow-ups.





11 | Conclusion and call to action

One year into PA23, the differentiator is not who has the newest template set. It is who can consistently produce decisions that read as coherent, consistent and evidence-led from design through to award communications. Coherence is a control because it reduces contradiction, ambiguity and retrospective storytelling, the most common drivers of rework and challenge exposure.

Killer takeaway: if your procurement record is coherent, it becomes self-defending. Procurement becomes faster, not slower, because governance and communications can move with confidence.

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