

Detailed Business Case – IMT418 – Azure Migration

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1. Executive Summary

Background

Prior to 2015 the Council hosted much of its Datacentre infrastructure onsite and while appropriate at the time of implementing by 2014 the technology platform had become outdated, prone to failure, and presented the Council with significant risks such as a lack of resilience and disaster recovery capability. The options for the Council were limited, involving either refreshing the legacy estate at significant cost, or moving with the market and making use of the 'cloud'. Essentially 'cloud' based storage means using offsite data centres that are managed by third parties and buying capacity rather than physical equipment. The Serco bid proposed the transformation of the existing LCC Datacentre estate by moving it into a private cloud and assumed that most of the workload would be migrated to their preferred cloud hosting partner SunGard.

This migration activity was a significant undertaking and resulted in the migration of roughly 50% of the Council's Datacentre infrastructure, some 300 Virtual Machines, while the remaining 50% of the Council's Datacentre infrastructure sits within Orchard House

Current State

Since 2015 the Datacentre market has continued to mature and the existing private cloud model is now considered sub-optimal for the Council's requirements because it requires additional maintenance effort, and due to new technologies, it is no longer the most efficient way to buy Datacentre capacity. It is now more efficient to buy services from a public cloud, such as Microsoft Azure, AWS or Google, which enables a more efficient use of the Datacentre and provides some additional benefits identified below.

The main difference between a public cloud and a private cloud is that in a private cloud the Council buys the capacity that it believes it needs, in advance via a fixed fee. In contrast, within a public cloud the infrastructure is scaled immediately on demand. Scaling on demand means that the Council only uses and pays for what it needs when it needs it, and its capacity profile can flex up and down minute by minute ensuring the Council only pays for capacity it actually uses, rather than what it estimates it might need.

As a public cloud can respond immediately to increased demands it is also possible to change the way that resilience is managed. Currently the Council buys additional capacity in advance to ensure that it has a resilient model, i.e. duplicating systems and servers to ensure that backup capacity is available in the event of an outage. This is now an expensive model and means the Council is paying for capacity it might never use. Within a public cloud it is possible to immediately and automatically provision additional capacity in the event of an outage or security attack, and only pay for what has been used. This provides a much more efficient delivery model that still offers the resilience that the Council requires.

Future

Serco previously submitted an outline business case to move the Council from its current private cloud, to a new public cloud platform in Microsoft Azure; this has now been refined and the savings projections are still in line with expectations but in addition we have now

included selected elements of Orchard House within the scope. Considering the above benefits Serco have submitted an updated proposal to move the Council's SunGard Datacentre infrastructure into a Microsoft Azure public cloud environment. Due to some technical constraints the Council is required to retain some of its residual onsite Datacentre infrastructure, which has recently been refreshed to ensure that it remains reliable and serviceable.

Whilst the migration is taking place the Serco/IMT team will look to carry out a housekeeping exercise of all applications with a view to rationalise the number and provide additional cost reductions.

Financial Information

Completing the migration activity from SunGard to Azure provides an annual saving of circa £897K. Considering implementation costs of £1.165M the return on investment will be 18-24 months dependent on speed of the migration activities.

The following information provides a financial breakdown of potential savings

All numbers are 000's	Business Case	
Implementation Costs		
Serco Implementation Cost	£	990
Third Party Vendor Implementation Cost (Provision)*	£	175
Total Implementation costs	£	1,165
Ongoing Costs (per annum)		
Current Baseline cost for SunGard	£	1,872
Less Ongoing Azure Platform Costs	£	642
Less Azure Management and support	£	175
Less Orchard House Migration to Azure (Windows 2008)	£	158
Total Ongoing Cost for Azure Servers (per annum)	£	975
Annual Saving moving from SunGard to Azure	£	897

**These costs will arise through the need to reconfigure various applications that the Council uses which will be hosted within the Azure environment. The application vendors will charge the Council for this reconfiguration work. It is currently unknown the full extent of this work and so the costs identified are provisional and will be updated when more information is available.*

2. The Strategic Case

2.1 Description of the Programme

The programme requirement is to migrate LCC existing server estate from the SunGard data centre managed service to the Microsoft Azure Cloud. Doing so creates an additional benefit through the extended support to the Windows 2008 server estate which is offered by Microsoft for Azure customers.

The programme requires the discovery, design, implementation, migration and support of an Azure solution with an associated Service Design. This will facilitate the exit from the current platform in SunGard whilst protecting the Windows 2008 Server support for an additional 3 years.

The overall objective of this Programme is to deliver the following benefits to Lincolnshire County Council: -

- A target environment designed for a transformed, 'Hybrid/Cloud Centric' operating model
- A significant long-term cost reduction achieved through lower hosting costs and a more efficient service model
- Creation of a scalable platform for future development
- Streamlining of the deployment and management of infrastructure capacity
- Disaster Recovery as a Service
- Cloud centric operating models for Secure Management and Monitoring
- A hosting environment complementary to LCC's strategy to move to Office 365
- Improved service delivery and management by Serco for the new platform
- Continued support for the Windows Server 2008 legacy Operating System

"Hybrid Cloud is a computing environment which uses a mix of on-premise, private & public cloud services as a cost-effective, manageable computing solution."

2.2 Rationale for the Programme

Summary information

Lincolnshire County Council (LCC) currently has a server estate that is spread across several locations. The main data centres are: -

- **SunGard Hosted Data Centre** – Server and Operating System layer managed by SunGard with the application layer managed by Serco

- **Orchard House Data Centre** – Server, Operating System and application layers managed and maintained by Serco.

The current mixed hosting environment presents LCC and Serco with several commercial and technical issues: -

- A proportion of the Orchard House server estate has unsupported hardware and/or software which leads to service failures and increased security risk;
- The general technical model inhibits operational agility, increasing lead time for technical changes and often resulting in over-provision/underutilisation of resources. The net result is a higher cost to LCC.
- Services uniquely available in the Azure platform will allow a number of significant strategic benefits to be provisioned, eg password less logon.

Rationale

SunGard currently provide a hosted private cloud for about 300 Virtual Machines (approximately 50% of the total LCC estate of Virtual Machines):

- It is based on a Legacy private cloud model which provides limited benefits of on-demand elasticity of Virtual Machines or storage;
- Availability and recovery targets require stand-by instances to be provisioned and paid for, increasing costs;
- Relatively high charges in comparison with public cloud equivalent services.
- Serco - SunGard contract ends December 2021 and contract renewal is expected to increase costs further, acting now will negate the need for contract renewal.

On premise (Orchard House) facility owned by LCC:

- On premise support charges consist of a fixed monthly fee, in addition to a component of the contract Availability Fee - this cost will remain broadly the same during the remaining term of the Services Contract extension.
- Some legacy equipment modernisation is nearing completion ('retained infrastructure') – notably refreshed Storage, Network and Virtual Machine hosts for a number of servers which are required to be maintained locally;
- A proportion of the estate is operating on Windows Server 2008 and the support from Microsoft is due to expire in January 2020 – remediation plans are currently being developed however Moving to Azure will mitigate for a further 3 years as the support for Windows Server 2008 is extended for Azure customers;

To overcome the issues the purpose of the programme would be to relocate all of the SunGard server estate and many Windows 2008 Servers in Orchard House to Azure whilst optimising the use of sunk investment.

During the programme IMT are using a creative and aware risk strategy and have considered all potential delivery options to date, measuring each risk and are fully aware of any impacts based on the decisions made. IMT will continue to review risk on a regular basis to ensure continuity and that there are no surprises in the future.

2.3 Benefits and Risks

Technology Benefits to LCC for moving to the cloud

Reduces capital expenses

Azure cloud computing reduces the capital expenses of buying hardware and software.

Infrastructure resource management in a matter of minutes

Azure cloud computing services provide self-service and on demand, so even vast amounts of computing resources can be provisioned in minutes, typically with just a few mouse clicks reducing cost of provisioning and providing LCC greater flexibility.

Elasticity to scale up and down to meet business requirements

A major benefit for LCC of cloud computing services includes the ability to scale elastically. That means delivering the right amount of IT resources—for example, computing power, storage, when it's needed, and from the right geographic location in the UK.

Decreased time to market/release

By reducing operational overhead and freeing up budget, more time and effort can be focused on rapid software and solution development. Faster deployment of infrastructure-as-a-service (IaaS) and platform-as-a service (PaaS) platforms will enable LCC business to release faster and more often.

Application development and modernisation

The cloud provides an integrated platform for modern development, where Application teams can improve efficiency by up to 33 percent. IMT Data services are already using Azure for this purpose.

Reduced spend on productivity tasks

On-site datacentres typically require a lot of maintenance activity—hardware setup, software patching, and other time-consuming IT management chores. Cloud computing removes the need for many of these tasks, so IT teams can spend time on achieving more important business goals.

Better performance with enterprise-class computing resources

Azure cloud computing services run on a worldwide network of secure datacentre's, which are regularly upgraded to the latest generation of fast and efficient computing hardware. This offers several benefits to LCC over a single corporate datacentre by always being at the leading edge of performance. As a government client LCC servers/applications and databases will be restricted to UK datacentre's only

Reliability to ensure maximum business continuity

Azure cloud computing makes data backup, disaster recovery, and business continuity easier and less expensive, because data can be mirrored at multiple redundant sites in the UK

Financial Benefit to LCC

Cost savings of £897,000per annum over current billing once migrated are indicated at current run rates.

Reduced operational risks by providing:

- Optional provision of enhanced DR Capability for Orchard House
- Extended 3-year support for server 2008 if moved into Azure

Risks to LCC/the overall Programme

Risk	Description	Rating	Impact	Risk Impact Statement	Mitigation
R01	Commercial or Technical obstacles to exiting SunGard	Low	High	Majority of financial benefits cannot be realised; Programme would not be viable	The LCC IMT Commercial officer sits on the board to ensure the financial outcomes are considered as a part of all project decisions.
R02	Migration effort is greater than estimated	Medium	Medium	Increased migration costs will delay the return on investment period	Estimates have been prepared based on LCC Transformation Programme experience. We have evaluated Microsoft Partners

					and/tools to reduce risk
R03	Windows 2008	Medium	Medium	Windows 2008 becomes end of life in January 2020 and any further support is dependent on agreeing a support extension as on previous occasions, this contract would come at an additional cost. This is a potential security issue and could prevent LCC achieving Public Services Network Compliance at some point in the future.	By moving this to Azure Microsoft will provide 3 years additional support, allowing LCC the time to upgrade and retaining PSN Compliance
R04	LCC Commitments	Medium	High	Constraints on technical resource from LCC could cause delays to the project timeline	Ensure robust programme communication plan with advanced notice of keys dates/migrations taking place, and required LCC resource requirements. Protecting key technical staff from over "utilisation" via additional resource depending on IMT work portfolio.
R05	LCC Business input	Medium	High	Delays to the programme caused by late return of decisions on application migrations	Ensure LCC decision makers are fully aware of impact and are aligned to the programme
R06	Serco Technical Resource	Medium	High	Constraints on resource from Serco could cause delays to the project timeline	Serco recognise this project as a key strategic deliverable
R07	Sungard Technical resource	Medium	High	Constraints on resource from Sungard could cause delays to the project timeline	Serco project manager will liaise closely with Sungard at all times to satisfy themselves that Sungard resources are available

2.4 Barriers

No critical barriers have been identified. The following observations were made during this phase.

The total investment to carry out the migration from SunGard to Azure is £1.165M however the return on investment breakeven is 18-24 months dependent on the speed of the migration.

Microsoft Azure Subscription contractual arrangements will sit directly between Microsoft and LCC via the Enterprise agreement.

ExpressRoute* (connectivity circuits) contractual arrangements will sit directly between JANET**, KCom and LCC.

The current management and support for SunGard is carried out by SunGard via Serco's subcontract. LCC plan to adopt a Serco service extension to manage and maintain Azure hosted services.

Serco are developing that service extension within this program having recently adopted Azure as a strategic product for its customers. Serco have agreed to use a specialist Microsoft Partner to ensure that service will be approved for LCC production support.

Due to the dynamic nature of the platform this may have an impact on the Serco/LCC contractual arrangements. There are however no relevant contractual constraints between Serco and SunGard regarding purchasing services on behalf of LCC therefore no contractual barriers to the adoption of Azure

Contractual impacts are not expected to be significant and may require some minor adjustments to the service levels with Serco to ensure that they are aligned with what is provided through Azure.

**ExpressRoute is the private connectivity method between Microsoft Azure to Azure customers.*

*** JANET are the public sector service provider for our onward connectivity to the Internet and Microsoft provider edge. Kcom are our regional network provider who connect LCC sites to JANET .*

2.5 Impact Analysis

Due to the nature of the programme delivery there is the potential of disruption as services are migrated from their originating environment (SunGard / Orchard House) to the Azure cloud. All migrations will take place out of hours and if issues arise, the original environment will take back operations to allow investigations to be completed prior to an additional attempt at migration.

If LCC decide not to proceed with the programme, then the following elements will have a direct impact to LCC over the coming months/years:

- It is possible LCC would be delayed further in achieving PSN Compliance as there are 125 Windows 2008 Servers within the LCC estate and Microsoft support on these servers ceases on the 21st January 2020 it will take a substantial time to remediate these servers

- Longer term impact – costs for SunGard would be maintained at their current rate and therefore the LCC budget would be sub optimal by circa £900K annually.
- Future impact – the SunGard contract is between Serco and SunGard and this is going through negotiation for renewal. It is expected to terminate at the latest in December 2021, at which time any new contract/extension could increase costs and not reduce them.

With regards to GDPR and the data within the servers, at present there is no plan to carry out a Privacy Impact Assessment or Data Protection Impact Assessment by LCC as the change in this instance is a technical change and the data will be moved automatically without human interaction. This position has been confirmed by David Ingham – the Council's Information Assurance Manager. The service design will conform to security in line with the National Cyber Security Centre (NCSC) cloud security principles.

3. The Commercial Case

3.1 Market Sufficiency and Competition

Amazon Web Services (AWS) and Google Cloud Platform can provide a cloud using Microsoft products but there would likely be an additional management burden for doing so because their focus is primarily on services that are not in the same corporate enterprise space as Microsoft. For example, Google Cloud Platform is primarily targeted towards organisations that use the Google suite of tools, such as GSuite and the Android operating system as a primary platform.

Microsoft Azure is the preferred provider because of the substantial alignment between the Council's technical systems and the cloud platform, many being Microsoft products. This means that the way the systems work together is more streamlined and enables better functionality and monitoring capability. This in turn reduces the cost of looking after the environment, security checking, and detection of malware and other nefarious attacks. It is practically impossible to replicate this rich technology mix on premises.

As a further benefit, Microsoft gives an additional three years support for their Server 2008 software which is soon going “end of support” any support outside of the Azure cloud platform will be at additional cost.. The Council has many Microsoft Service 2008 instances and so this is a major benefit and will allow the Council some time to review the need for these licences and scale down if possible or replace them with cloud options.

The Council would buy Microsoft Azure services through the current provider of the Council's Microsoft Enterprise Agreement, Softcat. The Softcat contract already has within its scope a nominal quantity of Azure licences and the specification anticipated buying additional licences through the term of the contract. This method of procurement is commonly used by different Council's across the country and would be compliant with the Council's procurement obligations. Furthermore the subscription in combination with our Office 365 subscriptions confer usage rights on a broad set of applications and tools which are exclusive to Azure and can displace other technologies in use over time.

3.2 Evidence of other local authorities' work

Microsoft is a Global Public Cloud Provider, with 54 Azure regions across the Globe, more than AWS and Google combined. Some examples cited by Microsoft of other local authority

implementations and utilisation of the Azure platform in combination with other services and technologies are as follows:

Cambridgeshire County Council

Digitised concessionary travel renewal and saved £10 for each renewal whilst driving digital renewal rates from 25% to nearly 70%.

Enfield Council

Self-service citizen portal reduces costs by £20 - £25 million and allows for reduction of staff overhead delivering 40% reduction in back-office manual processing.

Hackney Council.

Saved over £1.1m a year in social services costs and improved support to “at risk” families by building risk profiling applications and data sharing across public sector bodies. Social workers now receive risk-based scores driven by events to improve life outcomes for individuals and families and improve engagement as well as reducing costs.

Birmingham Council

Online housing claim form allows completion in half the time and take-up levels hit 100%. Also reduces council process time as forms can only be submitted when complete and error-free and integrates directly into Birmingham back-office process system.

Peterborough Council

Have taken a decision to leave Google office and return to Microsoft Office 365 due to the interoperability challenges of using non-Microsoft technologies with major line of business systems.

3.3 Delivery model

Current

LCC has contracted with Serco for delivery of IT services and support housed in SunGard, in addition to the hardware maintenance and IT Service support for Orchard House & Lancaster House.

In the SunGard estate, SunGard support the platform and network on behalf of Serco. This is charged through a variable fee based on monthly use of the platform whether at capacity or not. In this instance Serco are fully responsible for SLA's on the platform itself in accordance with the contract.

In Orchard House, Serco carry out full support on a monthly fixed price basis. This covers hardware support and IT services support. Serco are fully responsible for SLA's in accordance with the contract

Application vendors are either aligned directly to Serco or LCC, but all are in scope for Vendor Management by Serco.

Change to the Delivery model

LCC intend to contract with Serco for the management and support of the Azure Environment, but there is a fundamental change to the relationship as Serco will no longer

hold the relationship with the provider - this will be a direct contract between LCC and Microsoft. The result of this is that Serco will only vendor manage Microsoft and if there are platform issues the applicable SLA for availability will be that contained within the Microsoft contract. – this may necessitate a contract change with Serco to reflect specific constraints and any additional undertakings. Serco will continue to manage any support cases in relation to the platform.

The service design changes required are not thought to be significant and work continues to deliver the detailed service design.

3.4 Commercial considerations

The Council would change the way it purchases compute services and move from Serco to Microsoft. The Council would purchase Microsoft Azure services directly through the existing Microsoft Enterprise agreement, via the software reseller, Softcat. The terms and conditions would be standard Microsoft Terms and Conditions contained within the Enterprise Agreement, the Microsoft Subscription Agreement and the information contained within the Microsoft Azure Legal Information.

The change to the above will require a contract review as LCC are taking over the responsibility for a key supplier and in this instance, it will be a direct relationship between LCC/Microsoft. This will impact on certain Service Level Agreements between LCC and Serco, as support via LCC managed Vendors is beyond Serco's control and decisions made by LCC may impact on the availability of the platform, which may have a knock-on impact on service delivery. Therefore, an amendment will be required under the Vendor Management arrangements as part of the contract.

In moving suppliers, Serco have confirmed that SunGard have no direct staff working for LCC and so TUPE is not an issue, and once migrated from SunGard to Azure, LCC/Serco will have no further obligations under the SunGard contract.

4. The Financial Case

The base Financial case is made up of the following:

- Projection of costs for the next 5 years;
- Baseline costs are the annual cost from SunGard for the current server estate housed by them;
- SunGard, Azure, Orchard House and Azure Management costs are the expected outlay over the period;
- Operating benefit provides the total annual benefit to LCC; and Migration costs cover Serco, hardware and vendors cost for the migration activity.

The cumulative totals below show the benefit over the 5-year period.

All numbers are 000's	2019	2020	2021	2022	2023	2024
Baseline Costs	£ 1,872	£ 1,872	£ 1,872	£ 1,872	£ 1,872	£ 1,872
SunGard costs	£ 1,872	£ 850	£ -	£ -	£ -	£ -
Azure Costs SunGard		£ 517	£ 642	£ 642	£ 642	£ 642
Orchard House costs	£ -	£ 158	£ 158	£ 158	£ 158	£ 158
Azure Management and Support		£ 175	£ 175	£ 175	£ 175	£ 175
Transformed costs	£ 1,872	£ 1,700	£ 975	£ 975	£ 975	£ 975
Operating Benefit	£ -	£ 172	£ 897	£ 897	£ 897	£ 897
Programme Costs	£ 275	£ 640				
Hardware	£ 73					
Vendor Costs approximated	£ 25	£ 150				
Total migration costs	£ 373	£ 790	£ -	£ -	£ -	£ -
Annual Saving	-£ 373	-£ 618	£ 897	£ 897	£ 897	£ 897
Cumulative totals	-£ 373	-£ 991	-£ 94	£ 803	£ 1,700	£ 2,597

Programme implementation costs are broken down as follows:

- Phase 1 - Design, assessment and Service Design creation £150,000 (Completed)
- Phase 2 - Azure/network/security build, pilot migration, early service support model implementation £223,000
- Phase 3 - Migration of Server and Application estate to Azure c. £750,000
- Service implementation costs circa £40,000

Other Considerations

Consideration was given to expand the Orchard House environment in lieu of moving servers to Azure. However, although the Orchard House computer hardware can be expanded if additional servers are required, the capital outlay and on-going support and maintenance would be higher than moving to Azure.

At this time, we do not intend to remove anything further from Orchard house, other than the Windows 2008 Servers which can be moved, allowing LCC to realise the benefits derived from the sunk investment for the retained platform.

In the event of significant inflation in the cost of public cloud costings, perhaps due to reduced competition in coming years, we will have the strategic option to expand these facilities and migrate loads back, to optimise our cost base.

Additional potential cost savings

The following indicates additional cost saving that LCC can procure via Microsoft/Azure activities:

AHUB - The **Azure Hybrid Use Benefit** (AHUB) is available if you own Windows Server Standard or Data-centre edition licenses with active Software Assurance. In addition, further licensing costs can be saved using LCC SQL licensing if software assurance is current

RI- An **Azure Reserved Virtual Machine Instance** is a virtual machine on the Microsoft Azure public cloud that has been reserved for dedicated use on a one- or three-year basis. Below pricing is uplift savings from 1 year to 3 year

Assumptions –

- Azure Hybrid Use Benefit Licenses need to be purchased beforehand and the purchase is factored in the below numbers
- Azure Reserved Virtual Machine Instance costs are incorporated into the net savings per annum.
- Savings projections are provisional and will be further refined during the selection of the migration approach for each application

	Azure Monthly costs	Monthly Saving	NET Saving PA
Azure Hybrid Use Benefit	£ 70,000	£ 9,200	£ 110,400
Azure Reserved Virtual Machine Instance uplift to 3 year based on 60% of servers	£ 70,000	£ 9,000	£ 108,000
			£ 218,400

This business case is based on the following notes and assumptions

Key notes:

- Server and Environment Support costs are based on current scope. Volumetric charging model to be agreed.
- Third party implementation costs are a provision subject to third party engagement in next phase.
- Azure Platform costs are based on current system assessment undertaken by Microsoft partner Ensono. These are volumetric costs based on current usage levels.
- All costs and saving estimates have been provided based on the best available data, they are subject to on-going refinement in the next phase. In addition, as a cloud-based service, costs will fluctuate depending on usage.

Migration numbers:

SunGard

- 8 simple applications/systems (Automated Migration)
- 19 medium applications/systems (Automated Migration)
- 160 complex applications/systems (Manual Migration)

Orchard House

- 61 applications/systems based on Windows 2008 reduced number from previous estimates
- 117 systems are expected to be maintained in Orchard House because of high latency when housed offsite and some Windows 2003 servers which cannot go into Azure

The manual migration cost will be refined in the next stage through engagement with the relevant third-party support providers.

Previous business case did not include Orchard House, we have included it within the figures for this business case

Financial Summary

In Summary LCC is expected to realise a saving of £2.5M over a 5-year period, with a potential further saving of £1M if the options are taken for the same period. Return of investment will occur between 18-24 months dependent on speed of migration and consideration of additional savings.

5. The Management Case

This program of work will be delivered using the existing Project Management Offices that exist across the IMT service. Programme and Projects are delivered in a structured manner based on the Managing Successful Programmes (MSP) and Prince2 Methodologies and will be governed in accordance with the relevant processes contained within each. This aligns to the LCC IMT Programme and Project methodology.

Given the business outcome is essentially financial and the strategic outcomes are technical being indirectly beneficial to later business drivers, business oversight will be provided as standard via the IMT board through periodic updates which include quarterly program finance trackers.

The IMT Project methodology has a mature risk management approach and any project that goes into serious exception in terms of risk of business outcome, including probable breach of budget would be referred via the IMT board, with a delivery impact assessment to support the decision making process in a proceed or cancel decision.

Given the scale and cost of this project, the project is sponsored by the Assistant Director IMT supported by an IMT Technical Architect, the project would be managed by a Senior Serco Programme Manager,

Programme Timeline



6. Next Steps

Activity/Milestone	Start Date	End Date
Sign off Service Design Statement of works	11/10/2019	11/10/2019
Sign off PID for the next phase and issue PO for £222,468.71 to allow for the commencement of the build and Pilot	11/10/2019	11/10/2019
Build platform (based on PO receipt as above)	01/11/2019	14/11/2019
Build Security devices	07/11/2019	22/11/2019
Carry out pilot migration (plan/change/test/pilot)	01/11/2019	15/12/2019