

Procurement Policy

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Approved by:	Executive Team
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Purpose and scope of the policy

This policy sets out our commitment to ensuring that all our procurement activities are undertaken in a fair, open and transparent way, in line with all appropriate laws and regulations and our commitment to value for money and sustainability.

Procurement covers the full range of activities related to obtaining goods, services, works and utilities from initial assessment of the business need, through contract management to the end of the service contract or useful life of an asset, including disposal.

1. Policy

- 1.1 We'll ensure that all our procurement activities are undertaken in a fair, open and transparent way in line with our Procurement Framework (Operating Procedures) and all appropriate laws and regulations (please see 'Related legislation and regulations' section of this policy).
- 1.2 We'll aim to procure goods, services and works in an innovative and effective way, working with our suppliers and providers to develop successful partnerships which reduce costs and improve services to best meet our business needs and our customers' needs.
- 1.3 As such, we'll work with a variety of suppliers, contractors and consultants to provide our services, ranging from small local businesses to national organisations. We encourage applications from local micro, small and medium-sized enterprises and businesses, and businesses that are majority owned, managed and controlled by minority groups.
- 1.4 We'll use partnering, which is recognised as a valuable approach to procurement, where appropriate, for example where this offers greater value for money through improvements in quality, reductions in cost or reduction in procurement risk. We'll explore procurement opportunities with other collaborative procurement organisations, consortiums, public sector procurement groups and other housing associations and similar organisations as and when such opportunities arise.

2. Value for Money

- 2.1 Through our procurement activities, we'll aim to provide optimum service delivery in a way which also balances the need to obtain value for money, including having regard to the Regulator of Social Housing's Value for Money Standard and Code of Practice April 2018. We'll obtain value for money through appropriate competition whilst ensuring that the procurement approach is proportionate to the size, scale and complexity of the project.
- 2.2 Obtaining value for money means obtaining the maximum benefit, for our business and our customers, from the goods and services we acquire or provide. Value for money doesn't always mean lowest price. In assessing value for money, we'll consider the balance of quality, cost, use of resources, fitness for purpose, timeliness, sustainability, added social value created, reducing wastage and improving service delivery.

3. Sustainability

- 3.1 In order to deliver tangible benefits to our local community and to the wider community, we'll incorporate sustainable procurement approaches covering all aspects of sustainability - economic, social and environmental.
- 3.2 We'll undertake our procurement activities in accordance with the principles of sustainable procurement, *'the process whereby organisations meet their needs for goods, services, works and utilities in a way that achieves value for money on a*

whole-life basis, in terms of generating benefits not only to the organisation, but also to society and the economy, whilst minimising damage to the environment'.

- 3.3 In line with our commitment to playing our part in preserving natural resources and preventing environmental pollution, we'll use sustainable products and services wherever possible.

4. Ethics, Bribery and Behaviour

- 4.1 We operate a zero-tolerance policy towards bribery by our board members, colleagues, contractors, agents and other associated persons.

- 4.2 We'll treat all suppliers, and potential suppliers, fairly and consistently in accordance with our Procurement Framework (Operating Procedures) and relevant legislation (please see 'Related legislation and regulations' section of this policy).

- 4.3 We'll comply with the Chartered Institute of Procurement and Supply (CIPS) Code of Ethics when conducting procurement.

- 4.4 All of our suppliers, and potential suppliers, must:

- take steps to eliminate all forms of corruption and avoid potential conflicts of interests for our employees
- comply with legislation and regulations in terms of labour laws and employment of workers with the requisite residence and work permits; and
- not use child labour or any form of forced or compulsory labour.

- 4.5 We're committed to the highest possible standards of honesty, openness and accountability and have in place a Whistleblowing (Confidential Reporting) Policy so that people employed by us and / or working for us (for example, agency staff, consultants and external contractors) can raise concerns and allegations of wrongdoing in confidence.

- 4.6 We expect our suppliers, service providers and contractors to share our commitment to the highest possible standards of honesty, openness and accountability and to have in place a similar policy for their employees and subcontractors which seeks to protect those individuals who make certain disclosures with regard to any instance of malpractice or wrongdoing and to investigate them in the public interest.

5. Modern Slavery

- 5.1 We're committed to preventing slavery and human trafficking in our corporate activities and to ensuring that our supply chains are free from slavery and human trafficking. We require that all direct suppliers, service providers and contractors have absolutely committed themselves to preventing slavery within their own activities and through their supply chain which includes manufacturers and producers.

Equality, Diversity and Inclusion

This policy will be delivered in accordance with our Equality, Diversity and Inclusion Policy. An Equality Impact Assessment was completed for this policy and considered as part of the approval process.

Data protection

This policy will be delivered in accordance with our Data Protection Policy, data protection legislation and relevant transparency requirements, which allow for redaction of certain information at some stages of the procurement process.

Where we need to share data with suppliers / potential suppliers as part of a procurement process, we'll undertake a Data Protection Impact Assessment on a case-by-case basis. Where required, we'll include appropriate and proportionate Data Sharing arrangements within contractual agreements with suppliers.

We won't share any sensitive information (including TUPE data where applicable) with bidders or contractors before appropriate undertakings have been entered into.

Related legislation and regulations

- Public Contracts Regulations 2015 (as amended)
- Procurement Act 2023
- Section 20 of the Landlord and Tenant Act 1985 as amended by section 151, Commonhold and Leasehold Reform Act 2002.
- Regulator of Social Housing's Value for Money Standard and Code of Practice April 2018.

As a registered provider of social housing, our procurement is governed by the **Public Contracts Regulations 2015 (as amended)** or the **Procurement Act 2023**, which require that we operate in a fair, open and transparent way. We must also comply with the requirements of **Section 20 of the Landlord and Tenant Act 1985 as amended by Section 151, Common and Leasehold Reform Act 2002**.

From the implementation date of the Procurement Act 2023 (expected to be February 2025) we'll need to comply with the Procurement Act 2023 for new procurements instead of the Public Contracts Regulations (PCR). However, the PCR will still apply to contracts awarded under the PCR, including contracts awarded after the implementation date of the Procurement Act 2023 under a framework agreement which was let under the PCR, or as part of a procurement process which commenced before the implementation date.

Related policies and procedures

- Anti-Fraud, Tax Evasion & Bribery Policy and the Fraud Response Plan
- Anti Money-Laundering Policy
- Data Protection Policy
- Disposal Policy
- Equality, Diversity and Inclusion Policy
- Policy on Payments and Benefits to Board Members and staff
- Safeguarding Adults at Risk Policy
- Safeguarding Children Policy
- Service Charge Policy
- Tenancy Fraud Policy
- Whistleblowing (Confidential Reporting) Policy

- Modern Slavery Statement
- Procurement Framework (Operating Procedures)

Customer engagement

We're committed to engaging with customers and other stakeholders in the design and implementation of our procurement activities and processes. The nature of this involvement will vary depending upon the service or activity being procured.

Comments on the policy were sought from customers and the draft was reviewed to take these comments into consideration. Some comments were not applicable to the policy but are relevant to other procurement documents and will be incorporated into those.

Document Revision History (Record of any changes made to the policy)

Date	Changes approved by	Details of changes made