Procurement Policy

If you have difficulty with reading this policy, including any difficulties with sight or hearing, or if you require this document translated into another language, please contact us and we will be happy to provide this information in a format that suits your needs.

Last Review: August 2026 Next Review: August 2029 Policy Number: A19

Our Vision, Our Values, Our Strategic Objectives

Our Vision

Vibrant Neighbourhoods, Successful Communities

Our Values

Caring, Reliable, Fair, Open and Adaptable

Our Strategic Objectives



Equality and Diversity Statement

Elderpark Housing are committed to ensuring people or communities do not face discrimination or social exclusion due to any of the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation.

This document complies with our Equality and Diversity Policy.

We will regularly review this Policy and consider any equalities implications taking the necessary action to address any inequalities (either directly or indirectly) that result from the implementation of this Policy.

Executive Summary

Policy Author

The Director of Assets is responsible for drafting this policy; however, all staff who purchase goods or services are responsible for implementing this policy.

Purpose of the Policy

The purpose of the Procurement Policy is to ensure that all procurement activities are carried out in a transparent, open manner and that all suppliers are treated equally.

Aims and Objectives of the Policy

The aim of this Policy is to provide compliant, open and transparent procurement activity, with the objective of delivering sustainable procurement that secures value for money for the Association and its tenants. This section outlines the key aims and objectives of the policy, to ensure that the Association's procurement activities are not a risk to the Association.

Legislative and Regulatory Compliance

The legislative and regulatory compliance relating to Procurement is:

- The Procurement Reform (Scotland) Act 2014 (the 2014 Act);
- the Public Contracts (Scotland) Regulations 2015 (the 2015 Regulations); and
- the Procurement (Scotland) Regulations 2016 (the 2016 Regulations).

The Association also has regard to:

- Scottish Procurement Policy Notes (SPPNs) issued by the Scottish Government;
- the Freedom of Information (Scotland) Act 2002, which has applied to Registered Social Landlords since 11 November 2019;
- the Equality Act 2010; and
- the UK GDPR and the Data Protection Act 2018.

Following the United Kingdom's withdrawal from the European Union, procurement in Scotland continues to be governed by the Scottish legislation listed above. References to European Union Directives and to publication in the Official Journal of the European Union (OJEU) no longer apply. Higher-value regulated contracts are now advertised on the UK Find a Tender Service (FTS). The Association publishes its contract notices through the Public Contracts Scotland (PCS) portal, which automatically transmits above-threshold notices to FTS. This policy has been updated accordingly. To further our compliance, we have reviewed the statutory guidance issued by the Scottish Government and the Scottish Housing Regulator.

Equalities

The aim of this policy is to ensure that each economic operator (contractors, consultants and service providers) is treated equally, non-discriminatorily and transparently throughout the procurement activity.

Privacy

This policy does contain situations which require compliance with Freedom of Information requests and GDPR.

Related Policies

Policy Title	
FOI and EI Policy	G29 FOI and EI Policy.pdf
Code of Conduct: Management Committee Members	G4 Code of Conduct Management Committee.pdf
Code of Conduct: Employees	G3 Code of Conduct Employees.pdf
Scheme of Financial Delegation	G5 Scheme of Financial Delegation Policy.pdf
Anti-Fraud and Corruption Policy	
Standing Orders Policy	G7 Standing Orders Policy.pdf
Risk Management Policy	G23 Risk Management Policy.pdf
Whistleblowing Policy	G24 Whistleblowing Policy.pdf
Notifiable Events Policy	G30 Notifiable Events Policy .pdf
Procurement Strategy 2026–2029	
Equality and Diversity Policy	G13 Equality, Diversity and Inclusion Policy.pdf

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1 Introduction

1.1 This policy describes how Elderpark will purchase, or 'procure', goods, services and works.

1.2 The term 'procurement' as used in this policy covers the process of purchasing the full range of goods, services and works we require, ranging from small items (e.g. office stationery) to large development and planned maintenance contracts awarded following a full robust tendering process.

1.3 Under the system of delegated authority, staff members will be responsible for committing Elderpark's funds to the purchase of goods, services and works in the legitimate operation of the Association's business.

1.4 It is Elderpark's policy that all activities which involve procurement will be undertaken with honesty, integrity and with appropriate internal controls in place, both to safeguard the staff involved and maintain the reputation of Elderpark Housing Association.

2 Purpose of Policy

2.1 All of Elderpark's procurement activities will aim to achieve optimum value for money in a sustainable manner by ensuring that, whenever appropriate, we assess quality, cost and sustainability. We recognise that the lowest cost will not necessarily be the best value in the longer term, and that we cannot award contracts based on price alone.

2.2 We also recognise the importance of sustainable procurement, and our duty to procure in a manner that improves the economic, social and environmental wellbeing (this includes reduction of inequality) of the communities in which we operate. All our procurement will be sustainable and balance price, quality and the positive impact on our communities, whilst always being proportionate to the size of each individual procurement exercise.

2.3 To help achieve a sustainable procurement approach, we will maximise the community benefits that we secure through our procurement activities; however, we recognise that this must be proportionate to the value of the contracts being procured, and so will consider the inclusion of explicit community benefit clauses in all our contracts.

A key driver in this will be having an impact on the local economy. Elderpark Housing realises the distinct benefits we can create as a community-based business working with other small businesses (commonly known as SMEs) in helping local employment and other social value projects within the local community.

2.4 We will ensure that our procurement processes are fair and comply with legal requirements, including the Procurement Reform (Scotland) Act 2014, the Public Contracts (Scotland) Regulations 2015, the Procurement (Scotland) Regulations 2016 and relevant Scottish Procurement Policy Notes. References in the previous version of

this policy to European Union procurement Directives have been removed, as these no longer apply following the United Kingdom's withdrawal from the European Union.

2.5 The specific procurement approach adopted for individual procurement exercises will be based on the nature, scale and value of the contract being awarded (Ref: Appendix 1). Where it is appropriate to evaluate tenders on a price/quality basis, a scoring matrix will be developed. The factors scored will vary depending on the nature of what is being procured, with the weighting of the different factors (e.g. 70% quality, 30% price) considered and determined in advance; scoring criteria will be included in tender packs. The Quality/Price ratings for high value, high risk contracts will be approved by the Management Committee.

2.6 In making procurement decisions, we will also seek to contribute to maintaining and improving the environment, both by purchasing recycled or 'environmentally friendly', energy efficient, fair and ethically traded goods whenever possible and/or by supporting suppliers or contractors whose values and production processes are environmentally positive.

The use of Frameworks and Direct Tendering

2.7 Elderpark is a member of, and has access to, a number of collaborative procurement frameworks, including those operated by Scotland Excel, the Scottish Procurement Alliance (SPA) and other public sector bodies. The Association will use a framework in which the relevant Director assesses whether doing so represents the best use of the Association's time and resources and delivers value for money for tenants.

2.8 Framework use is not automatic. If the relevant Director assesses that Elderpark would secure better value for money, a more suitable specification, stronger community benefits, or better contract terms by running its own tender exercise, the Association will tender directly. Neither route is preferred in principle; the test is value for money and fitness for purpose in each case.

2.9 For every procurement route listed above the Quick Quote threshold in Section 7, the relevant Director will record the reasoning for the route chosen, framework call-off or direct tender, before the exercise commences. The record must set out the options considered, the basis of the value-for-money judgement and the recommended route. This record forms part of the procurement file and, for regulated contracts, will be reported to the Senior Management Team and summarised for the Management Committee.

2.10 Where a framework is used, the Association must/will comply with the call-off rules of that framework, including any requirement to run a mini-competition. Direct award from a framework will only be made where the framework's own rules permit it, and the justification is recorded on the procurement file.

3 Responsibility for Procurement

3.1 The Director of Asset Management is the owner of this policy. However, each Director is responsible for procurement activity within their area of responsibility and for

ensuring that staff undertaking procurement on their behalf comply with this policy, the Financial Regulations and the Scheme of Financial Delegation. This document is the underlying policy that guides and supports those decisions.

3.2 With the adoption of this policy, Elderpark will ensure compliance with the following:

- Current legislative and statutory regulations.
- Codes of practice, in particular those produced by Scottish Government, the Scottish Procurement Directorate and other professional bodies.
- Accounting standards, in particular compliance with external and internal audit requirements.
- Association Rules, Management Committee remits and Standing Orders.
- Delegated powers to Office Bearers and staff.
- SHR and SFHA guidance, e.g. Regulatory Standards, Code of Conduct for Board Members/staff.

3.3 Elderpark Housing will ensure that any committee member or member of staff who has an interest in the item being procured takes no part in the procurement process and that any such interest is declared and recorded in the required manner.

3.4 The Management Committee will ensure that Committee Members participate in the procurement process at the appropriate stages in accordance with the tendering procedures as outlined within this policy and the Financial Regulations.

4 Principles of Procurement

4.1 In respect of all transactions that involve committing Association funds to the purchase of goods and services, the following principles should be applied:

- The appropriateness of the goods/service for the purpose of the procurement, e.g. what level of quality/standard is required and why.
- Our strategic aim, in all our procurement activities, will be to achieve the best 'value for money' by ensuring that, in all procurement exercises, we assess quality, cost and sustainability.
- Elderpark shall not award any contract based on price alone.
- In considering value for money and appropriateness, staff should identify additional requirements such as sustainability, timing (e.g. speed of delivery), back up/implementation requirements, community benefits, and special discounts.
- Elderpark Housing Association is not registered for VAT. The Association cannot recover input VAT and therefore bears the full VAT-inclusive cost of all goods, services and works it purchases. All budget estimates, cost comparisons and value-for-money assessments must therefore be made on a VAT-inclusive basis.

5 Commitment to Equality & Diversity

5.1 Elderpark Housing is committed to promoting fair and equal treatment for all and is opposed to any form of unlawful discrimination. We operate an Equality & Diversity

Policy which informs all aspects of our business and ensures we adhere to the Equality Act 2010.

In line with our commitment and upon request, the Association can make this Policy available, free of charge, in a variety of alternative formats including large print, audio, Braille and other languages.

6 Authority to Incur Expenditure

6.1 All procurement activities will be conducted in accordance with the Association's financial and governance policies such as Value for Money and Fraud policies and in line with the financial limits detailed within Section 7 of this policy.

6.2 The Management Committee will review these financial limits regularly to ensure that they remain appropriate for the effective governance of the Association.

6.3 As per the Financial Regulations, staff members have delegated authority and should be cross-referenced with the current Scheme of Financial Delegation in place at the time of the procurement activity.

6.4 Point of authorisation. Authorisation under the Scheme of Financial Delegation is given when the Association commits itself, that is, at contract award or at the award of a call-off contract under a framework. Where a contract or framework call-off has already been authorised at the correct level, individual orders and instructions issued under it do not require fresh authorisation, provided they are within the scope, terms and value of the contract as awarded and within the approved budget. Any instruction that takes the cumulative value beyond the value authorised at award must be re-authorised at the level appropriate to the revised value.

7 Financial Limits for Tenders

7.1 The Management Team, in conjunction with the Chief Executive, will consider when tendering for services to the Association is appropriate or when receipt of quotations or estimates is acceptable.

7.2 In view of 7.1 and 6.3 above, the following cost guidelines will be adhered to. In the event of any incident in which these guidelines are not adhered to, the reasons for this will be reported at the next Management Committee meeting.

(a) Expenditure between £10,000 and £50,000 will require at least 3 quotes using the Quick Quote process on the Public Contracts Scotland (PCS) portal. Approval of the successful tender by the Committee is not required due to the low risk and contract value.

(b) Expenditure over £50,000 for goods and services will be categorised as a Regulated contract and will be advertised and tendered through the Public Contracts Scotland portal. Approval of the successful tender by the Committee is not required as the Management Committee should have already approved the budget and/or the framework contractors for that particular contract.

(c) Major capital (works) expenditure likely to exceed the Regulated contract threshold will be tendered via Public Contracts Scotland and, depending on the value threshold for goods, services or works, this will determine if it is a Regulated procurement activity. Approval of the successful tender is not required as the Management Committee have already approved the budget and/or the framework contractors for that particular contract.

(d) Works contracts with an estimated value below £2,000,000 (excluding VAT) are not regulated contracts under the 2014 Act. Elderpark may nonetheless opt to use the "open" procedure and publicise its intention to seek offers in line with a regulated procurement route, using the Public Contracts Scotland portal.

(e) Contracts at or above the thresholds in the 2015 Regulations are subject to the full procurement regime and must be advertised on the UK Find a Tender Service (FTS) as well as on Public Contracts Scotland. The thresholds applying to Elderpark from 1 January 2026 are set out in Appendix 1. Staff must check the current threshold values before commencing any procurement, as they are revised every two years.

(f) The estimated value used to determine the correct route is the value of the contract over its whole term, including all options, extensions and renewals. A contract must not be divided, and its term must not be understated, in order to bring it below a threshold.

7.3 As members of the various frameworks, all mini-competition call-offs shall be processed via the Quick Quote functionality contained in the PCS portal, or via the framework operator's own portal where the framework requires this. Call-offs via the Scottish Procurement Alliance (SPA) will be administered by SPA staff, and call-offs via Scotland Excel will be administered in accordance with Scotland Excel's framework guidance.

8 Service Agreements and Contracts

8.1 We will procure certain services through contracts or service agreements for periods of one year or longer, in accordance with current procedures. Examples include contracts for the provision of cyclical maintenance, gas servicing and repairs, lift maintenance, landscape maintenance, or agreements for the servicing of office equipment, fire and security alarms, or IT systems.

8.2 Where these agreements fall within the spending limits for staff, they will have delegated authority to enter into agreements; otherwise, these services should be procured as per the detailed procedures.

8.3 The results and awards of procurement activities for "Regulated" service contracts or agreements will be reported to the Management Committee at the next meeting and in the annual procurement report.

9 Obtaining Prices, Quotations and Tenders

9.1 The summary table in Appendix 2 sets out the different methods of obtaining prices, quotations and tenders that must be followed when procuring goods, services and works. These methods are based on the value of the procurement and show the acceptable procurement method and the necessary level of approval.

9.2 For items under the current cost limit which do not require quotations or tenders, the authorised member of staff will, where appropriate and/or possible, seek to check at least two alternative prices either in writing, by price list, or by requesting details by e-mail.

9.3 Quotations: Quotations may be requested electronically using Quick Quote on the PCS portal. The authorised member of staff will ensure that sufficient detail is provided in the scope and specification for those invited to quote, enabling accurate, comparable quotes to be received.

9.4 Tenders: Following the full development of all relevant tender documentation, suppliers will be invited to tender. Where the value of the contract deems it a "regulated" contract, it will be incorporated into the annual Procurement Report. The annual report covers the preceding financial year and is published as soon as reasonably practicable after the year end. As outlined in Section 4, all goods, services, and works will be procured on a quality-and-price basis. Where this is the case, the appropriate criteria and ratios will be agreed in advance of the procurement being advertised on the PCS portal.

9.5 Negotiation: Where it is proposed that contracts are procured through negotiation, there must be clear justification for doing so and the decision to enter into contracts based on negotiation must be approved at the appropriate level of authority.

9.6 Freedom of Information requests. All Registered Social Landlords are subject to the Freedom of Information (Scotland) Act 2002. Freedom of Information requests on the details of tendered costs for works are deemed commercially sensitive and shall not be disclosed. However, unsuccessful contractors who bid for tenders and lost out can receive more detail about their quality submissions and scoring. We shall proactively publicise information that is likely to be of public interest to enable the Association to respond to requests more easily and, hopefully, reduce the number of requests.

Urgent and emergency procurement:

9.7 Where immediate action is required to make a property or site safe, or to protect the health, safety or security of tenants, staff or property, work may be instructed without the competitive process that the value would otherwise require. This exception is strictly limited and operates as follows:

(a) it extends only to the work reasonably necessary to make safe or to remove the immediate risk; any further works arising must be procured in accordance with this policy;

(b) it must be authorised by the relevant Director, or in their absence by the Chief Executive;
(c) it does not remove the requirement for the contractor to hold current insurance and any licence or certification required by law for the work being carried out;
(d) a written record of the circumstances, the authorisation given and the estimated value must be placed on file within five working days and entered on the exceptions log maintained under clause 15.5.

10 Specialist Suppliers / Contractors / Consultants

10.1 Where there is only one specialist supplier or contractor for a particular item or service, we will seek to negotiate the most advantageous price and terms prior to placing an order or signing a service level agreement. Details of the discussions held and the reasons for the final recommendation will be fully recorded and reported to the Management Committee.

10.2 Appointment of Consultants – Staff may make consultant appointments subject to financial limits. The following may be taken into account when identifying consultants to be invited to quote or tender:
(a) Previous performance on behalf of the Association.
(b) Recommendation by another approved consultant, contractor or Housing Association.
(c) Allocating workload according to experience, size of practice, value of contract and workload commitments. It may, for instance, be inappropriate to award a large contract to a one-person firm whereas for a smaller contract this may be wholly appropriate.

10.3 For the avoidance of doubt, the factors listed at 10.2 (a) to (c) may inform which consultants are invited to compete. They do not provide a basis for appointing a consultant without competition. All consultant appointments must follow the financial limits in Section 7 and the methods in Appendix 2, and the fees payable must be included when estimating the contract value.

11 Other Methods of Procurement

11.1 We will continually review our methods of procurement in order to achieve best value for money, meet our duty of sustainable procurement, and to comply with current statutory regulations, Scottish Housing Regulator guidance and 'good practice'.

12 Supply Chain

12.1 The Public Contracts (Scotland) Regulations 2015 and the Procurement (Scotland) Regulations 2016 set out a variety of situations in which the Association must exclude a potential member of its supply chain.

12.2 These situations include: conviction of an offence; bribery; corruption or theft; failure to comply with payment of tax or another statutory duty; misconduct or collusion to

distort competition; lack of a necessary licence; non-membership of a regulatory body required to perform the contract; insolvency or appointment of a receiver; or deficient performance in another regulated procurement.

12.3 In addition to the situations listed in 12.2, further guidance is published by the Scottish Government, and this may include additional assessment of potential suppliers relating to recruitment, remuneration (including payment of a living wage) and other terms and conditions, as well as Trade Union recognition. Elderpark will seek to apply the Scottish Government's Fair Work First criteria to its regulated procurements, and will seek payment of at least the real Living Wage to workers engaged on Association contracts.

12.4 There is also a duty on the Association to pay its contractors in a timeous manner. Elderpark will pay valid and undisputed invoices within 30 days of receipt, and will require the same payment terms to be passed down the supply chain in contracts where the applicable regulations require it. Payment performance will be monitored and reported to the Senior Management Team.

12.5 Compliance before work commences. No contractor will be permitted to commence work for the Association until it has provided, and the Association has verified and retained, evidence of current insurance cover at the levels required for the work, any licence or certification required by law or by the Association for the trade concerned, and risk assessments and method statements accepted by the Association. This requirement may not be waived by any member of staff; the only exception is urgent make-safe work authorised under clause 9.7, which has/must be approved by a Director and/or CEO.

12.6 Continuing validity during the contract. Insurance and certification are verified at award but expire during the contract term. The expiry date of each insurance policy and certification will be recorded in the contract register at the point of award, and renewal evidence will be obtained for all live contracts before that date. Where evidence is not provided, no further instructions will be issued to that contractor until it is.

12.7 Minimum insurance levels: Minimum levels of Employers' Liability, Public Liability, Professional Indemnity and, where applicable, Contractors' All Risks cover will be set out in a schedule maintained by the Director of Asset Management, reviewed annually in conjunction with the Association's insurance broker and approved by the Senior Management Team. Levels will be proportionate to the risk of the work, and the schedule will identify those categories of lower-risk service contracts for which a reduced level of Public Liability cover is acceptable, so that the requirement does not unnecessarily exclude smaller local contractors.

13 Freedom of Information and GDPR

13.1 Where possible and practical to do so, Elderpark will aim to be open in its request for tendering information. However, when implementing the policies and procedures, all staff and Committee members must adhere to and be aware of the requirements of the Association's approved Freedom of Information and Environmental Information and

Privacy Policies, and be mindful of commercial sensitivity, particularly of third-party information.

13.2 In situations where there may be any doubt about the requirements of Data Protection, FOI Policies and commercial sensitivity versus the rights to information, it is recommended that the Association seeks the views of its GDPR consultants.

14 Risk Management

14.1 Elderpark recognises that ineffective procurement presents a risk to the Association. This is rated as high risk, so a risk management action plan is in place, and early warning indicators have been identified to monitor this risk. Procurement risk is recorded on the Association's Risk Register and is considered as part of the annual assurance process.

14.2 Failure to operate within procurement legislation could result in contract awards being cancelled, with costs or other remedies being sought through the courts by third parties. This is rated as a low risk as we aim to follow the Government's published procedures.

14.3 Elderpark will ensure any training on procurement required by staff is identified through performance review or otherwise, and that these needs are met to provide an efficient and effective procurement service.

14.4 Elderpark will undertake both internal and external audits of procurement as required and will take account of any recommendations contained therein.

14.5 Procurement training and competency: Staff who authorise expenditure, run procurement exercises or verify contractor compliance will receive procurement training appropriate to their role before doing so, and refresher training following any material change to this policy or to procurement legislation. A record of training completed will be maintained by the Director of Asset Management. The Association will periodically assess procurement skills against the National Procurement Competency Framework and use the results to target training. This protects individual members of staff as much as it protects the Association: staff can only reasonably be held to a control framework they have been trained to operate.

15 Monitoring Procurement Activities

15.1 The Chief Executive is responsible for ensuring that all Committee Members and members of staff involved in the procurement process follow this policy and the supporting procedures. This will also ensure that staff carrying out procurement activities have received adequate training and possess the expertise required.

15.2 The Chief Executive is responsible for ensuring that staff implement this policy and the relevant procedures when procuring goods, services and works.

15.3 The Chief Executive will ensure that the Committee reviews this policy regularly and that the appendices are reviewed as necessary and revised if required.

15.4 The Association should monitor the value of its contracts within a given financial year, to ensure it complies with the Scottish Government procurement regulations.

(a) Procurement Strategy: Under section 15 of the 2014 Act, a contracting authority which expects its regulated procurement expenditure to be £5,000,000 or more (excluding VAT) in a financial year must prepare and publish a procurement strategy. Elderpark monitors our regulated spend annually against this threshold. Irrespective of whether the threshold is met, the Association will maintain and publish a Procurement Strategy as a matter of good practice and to support its regulatory assurance position. The strategy sets out how the Association will carry out regulated procurements to achieve its purpose, deliver value for money and comply with legislation, and gives details of the Association's policy in areas such as community benefits; consultation with those affected by the procurement such as tenants; promotion of compliance by its supply chain; health and safety requirements; and ethically traded goods and services.

(b) Procurement Report: As part of the strategy, Elderpark will produce an annual report on its regulated procurement activities at the end of each financial year that includes: completed regulated procurements; adherence to the procurement strategy; community benefits achieved; involvement of supported businesses; and expected procurements in the next two years. Where the Association is not required by statute to publish a report, it will report the same information to the Management Committee.

(c) The Procurement Reform (Scotland) Act 2014 places two duties on the Association in this area. First, under the sustainable procurement duty (section 9 of the Act), before carrying out any regulated procurement, we must consider how the procurement process can improve the economic, social and environmental wellbeing of the area in which we operate, with a particular focus on reducing inequality, and how it can facilitate the involvement of small and medium-sized enterprises, third sector bodies and supported businesses. Second, under section 25 of the Act, where the estimated value of a contract — calculated over its full term, including any extensions or renewals — is equal to or greater than the statutory community benefits threshold (currently £4 million), we must consider whether to impose community benefit requirements, and must state in the contract notice either a summary of the requirements to be imposed or our reasons for not including any. Where requirements are imposed, the award notice will state the benefits we expect to be derived. However, beyond these statutory duties, it is the Association's policy to consider including community benefit requirements in all regulated procurements, regardless of value. As a community-based housing association, we will impose requirements that are relevant and proportionate to the value, duration, and nature of the contract, and may include employment, apprenticeship, and training opportunities; support for local supply chains and SMEs; and contributions to community initiatives within our area of operation. Community benefit requirements will be recorded at contract award, monitored as part of contract management, and reported in our Annual Procurement Report.

(d) Contracts Register: The Association will maintain a contracts register for regulated procurement and publish the register on our website, in accordance with section 35 of the 2014 Act. The register will be updated as contracts are awarded, using the checklist at Appendix 5.

15.5 Exceptions log. Any departure from the requirements of this policy – including urgent procurement under clause 9.7, a direct award made without the competition the value would normally require, or a framework call-off placed other than with the highest-ranked contractor for the relevant lot – will be recorded on a procurement exceptions log maintained by the Director of Asset Management. The log will record the date, the contractor, the value, the reason for the departure and the officer who authorised it.

15.6 Annual procurement compliance report. The Director of Asset Management will report annually to the Management Committee on procurement activity and compliance, drawing on the contract register, spend analysis and the exceptions log. The report will cover contracts awarded in the year and the routes used; the proportion of spend under contract; exceptions recorded and the reasons for them; payment performance against the 30-day commitment; community benefits secured; and progress against the procurement improvement plan. This may be combined with the annual procurement report described at 15.4(b).

16 Review

16.1 This policy is planned for a full review in 3 years' time however, as a matter of course, we shall review every year following the performance of our procurement activities contained in the annual procurement report, or when there is any change in legislation affecting how we procure goods and services.

16.2 Review of operation after twelve months. The controls introduced by this version of the policy are new to the Association. Twelve months after approval, the Director of Asset Management will review how they have operated in practice and report to the Management Committee, so that any requirement found to be disproportionate to the scale of the Association's procurement can be adjusted. The purpose of this policy is to be used, not to be worked around.

Equality Impact Assessment

Name of Policy to be assessed	Procurement Policy	**New policy or revision of existing?**	Existing
Person(s) responsible for assessment		Duncan Smith	
1. Briefly describe the aims, objectives and purpose of the policy.	Guide procurement activities for the association to comply with relevant legal and regulatory requirements		
2. Who is intended to benefit from the policy? (e.g applicants, tenants, staff, contractors)	Providing clear and compliant guidance will benefit the organisation as a whole and ensure all contractors or prospective contractors are dealt with fairly and equally.		
3. What outcomes are wanted from this policy? (e.g the measurable changes or benefits to members/ tenants / staff)	Clear guidance for staff when procuring contracts		
4. Which groups could be affected by the policy? (note all that apply)			
Age	X	**Disability**	X
Gender reassignment	X	**Marriage and Civil Partnership**	X
Pregnancy and Maternity	X	**Race**	X
Religion or Belief	X	**Sex**	X
Sexual Orientation	X		
5. If the policy is not relevant to any of the equality groups listed above, state why and end the process here.			
6. Have those affected by the policy / decision been involved?			
No, not required			
7. Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.		**Positive Impact(s)**	**Negative Impact(s)**
		Policy ensures clear and consistent guidance for dealing with all prospective contracts	None
8. What actions are required to address the impacts arising from this assessment? (This might include: additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)		N/A	

Signed:	Duncan Smith
Dated:	18/08/2026

GDPR Impact Assessment

Name of Policy to be assessed	Procurement Policy	**New policy or revision of existing?**	Existing
Person(s) responsible for assessment		Duncan Smith	
Briefly describe the aims, objectives and purpose of the policy.	Guide procurement activities for the association to comply with relevant legal and regulatory requirements		
Which type of data will be used by implementation of this policy? (e.g. personal, sensitive or special category)	Data from prospective contractors would be commercially sensitive		
What outcomes are wanted from this policy? (e.g. necessary to meet legal obligations)	Clear guidance for staff when procuring contracts		
Which groups could be affected by the policy? (note all that apply)			
Tenants		**Committee**	X
Employees	X	**Contractors**	X
If the policy is not relevant to any of the data groups listed above, state why and end the process here.			
Have those affected by the policy / decision been involved?			
No, not required			
Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.		**Positive Impact(s)**	**Negative Impact(s)**
What actions are required to address the impacts arising from this assessment? (This might include: additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)		Clear procedures for dealing with contractor data to ensure it is protected during procurement activities	
Signed:		Duncan Smith	
Dated:		18/08/2026	