Procurement Policy

Policy owner	Executive Director of People & Governance
Approval level	Group Board
Customer input	Not required, although customer input and consultation will be required for certain procurements.
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1. What This Policy Is For

1.1 This policy supports our wider objective to be well governed and financially strong. It is a vital component in achieving value for money and delivering Social Value. It sets the expectations and rules for colleagues on how we will procure goods, services and works, and how we will make, approve and record key governance, legal, procurement and contract decisions.

1.2 The policy brings together the requirements for executing contracts, maintaining registers, managing contracts and applying delegated authority.

1.3 The policy should be read alongside the Financial Regulations and Scheme of Delegation, Contract Management Framework and any approved procurement procedural guidance. Supporting procedures, forms, templates and system instructions sit outside this document to guide and enable colleagues to meet these requirements.

2. Who this Policy Applies To

2.1 This policy applies to Southway Wythenshawe Homes and to any of its subsidiaries that must comply with relevant legislation and regulation. It applies to Board and committee members, employees, agency workers, consultants and anyone acting on the Group's behalf.

2.2 This policy does not normally apply to contracts of employment, acquisitions or disposals of land or buildings unless they are linked to works, services or goods, specified financial transactions, or any other contract that is exempt under applicable procurement legislation. Section 4 provides further detail on lawful exclusions. Colleagues must check the Financial Regulations and seek Procurement or legal advice if they are unclear.

2.3 Where a non-standard route is approved, it will not remove the requirement to comply with applicable law, procurement objectives, value for money, probity, conflicts of interest, audit trail and governance controls.

2.4 Where a Group entity has different constitutional or legal requirements, those requirements will take priority. Colleagues must seek advice from the Group Secretary, Finance Team or Procurement Team if the correct route is unclear.

3. Legal and Regulatory Requirements

Comply with Procurement Law and Guidance

3.1 We will comply with this policy, the related procedural guidance and all procurement legislation that applies to each contract. The applicable regime will depend on when the procurement started and how any framework, dynamic purchasing system or other commercial purchasing tool was established.

3.2 The following legislation and regulations apply to this policy.

- The Public Contracts Regulations 2015, where the procurement started before 24th February 2025 or the relevant framework agreement or dynamic purchasing system was established under those regulations
- The Concession Contracts Regulations 2016, where the procurement started before 24th February 2025
- The Procurement Act 2023, the Procurement Regulations 2024 and any related commencement, transitional or saving provisions, where the procurement started on or after 24th February 2025
- The National Procurement Policy Statement, as updated from time to time
- The Public Services (Social Value) Act 2012
- The Commonhold and Leasehold Reform Act 2002 and the Service Charges (Consultation Requirements) (England) Regulations 2003
- Equality, diversity, inclusion, health and safety and modern slavery legislation
- Any later legislation, regulations or statutory guidance that replace, amend or supplement the above.

3.3 Southway Wythenshawe Homes's Procurement Team maintains up-to-date statutory procurement thresholds. Colleagues must check the current thresholds before starting a procurement and must follow the additional requirements that apply at or above those thresholds.

3.4 We will apply the correct regime to each procurement and contract. Procurements started on or after 24th February 2025 will be conducted under the Procurement Act 2023, the regulations made under it and applicable Cabinet Office guidance. Procurements started under the Public Contracts Regulations 2015 will be managed under those regulations until the contract ends.

Follow the 2015 Regulations Where They Still Apply

3.5 For procurements and contracts that remain subject to the Public Contracts Regulations 2015, we will continue to follow the principles of equal treatment, non-discrimination, transparency and proportionality. This includes applying the correct rules to contract modifications and publishing any required notices on the relevant platform.

Follow the Procurement Act 2023 Objectives

3.6 We will deliver value for money, maximising public benefit, sharing information so suppliers and others can understand our procurement policies and decisions, and acting and being seen to act with integrity.

3.7 We will treat suppliers consistently and will not discriminate. Where a difference between suppliers justifies different treatment, we will take reasonable steps to avoid placing any supplier at an unfair advantage or disadvantage.

3.8 We will also consider the barriers that small and medium-sized enterprises may face and whether those barriers can be removed or reduced.

Governance and Probity

3.9 We will manage procurement activity with appropriate governance, probity and audit controls. Officers must declare conflicts of interest, keep accurate records, follow the approved route to market and seek procurement advice where the correct legal or procedural route is unclear. We will identify, record and keep under review actual or potential conflicts of interest for relevant procurements and manage any risk of unfair supplier advantage or disadvantage before proceeding.

3.10 We will expect everyone involved in procurement, including Board and committee members, colleagues, advisers and involved customers, to act openly, honestly and accountably. They must not use their role to gain a personal financial benefit,

give others an unfair advantage, or take part in any conduct that could suggest fraud, bribery, bias or impropriety.

3.11 Material breaches, governance concerns, unresolved procurement risks, significant supplier challenges and repeated failure to follow this policy will be escalated to the relevant Executive Director and reported through the appropriate governance route.

4. What We Will Do

Planning and Approval

4.1 Before starting any procurement activity, we will confirm the requirement, identify available procurement options, obtain the necessary approvals and establish which procurement legislation applies.

4.2 We will check whether an existing contract, framework, dynamic purchasing system or dynamic market can meet the requirement and identify the approvals required by the Scheme of Delegations.

4.3 We will not split contracts, phase purchases or use valuation methods to avoid procurement legislation, internal controls or approval requirements.

4.4 We will aggregate the value of similar, recurring or connected requirements unless there is a clear, documented reason not to do so.

4.5 For contracts above £30,000, we will prepare a Procurement Business Case. For contracts of £30,000 or below, we will retain quotation evidence and approvals so that we can demonstrate that value for money has been achieved.

4.6 Procurement Business Cases will be reviewed and signed by the Procurement and Finance Teams. The delegated approver must also approve and sign each business case before the opportunity is published. The Award Report must be approved before any commitment is made to a supplier.

4.7 We will maintain forward procurement plans and publish planned procurement notices where required by legislation.

4.8 We will consult residents and leaseholders in line with Section 20 requirements. Beyond this, we will actively involve customers when procuring services that have a direct impact on them, including Social Value commitments (see section 5 of this policy).

4.9 We will build any required consultation into the procurement timetable, keep appropriate records and make sure the procurement route supports compliance, transparency and value for money.

4.10 If a lawful exclusion from procurement legislation applies, this will be recorded as part of the business planning process. For development, regeneration, land or grant-funded projects, we will consider whether procurement legislation applies and obtain procurement and legal advice where required.

4.11 We will use current statutory thresholds and internal approval bands maintained by the Procurement Team. In doing so, we will estimate and record the total contract value as accurately as possible, including extension options and the full anticipated contract term.

4.12 Appendix 1 sets out the competition and approval bands. Statutory procurement thresholds will not be reproduced in this policy because they may change. Colleagues must use the current approved threshold schedule maintained by Procurement before starting any procurement. Internal competition and approval bands are shown including VAT unless stated otherwise.

Market Engagement

4.13 We will use preliminary market engagement where appropriate to develop requirements, understand market capability, design procurement processes and encourage supplier participation. We will ensure participating suppliers do not gain an unfair advantage and publish a Preliminary Market Engagement Notice where required by procurement legislation.

Procurement Route

4.14 Competition is the default procurement route. A non-standard route may only be used where Procurement confirms that a lawful route is available. Exceptional routes must not be used because of poor planning, convenience or budget

pressures. We will record the legal basis, value-for-money justification, approval route and any publication requirements before making any commitment.

4.15 Where an existing contract or compliant framework cannot meet the requirement, competition will normally be used. We will act with integrity, achieve value for money, maximise customer benefit, promote Social Value and consider barriers faced by SMEs.

4.16 The colleague requesting a non-standard route must not approve it. The Procurement Team and the delegated approver must approve all non-standard routes.

4.17 We will use frameworks, dynamic markets and other commercial purchasing tools only where the Group is entitled to use them, the requirement is within scope, and the Procurement Team confirms they were established lawfully.

4.18 Before award, the Procurement Team will confirm any notice, assessment summary, standstill or publication requirements. The Procurement Team may apply a proportionate voluntary pause or feedback period where this helps manage challenge risk, transparency or supplier queries.

Tendering and Evaluation

4.19 We will set award criteria before inviting bids and ensure they are relevant, proportionate, measurable and designed to support value for money and customer outcomes.

4.20 We will use an approved e-procurement system, keep bids confidential and require conflicts of interest to be declared and managed.

4.21 We will receive, open and evaluate bids fairly, securely and in line with the published procurement process.

4.22 We will follow Procurement guidance and maintain evaluation panel records, moderation records, clarification records and records relating to abnormally low tenders.

Contract Award

4.23 We will obtain delegated award approval, record the decision in the Award Report, notify bidders and publish all notices required by law.

4.24 We will complete exclusion and debarment checks where required and not award contracts to suppliers that must be excluded.

4.25 For procurements governed by the Procurement Act 2023, we will issue assessment summaries, publish required notices and observe any applicable standstill period.

4.26 Where a challenge, complaint or material feedback request is received before contract signature, we will pause the award process and seek legal advice where necessary.

Contract Mobilisation

4.27 All contracts will be in writing and clearly allocate responsibilities, obligations, rights and risks. Standard contract terms should be used wherever possible.

4.28 Where standard terms are not suitable or a bespoke agreement is needed, we will seek procurement and legal advice before signature and the contract file will record who approved the alternative terms.

4.29 We will raise purchase orders where required by financial procedures and ensure they reference the applicable contract.

4.30 We will execute contracts valued at £1 million or more as deeds. Contracts below £1 million may be executed as simple contracts unless legal advice or contract risk requires a deed. We will sign or seal contracts before supplies, services, works or concessions commence, except in authorised exceptional circumstances.

4.31 We will maintain accurate procurement, governance and contract records, including the contract register, to support audit, transparency and reporting requirements.

Contract Management

4.32 We will appoint a named Contract Manager for every contract above £30,000.

4.33 Contract Managers will monitor cost, quality, performance, compliance, customer satisfaction, risk, continuous improvement and Social Value throughout the contract term. They will use KPIs, supplier meetings, customer feedback and other performance measures to assess value for money and service delivery.

4.34 For contracts above £5 million, Contract Managers will assess supplier performance at least annually and on termination to support statutory notice requirements.

4.35 All contractors will be required to sign a Supplier Code of Conduct. The Contract Manager will monitor compliance with the Supplier Code of Conduct as part of the contract requirements.

Contract Changes and Extensions

4.36 Before making any contract change, we will confirm that the change is permitted under both the contract and procurement legislation. We will record the decision and obtain the required approvals.

4.37 We will extend contracts only where a clear extension option exists and is exercised in accordance with the contract. Bridging arrangements will only be used if they are lawful, necessary and limited in duration, scope and value.

4.38 We will only make contract modifications where Procurement confirms they are permitted under the applicable procurement legislation. The Procurement Team will confirm any publication, notice or legal advice requirements before the change is implemented.

5. Delivery of Social Value

5.1 Southway Wythenshawe Homes is committed to achieving Social Value benefits for our customers and communities. The procurement of goods, works and services provides significant opportunities to deliver these benefits, which we will maximise, monitor and support.

5.2 For procurements above £30,000, we will apply a minimum 10% Social Value weighting. We will apply the Public Services (Social Value) Act 2012

proportionately and design Social Value requirements so they are relevant to the contract, measurable, deliverable and capable of being monitored throughout the contract term.

5.3 We will involve customers in setting Social Value objectives and targets so that they deliver tangible and relevant benefits to our communities.

5.4 We will require contractors to make clear Social Value commitments at tender stage and, where those commitments form part of the award decision, we will include them in the contract, specification, mobilisation plan, KPIs or contract management plan. Commitments must be specific enough to evidence delivery, including what will be delivered, by when, for whom and how impact will be measured.

5.5 Contract Managers will manage Social Value proactively. They will agree reporting requirements at mobilisation, review progress through regular contract meetings, request evidence of delivery, challenge under-performance and support the recording of outcomes. They will be required to report progress at least annually.

5.6 Where a contractor is not delivering agreed commitments, the Contract Manager will agree corrective actions, escalate persistent non-delivery through their manager and apply the contractual remedies available where appropriate.

5.7 As a Real Living Wage organisation, we will encourage and, where appropriate, require suppliers to support fair pay and employment practices. Procurement will consider Real Living Wage requirements proportionately when designing specifications, evaluation criteria and contract terms, taking account of the nature, value, risk and deliverability of the contract.

6. Reporting

6.1 The Executive Board will receive a quarterly update on procurement outcomes.

6.2 At least annually, the Group Audit and Risk Committee will receive a comprehensive report that includes:

- Completed procurements above £30,000

- Material compliance issues, non-standard route approvals and any significant challenge or risk matters
- A value for money assessment of procurement outcomes
- Social Value outcomes

7. Equality, Diversity and Inclusion

7.1 We will apply this policy fairly and consistently. Procurement requirements, conditions of participation, award criteria and selection methods will be relevant, clear, measurable and proportionate. They will not create unjustified barriers, and we will consider accessibility, inclusion and equality impacts when designing requirements and managing contracts.

7.2 We will complete an Equality Impact Assessment or screening decision before this policy is approved. Any actions identified will be recorded, assigned to an owner and monitored through the policy review process.

8. Policy Review and Responsibility

8.1 This policy will be reviewed at least every three years, or whenever there is a change in relevant legislation or regulation.

8.2 Minor updates to maintained schedules, such as procurement thresholds, policy ownership details or procedural links, may be made without full policy re-approval where the change does not alter the approved policy principles or delegation controls.

8.3 The people responsible for overseeing this policy are listed below:

Role	Responsibility
Group Board	Approves this policy and matters reserved to the Board.
Company Secretary	Owns the governance framework, controls seals and maintains corporate registers.

Role	Responsibility
Executive Directors	Approve in line with the Scheme of Delegation and oversee implementation.
Directors and Heads of Service	Exercise delegated authority and make sure controls operate in their areas.
Group Head of Procurement / Procurement Team	Advises on procurement, reviews project spend, runs regulated procurement processes, maintains procurement records and publishes notices.
Finance	Confirms budget, financial approvals and segregation of duties.
Responsible Officer	Defines the requirement, secures approvals and works with Procurement through to award.
Contract Manager	Manages contract performance, including KPIs, risk, compliance, records, Social Value and end-of-contract activity.
All colleagues	Follow this policy, declare conflicts and seek advice where unsure.

9. Glossary

Term	Definition
Aggregation	The process of adding together the estimated value of similar, recurring or connected requirements to decide the correct procurement route.
Central Digital Platform	The national online platform used to publish procurement information and notices.
Assessment summary	A document explaining how a tender was assessed and why the award decision was made, where required by law.
Contract Manager	The person accountable for managing a contract after award.

Term	Definition
Below-threshold modification	A lower-value contract change that may be allowed if it meets the legal value and scope limits.
Deed	A legal document executed using additional formalities and generally subject to a longer limitation period.
Direct award justification	A legal reason that may allow a contract to be awarded without a competition in specific circumstances.
Dynamic Market	A flexible arrangement under the Procurement Act 2023 through which eligible suppliers may join and compete for contracts.
Framework	An agreement that sets terms for future call-off contracts.
Permitted modification	A contract change that procurement law specifically allows, subject to the required checks and approvals.
Planned procurement notice	A notice used to share information about future procurement activity where required by procurement legislation.
Procurement Business Case (PBC)	The approval record explaining the need, value, route, risks, benefits and proposed controls for a procurement.
Real Living Wage	A voluntary UK wage rate based on the cost of living, separate from the statutory National Living Wage.
Responsible Officer	The service-side officer accountable for the requirement and approvals.
Substantial modification	A contract change that is significant enough to make the contract materially different from what was originally procured.
Standstill period	A period between communicating an award decision and entering into the contract, where required.

Term	Definition
Total estimated contract value	The full expected value over the contract term, including options and extensions, calculated on the stated VAT basis.
Voluntary pause / feedback period	An internal pause before contract signature used to manage transparency, feedback or challenge risk where a statutory standstill is not required.
Section 20 consultation	A statutory consultation process that may apply before we enter into certain long-term agreements or carry out qualifying works where leaseholders may be charged through their service charges. It helps make sure leaseholders are informed and consulted before relevant costs are committed.
Supplier Code of Conduct	The standards and behaviours suppliers are expected to sign up to where they apply to a procurement or contract.
Supplier exclusion / debarment	A legal process or status that may prevent a supplier from being awarded a public contract, where required by procurement legislation.
Value for money	The best overall balance of cost, quality, risk and outcomes, not simply the lowest price.

Appendix 1. Procurement Competition and Approval Levels

A1.1 Competition Levels

Total estimated value (Must include VAT)	**Minimum competition / route**	**Advertising**
Up to £10,000	One request for quote; multiple quotes are not essential	Not applicable
£10,001 to £30,000	Seek at least three comparable written quotations	Not normally required
Above £30,000 and below the relevant statutory threshold shown in the maintained threshold schedule	3 to 6 invited tenders or an open below-threshold process, agreed with Procurement	E-procurement system; Central Digital Platform where legally required
At or above the relevant statutory threshold shown in the maintained threshold schedule	Regulated procurement process	E-procurement system and Central Digital Platform

A1.2 Procurement Business Case Approval

Estimated value (including VAT)	**Approval level**
Above £30,000 and up to £249,999	Head of Service
£250,000 to £999,999	Director of Service Area
£1,000,000 and above	Executive Director

A1.3 Award Report Approval

Estimated value (including VAT)	**Approval level**
Above £30,000 and up to £249,999	Head of Service

Estimated value (including VAT)	Approval level
£250,000 to £999,999	Director of Service Area
£1,000,000 and above	Executive Director

A1.4 Non-Standard Procurement Approval

Contract value (including VAT)	Approval level
Up to £249,999	Head of Service
£250,000 to £999,999	Director of Service Area
£1,000,000 and above	Executive Director

A1.5 Contract Sign-Off and Execution Reference

This table is an easy reference for who can sign off a contract once the procurement route, award approval and budget approval have been completed.

Contract value	Who can sign off	Execution route / notes
Up to £10,000	Budget holder with appropriate delegated authority	Simple contract, purchase order or approved ordering route, unless a deed is required.
£10,001 to £30,000	Budget holder / Responsible Officer with appropriate delegated authority	Simple contract or purchase order, supported by quotation records and budget approval.
Above £30,000 and up to £249,999	Head of Service	Written contract signed before start. Procurement Business Case and Award Report required.
£250,000 to £999,999	Director of Service Area	Written contract signed before start. Consider deed execution if risk,

Contract value	Who can sign off	Execution route / notes
		limitation period or contract type requires it.
£1,000,000 and above	Relevant Executive Director / Group Chief Executive	Deed execution will be required. Check any additional Scheme of Delegation requirements before signature.
Development contracts	Authorised signatory in line with delegation and project approval	Executed as deeds unless legal advice confirms another route is appropriate.