

Policy title:	Procurement Policy		
Scope:	Group-wide		
Policy owner & job title:	Hannah Mapp, Procurement Manager		
Approver:	Andrew Palmer, Executive Director of Finance		
Date:	01/07/2024	Review Due Date:	01/07/2026

POLICY SUMMARY

- This policy outlines the strategic approach to procurement aligned to the Value for Money Strategy (2024 to 2030) and demonstrates how procurement will contribute towards the ultimate vision of Putting people first by delivering safe decent homes and excellent housing services through our talented Aspire team.
- Aspire Group spends in excess of £50,000,000 per annum on commissioning and procurement therefore can have a significant impact on the business, customers and the social and environmental well-being of Staffordshire and our surrounding area.
- Aspire Housing Procurement Policy applies to all spend, regardless of value. The policy is aimed at ensuring compliance with legislative requirements and our own standing orders and financial regulations.

Associated Policies & Procedures: Standing Orders Policy (Group) – Including Financial Regulations.

1. POLICY STATEMENT

1.1. OVERALL AIM

Provide procurement excellence by delivering best value through engagement with organisations that not only exceed our cost and quality expectations but fundamentally share our corporate vision to embed a socially responsible philosophy throughout the relationship.

- Buy Local - We place special importance on the ability to engage with organisations that operate within and support our local area. Our processes provide a unique opportunity to help boost the local economy by helping to create a multiplier effect with every pound spent.
- Buy Social - The Social Value Act 2012 provides a platform on which to consider and encourage the environmental, social and economic benefits to an area when awarding contracts. These factors remain a vital part of our evaluation process as we seek to maximise and develop benefits that can be obtained from commercial arrangements we undertake.

- Buy Quality - To determine better outcomes we evaluate many quality factors and not just cost alone. We drive a quality agenda from commissioning, through the evaluation phase to contract delivery and management to achieve a high level of service throughout the life of a contract
- Value for Money - The over-riding procurement policy requirement is that all public procurement must be based on value for money. As such, we adhere to the EU Treaty Principles which underpin the way we work proportionality, mutual recognition, transparency, non- discrimination and equal treatment.
- Improving sourcing efficiency – By capability and capacity building.
- Implement spend-mapping and category-based decision making – Being able to demonstrate procurement resources deployed where it can have the most impact.

1.2. OBJECTIVES

The policy will be delivered by achieving objectives as outlined below:

- Drive efficiencies and cost reduction initiatives to ensure we are delivering value for money throughout the life of our contracts and report this annually.
- Ensure procurement activities are planned, maintained, and reviewed effectively with service level agreements and key performance indicators with the involvement of all stakeholders.
- Ensure our processes help to identify and maintain sustainable, socially inclusive, and responsible standards which remain true to the vision.
- Identify opportunities for working with others both in the public and private sectors in order to widen the scope for maximising purchasing power and identifying innovation.
- Encourage SME involvement with procurement activity and monitor and report local spend data annually.
- Provide effective management and monitoring to ensure compliance with current the Public Contracts Regulations and best practice.
- Ensure reportable and accurate spend and contract data to demonstrate VFM, Compliance and statistics.

1.3. E-PROCUREMENT AND EVALUATIONS

We will adopt a range of procurement options in order to optimise the quality-of-service outcome and allowing innovation to maximise value for money.

We will ensure that every stage of the procurement process will be conducted in a manner which is open, fair, and transparent. Any award will have a clear audit trail indicating how the decision has been reached.

We will comply with Standing Orders (Including Financial Regulations) and use E-Procurement tools, which support both procurement and the subsequent contract management activities.

By adopting a proactive approach to procurement opportunities, we are able to undertake a full scoping exercise with all stakeholders when assessing the business need to always include the following:

- The strategic importance of the service, goods or works to us
- Item specification
- Cost targets
- Key Performance Indicators and Service Level Agreements
- Stakeholder involvement
- Quality considerations (Health and Safety, Capacity and Capability, social value, technical expertise, modern slavery, and environmental factors etc.);
- Legal implications (compliance).

Qualifying responses will be evaluated against clear pre-determined criteria by an evaluation panel containing key stakeholders.

All bidders will be notified of the results of their submissions in writing and where applicable given structured feedback to help assist with future opportunities.

We will openly advertise our opportunities in appropriate media in order to ensure that we engage with local businesses and social enterprises.

1.4. WAIVERS AND BREACHES

A waiver is approval to deviate from the procurement policy before the matter happens. A breach is a deviation from the policy after the matter.

Approval for a waiver or breach must be agreed with the relevant member of the Senior Leadership team, using the waiver and breaches template. This should then be sent to the Finance Director and Procurement manager for approval.

More than one waiver or breach for the same supplier will require additional ED approval.

A register will be maintained for both waivers and breaches by the Procurement team and reported on quarterly to Executive Directors.

1.5. SAVINGS APPROACH

Aspire is facing a challenging period with increasing demands on our service delivery which places a critical focus on the effectiveness of the procurement activity. This policy outlines our approach to procurement but is inextricably linked to the drive for efficiency and achievement of challenging earnings targets.

In addition to ensuring we undertake competitive procurement projects to achieve the best value, we will also look to extract additional benefits from existing positions and drive cost reduction initiatives through value engineering methodology. This will remain a consistent programme which is part of contract management and reviewed as part of the annual strategic objectives.

We will lead a programme through regular key supplier spend analysis to achieve greater visibility in conjunction with the commitment of stakeholders to:

- Help create Procurement strategies, market intelligence, effective contract management and overall performance management of outcomes. This will ensure supply arrangements are planned, executed, managed, and reviewed to drive the concept of savings.
- Reduce the cost, or improve the quality, of current contracts with key suppliers.
- Review and consolidate our supplier base and seek to reduce inefficiency and processing costs by actively using existing suppliers for our requirements.
- Reduce the number of suppliers that fail to demonstrate value for money as our commitment to drive continuous improvement.
- Analyse spend across the group of companies to allow pooling of requirements to create economies of scale and further develop strategic partnerships with key suppliers.
- Maintain a strategic supplier matrix and evaluate risk.
- Ensure contracts are being managed at operational levels.
- Report on savings type (i.e. Cashable/Cost Avoidance etc) and Value quarterly.

1.6. QUALITY DRIVERS

When evaluating organisations during the selection process we ensure that they share the Aspire vision by the critical appraisal of their quality submission which can typically include the following sections (these parameters also apply if work is subcontracted to a third party):

Social Value: We will encourage organisations to consider carefully details of their bids and the potential to add value to the local area both in terms of labour opportunities and the general economy. We are supported in our aim by the Social Value Act 2012 which allows us to build these aspects into our overall evaluation process. We will maximise the opportunity through our supply chain with the expectation that the use of apprenticeships form part of the service delivery along with other employment and skills options by prioritising this in our procurement decisions.

Sustainability/Environmental Characteristics: We are committed to protecting the environment and whilst addressing the impact of our activities we expect our suppliers to demonstrate not only awareness but a proactive action on sustainability and environmental characteristics of their service delivery.

Modern Slavery Act 2015: Modern slavery is a serious crime in which victims are exploited for someone else's gain. It can take many forms including trafficking of people, forced labour and servitude. Victims are often hidden away, may be unable to leave their situation, or may not come forward because of fear or shame.

It is the responsibility of each and every Aspire colleague to look out for modern slavery and to report if we think this may be happening whether at Aspire or within Aspires supply chain.

Procurement will ensure measures are in place to comply with the Modern Slavery Act 2015 in relation to transparency in our supply chain and will establish processes and embed ethical principles on how suppliers and tenders are evaluated and assessed to identify vulnerabilities, driving out unethical practices from our supply chain and taking corrective action where appropriate.

Continuous Improvement and Innovation: We will encourage and promote continuous improvement throughout the term of the contract and seek innovations to increase service value or deliver efficiencies. These will remain an agenda item of contract review meetings

1.7. RISK MANAGEMENT

We will take all reasonable steps in the management of risk to ensure that any service disruption is minimised. For procurement to deliver best value it is appropriate to adopt an approach based on risk management principles. In this way, contracts involving a high level of risk (whether that risk is in terms of impact of customers, finance, time, the environment, or service delivery) should involve a more detailed process, whereas low risk projects would not generally justify a resource intensive procurement procedure.

We will carry out financial assessments on all key contractors and seek to limit the exposure of our suppliers to an over reliance on our business as the main source of their income.

1.8. PROBITY

Any stakeholder within the business involved in procurement activity must declare any interest that they have with any actual or potential suppliers.

Each member of an Evaluation Team must complete a Conflict-of-Interest form before completing any tender evaluation.

Suppliers are also required to declare any interest they may have with Aspire or its staff as part of their tender submission.

1.9. BUSINESS CONTINUITY

We will ensure that all contracted organisations have effective business continuity arrangements in place to ensure that they are able to maintain service delivery in the event of a major incident.

1.10. CUSTOMER INVOLVEMENT

Participation from our customers is an integral and valuable part of some procurement activity. The requirement will be assessed at the commencement of such procurement activity and suitable representatives engaged.

1.11. SMALL / LOCAL BUSINESS ENGAGEMENT

Our approach brings a unique opportunity to boost the economic fortunes of Staffordshire and produce a regenerative effect by ensuring, where appropriate, our spend is in the locality and helps to create a positive multiplier effect by being spent many times over in the local economy.

We will actively seek to engage with small and/or local businesses when awarding contracts and recognise the contribution that can be made and therefore ensure that contracts are structured in a way that allows those to compete subject to delivering best overall value. We can further support their participation by:

- continuing to work proactively with local businesses to explain how to do business with us and obtain and act upon feedback in order to improve our processes and documentation;
- providing detail regarding future procurement opportunities in a timely manner to aid their planning and preparation. In the event that large contracts are necessary we look to encourage and challenge the integration of SME's throughout their supply chains. In addition, we will develop our approach to social value into contracts which encourages suppliers to employ, subcontract and procure from within the Staffordshire area.
- Creating an area on Aspire external website for "How to do business with Aspire" providing a how to guide and guidance for SMEs on submitting tenders, future pipeline and key policies.

1.12. AUTHORISATION LEVELS

The authorisation requirements for commercial contracts relating to goods, works and services are subject to the financial thresholds and approval conditions and detailed in the Standing Orders Policy (Group) – Including Financial Regulations.

- When considering the procurement route to follow the thresholds in Appendix 1 must be observed.
- All contracts must be signed by an authorised person as per Appendix 2 – Delegated Authorities Schedule.

1.13. CONTRACT MANAGEMENT

We will hold centrally all contracts within our E-tendering platform to create a group contract register.

We will manage our key contracts actively to drive continuous improvement through contract performance and efficiencies and the achievement of best value. This will be enabled firstly, by greater visibility of spend data with key suppliers with agreed performance standards and secondly by taking a clearer lead role as the commercial owners of our major suppliers and contracts.

Review meetings will be determined by the strategic importance of the supplier to us both in terms of frequency and detail which will be agreed between procurement and contract owners to form a contract management plan.

We will work with operational contract owners to help develop best practise and provide training in contract management alongside appropriate documentation where required. This structured approach will allow more detailed information to be provided to senior managers within the group and ensure suppliers are accountable to validate performance at the standards expected but also to drive innovation and additional efficiencies during the entire life of the contract.

We will maintain a professional business approach with our suppliers and as such past performance will determine future opportunities to work with us. This will be monitored during contract review meetings, action logs and KPI performance and where necessary reported to the Procurement Review Unit (PRU)

1.14. ETHICS

We are committed to the consistent application, enforcement of and compliance with the Code of Conduct and Probity Policy and all relevant UK procurement legislation.

All information contained in tender documentation submitted by suppliers is treated as confidential and is not disclosed to other potential suppliers or made available outside the organisation.

1.15. EQUALITY & DIVERSITY

We will ensure that our procurement activities are carried out fairly and equitably and in accordance with our Equality and Diversity Policy. This includes the process of supplier selection but also ensures that those selected can demonstrate they share the same values as the Aspire Group and consider the different needs of our customer base when carrying out any activity on our behalf.

We openly advertise our opportunities on our tendering portal and in appropriate media in order to ensure that we engage with local businesses and social enterprises.

2. RESPONSIBILITIES OF EMPLOYEES

All employees are responsible for ensuring any procurement exercises in which they are involved is conducted in line with this policy.

Managers are responsible for ensuring that they do not authorise any procurement which was not conducted in line with this policy. They are also responsible for ensuring that any employee in their team who is charged with procuring any product or service is familiar with this policy.

3. RESPONSIBILITY OF ASPIRE

Aspire will support employees to adhere to this policy, providing clear and timely guidance as required.

This policy will be reviewed every two years or earlier if:

- It is invoked and use suggests that amendments are needed.
- Organisational restructures lead to changes in reporting lines

The designated policy owner is responsible for ensuring the policy and procedures are reviewed and updated as needed, including when there are changes to any individuals or roles mentioned in the policy or supporting procedures.

Routes to Market

Procurement will use one or more of the following routes to market based on the risk and level of spend.

ROUTE	DESCRIPTION	THRESHOLD
Soft Market Test (SMT) or Request for Information (RFI)	<ul style="list-style-type: none"> Allows testing of the market to understand available solutions to meet a supply need. The information can be used to inform a set of requirements, understand best practise and some outline costs. The SMT process can reduce tender timescales at a later date if a notice is issued (speak to procurement) The Soft Market Test cannot be used for supplier selection or elimination. Keep all evidence of SMT. 	All spend levels.
Three Quotations (Up to the value of £25k)	<ul style="list-style-type: none"> For goods, services and works that do not exceed the values set out in the Public Contracts Regulations. A non-formal sourcing process conducted in accordance with best practise guidance from Procurement. Approach 3 providers if you don't get 3 quotes back this is still compliant as you can evidence approach. 	Goods & Services or Works Contracts Values below the Public Contracts value.
Tender: Non FTS (RFQ)	<ul style="list-style-type: none"> For goods, services and works that do not exceed the values set out in the Public Contracts Regulations (2015)/ Procurement Act. 	Goods & Services or Works Contracts Values below the PCR 2015 value.
Tender: Open (ITT)	<ul style="list-style-type: none"> For goods, services and works that are either close to, the same as or exceed the FTS threshold levels. A one stage tender process which is advertised openly for all interested applicants to request and submit tenders. This is published on E-Procurement platform. 	Goods, Services or Works Contracts Values above the Public Contracts value.
Tender: Competitive Flexible Procedure* (ITT)	<ul style="list-style-type: none"> For goods, services and works that are either close to, the same as or exceed the FTS threshold levels. A flexible multistage process (designed to suit your need) which involves multiple stages to appoint a provider. 	Goods, Services or Works Contracts Values above the Public Contracts value.

Framework: Mini Competition	<ul style="list-style-type: none"> • Mini competition between suppliers that are approved and available through an approved Aspire or National Framework provider arrangement. • Note – for a framework mini competition you may be able to select who to invite to compete. 	All spend thresholds
Framework: Direct Award	<ul style="list-style-type: none"> • Direct award to a supplier using the contract available from an approved Aspire or National Framework provider arrangement such as CCS 	All spend thresholds
Dynamic Purchasing System (DPS): Mini Competition	<ul style="list-style-type: none"> • Mini competition between all suppliers that are appointed onto Aspire or National Providers DPS. • Please note for a DPS – All suppliers are required to be invited. 	All spend thresholds
Direct Award	<ul style="list-style-type: none"> • Direct award to a supplier. • Dependent on the level of spend, the award process will vary. • Should a Direct Award be required then a WAIVER will need to be written and approved by the procurement manager and the Director of Finance 	Goods, Services or Works Contracts

**New procedure as of Procurement Act 2023 coming into effect October 2024.*

Procurement considerations

CONSIDERATION	ACTION
Budget	Is there a budget. Has it been approved?
Section 20	Required if costs are service chargeable. Advice required from Rent and Service Charge Team
TUPE	Where TUPE applies, this must be stated and all information provided within the procurement documentation and transfer of staff must be considered as part of the overall cost and timescales for the process.
Customer involvement	At discretion of the Department making the purchase. Recommended for customer impacting contracts.

Social Value	Must be considered as part of the procurement evaluation for over threshold.
Data Protection/Information Security	Where suppliers will be processing data on behalf of Aspire, advice must be sought from the Procurement Team, Data Protection Lead and Information Security Manager. No contract should be signed where personal data is being processed without approval from the DPO
Payment / New supplier Process	No PO No Pay Follow purchase order process. Request a new supplier if required.
Contracts register	All contracts to be added on to the contract register by procurement

Roles and Responsibilities

<p>Board</p>	<ul style="list-style-type: none"> • Approve award of contracts in line with scheme of delegated authority
<p>Executive Directors</p>	<ul style="list-style-type: none"> • Review procurement performance and risk • Approve award of contracts in line with scheme of delegated authority
<p>Directors</p>	<ul style="list-style-type: none"> • Accountable for team's adherence to the policy • Approve award of contracts in line with scheme of delegated authority
<p>Procurement Manager</p>	<ul style="list-style-type: none"> • Develop strategy in line with business and regulatory objectives. • Provide procurement guidance to EDs, senior leaders and managers • Produce quarterly reports for EDs on procurement performance and compliance • Ensure the business is aware of their legislative requirements and keep updated of any changes to legislation • Drive continuous improvement across the business
<p>Procurement Team</p>	<ul style="list-style-type: none"> • Responsible for Contracts Register and forward tender plan in line with business needs • Ensure compliance of spend through contracts • Drive savings
<p>Employees</p>	<ul style="list-style-type: none"> • Ensure purchase of goods, services or works is in line with procurement policy • Ensure the use of existing suppliers where possible
<p>Contract Managers</p>	<ul style="list-style-type: none"> • Be involved in the procurement of the contract they manage • Ensure monitoring of supplier performance through KPIs • Ensure regular performance meetings with supplier • Ensure audit trail of contract management in In-Tend. • Ensure formal change control procedures to avoid contract "creep" • Consider risk under contract and mitigations

APPENDIX 1 - ORDER AND TENDER GUIDANCE

The following threshold levels for procurement activity which have been copied from the Standing Orders (Group) Policy (incorporating the Financial Regulations) must be complied with.

Value (All inc VAT)	UK Procurement Law	Process & Timescales	Terms and Conditions	Lead Department	Evaluation
£0 - £9,999	Won't Apply	<p>Check whether your requirement is covered by an existing contract, if not, ensure value for money One written quotation. Place the order within the required authorities for approval</p> <p>Estimated time frame - 1 day</p>	Purchase order Terms and conditions only	Individual Department	Price only
£10,000 - £24,999	Won't Apply	<p>Check whether your requirement is covered by an existing contract, if not, three written quotations. Place the order within the required authorities for approval</p> <p>Estimated time frame - 1 week</p>	Purchase order Terms and conditions only	<p>Individual Department</p> <p>*Procurement can support if needed</p>	Likely price only

£25,000 to PCR	Won't Apply	<p>Procurement will work with you to understand your needs and agree the best approach to procure your requirements. This could include 3 quotes, RFQ, ITT, Framework or DPS</p> <p>Estimated time frame - 2-4 weeks</p>	<p>Procurement to advise depending on risk and value. Purchase order Terms and conditions or formal contract</p>	Procurement*	Procurement to decide based on approach
£214,904 + (Supplies and Services)	Yes	<p>In compliance with the PCR applicable to Supplies & Services Full tender or call off through a compliant framework or Dynamic Purchasing System.</p> <p>Estimated timeframe - 6-12 months</p>	Formal contract required	Procurement*	<p>Detailed Price and Quality evaluation required Moderation meeting to be held Minimum 3 evaluators required Conflict of Interest forms to be completed by evaluators Clarification Interviews optional</p>
£5,372,609 + (Works)	Yes	<p>In compliance with the PCR applicable to Works Full tender or call off through a compliant framework or Dynamic Purchasing System.</p> <p>Estimated timeframe - 6-12 months</p>	Formal contract required	Procurement*	<p>Detailed Price and Quality evaluation required Moderation meeting to be held Minimum 3 evaluators required Conflict of Interest forms to be completed by evaluators Clarification Interviews optional</p>

***For all procurement lead tenders award recommendation reports (which explains the process, outcome and benefits) will be drafted and sent for approval to award to relevant authoriser based on value.**

NOTE: The value of procurement must not be artificially split or reduced to affect the thresholds and influence the procurement route.

The value of procurement should be calculated to:

- Reflect the whole life cost of the procurement/contract, not just the annual value if the contract is for more than one year; and
- Include value added tax and insurance premium tax

Contract lengths should not be artificially split to affect the thresholds.

APPENDIX 2 – DELEGATED AUTHORITIES SCHEDULE

The following are the approval levels for contract which have been copied from the Standing Orders (Group) Policy (incorporating the Financial Regulations)

Table 1 – Approval of commitments/orders/contracts/invoices

Job Level	Approver	Maximum
Tier 1	Board	Unlimited
Tier 2	Group Chief Executive	£10,000,000
Tier 3	Executive Directors	£5,000,000
Tier 4	Directors	£1,000,000
Tier 5	Heads of Service	£500,000
Tier 6	Managers and technical specialist	£25,000
Tier 7	Other nominated officers	£1,500