Procurement Policy

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You are advised that a printed version may not be the latest available version. The latest version, which supersedes all previous versions, is available on the Brighter Places drive.

Those to whom this policy applies, are responsible for familiarising themselves with the latest version and for complying with the policy requirements at all times.

Should colleagues require any reasonable adjustment to allow for engagement with this document please contact the policy lead.

Procurement Policy

Brighter Places

November 2025

1.0 Introduction and aim

1.1. This Procurement Policy document is not intended to replace or alter the Rules of Brighter Places.

1.2. This Procurement Policy document shall be read in conjunction with the Standing Orders & Financial Regulations, Standing Financial Instructions and the Procurement Procedures documents.

1.3. A copy of this Procurement Policy together with the Procurement Procedures is to be available to all Board Members and staff of Brighter Places via the Board Portal and SharePoint.

1.4. Procurement is defined as the process for purchasing supplies, services or works. This involves the whole life cycle of an arrangement; from the initial concept and definition of business need, to selecting and commissioning suppliers, requisition, delivery and payment, and the ongoing monitoring and review of arrangements.

1.5. Our ability to procure efficiently and effectively impacts on our financial sustainability, our reputation and, ultimately, the quality of our homes and services, as well as contributes to wider environmental goals. Key to this is having a clear, well-structured and robust approach to what we procure and how we go about it.

1.6. This Procurement Policy is key to Brighter Places delivering a consistently high-quality approach to procurement that is aligned with the Procurement Act 2023, the National Procurement Policy Statement (NPPS) and wider Brighter Places' Corporate Strategy. It sets out Brighter Places' procurement principles and approach, which must be followed to ensure that goods, services and works procured demonstrate integrity and best practice, achieve value for money, consider environmental and social sustainability and comply with legal requirements that apply to public sector procurement activities.

1.7. For the purpose of this policy, the term 'supplier' means any business with which Brighter Places is considering entering into an arrangement for the provision of goods, services or works. The term 'procurement' includes also contract management.

1.8. This policy will be reviewed every 2 years in line with the organisation's policy review timetable or, in the interim, if any major legislative or regulatory changes require it.

2.0 Policy

2.1 Brighter Places is committed to undertaking high quality procurement, setting rigorous quality standards and monitoring both performance and procedures to ensure the best value delivery of goods, services and works in a compliant manner.

2.2 All procurement will be undertaken and managed by a member of staff with sufficient skills, capability and capacity appropriate to the value and risk associated with that transaction. To facilitate this, we will ensure that staff are provided with opportunities to develop and improve their procurement skills and knowledge. This will help ensure that, along with other resources and support, they are appropriately equipped to procure in a confident, competent and professional manner.

2.3 Brighter Places requires all staff involved in procurement to adhere to and promote the following principles:

2.4 All procurement activities carried out by Brighter Places are:

- Appropriate for what is being procured;
- Considerate of the needs and views of customers
- Approved in terms of sufficient budget being available;
- Transparent and undertaken electronically ensuring auditable records;
- Aligned with Brighter Places's values and objectives;
- Compliant with legislative, regulatory and corporate requirements;
- Able to provide and evidence probity and value for money; and
- Achieved through market testing and competition unless there are compelling reasons to the contrary.

2.5 All procurement activities should contribute, either directly or indirectly, to the implementation of Brighter Places' Corporate Strategy and its values and commitments including:

- Economic value
- Social Value including benefits to local community
- Needs and safety of the customers / residents
- Risk Management
- Carbon Neutrality
- Sustainability (both environmental and social)

2.6 As part of their commitment to local communities, Brighter Places will seek to achieve social value in all contracts over £100,000 in value in accordance with the Public Services (Social Value) Act 2012. This commitment shall be considered in all applicable procurement processes with social value requirements included in the Invitation to Tender documents.

2.7 The interpretation and implementation of Procurement Policy and all procurement and contract management practices on behalf of Brighter Places shall comply with the expressed intention of Brighter Places that the principles of fairness, openness and best value shall apply in all respects.

2.8 All procurement activities should adhere to and follow the correct procurement procedures and procurement toolkit providing templates, decision trees, process flowcharts and guidance notes to ensure consistent and compliant approach.

2.9 The authority to make commercial commitments (including approvals to procure and approvals to award) is in all cases subject to the general restriction that the expenditure must relate to the responsibilities of the person authorising it and be within the budget.

2.10 The approval to enter into a development or design & build contract must require Executive Team agreement and Board Approval.

2.11 All procurement activity (where the estimated contract value (including VAT and permitted contract extensions) is £30,000 and above) is undertaken via an e-Procurement system adopted by Brighter Places. Approval may be granted to utilise an alternative e-Procurement / e-Tendering system in cases where the procurement activity is undertaken through a framework / dynamic purchasing system / dynamic market and the framework provider, supporting the procurement activity, adopts an alternative e-Procurement / e-Tendering system.

2.12 Compliance will be mandatory, meaning that all procurement activities comply with all applicable statutory, legislative, regulatory and corporate requirements and obligations relating to procurement including, but not limited to:

Legislation

- The Procurement Act 2023;
- The Bribery Act 2010;
- The Public Services (Social Value) Act 2012;
- The Modern Slavery Act 2015;
- The UK General Data Protection Regulations (UK GDPR);
- Data Protection Act 2018;
- The Equality Act 2010 (Specific Duties) and Regulations 2011;
- Section 20 of the Landlord and Tenant Act 1985 (as amended);
- Service Charges (Consultation Requirements) (England) Regulations 2003;
- Construction Design and Management Regulations 2015;
- Housing and Regeneration Act 2008; and
- Health and Safety at Work Act 1974.

Regulatory requirements

- The Regulatory Framework for Social Housing in England (2015), and
- NHF's Code of Conduct 2022.

Internal controls and related documents

- Standing Orders & Financial Regulations;
- Standing Financial Instructions;
- Procurement Procedures;
- Procurement process and toolkit;
- Modern Slavery Policy;
- Brighter Places Document and Transaction Signing & Sealing Guidance;
- Staff Handbook

- Anti-fraud, Anti-bribery and Anti-corruption Policy;
- Code of Conduct Additional Guidance;
- Safeguarding policy;
- Data Protection Policy; and
- Equity, Diversity and Inclusion Strategy and Policy; and
- Health and Safety Policy.

2.13 The National Procurement Policy Statement must be regarded in all procurement activities, including, where appropriate to the value and nature of the contract, increasing opportunity for small and medium-sized enterprises (SMEs) and local suppliers by opening up competition and removing the barriers to participation.

2.14 Proportionate consideration should be given for all procurement decisions to the potential for Social Value.

2.15 We will aim to operate procurement processes that encourage and are open to all size of partners, without excessive barriers to entry in accordance with our EDI principles.

2.16 Conflict of Interest must be regarded in all procurement activities, with a formal Conflict of Interest Assessment being mandatory for all qualifying procurements.

2.17 All procurements above £10,000 in value (excl. VAT), whether for goods, works or services, must be accompanied by a formal contract in a form approved by Brighter Places (unless an exception is formally authorised) and duly signed by all parties to the agreement, following our signing and sealing process.

2.18 All contracts with the value of £10,000 and above must be duly recorded in the central Contracts Register with an electronic copy of the fully signed contract and associated procurement / contract management documents being stored in a central repository of contracts.

2.19 Prior to commencing any procurement process, the following aspects of the contract should be considered:

- Insurances applicable to the contract and appropriate levels of such insurances (such as Public Liability, Professional Indemnity, Employer's Liability and other contract specific insurances);
- Requirements in relation to Cyber Security;
- Requirements in relation to Quality, Health, Safety and Environment (QHSE), including ISO certification;
- Whether a supplier will be required to sign Brighter Places' Data Processing Agreement;
- Whether suppliers are required to be registered with, accredited or certified by a professional body/bodies, possess a particular authorisation or be a member of a particular organisation in order to provide specified goods, services or works; and

- Whether any supplier's staff, operatives, agents etc. will be subject to DBS checks and required to possess valid DBS certificates.

2.20 Prior to commencing any procurement process, consideration should also be given to the provisions of Section 20 of The Landlord and Tenant Act 1985 where it is known that any repair or improvement work undertaken by appointed contractors is likely to affect leaseholders. If this is the case, you should consult the Finance Director before issuing an Invitation to Tender / Quote.

2.21 We will encourage collaboration and, where appropriate, engage with and involve colleagues and residents in procurement activities using their input to influence standards and specifications and, ultimately, the selection of suppliers. In addition, we will work closely with our suppliers to continuously improve the services and products provided.

2.22 All contracts over £10,000 shall have a nominated contracts manager who will be responsible for managing the discharge of the contract and the relationship with the supplier. This will include managing compliance and performance against the specified requirement.

2.23 Supplier performance and arrangements will be reviewed in accordance with the terms and conditions of their contracts or agreements. All contracts with the value of above £5m should include at least three Key Performance Indicators (KPIs), and respective notices are timely published on the Central Digital Platform.

2.24 All contract variations/modifications are compliant and documented with the Contracts Register updated accordingly and the relevant Contract Change Notice published where applicable.

2.25 All staff responsible for contract management shall ensure that within 90 days of a modification being made

- a copy of the modification is published on the Central Digital Platform where the value of the contract was already over £5m before the modification; or
- a full copy of the contract documents, as modified, is published on the Central Digital Platform where the value of the contract is now over £5m as a result of the modification.

2.26 All contract extensions and terminations are compliant and documented, with the Contracts Register updated accordingly and the Contract Termination Notice published where applicable.

2.27 The review process will be used to provide effective scrutiny for all procurement that falls within the published financial limits at relevant gateway points (e.g. seeking approvals to procure and approvals to award).

2.28 Staff who become aware that the final cost of a contract is likely to exceed the contract sum shall report on the circumstances to the Chief Executive.

2.29 All staff responsible for and contract management shall ensure that suitable procedures are followed for the effective cost control of the project including the recording of payments made, costs of variations ordered and comparison of expenditure with the approved budget and original estimate of the contract value.

2.30 All staff responsible for contract management must be mindful of the concept of a "convertible contract" under the Procurement Act 2023 and shall ensure that, where the value of a modification (variation) will take the value of the contract after the modification over the relevant threshold amount, this contract is managed from that moment in full compliance with the provisions and obligations, applicable to the above-threshold contracts within the Procurement Act 2023.

2.31 Whenever economically advantageous, and without jeopardising their financial or legal independence, Brighter Places shall seek ways to collaborate with other public bodies, private sector and voluntary organisations and consortia in order to widen the scope of Brighter Places Procurement experience, to maximise economies of scale, and to achieve the maximum value from procurement. Where necessary legal advice should be taken to ensure clarity of responsibilities and liabilities between Brighter Places under the contract to be entered into.

2.32 All suppliers seeking to enter into a business arrangement with Brighter Places will be expected, where appropriate and as far as is reasonably practicable:

- to demonstrate their commitment to the principles of equality, diversity and inclusion; along with evidencing their compliance with the requirements of The Equality Act 2010,The Modern Slavery Act 2015 and The UK General Data Protection Regulations (UK GDPR) and Data Protection Act 2018;
- to demonstrate their commitment to advancing environmental and social sustainability;
- to demonstrate their commitment to customer care and align to Brighter Places customer care expectations;
- to evidence their approach and commitment to health and safety, along with evidencing their compliance with the requirements of Health and Safety at Work Act 1974 and other health and safety related statutory and legislative requirements specific to the nature of their business / supply;
- to evidence their approach and commitment to anti-corruption, cyber security and all other applicable statutory, regulatory and legislative requirements and obligations;
- be financially stable;
- to demonstrate integrity and good business practice; and
- to support Brighter Places' values and wider strategic ambitions and objectives.

Version	Amendment	By	Date
1.0	N/A	Yauheniya Yurevich (Procurement Consultant, PfH)	November 2025