



Title: Procurement - Group Policy

Business Function: All Functions across Sanctuary Group

Author: Head of Procurement

Other Contributors: Financial Services

Authorised by: Executive Committee

Sanctuary Group:
Sanctuary Group is a trading name of Sanctuary Housing Association,
an exempt charity, and all of its subsidiaries.

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1. Policy statement

- 1.1 Sanctuary Group (the Group) is committed to maximising value for money across all procurement activity whilst maintaining fair and equitable practices that are consistent with the vision and values of the Group.
- 1.2 Procurement can be defined as the process that seeks to extract maximum value from commercial relationships at every step of the procurement life cycle, from product or service concept through sourcing, contract management and ultimately termination or disposal.
- 1.3 It is the Group's intention to work within the laws of the territories in which we operate and consistently strive to deliver processes that are compliant with the letter and spirit of European Union (EU) procurement Directives by delivering value for money through open and transparent competition.
- 1.4 The Group Procurement team ensure all procurement activity is aligned with the Group's Corporate Social Responsibility agenda.
- 1.5 The purpose of this policy is to:
 - ensure that all staff understand their obligations and accountabilities when planning to spend money on third party goods and/or services;
 - provide a procurement service that delivers economic, social and environmental benefits;
 - ensure the Group is compliant with public procurement legislation, and reflects good practice; and
 - through a clear understanding of procurement processes, improve the Group's chances of:
 - meeting business needs through collaboration across Group business functions;
 - delivering value for money through a whole life cost ethos and maximising Group leverage;
 - implementing the most efficient, low cost processing practices;
 - reducing risk to the Group through implementing robust management practices; and
 - supporting the development of a Groupwide culture of cost awareness and delivering value for money.

2. Roles and responsibilities

- 2.1 Directors/Regional Managers (or equivalent) are responsible for ensuring adoption of and adherence to this policy and procedure. This policy applies to all staff within the Group.
- 2.2 Designated Managers are responsible for assessing:
 - and facilitating appropriate staff training;
 - methods of handling procurement; and
 - staff performance where there is involvement in the procurement process.

2.3 The Group Procurement team is responsible for:

- ensuring that all procurement activity meets legislative requirements;
- the approval of new vendors;
- ensuring alignment with the Group's Corporate Social Responsibility agenda; and
- providing advice to staff members.

3. References and sources

- [September 2004 Office of the Deputy Prime Minister announcement confirming RSL's as 'bodies governed by public law'](#)
- [Public Contracts Regulations 2015](#)
- [Corporate Manslaughter and Corporate Homicide Act 2007](#)
- [Data Protection Act 1998](#)
- [EU General Data Protection Regulations 2018](#)
- [Health and Safety at Work Act 1974](#)
- [Sale and Supply of Goods Act 1994 - replaced by Consumer Rights Act 2015](#)
- [Transfer of Undertaking \(Protection of Employment\) 2014 Regulations \(TUPE\)](#)
- Corporate Social Responsibility - including the Environment, Human Rights and Ethical Trading, Equality and Diversity, Sustainability and other social, environmental and economic issues
- [Modern Slavery Act 2015](#)
- [Company Credit Card and Government Procurement Card \(GPC\) - Group Policy and Procedure](#)
- [Data Protection - Group Policy and Procedure](#)
- [Group Financial Regulations \(England\)](#)
- [Financial Regulations \(Scotland\)](#)
- [Procurement - Group Policy.](#)

3.1 The Group is required to comply with EU procurement Directives when conducting procurement activity. A number of obligations are required in tendering which are dependent on the type and scale of procurement activity, the most recent guidelines for which can be obtained by contacting a member of the Group Procurement team.

4. Impact on diversity

4.1 This policy applies to Sanctuary designated officers, employees and suppliers via our management processes as outlined above.

4.2 The Group demonstrates its commitment to diversity and promoting equality by ensuring that this policy is applied in a manner that is fair to all sections of the community, with due regard to the protected characteristics identified under the Equality Act 2010 and in accordance with its 'Fairness for All' Single Equality Scheme.

4.3 Compliance with this policy and subsequent procedures will result in a positive impact on a number of the Group's core values by:

- applying selection criteria within the tendering process that takes into account evidence of a positive diversity ethos in contractor and partner organisations; and
- addressing and promoting issues of diversity through supplier relationship management practices.

5. Resident consultation

5.1 Engaging tenants and residents and utilising their feedback to improve the quality and value of goods and services. This would form part of any robust stakeholder management approach.

6. Monitoring and compliance

6.1 A number of tools and processes are employed to monitor policy compliance:

- regular analysis is undertaken to ensure savings are captured and reported;
- tendering processes include a charter which promotes diversity and the avoidance of modern slavery within our supply chain. 'Section 20' commitments to tenants are administered via the tender process steps, when applicable. These outcomes can be measured in historic contract awards and through periodic internal audits; and
- the supplier management programme reviews contract performance for service levels against key performance indicators. This is an on-going performance review process.

6.2 Period of review

6.2.1 Until a new policy is formally adopted this document will remain in force and operational.

6.2.2 This policy will be reviewed in accordance with the policy review programme agreed by Executive Committee.

6.2.3 If there are significant changes to legislation or regulation or there are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations, the Chief Financial Officer will initiate an immediate review.

6.2.4 Where appropriate, key stakeholders, residents/tenants and interested parties will be consulted as part of any review of this policy.

7. Approval

7.1 This policy is approved by Sanctuary Group's Executive Committee.

8. Operational arrangements

- 8.1 This policy is supported by the [Procurement - Group Procedure](#) and [Construction and Major Works Procurement - Group Procedure](#).