

Procurement Policy

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Purpose

This policy sets out the principles and requirements for procurement activities within BHT Sussex. It ensures compliance with the Procurement Act 2023 and internal governance standards. It establishes a framework for transparent, fair and proportionate procurement processes that safeguard organisational resources, deliver value for money, promote integrity and support social value. The policy applies to all procurement activity, including procurements commenced, awarded or called off during the transitional period using frameworks and Dynamic Purchasing Systems (DPS) established under previous procurement legislation, as well as procurements undertaken in accordance with the Procurement Act 2023. This approach ensures continuity of service, legal compliance, transparency and proportionate access for small and medium-sized enterprises (SMEs) throughout the transition and thereafter.

Definition

Procurement is the process the organisation uses to buy goods, services and works in a planned, controlled and consistent way. It includes everything from identifying what is needed, selecting the best supplier, agreeing the price and terms and ensuring that what we receive is safe, good value and meets our requirements. In short, procurement is how we make sure we buy the right things, at the right price, from the right people, in the right way.

It is recognised that not all purchasing activities fall under procurement. Purchasing relates primarily to the immediate act of buying goods or services. It is a short-term, transactional activity focused on placing orders and completing individual purchases, rather than overseeing the wider, strategic procurement process.

Scope

This policy applies to all BHT Sussex employees, volunteers and contractors involved in procuring goods, services, works and property-related contracts. It covers all procurement activities (see definition), whether above or below statutory thresholds, and includes the onboarding of new suppliers and contract management. It is noted that low-value or ad hoc purchases and urgent emergency procurements are exempt from the full procurement process. However, they must show value for money, be limited to what is essential and be recorded. These exceptions must not be used to avoid competition and they remain subject to audit.

Policy Statement

BHT Sussex is committed to:

- Conducting procurement in a manner that is transparent, fair and proportionate.
- Complying with all relevant legislation and internal governance requirements.
- Using frameworks and DPS to provide compliant, efficient and flexible routes to market.
- Treating suppliers equally and encouraging participation from SMEs and local businesses.
- Maintaining robust controls for quotations, tenders and waivers aligned with delegated authority thresholds. This includes permitted exceptions and a formal tender waiver procedure, which must be documented and approved by senior management.
- Ensuring all suppliers are approved and set up on relevant systems before procurement.

BHT Sussex will ensure that this policy is applied fairly and consistently. We will not directly or indirectly discriminate against any person or group from whom we are purchasing goods or services, in line with our Equality, Equality, Diversity and Inclusion Policy. We will act sensitively towards the diverse needs of individuals and communities and will take positive action or make reasonable adjustments where appropriate.

Legal Framework

Procurement must comply with:

- Charity Commission guidance
- ISO 9001 requirements
- National Procurement Policy Statement (NPPS)
- Procurement Act 2023 and associated regulations

Principles

Transparency, fairness, proportionality, integrity, value for money and social value underpin all procurement decisions. Environmental and ethical considerations must also be factored into procurement processes.

Responsibilities

Employees: Initiate procurement requests, complete documentation accurately and ensure compliance with policy.

Managers: Review and approve procurement requests and business cases, ensuring justification for new suppliers and oversee adherence to policy. In addition, Managers that are **Budget Holders:** Identify procurement needs, prepare business cases and ensure compliance with thresholds.

Building Surveyor: Approves property-related supplier requests and ensures compliance with safety and technical standards.

Finance Team: Verify documentation, set up approved suppliers on systems and monitor compliance.

Director of Finance and Resources: Monitors compliance, maintains oversight reporting and reviews policy annually.

Finance, Audit and Risk Committee (FARC): Review quarterly procurement reports, monitor aggregate spend and oversee risk management and procurement activities.

Procurement Process

Clear quotation and tender thresholds will be applied to all purchases to ensure compliance and value for money.

Procurement processes vary by contract value, and employees must make purchases in accordance with our Financial Levels of Delegated Authority:

Contract Value	Process	Requirements
< £10,000	Informal	Compare three estimates or prices
£10,000 - £29,999	Competitive	Competitive quotation – a minimum of three quotes
> £30,000	Formal	Formal tender or approved framework/ DPS

Tendering Controls:

- Purchases over £30,000 require formal tender and recording in the Tender Register. If a tender process is not used (for example, if a broker or advisor is used instead), the reasoning for this must be recorded.
- Purchases over £150,000 require Board approval.
- All tender documentation must be retained to provide a clear audit trail.

Ethical Purchasing

BHT Sussex is committed to human rights and is determined that the suppliers of services or products are produced and/ or delivered under conditions that do not abuse or exploit any persons or the environment. As far as practical, we will not source supplies from nations guilty of human rights abuses or companies associated with those governments.

Sustainability

Sustainable procurement offers the opportunity to encourage working collaboratively with Contractors to adopt practices that minimise environmental impacts and encourages sustainable practices and innovation solutions to be adopted.

Supplier Onboarding

Before engaging a new supplier:

- A business case must be submitted, demonstrating why existing approved suppliers cannot meet the need.

- The New Supplier Request Form must be completed by the supplier and include all required documentation:
 - Bank details on letterheaded paper
 - Public Liability Insurance certificate
 - Health & Safety policy
 - Relevant service-related certificates
- Any exceptions for low-risk or ad hoc suppliers must be documented and justified.
- Approval must be obtained from the relevant manager and, for property maintenance suppliers, the Building Surveyor.
- Finance will set up the supplier on Dimensions and, where applicable, Pyramid.

Conflicts of Interest

All employees involved in procurement decision-making must:

- Identify and declare any conflicts of interest.
- Submit declarations to the Company Secretary for inclusion in the Public Register and for escalation to Board or Committee if required.

Whistleblowing

Employees should be aware that fraud, corruption and/ or theft may exist in the workplace and be able, and prepared, to share their concerns about it. BHT Sussex has a Whistleblowing Policy which encourages employees and Board members to raise concerns about malpractice, or suspected malpractice, without fear of suffering any discrimination or victimisation as a result of their actions.

Exceptions to the Policy

There will be situations where the procurement policy cannot or will not apply:

Waiver

- Low-value or ad hoc purchases.
- Emergencies or disasters involving destruction of, or danger to, life or property.
- Situations that could be deemed to affect public health and leave limited time to undertake a procurement tendering procedure.
- Limited providers or specialist requirements. The goods, works or services are specialist or available from only one or a limited number of suppliers and there are no other satisfactory alternative options.
- Existing Suppliers. A change of supplier would result in receiving goods, services or works that are different from, or incompatible with, existing provision, causing significant technical difficulties in operation or maintenance (e.g., closed protocol systems).
- Professional subscriptions, one off training providers and recruitment agencies.

If a tender process is not used (for example where a broker or advisor is engaged instead) the justification for this approach must be recorded.

Contract Extension, Variation or New Contract

- Continuity of service or works provision where exceptional circumstances clearly show it is in the best interests of BHT Sussex to extend or vary an existing contract, providing this remains compliant to the requirements with the Procurement Act.
- Temporary contract extensions to allow time to undertake or complete a complaint procurement process.

Exclusion Grounds

Suppliers may be excluded for:

- National security risks.
- Improper behaviour or unethical practices.
- Inclusion on the debarment list.
- Breach of legal or ethical standards.

Notices and Reporting

In line with the Procurement Act 2023, the following notices must be published on the central digital platform:

- Pipeline Notices
- Planned Procurement Notices
- Transparency Notices (for direct awards)
- Contract Award Notices
- Contract Termination Notices

Contract Management

Contracts must include electronic invoicing, implied payment terms, key performance indicators (KPIs) and modification and termination clauses in line with the Procurement Act 2023. In addition, key contract details such as value, term, renewal date and contract owner must be recorded (for Major Works/ Cyclical Works) in EDMS Pyramid.

Senior Managers are responsible for ensuring a contract is in place for procurements that are undertaken in their service areas over £3,000 in accordance with our Financial Levels of Delegated Authority. Senior Managers must ensure that a copy of the signed contract is saved in the Supplier Contracts folder and that they are added to the Supplier Contract Register.

Corporate Services will complete an annual review to identify suppliers requiring contracts and will liaise with managers to ensure appropriate agreements are in place. A central contract register will be maintained to monitor contract expiries and to ensure timely renewals.

Remedies and Supplier Rights

Suppliers have the right to challenge procurement decisions through civil proceedings. Standstill periods and publication obligations apply to ensure fairness and transparency.

Training

Budget holders, contract managers and employees involved in procurement must attend procurement training, this will be provided at Operational Managers Team Meetings. Refresher training will be provided every two years and attendance records will be maintained.

Monitoring

Procurement activity will be monitored through quarterly reports to the Finance, Audit and Risk Committee (FARC), covering aggregate spend and supplier dependencies. The Finance Team will undertake an annual internal audit to assess compliance with this policy. Monthly management account reviews will identify variances.

In addition, compliance checks will be carried out on new supplier setups to ensure accuracy and adherence to requirements.

BHT Sussex maintains a Strategic Risk Register. Compliance with this policy supports risk mitigation and strengthens procurement governance.

Data Retention

Full and accurate records relating to the procurement of goods and services will be retained for six years after the contract has been completed, or as long a period as may be agreed between the parties.

Associated Policies and Procedures

This policy should be read in conjunction with:

- Procurement Procedure
- Petty Cash and Equals Card Policy and Procedure
- Credit Card Policy and Procedure
- Food and Provisions Expenditure Policy (new)
- Bribery Prevention Policy
- Ethical Purchasing Policy
- Financial Levels of Delegated Authority
- Fraud Prevention Policy
- Gifts and Hospitality Policy and Procedure
- Standing Orders Policy
- Tender Policy and Procedure
- Whistleblowing Policy and Procedure