



FINANCE
PROCUREMENT POLICY
May 2024
May 2029

Policy on:	Procurement
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Compliant with Charter:	13: Value for Money 14 and 15: Rents and Service Charges
Compliant with New Regulatory Framework:	<p>Standards of Governance and Financial Management</p> <p>Standard 2: The RSL is open and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these priorities.</p> <p>Standard 3: The RSL manages its resources to ensure its financial well-being, while maintaining rents at a level that tenants can afford to pay.</p> <p>Standard 5: The RSL conducts its affairs with honesty and integrity.</p> <p>Standard 6: The governing body and senior officers have the skills and knowledge they need to be effective.</p>
Compliant with Tenant Participation Strategy:	N/A
Compliant with Equal Opportunities	YES
Compliant with Financial Plan /Business Plan:	YES: 6. <i>Build organisational resilience</i>

Date of Approval:	May 2024
Date for next review:	May 2029

Responsible Officer:	Head of Finance & IT, Lorna Colville
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1. What is Procurement?

Procurement is an integral part of resource, financial and budgetary management.

Best Value Procurement (BVP) is the process of acquiring goods, services and works from external parties at in a way that optimises cost, quality, and sustainability to meet our requirements.

2. What does this Procurement Policy do?

This Procurement Policy outlines the principles and procedures to be followed by Paisley HA in the procurement of goods, services, and works. The policy is designed to promote fair and open competition while minimising exposure to fraud and collusion, achieve value for money, maintain compliance with relevant legislation and best practices, and promote social value.

This Policy sets out the principles that should be applied to all procurement by the Association, in particular:

- How and when we chose a particular procurement route
- Roles and responsibilities of staff and Board in procurement

It is supported by and follows the [Procurement Journey](#) , as published by the Scottish Government.

The key elements of this policy reflect the essential requirements for internal controls and rigorous processes. There requires to be fundamentally a recognition and implementation of good governance and accountability by the staff and Board of the Association & PSPS, as they apply to procurement activities.

While specific timelines and procedures are specifically outlined for procurement above the Agreement on Government Procurement (GPA) & Procurement Reform (Scotland) Act 2014 thresholds, the association also aims to promote transparency, fairness, and competition for procurements below these thresholds, whenever feasible considering the best use of resources.

This Policy is a Group Policy, and the content and documentation is equally relevant to Paisley Housing Associations (PHA) and our Subsidiary, Paisley South Property Services (PSPS)

3. Policy Aim

We strive to obtain goods, services, and works from external parties in a way that optimises cost, quality, and sustainability. Additionally, we take into consideration the needs of our key customers and the broader community whenever feasible considering the best use of resources.

4. Policy Objective

4.1 The key policy objectives are:

- ❖ To achieve best value for money in all procurement activities.
- ❖ To promote fair & open competition in the procurement processes.
- ❖ To comply with all relevant legislation, including, but not limited to, the Public Contracts (Scotland) Regulations 2014 & Public Contracts (Scotland) Regulations 2015
- ❖ To ensure that procurement activities are conducted efficiently and effectively, minimising risk and maximising benefits to PHA.
- ❖ To support local economies and promote social and environmental sustainability.
- ❖ To promote and encourage collaborative/partnership working with others e.g., FLAIR, Renfrewshire Council etc., where sensible to do so. The objectives being to better utilise procurement skills and resources and gain greater purchase leverage.
- ❖ To ensure, Separation of Duties to ensure more than one person is required to complete the purchase.
- ❖ To ensure procurement decisions are aligned with business objectives.

5. Procurement Principles

5.1 Competitive Process

Goods, services, and works should be acquired by effective competition, including adequate publication of contract opportunities unless there are convincing and justifiable reasons to the contrary.

Competition avoids any suggestion of favouritism and the encouragement of monopoly: it also helps to promote efficiency and economy.

Subject to any relevant legal obligations/guidance, for example the Procurement Reform (Scotland) Act 2014, the form of competition should be appropriate to the value and complexity of the goods, services or works to be acquired. The Association objective is to keep bidding costs to the minimum necessary for effective competition and should remove barriers to participation by, for example, small firms, the self-employed and the third sector, without discriminating against others. Consistent with legal obligations, during competition any minimum standards required should be proportionate to the contract in question.

5.2 Access to grants and conditions attached to the grants.

Where considered value for money to do so, the association will, where possible, apply for grants to assist with the payment of expenditure, for us or for others, such as owners participating in common works.

These grants may restrict our ability to ensure open competition.

Where the grants available fund a significant proportion of the costs and it is considered in the best interest of our customer and the most efficient use of our resources, the Board can approve the restriction to a particular contractor/supplier, if required to obtain the grant.

5.3 Procurement Methods

The main methods of procurement are:

- Direct Award – can be used when using eligible Frameworks/Dynamic Purchasing Systems or for low value procurement as an alternative to Route 1 procurement or Frameworks.
- Negotiation – can be used to extend contracts only in very particular justifiable circumstances.
- Competitive bidding—can be commonly used for Route 2 and 3 procurements but also Route 1 Quotations or for mini tenders within frameworks/Dynamic Purchasing Systems

5.4 Appropriate forms of competition

Subject to legal requirements and restrictions noted in this document, the Budget Holder has the authority to agree the most appropriate form of competition for each purchase. This will be dependent on what the objective of the purchase is. e.g. costs certainty, high quality, balancing price and quality, high standards of customer care, high specification's standards etc.

The best value needs of the Association and our customers will also be the primary consideration in the choice of procurement method.

5.4.1 For non-construction spend, there are 3 different Procurement Routes noted in the Procurement Journey for general spend:

- **Route 1 provides guidance and templates for procurements that are:**
 - low value (a total estimated value of under £50k excluding VAT)
 - low risk and
 - non-repetitive.
 - Used for Quotations.
- **Route 2 provides guidance and templates for procurements that are:**
 - Used for Regulated procurements between £50k and up to the GPA level.
- **Route 3 provides guidance and templates for procurements that are:**
 - Used for Regulated procurements at GPA level and above.

The 3 different Procurement Journey Routes are designed to give PHA options that are proportionate to the risk and value of the procurement exercise that is being conducted.

5.4.2 For Constructions spend there are 4 different routes has noted in the Construction Procurement Handbook, as referenced in the Procurement Journey

Construction Procurement Route	Spend Type	Threshold	Risk Rating
1A	Goods & Services	Below £50,000	Low/Medium
	Works	Below £100,000	Low/Medium
1B	Goods & Services	Below £50,000	High
	Works	Below £100,000	High
2A	Goods, Services	£50,000- GPA Level	Low/Medium/High
	Works	£100,000 – GPA Level	Low/Medium/High
2B	Goods, Services & Works	GPA Level	Low/Medium/High

For works PHA have set the threshold at £100,000 where Regulated Procurement rules are adopted, rather than £2m as noted in the 2014 Act.

5.4.3 Use of Quotations

- Where we have no suitable frameworks available, and quotations are required consideration should be given to:
 - Using the Public Contract Scotland Portal (PCSP): Quick Quotes. Note We will promote registration on PCPS to our local suppliers OR
 - advertising with other appropriate mediums e.g. Scottish Housing News. - generally used for RSL specialist consultants.

5.4.4 Use of Traditional Competitive Tender (Open and Restrictive Procedures)

- Used for Open, Restrictive Procurement Procedures and Competitive procedures with Negotiation.
- The Budget Holder will establish all tender documentation: Single Procurement Document (SPD) documentation and the Invitation to Tender including Award Criteria (including sub criteria), prior to advertising the invitation to tender.
- Single Procurement Document or SPD is a standard pre-qualification questionnaire that contains questions used at the selection stage of a procurement exercise i.e. it allows staff to ask questions to identify suitably qualified and experienced bidders for their procurement and exclusion grounds.
- The Award Stage involves examination the tenders received from eligible bidders against the stated evaluation criteria. This will identify which of the eligible tenderers will deliver the best value for money solution for the Association, based on the Most Economically Advantageous Tender (MEAT), assessing both quality and price, using an appropriate Quality Price Ratio approved by the relevant Head of Department, to evaluate tenders submitted.
- The ITT will include the Technical Specification, where relevant.
- The contract is awarded to the tenderer who is assessed to offer best Value for Money
- The relevant Head of Department will decide how best to debrief bidders.

5.4.5 Route 3 Procurement Procedures

There are 6 different procedures as noted below:

- Open Procedure (only use when the number of expected tenders is known to be limited)
- Restricted Procedure (Most commonly used procedure)
 - It is a 2-stage process: -
 - i. Selection Stage: Selection of a number of suitably experienced, qualified companies ('shortlisting') using SPD, and
 - ii. Award Stage: Inviting selected companies to submit proposals.
 - The Selection Stage and Award Stage can also be undertaken together if no initial shortlisting is required.
- Competitive Procedure with Negotiation (use in specific situations)
- Competitive Dialogue Procedure (use in specific situations)
- Negotiated Procedure without Prior Publication (use in exceptional situations)
- Innovation Partnership (use in specific situations)

5.5 Procurement Process Threshold

5.5.1 We have set out clear guidelines and methods regarding Threshold and Approval levels and advertising requirements, by which the Association will procure services, goods and works. See Appendix 1

5.5.2 Procurement Reform (Scotland) Act 2014 Threshold

This Act only applies to procurements above certain financial threshold values. Appendix 2 sets out in more detail the definition of Supplies/Services and Works and at what thresholds the Procurement Reform (Scotland) Act 2014 applies.

Any contract valued on or above these threshold values are considered a 'Regulated Procurement'.

5.5.3 Public Contracts (Scotland) Regulations 2015 Threshold

The GPA procurement thresholds where the Public Contracts (Scotland) Regulations 2015 thresholds apply only apply to contracts above certain financial threshold values. Appendix 2 sets out in more detail the definition of Supplies/Services and Works and when the thresholds apply.

5.6 Advertising

To ensure competition, the Association will advertise as widely as is considered efficient to do so. However, expenditure below £5000 does not require to be advertised as it is considered cost prohibitive and not best uses of resources to do so.

The Budget Holder will ensure adequate publicity is undertaken given the level of the expenditure and in line with legislation and guidance. Suggested methods of advertising to be used for the different purchasing levels are noted in the Procurement Process Threshold table (Appendix 1).

5.7 More detailed procurement guidance is provided by the Scottish Government through the Procurement Journey, published on their website.

6. Partnering/Dynamic Purchasing Systems

6.1 The Association, where practical, will consider partnering with its other IFLAIR partners to purchase goods, services and works where it is considered best use of procurement skills and resources and/or greater purchasing leverage can be gained from partnering. This will also include 'Wider Role' projects.

6.2 Even where it is considered necessary to tender separately, consideration will be given to the benefit of sharing procurement information, such as tender documentation, to avoid duplication of resources.

6.3 Framework Agreements

- The process for selecting a contractor/supplier from a Framework will be dictated by the relevant Framework.
- The Association will consider using the Scottish Government 'Contract and Strategy Directory' (link below) for all relevant purchases unless we have alternative frameworks to use or have evidence that better pricing can be obtained elsewhere, particularly from small local and charitable companies.

<http://www.scotland.gov.uk/Topics/Government/Procurement/directory>

On request staff training will be provided by the Head of Finance & IT on how to access and use the Directory.

- The Association will participate in all IFLAIR frameworks/Dynamic Purchasing Systems, where it is beneficial to do so.
- The Association will consider the use of other frameworks available to the Association, where considered good value to do so.
- Mini Competitions can be undertaken, as per the Framework criteria.
- Delegated Authority is given to the Heads of Department to assess which and when frameworks should be used. Board prior approval is only required where the framework commits us to spend above the Head of Departments approval levels.

6.4 The Association will adopt Dynamic Purchasing Systems (including setting up its own system) for smaller regular purchases, where considered efficient to do so to comply with the procurement regulations.

7. Governance

7.1 Role of Board

The Board is responsible for

- formal approval of this Procurement Policy
- overseeing the implementation of this Procurement Policy.
- Agreeing the principles/levels at which various staff members have delegated authority.
- The Board will also approve acceptance of larger contracts, above the Chief Executive's approval levels.

7.2 Role of Chief Executive/Heads of Department

The Chief Executive/Heads of Department are responsible for developing and implementing procurement procedures consistent with this policy.

To ensure:

- a) the principles of the policy are always followed by staff,
- b) to ensure the procurement procedures fit with this policy and are clearly set out and promoted to staff.
- c) day to day implementation of this policy and associated procedures

7.3 Role of Staff

All staff involved in procurement activities must adhere to this policy and related procedures.

Below the noted procurement thresholds & spend levels, staff put in charge of a procurement exercise have delegated authority to decide how suppliers will be selected and evaluated.

Staff must highlight to the Heads of Department where they feel training is required.

7.4 Delegated Authority Levels

The Spend Authority Levels (Appendix 3) sets out which sets out what delegated authority staff have regarding procurement on behalf of the Association and where Board approval is required.

This includes the making of purchases and the award of procurement contracts/frameworks.

7.5 Emergency Authority Levels

As per the Financial Regulations, in Emergency situations as approved by the Chief Executive or a Head of Department, staff have the authority to spend as required to deal with the emergency. The emergency spend will be reported to the Senior Management Team and Board Chairperson, as soon as practical thereafter. And to the Full Board at the next meeting, where spend is above the Chief Executives approval level as noted in Appendix 3.

7.6 Separation of Duties

The role of budget holder and payment authority should always be separated. Where possible the role of budget holder and purchaser should also be separated

The Board approve the overall budgets for the Association, although the detailed split of these budgets is delegated to the Senior Management Team.

The budget holder (normally the Head of Department) has the overall responsibility for spending within their budget headings and they have the authority to financially commit the Association to making payments from their budgets including the authority to approve a procurement strategy or to commit the organisation to a contract for the purchase of goods, services or works.

The purchaser (normally staff) has the authority to:

- issue the invitation to tender document or requests for quotations.
- place a purchase order, and.
- approve invoices for payment.

The payment authority (Payment Signatories) has the authority to make payments for goods, services or works. (Per PPFD FIN02 Approved List of Banking Signatories)

Separation of roles within a procurement process, between invoice approval and invoice payment provides necessary safeguards against impropriety or unethical

practice. Procedures exist that allow only those staff with appropriate purchasing authority to commit the association to a new contractual relationship or purchase.

7.5 Procurement Arrangements

Procurement arrangements will be reviewed periodically to consider whether ordering and payment procedures could be streamlined and value for money improved through implementation of relevant technology solutions, including e-procurement.

7.6 Payment Arrangements

The payment of invoices that do not have a pre-requisite contract or order for the goods, services or works provided tends to facilitate unofficial buying by allowing the procurement function to be bypassed. It also means that authority to procure is retrospectively given rather than pre-approved. Therefore, suppliers should be given notice that goods, services, and works should only be provided on receipt of appropriate contract, written order (including emails) or works order from the Association, invoices received without contract or authorised order will require special approval within the Association if they are to be paid.

Payments will be made in line with the Purchase Ledger Procedure (PPKD Fin 28) and Banking Procedure (PPKD Fin 32).

The Association's policy will be to aim to pay all suppliers (where there is no dispute) within 30 days of receiving the invoice for payment.

8. Training and Development:

There is an acknowledgement that this is a changing and complex area of knowledge that cannot be completely covered in all detail in this policy and associated procedures.

Staff involved in procurement activities shall receive appropriate training and support to ensure compliance with this policy and related procedures.

Training shall cover relevant legislation, procurement processes, risk management, and ethical considerations.

Heads of Dept should ensure they attend training to ensure they keep up to date with the relevant legislation regarding procurement to ensure they have a working knowledge of procurement.

The Association will ensure any training on procurement required by staff, is identified through performance review or otherwise, and that these needs are met to provide an efficient and effective procurement service.

More detailed training and guidance is provided by the Scottish Government through the Procurement Journey, published on their website.

For more complex procurement, in particular high value procurement new to the Association, it may be necessary to appoint a procurement expert to assist with the process.

9. Risk Management

Procurement activities shall be subject to appropriate risk assessment and management processes as set out in the Risk Management Policy.

Risks associated with procurement, such as supplier failure, contract disputes, or non-compliance with legislation, ineffective procurement shall be identified, assessed, and mitigated where possible.

Risk will be mitigated through this Policy, associated procedures, and staff training.

The Association will undertake both internal and external audit of procurement as required and will take account of any recommendations contained therein.

10. Compliance with Standards & Legislation

All procurement activities shall comply with relevant legislation, including, but not limited to, the Public Contracts (Scotland) Regulations 2015 and SHR Charter standards.

10.1 SHR Charter Standards

- **13. Value for money**
Tenants, owners, and other customers receive services that provide continually improving value for rent and other charges they pay.
- **14. Rents and Services**
A balance is struck between the level of service provided, the cost of the service and how far current and prospective tenants and other customers can afford them.

10.2 SHR Regulatory Framework: Standards of Governance and Financial Management

- **Standard 2**
The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders and its primary focus is the sustainable achievement of these priorities.
- **Standard 3**
The RSL manages its resources to ensure its financial well-being, while maintaining rents at a level that tenants can afford to pay.
- **Standard 5**
The RSL conducts its affairs with honesty and integrity.
- **Standard 6**
The governing body and senior officers have the skills and knowledge they need to be effective.

10.3 Compliance with the legislation covering Procurement.

Public sector procurement in Scotland takes place within the framework of International, UK and Scottish legislation.

1) Procurement Reform (Scotland) Act 2014

This Act regulates procurement above the 'regulated procurement' threshold (Appendix 2) but below the GPA Procurement Thresholds.

The **Procurement Reform (Scotland) Act 2014** introduces several key requirements aimed at improving public procurement practices in Scotland. These requirements include:

1. Sustainable Procurement Duty:

- Under the Act, public bodies are **legally obligated** to consider how their procurement activities can contribute to the **economic, social, and environmental wellbeing** of their area.
- They must also facilitate the involvement of SMEs (small and medium-sized enterprises), the third sector, and supported businesses, as well as promote innovation.

2. Community Benefit Requirements:

- The Act emphasises the importance of promoting community benefit in procurement.
- For contracts worth £4 million or more, the Association must include community benefit provisions. The Association will aim to include community benefit provisions in any projects worth £2m or above.
- These provisions can include requirements related to training, recruitment, subcontracting opportunities, or other measures that enhance the area's wellbeing.
- The Association will follow the Scottish Government Guidance on how best to achieve these requirements.

3. Fair Work First:

- The Act encourages the adoption of **Fair Work practices** in procurement.
- Authorities should consider factors such as fair wages, employee rights, and ethical employment practices when awarding contracts.

4. Selection of Tenderers and Award of Contracts:

- The Act outlines procedures for selecting tenderers and awarding contracts.
- To treat economic operators equally and without discrimination
- Authorities must follow a fair and transparent process, considering various criteria such as price, quality, and other relevant factors.

- To engage with local suppliers and contractors to support the local economy.

5. **Publication and Transparency:**

- Contracting authorities are required to publish a **contracts register**, and where Regulated Procurement is greater than £5m a **procurement strategy** and an **annual procurement report**.
- This transparency ensures accountability and allows the public to access information about awarded contracts.

The Act aims to enhance sustainable procurement practices while promoting economic growth and community benefits.

2) Public Contracts (Scotland) Regulations 2015.

The Regulations set out the thresholds above which the formal procurement procedures must be followed.

The **Public Contracts (Scotland) Regulations 2015** outline the principles of procurement. These regulations provide guidance for public procurement processes in Scotland. The key principles are:

1. **Transparency:** Procurement processes should be transparent, ensuring that all relevant information is accessible to potential suppliers. Transparency helps maintain fairness and prevents favoritism.
2. **Equal Treatment:** All suppliers must be treated equally and without discrimination. This principle ensures a level playing field for both large and small businesses.
3. **Non-Discrimination:** Procurement decisions should not discriminate based on nationality, gender, race, or any other protected characteristic. Fairness and impartiality are essential.
4. **Proportionality:** Procurement procedures should be proportionate to the value and complexity of the contract. Rigorous processes are necessary for high-value contracts, while simpler procedures suffice for smaller ones.
5. **Best Value for Money:** Procurement decisions should focus on achieving the best value for public funds. It is not just about the lowest price; quality, sustainability, and whole-life costs matter too.
6. **Innovation and Sustainability:** Encourage innovation and consider environmental and social sustainability aspects during procurement. Sustainable practices benefit society and the environment.

Following the UK's exit from the EU, Scottish Ministers now revise the threshold values of the procurement regulations every two years to ensure that they remain aligned to thresholds set out in the World Trade Organisation's Government Procurement Agreement ("GPA").

3) Procurement (Scotland) Regulations 2016

The 2014 Act and the Procurement (Scotland) Regulations 2016 complement the Public Contracts (Scotland) Regulations 2015 by making provisions similar to the existing legal requirements apply to lower value contracts.

The 2016 Regulations set out the methods by which the estimated value of regulated contracts shall be calculated and the provisions of the Act which will not apply to Dynamic Purchasing Systems.

In particular, the 2016 Regulations relates to Specific Duties under the Act, and covers providing details regarding advertising contract opportunities, using prior information notices and publishing contract award notices, setting out the criteria on which businesses must be excluded from bidding for public contracts, the basis on which businesses may be selected to participate in a competition and rules relating to the use of technical specifications.

11. Performance Management, including Contract and Supplier Management

11.1 Contract Management General

The purpose of Contract and Supplier Management is to collaborate closely with suppliers and internal customers to:

- minimise the total cost of ownership and
- to maximise Supply Chain efficiencies throughout the life of the contract.

The main benefits of Contract and Supplier Management

- ensure that the service/contract is delivered to the required standards.
- provides value for money.
- proactively identifies and manages any risks e.g., which may impact on a supplier's service delivery / fulfilment of the contract requirements.
- consistent approach will maximise efficiencies and promote adding value across the supply base.
- appropriately influence supplier activity and decisions
- ensure the contract is effectively administered,

Managing contracts should be based on value and risk to determine contract administration and frequency of meetings but a common approach can be used in relation to the structure of meetings and reporting, with a dedicated contract owner assigned.

This process aims to provide a standard approach and guidance to Contract and Supplier Management, defining clear ownership of all contracts and managed by the contract owner throughout the lifecycle of the contract.

The Association shall maintain a Supplier Code of Conduct, outlining expectations regarding ethical conduct, environmental sustainability, and fair labour practices (Fair Work First)

11.2 Performance Monitoring

- Overall financial performance of procurement will be monitored through the management accounts and KPIs reported to the Board.
- Contract specific KPIs will be reported to the Heads of Department
- IFLAIR KPI will be monitored via IFLAIR and reported annually to the Board.
- Contractor Meetings will be used to discuss performance.

11.3 Dispute Resolution will be included in all regulated contracts.

12. Procurement Reporting

- The Association will publish its Contract Register of all its regulated contracts on the PHA website quarterly.
- Annually a Procurement Report (including an update on the Procurement Strategy) will be presented to the Board for information and any required approval.
- The HOF&IT and HOAM will present to the Board in March each year, along with the final updated 5YFP, a report on all planned projects for the following year where planned spend will be £50,000 or greater. For formal approval of the projected project spend.
- The association will annually review the total estimated value of its regulated contracts spend for the coming year and if above the level

specified by the Procurement Reform (Scotland) Act 2014 (currently £5m), the Association will:

- Publish its Procurement Strategy on the PHA website.
- The Association will also prepare a summary report for each regulated contract, in the form specified by the Scottish Government.

13. Customer Involvement

In consultation with the Tenant Participation Working Group, it was previously agreed Tenants will be informed of our levels of spend in the following ways.

- Annually the Association will publish a pie-chart showing what the main areas of expenditure were the previous year.
- Annually the Association will publish a table of the value of purchases for the year split into companies from within:
 - Renfrewshire, or
 - Scotland, or
 - UK
- Construction projects and component replacement contracts will be publicised, along with the associated costs, to tenants in the newsletter.

14. Ethics and Anti - Corruption

In all dealings with suppliers and potential suppliers, the Association must preserve the highest standards of honesty, integrity, impartiality, and objectivity, in line our various 'Ethics' Policies, and particularly the Code of Conduct of Staff.

Staff engaged in commissioning of tenders/contracts must:

- be fair, efficient, firm, and courteous.
- maintain the highest possible standard of integrity in all business relationships.
- where relevant, acquire and maintain current technical knowledge.
- comply with the law, guidance on professional practice and contractual obligations.
- declare any personal interest which may affect or be seen by others to affect impartiality.

- respect the confidentiality of information received in the course of duty and ensure that information given in the course of duty is honest and clear; and
- respond promptly, courteously, and efficiently to suggestions or enquiries.

Contractors will be expected to follow the Code of Conduct for Contractors.

Staff and Board Members must declare any conflict of interest (potential or actual) with contractors/suppliers/consultants in the normal manner through the Declaration of Interests procedure. (PPKD HR03)

Through its procurement, the Association will encourage contractors/suppliers to commit to Fair Work First practices, by adopting:

- Appropriate channels for effective voice, such as trade union recognition
- Invest in workforce development.
- No in appropriate use of zero-hour contracts
- Action to tackle the gender gap and create a more diverse and inclusive workplace.
- Providing fair pay for workers (for example payment of the real Living Wage)
- Offer flexible and family friendly working practices for all workers from day one of employment.
- Oppose the use of fire and rehire practices.

Adherence to PHAs Anti Bribery Policy & Anti-Fraud Policy which sets out the responsibilities of the Paisley HA Group and those who work for us about observing and upholding our zero-tolerance position on bribery and corruption.

The Association will require suppliers to adhere to these ethical standards and to not engage in modern slavery.

15. Data Protection/Freedom of Information

Where possible and practical to do so the Association will aim to be open in its request for tendering information.

However, when implementing the policies and procedures of Paisley Housing Association all staff and board members must adhere to and be aware of the

requirements of the Association's approved Data Protection Policy and be mindful of commercial sensitivity, particularly of third-party information.

In situations where there may be any doubt about the requirements of the Data Protection Policy versus commercial sensitivity, it is recommended that the Association seeks the views of its legal advisors.

The Association shall maintain records of all procurement documentation, including tender documents, contracts, and evaluation criteria for 6 years after tendering.

16. Equality & Diversity

Paisley HA is committed to providing fair and equal treatment to all our suppliers to complying with the Equality Act 2010 as noted in **Equalities and Diversity Policy** (PPKD GOV01)

An Equality Impact Assessment has been undertaken on this Policy and concluded this policy should help to make procurement rules within PHA more consistent as well as improve the accessibility of businesses to our contracts. Considering this, it is anticipated that overall equality impacts should be positive and that any negative equality impacts should be minimal.

17. Complaints procedure

The Association aims to ensure that the service provided to our customers is of the highest quality. If this is not the case, the Complaints Policy and Procedure is in place to allow all customers or affected parties to state their grievance.

18. Communication:

This Procurement Policy shall be communicated to all staff, suppliers, contractors, and other relevant stakeholders.

Feedback on procurement processes and procedures shall be welcomed and considered in the ongoing review and development of this policy.

19. Review and Monitoring:

This Procurement Policy shall be reviewed at least every 5 years, to ensure it remains up-to-date and reflects changes in legislation, best practices, and organisational requirements. The review of GPA Procurement Thresholds which takes place every 2 years.

This Policy will also be reviewed if there are any significant issues that would merit a change to this Policy.

Procurement processes and outcomes shall be monitored and evaluated to identify areas for improvement and ensure compliance with this policy.

20 Conclusion

This Procurement Policy reflects Paisley HA's commitment to conducting procurement activities in a transparent, fair, and efficient manner, while maximising value for money and promoting social and environmental sustainability. All staff, suppliers, and stakeholders are expected to adhere to this policy and support its implementation.

Appendix 1 A Procurement Process Threshold

	Estimated Value(Excl VAT)	Definition	Tender Process	Tender Activity	Minimum Advertising Requirements	Internal Guide Timescales
1	£0- £999	Works, Services and Supplies	Spend may be authorised within individual officer limits and contractor may be directly engaged without any form of public procurement exercise.	Ability to directly appoint a supplier.	Direct approach to suppliers	1-2 weeks
2	£1000- £4,999	Works, Services and Supplies	Quotation – minimum of 1 quotation to be received – with a direct appointment allowed subject to this being a one-off commission or purchase.	Ability to directly appoint a supplier following receipt of a quotation in writing.	Direct approach to suppliers	1-2 weeks
3	£5,000- £14,999	Works, Services and Supplies	Minimum of 3 competitive quotations to be invited using standardised documentation and processes (for example, a specification and return date to be sent to all contractors being asked to provide costs. Lowest priced contractor to be appointed. Route 1/CPA 1A used.	Ability to directly appoint a supplier following receipt of quotations in writing.	Direct approach to suppliers OR On-line Quick Quote using the public contracts website	1-2 weeks
4	£15,000 - £49,999	Work Services and Supplies,	Quick Quote Route 1/CPA 1A	Use of ITT document incorporating price/quality ratio and tender questionnaire document	On-line Quick Quote using the public contracts' website	Minimum 2 weeks

	Estimated Value(Excl VAT)	Definition	Tender Process	Tender Activity	Minimum Advertising Requirements	Internal Guide Timescales
4	£50,000 - £99,999	Works	Quick Quote CPA 1A or CPA 1B	Use of ITT document incorporating price/quality ratio and tender questionnaire document	On-line Quick Quote using the public contracts' website	Minimum 2 weeks
5	£50,000 – GPA Threshold	Services and Supplies	Formal Tender Process Minimum of 3 written tenders (Below GPA Level - Scottish Level) (Above GPA Level – <i>Find a Tender</i> Threshold) Route 2	Use of SPD and ITT document incorporating price /quality ratio.	To be advertised on the public contracts' website	5-8 weeks
5	£50,000 - £99,999	Works	Formal Tender Process Minimum of 3 written tenders Route 2A	Use of SPD and ITT document incorporating price /quality ratio.	To be advertised on the public contracts' website	5-8 weeks
6	£100,000 - GPA Threshold	Works	Formal Tender Process (Below GPA Threshold - Scottish Level) (Above GPA Threshold – <i>Find a Tender</i> Threshold) Route 3	Use of SPD and ITT document incorporating price /quality ratio.	To be advertised on the public contracts' website	6-12 weeks
6	GPA Threshold or above	Work Services and Supplies,	Formal Tender Process (Below GPA Threshold - Scottish Level) (Above GPA Threshold – <i>Find a Tender</i> Threshold) Route 3	Use of SPD and ITT document incorporating price /quality ratio.	To be advertised on the public contracts' website	6-12 weeks

Appendix 1 B Procurement Process Threshold

	Risk	Good & Services – Non- Construction	Good & Services – Non-Construction	Works
£5000- £49,999	Low /Medium	Route 1	Construction Procurement Route 1A	Construction Procurement Route 1A
	High	Route 1	Construction Procurement Route 1B	Construction Procurement Route 1B
£50,000 to £99,999	Low/Medium/	Route 2	Construction Procurement Route 2A	Construction Procurement Route 1A
	High	Route 2	Construction Procurement Route 2A	Construction Procurement Route 1B
£100,000-GPA Level	Low/Medium/ High	Route 2	Construction Procurement Route 2B	Construction Procurement Route 2B
GPA Level or above	Low/Medium/ High	Route 3	Construction Procurement Route 2B	Construction Procurement Route 2B

Appendix 2: Procurement Levels

Regulated Contracts Threshold

Threshold applicable (excluding VAT) to the Procurement Reform (Scotland) Act 2014:

Procurement Reform (Scotland) Act 2014	Supplies	Services	Works
Other public sector contracting authorities	£50,000	£50,000	£ 2,000,000

GPA Procurement Threshold

The GPA procurement thresholds changed (to the values listed in the table below) from 1 January 2024.

More information can be found at [Public procurement - updates to procurement thresholds](#)

Public Contracts (Scotland) Regulations 2015	Supplies	Services	Works
Other public sector contracting authorities	£214,904 (Indicative value excluding 20%)	£214,904 (Indicative value excluding 20% VAT £179,087)	£5,372,609 (Indicative value excluding 20% VAT £4,477,174)

This Appendix will be updated in January 2026.

Appendix 3: Spend Authority Levels (Excluding VAT)

An individual member of staff may authorise expenditure on items provided for in the annual budget, subject to the following limits:

Post	Spend Authority Level Without Prior Board Approval	Spend Authority Level with Prior Board Approval
Board	£50,000 and above	N/a
Chief Exec	£49,999	To Board pre-approved budgeted level
Head of Finance & IT	£49,999	To Board pre-approved budgeted level
Head of Housing/ HoAM	£14,999	To Board pre-approved budgeted level to maximum level of £250,000
Housing Manager/Advice & Projects Manager /Asset Manager/Finance Manager/ SCOW	£7499	To Board pre-approved budgeted level to maximum level of £100,000
Housing / Asset /Contract & Compliance Officers	£4999	N/a
Customer Services Officer	£4999	N/a
Asset Coordinator	£999	N/a
Receptionist/Asset Assistants/Housing Assistants / Estate Assistant	£499	N/a