
Sanctuary Group

Title: Procurement - Group Policy

Business Function: All Functions across Sanctuary Group

Author: Director of Group 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 is committed to maximising value for money, efficiency, and quality, actively managing risk, and delivering its environmental and social policy through all third party spend and procurement activity. It will maintain fair and equitable practices that are consistent with Sanctuary's vision and values.
- 1.2 Under the Procurement Act 2023, Procurement is defined as all stages of the procurement life cycle from pre-market engagement to tender, award and contract management. The role of procurement is to oversee the steps of the procurement cycle, from the identification of needs, through to the end of a services contract or the end of the useful life of an asset.
- 1.3 Sanctuary will work within the laws of the territories in which it operates and will ensure procurement practice follows the letter and spirit of current and emerging procurement legislation.
- 1.4 The purpose of this policy is to:
 - ensure all staff understand their obligations and accountabilities when planning to spend money on third party goods and/or services;
 - define a procurement service that delivers economic, social, and environmental benefits;
 - ensure Sanctuary is compliant with relevant procurement legislation and reflects best practice; and
 - through a clear understanding of procurement process and current best practice:
 - align procurement to meet business needs through collaboration across Sanctuary business functions;
 - maximise value for money through a whole life cost culture and realisation of total leverage of both Sanctuary and partners;
 - increase efficiency by reviewing and improving procurement processes;
 - deliver quality of goods and services ensuring all areas of the supply chain are fit for purpose;
 - advance Sanctuary's environmental and social policy agenda through innovation and effective supply chain and category management;
 - manage supply, reputational, legal, and financial risk to Sanctuary through the implementation of a robust risk identification, management and reporting regime;
 - support the development of a groupwide culture of procurement and commercial best practice; and
 - support best practice for contract management across Sanctuary.

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 Sanctuary.

2.2 Designated Managers are responsible for:

- assessing and facilitating appropriate staff training in partnership with Group Procurement;
- ensuring staff follow the agreed methods of handling procurement; and
- staff performance where this is involvement in the procurement process.

2.3 The Group Procurement team is responsible for:

- defining this policy and the associated procedure;
- ensuring alignment with Sanctuary's Social and Environmental agendas;
- ensuring that all defined procurement processes meet legislative requirements;
- the approval of new vendors; and
- carrying out tenders, providing advice and general support, as required.

3. References and sources

3.1 Sanctuary is required to comply with the Public Contract Regulations or the Procurement Act 2023 when conducting procurement activity. The nature of the procurement activity will determine which legislation must be followed. The procurement team can advise.

3.2 A number of additional obligations are required in tendering which are dependent on the nature and scale of the procurement. The most recent guidelines can be obtained from Group Procurement:

- [Public Contracts Regulations 2015](#)
- [Procurement Act 2023](#)
- [Public Procurement \(Amendment etc.\) \(EU Exit\) Regulations 2020](#)
- [Public Procurement etc. \(EU Exit\) \(Scotland\) \(Amendment\) Regulations 2020 \(legislation.gov.uk\)](#)
- [General Data Protection Regulation](#)
- [Modern Slavery Act 2015](#)
- [Government Procurement Card \(GPC\) - Group Policy and Procedure](#)
- [Data Protection - Group Policy and Procedure](#)
- [Group Financial Regulations \(England\)](#)
- [Financial Regulations - Scotland](#)
- [Environment - Group Policy](#)
- [Equality, Equity, Diversity and Inclusion - Group Policy Statement](#)
- [Procurement - Group Procedure](#)

4. Impact on diversity

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

4.2 Sanctuary 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 the '[Sanctuary Inclusion for All Strategy 2024-2026](#)'.

4.3 Sanctuary's equality, diversity and inclusion commitment is communicated through the Supplier Code of Conduct and enforced/monitored through the tendering process and subsequent contract management process.

5. Resident/Client consultation

5.1 Procurement stakeholder management encompasses a thorough internal and external customer engagement process. This is carried out on an individual category/contract basis.

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.
- The supplier management programme reviews contract performance/service levels against key performance indicators. This is an ongoing 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'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](#).