

# Wheatley Group Group Procurement Policy 2025

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در صورت درخواست، می توانیم اطلاعات را در چاپ بزرگ، خط بریل، روی نوار یا در فرمت غیرنوشتاری دیگری ارائه دهیم. همچنین می توانیم اطلاعات را به سایر زبانها ترجمه کنیم. در صورت نیاز به اطلاعات بیشتر در هر یک از این فرمتها، لطفاً از طریق شماره 0800 479 7979 با ما تماس بگیرید یا ایمیلی به [info@wheatley-group.com](mailto:info@wheatley-group.com) ارسال کنید.

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## Schedule of Definitions

<b>Procurement Terminology</b>	<b>Definition</b>
Board Member	A member of the governing body of an organisation, responsible for making key decisions and overseeing the management and operations of the organisation.
Collaborative Contracts	When two or more groups of people or organisations engage in procurement work together for mutual benefit.
Commodity	A raw material or primary product that is bought and sold e.g. copper, coffee.
Contract	An agreement between two or more parties that is legally binding.
Contract Award Notice	A publication which confirms the details of a contract which has been awarded to a supplier.
Contract Notice	A publication which advertises a procurement requirement.
Contract and Supplier Management	The process of monitoring supplier performance on a contract.
Contract Register	A published list of contracts put in place by a public sector organisation. This is a legislative requirement.
Contract Value	This is an estimate of the value of a contract over the whole period of the contract e.g. if the contract is for £50k per year for 3 years the contract value is £150k. The contract value should include any extension periods.
Freedom of Information (Scotland) Act (FOISA)	This legislation gives individuals access to information held by public authorities.
Frameworks or Framework Agreements	An agreement or other arrangement between one or more contracting authorities and one or more economic operators which establishes the terms (in particular the terms as to price and, where appropriate, quantity) under which the economic operator will enter into one or more contracts with a contracting authority in the period during which the framework agreement applies.
Key Suppliers	Those suppliers identified as business critical in terms of risk/value and business continuity.
KPIs	Key Performance Indicators. Measures put in place as part of the contract to evaluate how effective the contract is.
Life Cycle of Goods/Assets	How much money will be spent on an asset over the cost of its life.
Local Authority	A term used for councils in Scotland.

Lots	Grouping similar requirements within a procurement e.g. by geographical location.
Negotiated Procurement Without Prior Publication	A procurement procedure which can be used, in limited circumstances, by public sector buyers to procure goods or services without advertisement.
Procurement Capability Improvement Programme (PCIP)	The Procurement Capability Improvement Programme (PCIP) drives procurement performance by assessing public sector organisations and identifying areas for continuous improvement.
Prior Information Notice (PIN)	A method of giving advanced notice of future planned procurement exercises.
Procurement Process	A procurement procedure can be run in a number of ways (procurement processes) e.g. a Framework Agreement.
Procurement Category Specialist	The name given to the role/person who is a buyer. They are an individual who spends the majority of their time working in a role that adds value to the quality, cost and effectiveness of the procurement or acquisition of goods and services.
Procurement Law	Comprises of the Procurement Reform (Scotland) Act 2014, the Procurement (Scotland) Regulations 2016 and the Public Contracts (Scotland) Regulations 2015 which apply to Wheatley and the Public Contracts Regulations 2015 and Procurement Act 2023 (coming into force at the end of February 2025) which are only relevant where Wheatley uses framework arrangements or dynamic markets put in place by contracting authorities outwith Scotland.
Procurement Strategy	It is mandatory document for a Scottish public sector organisation, which estimates it will spend greater than or equal to £5,000,000 on regulated procurements to publish a Procurement Strategy which is proportionate and relevant to its organisation.
Public Sector Body	All organisations which are subject to public procurement laws. This includes government, councils, universities and colleges, the NHS and registered social landlords.
Public Contracts Scotland (PCS) Portal	The national portal used by the Scottish public sector to advertise all regulated procurement opportunities and awards.
Quick Quote	A process used by public sector buyers in Public Contracts Scotland for low value/low risk procurement requirements (normally under £50k in value).
Regulated Procurement	A procurement whose value is greater than £50,000 excluding VAT for goods and/or services for the full life of the contract. Or greater than £2m for Works contracts.

Risk Management	Activities undertaken to minimise negative impact.
Single Point of Enquiry (SPoE)	An impartial point of contact where suppliers can seek advice or raise concerns if they are dissatisfied with specific public procurement practices in Scotland.
Small Medium Enterprise (SME)	A small or medium-sized enterprise with fewer than 250 employees and a turnover of less than £36 million. They are further categorised as: <ul style="list-style-type: none"> <li>▪ Micro – 1–9 employees;</li> <li>▪ Small – 10–49 employees;</li> <li>▪ Medium – 50–250 employees;</li> </ul>
Stakeholder	Any person or group who has a vested interest in the success of the procurement activity, i.e. either provides services to it, or receives services from it.
Supply Chain	All activities, resources, products etc. involved in creating and moving a product or service from the supplier to the procurer.
Supported Business	An organisation whose main aim is the social and professional integration of disabled and disadvantaged workers and where at least 30% of their workforce are classed as disabled or disadvantaged.
Tender	The term used to describe the procurement process of advertising, requesting and awarding a contract.
Threshold	Values that apply to public procurement exercises.
UK GDPR	General Data Protection Regulation legislates how personal data is handled and stored.
Value for Money (VfM)	An economic assessment by the public sector as to whether a project represents value for money; the optimum combination of cost and quality to provide the required service.
Waiver	The process which allows procurements to be achieved without following the full tendering procedures. This is typically used when a purchase is time-critical, there are no other suppliers available, or continuity is required.

Within the above list of definitions, those relevant to procurement processes pick up the terminology under Procurement Law in Scotland. In 2005, new terminology will begin to be used for, for example, "contract notices" under the Procurement Act 2023 once in force. The Procurement Act 2023 will, however, only be relevant to Wheatley Group's call-off arrangements under collaborative procurement arrangements.

## 1. Introduction

Wheatley Housing Group ('The Group') is Scotland's leading housing, care and property management group. We are an organisation which currently comprises of four Registered Social Landlords, a Care Partner, a Charitable Foundation a Repairs Division and commercial subsidiaries.

The Group currently spans 19 Local Authority areas across Scotland.

Our Group partners are:

- Wheatley Homes Glasgow
- Wheatley Homes South
- Wheatley Homes East
- Loretto Housing Association
- Lowther Homes
- Wheatley Care
- Wheatley Solutions
- Wheatley Foundation
- \*City Building (Glasgow)

We refer to the 50/50 Joint Venture with Glasgow City Council, City Building (Glasgow), as a Partner Organisation, although City Building (Glasgow) have their own governance procedures and undertake their own procurement processes for the supply of all goods and services.

This Procurement Policy applies to all employees in the Group and its subsidiaries in any situation where they are involved in a purchasing process. 'Purchasing' includes all procurement activities including leasing and hiring and may where appropriate include other activities accompanying the life cycle of goods (or service contracts) and the end-of-life disposal of goods which have been procured (whether or not they remain in our ownership). Adherence to the Procurement Policy is both an individual and a corporate responsibility; failure to comply may result in disciplinary action.

The purpose of the Procurement Policy is to set out the general operating principles covering the activities and objectives of Procurement within the Group. The document explains the principles under which Procurement throughout the Group will be undertaken and proactively managed such that the stakeholders' requirements for supplies, works and services are efficiently and effectively sourced at the lowest sustainable 'total' cost whilst delivering best value for money.

The Procurement Team is responsible for managing procurement on behalf of the Group ethically and in compliance with legislation. It is responsible for providing guidance and support across the Group and to support staff who procure on behalf of their subsidiary. Should you require any assistance or guidance with any procurement matter please contact [procurement@wheatley-group.com](mailto:procurement@wheatley-group.com).

### Wheatley Housing Group / City Building (Glasgow) Joint Working Principles

In April 2017 the Group entered into a joint venture with Glasgow City Council. The Group became the 50/50 joint owner of City Building (Glasgow) (CBG) which delivers

investment, repairs and general maintenance work within the Group's Registered Social Landlords in the west of Scotland (including Wheatley Homes Glasgow, Wheatley Homes South and Loretto), the Group's commercial housing subsidiary Lowther Homes and its property management function.

We operate a collaborative approach to managing procurement across the Group with CBG. This will continue to be developed and agreed in line with the Group's compliance and legislation principles, reflecting best value and sustainability through the supply chain, determining the most effective route to market, jointly supporting SMEs, effectively benefiting the customer through the efficient management of Community Benefits and ultimately promoting excellence in procurement.



## 2. Principles, Aims and Objectives

Procurement activities must comply with all applicable UK laws and regulations. In particular all procurement must comply with, as relevant, the Public Contracts (Scotland) Regulations 2015, The Procurement (Scotland) Regulations 2016, Procurement Reform (Scotland) Act 2014, Concession Contract (Scotland) Regulations 2016 and the Housing (Scotland) Act 2001.<sup>1</sup>

All procurement activity aims to achieve Best Value for the Group. Best Value includes not only the initial purchase price, but also continuing costs throughout the life cycle of equipment, materials works and services, such as financing and depreciation, maintenance requirements and energy usage. Best value also includes the quality and reliability of the supplies, works or services and the punctuality and reliability of their execution.

The Group will work collaboratively with suppliers wherever possible to create relationships within which the Procurement Team can learn how to make it easier for suppliers to meet stakeholder requirements and to further encourage suppliers to improve their products, prices, quality and service level delivery.

The Group will work with Government bodies and other public sector organisations to utilise collaborative procurement arrangements where they offer value for money. In addition, the Group will consider including collaborative arrangements within its contracts to enable other public sector bodies to benefit from its rates, learn methods and scope of work.

All procurement for supplies, works and services that the Group undertakes and the methods it uses to procure them must not infringe upon laws applicable at the time of the procurement, and must conform to applicable ethical, social and environmental standards.

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<sup>1</sup> Going forward, pursuant to the coming into force of the Procurement Act 2023 on 24th and 25th February 2025, which applied predominantly outwith Scotland, where the Group undertakes call-offs from collaborative procurement approaches put in place under the Procurement Act 2023 the Group will require also to ensure compliance. With transition arrangements, this is not likely to impact materially in 2025.

### 3. Equity, diversity and inclusion (EDI)

We are dedicated to ensuring fair treatment for all our stakeholders and conducting business in a manner that actively promotes equality of opportunity while championing diversity and inclusion. The Group requires to comply with the with the Equality Act 2010 and moreover is committed to ensuring that no one is excluded or discriminated against based on religion or belief, race, age, sex, gender reassignment, sexual orientation, marriage or civil partnership, family circumstances, pregnancy and maternity, or disability in line. The Group has a zero-tolerance approach to bullying, harassment and victimisation and works to ensure that employees are safe within the workplace from such treatment including sexual harassment.

We also prioritise the highest standards of worker protection, focusing on the safety, well-being, and fair treatment of all our employees in line with the Worker's Protection Act 2023. This Act enhances the Equality Act 2010 by further strengthening provisions aimed at ensuring fair treatment and non-discrimination in the workplace. While the Equality Act 2010 consolidates and updates previous anti-discrimination laws to protect individuals from unfair treatment, the Worker's Protection Act builds on this foundation by introducing additional measures to safeguard workers' rights.

#### Real Living Wage

The Group are an accredited Real Living Wage employer who are dedicated to ensuring that our employees receive fair compensation for their hard work. We pay and are committed to paying the real Living Wage, as a minimum, to all our employees. In addition to our internal commitment, we actively encourage our suppliers to adopt the same standard. We believe that fair wages are essential for fostering a motivated and productive workforce, and we expect our suppliers to share this ethos. By promoting the real living wage throughout our supply chain, we aim to create a positive impact on the broader community and support the well-being of workers at all levels.

#### Fair Work First

Fair Work First is the Scottish Government's flagship policy for driving high quality and fair work across the labour market in Scotland by applying fair work criteria to grants, other funding and contracts being awarded by and across the public sector, where it is relevant to do so. Through this approach, the Scottish Government is asking employers to adopt fair working practices, specifically:

- Payment of at least the real Living Wage.
- Providing appropriate channels for effective workers' voice, such as trade union recognition.
- Investment in workforce development.
- No inappropriate use of zero hours contracts.
- Action to tackle the gender pay gap and create a more diverse and inclusive workplace.

- Offer flexible and family friendly working practices for all workers from day one of employment
- Opposing the use of fire and rehire practices

The Group values the culture of partnership working that has been established with Trade Union Colleagues and will continue to work together to develop transparent mechanisms for employee voice and engagement founded on trust and respect.

The Groups values and the priorities are aligned to the Fair Work First principles.

Although not directly applicable to us, we are also considerate of the Fairer Scotland Duty, as set out in part one of the Equality Act 2010. This places a legal responsibility on public bodies in Scotland to actively consider and ‘pay due regard to how they can reduce inequalities of outcome caused by socio-economic disadvantage, when making strategic decisions’<sup>2</sup>

Social mobility is a key theme threaded through our EDI actions. The Group recognises the role it plays in our local economies and is focused on targeting underlying weaknesses which include underemployment, above average levels of youth unemployment and low levels of qualifications. As a result, it shall support its stakeholders by seeking to provide education/employment opportunities via Group business activity and its supply chain. This includes the social value created by contracting with Supported Businesses.

Our focus goes beyond our legislative duties; to signal our commitment to EDI, when procuring we generally seek that our suppliers and contractors demonstrate the existence of their own EDI policy. Where our suppliers / contractors do not have an EDI policy, we encourage them to consider how EDI can inform their working practices and be considered within their own organisations.

Through our Contract Management System, we survey our suppliers to find out more about their commitment to EDI, their policies, and encourage our suppliers to detail how they reflect our EDI aspirations within their working practices.

You can access the Group’s EDI and Human Rights policy [here](#).

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<sup>2</sup> [About the Duty - Fairer Scotland Duty: guidance for public bodies - gov.scot \(www.gov.scot\)](#)

## 4. Data Protection

The Group holds a wide range of sensitive information, both of a personal and a commercial nature. We have a duty to protect this information and ensure it is not seen or accessed by people (whether internal or external to the Group) without the legal authority to do so.

The Group's policy position in respect of data protection is reflected in the Group's Data Protection Policy.

The Group must comply with all applicable data protection and privacy legislation in force from time to time in the UK including the UK GDPR, the Data Protection Act 2018 (and regulations made thereunder) and the Privacy and Electronic Communications Regulations 2003 (SI 2003 No. 2426) as amended, and the guidance and codes of practice issued by the Information Commissioner.

The Group will continue to carry out Data Privacy Impact Assessments (DPIA) when required to do so by law or good practice, on all activities which involve personal data or the exchange of personal data to help us identify the most effective way to comply with our data protection obligations and meet individuals' expectations of privacy. The UK GDPR requires us to undertake DPIAs in circumstances where we: -

- use systematic and extensive profiling with significant effects;
- process special category or criminal offence data on a large scale; or
- systematically monitor publicly accessible places on a large scale.

The Information Commissioner requires data controllers to undertake a DPIA if they plan to:

- use systematic and extensive profiling or automated decision-making to make significant decisions about people;
- process special-category data or criminal-offence data on a large scale;
- systematically monitor a publicly accessible place on a large scale;
- use innovative technology in combination with any of the criteria in the European guidelines;
- use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit;
- carry out profiling on a large scale;
- process biometric or genetic data in combination with any of the criteria in the European guidelines;
- combine, compare or match data from multiple sources;
- process personal data without providing a privacy notice directly to the individual in combination with any of the criteria in the European guidelines;
- process personal data in a way that involves tracking individuals' online or offline location or behaviour, in combination with any of the criteria in the European guidelines; and

- process children’s personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them.

DPIAs help the Group to identify and reduce the privacy risks of a project and document any mitigations we are required to put in place. The purpose of a DPIA is to ensure that privacy risks are minimised while allowing the aims of the project to be met wherever possible. The Group also has a duty to be accountable under the UK GDPR and requires DPIAs to be retained and updated by the contract owner where appropriate for audit and compliance purposes.

It is a standard condition of all our contracts that our suppliers and sub-contractors will comply with all data protection legislation and applicable regulations, including the UK GDPR, the Data Protection Act 2018, and all guidance and/or Codes of Practice published by the Information Commissioner’s Office.

The requirement for DPIA will be considered within all relevant future procurement activities.

## 5. Ethical, Social and Environmental Responsibility

### Fair and Equal Treatment of Suppliers

All procurement will be conducted such that all suppliers with the necessary abilities have a fair and equal opportunity to secure Group business including seeking to enable market access opportunities for Small & Medium Sized Enterprises (SMEs).

This includes, within the constraints of the regulated environment in which we operate and carrying out tendering in line with Procurement Law and relevant Scottish Government Statutory Guidance, conducting our procurements in a transparent manner, utilising public dynamic purchasing systems, frameworks and procurement processes that promote supplier diversity.

In practice, this enables a diverse range of suppliers to bid for contracts with us. Tender evaluations are conducted in line with Procurement Law. The Group is also committed to improving access to our contracts and empowering staff, in accordance with Procurement Law, to promote sustainability, for example through seeking to buy locally for low risk, low value purchases thus contributing to our local communities.

We shall appropriately review and evaluate all above-threshold and regulated contracts, considering the geographical location and the option of splitting them into smaller Lots, which may encourage SME participation. This will not be appropriate in every circumstance, and we retain our discretion not to Lot or retain larger value contracts as one Lot, determined by the best interests of the Group.

In particular, the Group will seek, where possible to promote local economic development and regeneration by actively encouraging fair and open competition across a varied supply base thus making it easier for all suppliers regardless of size to bid for contracts.

Prior to commencing a procurement exercise, we may seek to carry out market testing. To be open and transparent in our dealings we will only do this by going out to the market using the appropriate Prior Information Notice (PIN) on the Public Contract Scotland procurement portal, as applicable to regulated spend thresholds. Any improper approaches, whether in the form of inducements or threats from suppliers, must be reported to line managers, even if they are sufficiently ambiguous to allow for an innocent interpretation.

To ensure transparency and fair treatment of all suppliers during the tendering process and in compliance with the formal procurement process, all communication with suppliers will be carried out through the Public Contract Scotland portal and in accordance with arrangements set out in the Procurement Guidance section on the staff intranet, W.E. Connect, which staff must follow.

### Ethical Standards of Staff

The Group insists on suppliers adhering to strict ethical standards and behaviour, in return the Group will also demonstrate the highest level of ethical standards. The Group will be fair, honest and transparent in all dealings with suppliers and avoid any conduct which may be adversely interpreted.

Persons engaged in any aspect of procurement on behalf of the Group will not use their authority for personal gain. Adhering to this policy will also help ensure that we comply with the requirements of The Bribery Act 2010, which makes it an offence to:

- Bribe another person (e.g. offer, promise, or give financial or other advantage to induce or reward improper performance of a function);
- Receive bribes from another person (e.g. agreeing to receive or accept a financial or other advantage for improper performance of a function);
- Bribe foreign officials; and
- Fail to prevent bribery.

Further details are available in the Group Fraud, Corruption and Bribery Policy.

### Social and Environmental Responsibility

Effective procurement will complement our goals for maintaining awareness of sustainability issues amongst staff and customers. We expect our suppliers to meet our standards for sustainability as set out in the Group Sustainable Procurement Strategy.

The Group is committed to compliance with the Health and Safety at Work etc. Act 1974, and all related provisions and we expect all of our suppliers to comply with the legislation and promote good working practices throughout the supply chain.

### Gifts and Hospitality

All staff involved in procurement must comply with the Group's policy on Gifts, Hospitality, Payments and Benefits which sets out guiding principles for employees and Board Members to follow to ensure that we meet legal and regulatory requirements. This serves to protect our integrity and avoid the potential for any perception that our procurement processes can be unduly influenced.

All staff have a duty to act with honesty and integrity and must never accept a gift, favorable treatment or incentive in exchange for acting in a certain way.

### Conflicts of Interest

The Group contributes to the economies of the areas we work in and has commercial and business relationships with many different companies, contractors, suppliers and service providers. In order to comply with Regulation 25 of the Public Contracts (Scotland) Regulations 2015 we are required to take appropriate measures to prevent, identify and remedy conflicts of interest arising in the conduct of procurement procedures so as to avoid any distortion of competition and to ensure equal treatment of all economic operators and equivalent provisions apply under other areas of Procurement Law.

All staff must report connections as outlined in the Group's Gifts, Hospitality, Payments and Benefits Policy to their direct Line Manager and complete the relevant Declaration

of Interest form, forwarding this to the Governance Team for entry into the Group's staff register of interests. Board Members must follow the Group Non-Executive Conflicts of Interest policy. For the avoidance of doubt this includes any situation where an employee or Board Member has directly or indirectly a financial, economic or other personal interest which might be perceived to compromise their impartiality and independence in the context of the procurement procedure.

Any Employee or Board Member involved in a decision-making process in respect of any matter covered by this policy shall be required to ensure that, to the best of their knowledge, there has been no conflict of interest and the decision making process has been open and transparent. Alternatively, they shall be required to declare a conflict of interest immediately upon becoming aware of such an interest and where there is a conflict will be removed from the decision-making process.

In order to protect our reputation and demonstrate that we conduct our affairs with openness, honesty and integrity we maintain a staff Register of Interests. As a matter of good practice, all Board Members and Senior Leaders are required to complete a Registration of Interests form annually. All other Employees are required to exercise their discretion and complete such a form if they consider themselves to have a registrable interest. All forms should be passed on to the Governance Team who has the responsibility for maintaining and auditing the register. The Governance Team may contact you regarding the interest you are declaring.

Connections/ Interests will not necessarily prevent the Group trading with the supplier concerned but in the interest of ensuring the decision-making process is open and transparent, declarations of interest must be made and retained by the Procurement Category Specialists.

Group employees should avoid, as far as possible, dealings with Group suppliers in their private affairs, particularly if this is likely to put them under some obligation to the supplier. Where such arrangements are unavoidable, it is essential that they are not offered any deal, which could be construed as a reward for actions taken in the course of their employment.

It is the responsibility of Employees and Board Members to manage conflicts of interest that arise between their own personal or business interests and their duties to us, in accordance with the employee and governing body Codes of Conduct. Employees and Board Members give a written undertaking to act in accordance at all times with the Employee terms and conditions of contract and the Board Member Code of Conduct, which exemplify good governance and reflect relevant legal and regulatory requirements.

Further information can be found in our Group Gifts, Hospitality, Payment and Benefits and Group Non-Executive Director Conflicts of Interest policies.



## Criminal Convictions and Serious and Organised Crime

We view criminal conduct of our suppliers very seriously and work closely with Police Scotland with whom we have an Information Sharing Protocol. All suppliers are required, as a standard term of contract to complete a Declaration of Non-Involvement in Serious and Organised Crime.

In compliance with the Procurement Reform (Scotland) Act 2014 and Public Contracts (Scotland) Regulations 2015 we are required to exclude a business from bidding if it, or someone who holds a senior position within it, has been convicted of specific offences as detailed in the 2015 Regulations, the Procurement (Scotland) Regulations 2016 and relevant to future collaborative procurement approaches, the Procurement Act 2023) unless there are exceptional circumstances.

We are also entitled to exclude bidders should they attempt to distort competition. All staff involved in the procurement of goods, works or services should be aware of the potential for bidders to be acting together in order to fix market prices – this is highlighted within our Passport 2 Procure training which staff involved in procurement are required to complete. Any such arrangement is illegal. Staff may also become aware of potentially fraudulent activity throughout the life of any procurement. Any such suspicions must be reported in writing (together with any supporting evidence) to the Director of Assurance who will investigate and pass to the appropriate department for further investigation if necessary. All reporting of anti-competitive behaviour and fraud will be dealt with in accordance with the Group Fraud, Corruption and Bribery Policy and Group Anti Money-laundering and Counter Terrorism Financing Policy.

## Slavery & Human Trafficking

We are committed to the highest ethical standards of business and ensuring there is no slavery or human trafficking in any part of our Business or Supply Chain.

We are committed to developing the economies of the areas we work in and building strong relationships with local Suppliers. We operate solely within Scotland and do not have a large global Supply Chain.

The Group is committed to compliance of the Modern Slavery Act 2015 and related legislation such as the Proceeds of Crime Act 2002 as reflected in the Group Anti Money-laundering and Counter Terrorism Financing Policy. We expect all our Suppliers to comply with the legislation and promote good working practices throughout the Supply Chain.

We review and present our Group Modern Slavery Statement annually to our Group Board for approval. We publish our statement on our website and are also required to enter this into the UK Government's modern slavery statement registry.

## 6. Business Continuity and Disaster Recovery

As part of the Group business continuity management arrangements, the Group has identified essential activities and levels of service to be prioritised. These activities and levels of service have been identified through a business impact assessment against the following criteria:

- whether it is a life and limb service;
- the financial impact should the service be disrupted;
- whether it is a legislative requirement; and
- the reputational damage should the service be disrupted.

The loss of a Supplier is identified by the Group as a key risk as the ability to maintain these essential activities and levels of service may depend on the continuation of suppliers, services and products. Further identified risks for our Supply Chain include pandemic, loss of premises, loss of ICT, fuel shortage, severe weather, loss of key staff and disruption to critical infrastructure.

If a supplier is unable to provide its contracted service or product to the Group, this may have an impact on the Group's delivery of its own services. Therefore, ensuring that these Suppliers have their own effective business continuity arrangements (details of which must be included within their Service Level Agreement) in place is an important step in helping to ensure that they have considered incidents which could impact their service provision and have put contingencies in place to mitigate any potential disruption. Relevant Suppliers should also confirm their plan, exercise, or programme that demonstrates their plans have been tested and provide the results of those tests. The Group may invite key suppliers to take part in the testing of the Group's own plans, and we may also request to take part in the supplier's exercise of their plans. In addition, suppliers may be asked to confirm what help they may be able to offer the Group in the event of disruption to the Group's business as it relates to the supplier.

## 7. Route to Market

All Group procurements should be carried out in line with the authority as detailed in the table below. Procurements deemed to be of high business risk political or reputational nature must be reported to the Executive Team (ET) as a minimum.

Financial Value	Process	No. of Suppliers	Responsibility	Authorisation
Below £25,000	Guidance on W.E. Connect that must be followed to achieve best value. Quick Quote process via PCS (quality/price) may be followed if the contract is deemed to be of medium risk or higher.	N/A unless Quick Quote is used. if so, 3 – 5 suppliers must be invited to quote.	Business with advice from Procurement	Budget Holder
£25,000-£50,000	Quick Quote process via PCS (quality / price)	3 - 5	Business with advice from Procurement	Budget Holder
£50,000 (Goods and Services) £2m (Works) and above up to PCSR Thresholds	Tender process via PCS – quality / price in accordance with the requirements of the Procurement Reform (Scotland) Act 2014 and the Procurement (Scotland) Regulations 2016	As per specific procurement route. Seek advice.	Procurement	Budget Holder/ Business Leader/ Executive Team
Above PCSR Thresholds	Tender process in accordance with the requirements of the PCSR	As per specific procurement route in the PCSR. Seek advice.	Procurement	Budget Holder/ Business Leader/ Executive Team May also require Group Board approval.
Beneath £50,000 (Goods and Services) and £2m (Works) where a competitive tender process is not possible	Waiver Approval Form	Single Supplier	Procurement	Budget Holder/ Business Leader/ Executive Team  May also require Group Board approval.
Above £50,000 (Goods and Services and £2m (Works) where a competitive tender process is not possible	Negotiated Procurement without prior publication of a Contract Notice	Single Supplier	Procurement	Budget Holder/ Business Leader/ Executive Tea  May also require Group Board approval.

Separate to the above, it may be that the procurement route involves use of a collaborative procurement approach in the form of a framework agreement or dynamic purchasing system, in which case the relevant process will be dictated by the detail of the relevant collaborative procurement approach.

Contracts with a value of less than £50,000 are not subject to Procurement Law and do not require to be publicly advertised. Below this threshold staff will be offered training and support including an introduction to the Group's 'Passport to Procurement' program to use the 'Quick Quote' process via Public Contracts Scotland as good practice to achieve value for money.

The Quick Quote process is operated through the Public Contract Scotland Quick Quote facility and requires a minimum of 3 quotes from suppliers, who are independently invited to quote. Staff should be mindful when completing the Quick Quote process that they should not simply revert to previous suppliers. Furthermore, staff must ensure that the chosen supplier is appropriate, and that due diligence has been carried out in terms of financial standing and references and the procurement is carried out in line with Group Standing Orders and guidance relating to spend under £50,000.

The rules of aggregation on contracts apply. This means that the contract value must be calculated over the duration of the contract. This can be reached by:

- The Group having requirements with several suppliers for goods or services, with similar characteristics, which in total exceed the Regulated threshold or;
- The Group having requirements with the same supplier over a period of time which exceed the threshold.

Contracts with a value in excess of £50,000 or where it is considered that advertising would be advantageous in terms of obtaining value for money, all contracts shall be advertised on the Public Contracts Scotland Portal.

#### Regulated: £50k and over (Goods and Services) £2m and over (Works)

The procurement regime for works contracts over £2m and supply/service contracts over £50,000 and the relevant thresholds under the Public Contracts (Scotland) Regulations 2015 (see next section) is governed by the Procurement Reform (Scotland) Act 2014 and the Procurement (Scotland) Regulations 2016. Contracts of this value and nature must be advertised on Public Contracts Scotland using a contract notice or PIN in order to comply with S.23 of the Act.

(Scotland) Act 2014 will continue to be procured as Regulated Contracts. The current thresholds for the PCSR 2015 and the Procurement Reform Scotland Act in relation to Wheatley are set out below:

## Public Contracts (Scotland) Regulations 2015 Thresholds

PCSR 2015	From 1 January 2025 (inclusive of VAT)
Works	£5,372,609
Concessions – Works and Services	£5,372,609
Services and Supplies (non Schedule 1 Entities)	£214,904
Light Touch Regime	£663,540
Small Lots (works)	£884,720
Small Lots (supplies and services)	£70,778

Procurements for beneath the regulated thresholds can be undertaken by the Waiver process, these types of procurements are for goods, services & works where a contract is awarded to a single supplier which is deemed to be in the 'Best interests of the Group' and the Waiver Approval Form sets out the full background and justification to support the approval process, including any associated risks.

Procurements above the regulated thresholds, where the supplies or services can only be provided by a particular supplier shall be subject to a Negotiated Procedure without Prior Publication. This can be in the following circumstances:

- The Procurement's aim is the creation or purchase of a unique work of art or artistic performance;
- Competition is absent for technical reasons such that only one supplier can deliver;
- The availability of competition is absent on account of exclusive rights; or
- There is urgency, not of the contracting authority's making.

### Payment Approval

Payments to suppliers will be made in accordance with the terms of the particular contract. Our standard payment terms are within 30 days of receipt of a completed and valid invoice. Staff should note that payment terms will vary depending on the commodity being procured and, in particular, construction contracts must follow the payment provision approaches as set out in the Scottish Procurement Construction Policy Note (CPN) 1/2019. In order to ensure payments throughout the supply chain are made in accordance with the 2015 Regulations, contractual obligations contained within the terms and conditions of engagement will be monitored and reported via KPIs.

## Statutory Reporting

In order to comply with S.18 Procurement Reform (Scotland) Act 2014, the Group will publish an annual report concerning the Group's regulated Procurement activities of the previous financial year. The Group shall notify the Scottish Ministers of the completion of the report and said report shall be published on the Group's website. The Procurement Team shall be responsible for completing the required annual report.

## Contract Register

In order to comply with S.35 Procurement Reform (Scotland) Act 2014, the Group will publish our Contracts Register on our website. The Register is a live document and is updated on a regular basis.

## Delegated Authority to Procure

All procurement will be undertaken in accordance with the procedures set out within this Procurement Policy and read in conjunction with Group Standing Orders.

Staff may undertake the Group's 'Quick Quote' for procurement below £50,000 once they have completed the Group's 'Passport to Procurement' program. Where staff wish to procure goods, services or works above £50,000, they must refer to the Procurement Team for tendering purposes. With the exception of the Waiver process, the Procurement Team shall be responsible for managing all procurement above £50,000. Staff should refer to the table above outlining appropriate delegation of responsibility.

## Contract Approval

Approval to award contracts for goods, services and works will be in accordance with the Scheme of Financial Delegation and the Procurement Policy.

## Collaborative Procurement

The Group shall seek out opportunities to use collaborative contracts established by other organisations where it offers us better value for money than conducting our own procurement and meets our business needs.

As a result of the Group's size and scale we will use our leverage in the market to procure on behalf of other organisations in the housing sectors where value for money can be offered through collaborative procurements. We will use our strength to assist in the development of the Group by identifying opportunities to consolidate suppliers to gain economies of scale and to support transition for new procurement on contract expiry. We will seek to establish and develop Group wide frameworks, in accordance with the Scottish Procurement Construction Policy Note (CPN) 3/2017 guidance on frameworks, where appropriate.

As an associate member of Scotland Excel, the Group has access to a wide range of corporate and capital frameworks. This access to framework contracts has delivered

efficiencies and financial benefit to the Group. The Group is also a participant on the West Territory Hub through Scottish Futures Trust. Other framework providers being used by the Group include the Scottish Procurement Alliance (SPA), Northern Housing Consortium (NHC), Health Trust Europe, Places for People, Crown Commercial Service, ESPO, Scottish Government and Procurement for Housing (PfH). The Group's procurement programme has been aligned with framework and dynamic purchasing systems availability to ensure contracting for optimal solutions with the best placed suppliers is realised. The overarching requirement to achieve Value for Money remains our key focus.

### Plans for PCIP and Internal Audit

The Group Assurance function provides an internal appraisal service that reviews internal control systems in place across the Group's operations (e.g. Procurement). Internal Audit activity is aligned to the risk profile of the Group and provides assurance over the design and operating effectiveness of the controls put in place by management to manage known risks. A Procurement Risk Register is in place and is monitored regularly by Procurement management to ensure it continues to reflect the current procurement risk profile.

Procurement is a Group-wide function which is subject to periodic internal audit activity.

External accreditation is sought on a regular basis via Scotland Excel Procurement & Commercial Improvement Programme (PCIP) external audit.



## 8. Contract and Supplier Management

A Contract and Supplier Management (CSM) approach will be used by Contract Owners across the Wheatley Group. The aim of this approach is to provide a consistent and robust focus to the Group's contracting activities.

This approach will enhance the value derived from both new and existing contracts by boosting supplier performance, fostering continuous improvement, achieving mutual efficiencies, and improving supplier engagement. It will facilitate the development of strategic partnerships with key suppliers, leading to tangible contract savings.

Consequently, a CSM Guidance document is included with this policy for use across the Group.<sup>3</sup> The document provides comprehensive instructions on managing contracts and suppliers effectively to ensure the delivery of outcomes, value for money, and additional community benefits. This guidance aims to ensure that contracts deliver the best value outcomes for customers and service users by focusing on continuous improvement, compliance, risk management, and sustainable service delivery. Key points include:

- **Contract Ownership:** Contract Owners, typically directors or managers, are responsible for managing contracts and suppliers in accordance with the guidance.
- **Procurement Planning:** The Procurement Team assists in identifying the appropriate route to market and developing procurement strategies.
- **Risk and Resilience:** High-risk contracts require a Risk Assessment and consideration of disaster recovery and business continuity processes.
- **Supply Chain Security:** Ensuring suppliers meet technical and security requirements is crucial for contracts involving technology services.
- **Cyber Security:** The contract owner should be aware of the security measures and protocols for contracts involving technology services and the processing of corporate and personal data. The primary goal is to ensure that suppliers meet the minimum technical and security requirements, adhere to key cybersecurity KPIs, and manage specific cyber risks that could impact the Group's network, systems, or data throughout the contract by regular engagement and service review meetings.
- **Stakeholder Involvement:** Relevant stakeholders should be identified and involved in the procurement process to prepare specifications, technical questions, and pricing schedules.
- **Contract Administration:** This involves maintaining the mechanics of the relationship between the Contract Owner and supplier, including contract maintenance, change control, and risk mitigation.
- **Supplier Development:** Working with suppliers to optimise service delivery and maximise mutual benefits is encouraged.

The Procurement Team will assist Contract Managers in effectively utilising this guidance to manage their contracts. All staff with Contract Management responsibilities will receive training on relevant CMS procedures and software.

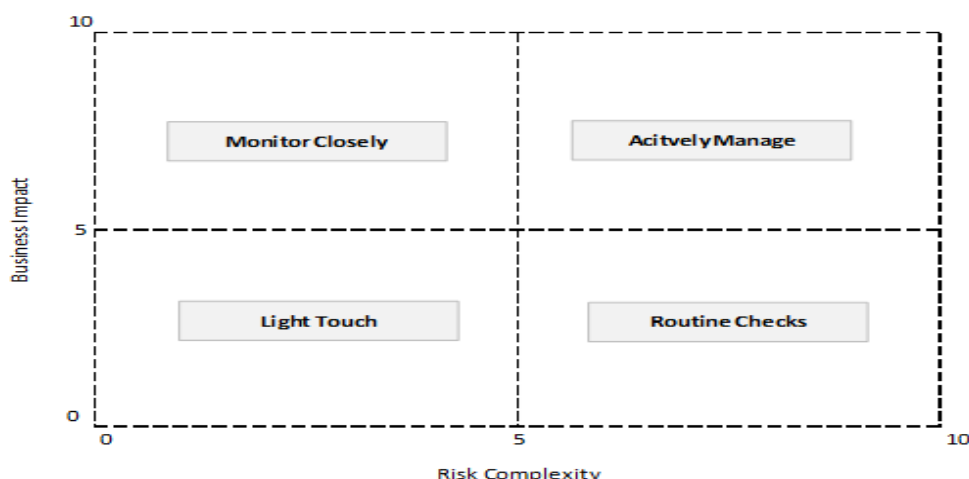
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<sup>3</sup> <https://wheatley.interactgo.com/Interact/Pages/Content/Document.aspx?id=55048>



## Supply Chain Risk

A Group Contracts Risk Matrix has recently been established and is available on W.E. Connect.<sup>4</sup> The Risk Matrix is a crucial tool for managing contracts within the organisation. It helps identify and assess potential risks associated with contracts, ensuring that we can mitigate and manage these risks effectively. The matrix categorises risks into various types, such as: financial, compliance, environmental, geopolitical, technological, logistical, and operational. It also scores these risks based on their impact and complexity, placing contracts into one of the four quadrants below:



Category	Characteristics	Minimum requirements
<b>Light Touch</b>	Commodities that are found in abundance and/or in low-risk supply markets (e.g. office stationery / PPE wear).	<b>Annual</b> review
<b>Routine Checks</b>	Commodities/Services that are important but sourced from low-risk markets (e.g. Legal Services / Technical Consultancy) with solid supply but would have an impact on service if supply were disrupted.	Contracts must include supplier risk for discussion as a minimum <b>annual</b> contract review.
<b>Monitor Closely</b>	Service and Goods with a high business impact in economic terms, and where supply continuity is at risk (e.g. new build contractors/insurance providers)	Contract supplier discussions as a minimum every <b>six months</b> (contract review, you may also need VSA and H&S checks) Finance checks, Equifax report will be run centrally.
<b>Actively Manage</b>	Services and Works contracts that are important both in terms of economic impact and for supply conditions from complex and/or risky markets (e.g. Servitor )	Contract supplier discussions as a minimum <b>every quarter</b> (contract review, you may also need VSA and H&S checks)  Finance checks, Equifax report will be run centrally

<sup>4</sup> <https://wheatley.interactgo.com/Interact/Pages/Content/Document.aspx?id=55066>

This scoring system guides our approach to supplier management and contract oversight.

All contract owners for actively managed contracts will be invited to quarterly meetings led by the Procurement Team. These meetings aim to ensure that all documentation, such as DPIAs, H&S, VSAs, and insurance documents, are up to date. Additionally, the meetings will address any challenges or issues and provide an open forum for discussion and technical support.

### Contract Management System (CMS)

Procurement have implemented a Contract Management System (CMS) to digitise our contracts which are now held on an electronic contract register and assist Contract Owners with their contract management responsibilities.

All Contract Owners will receive log in details to the CMS and will have access to administer, monitor and manage their suppliers/contracts. The CMS has two modules:

- Sourcing – Used to add new suppliers, amend supplier details and routinely check supplier information (insurances, bank details etc). For sole use of Procurement currently. This module is also used to issue Requests for Information (RFI) to suppliers. Examples are Health and Safety and Equality, Diversity and Inclusion (EDI) compliance checks.
- Contract Management – this module is where contracts are set up and documentation is uploaded to ensure that all information relevant to the contract can be viewed in one place. To be used by both Procurement and Contract Owners (predominantly Procurement)

Procurement shall work with Contract Owners to set up their contracts in the first instance and maximise the CMS' functionality. Contract Owner shall be responsible for contract/supplier interactions thereafter. The CMS will alert the Contract Owner when an action is due and will repeat the alert until action is taken.

## 9. Policy Review

This policy shall be reviewed annually and presented for approval to the relevant governing Board. However regular reviews will be considered where, for example, there is a need to respond to new legislation/policy guidance. Reviews will consider legislative, performance standard and good practice changes.

We will publish this policy on our website at [www.wheatley-group.com](http://www.wheatley-group.com) and it is also available on request. Customers may also request a translated copy of the policy or in alternative formats.

## 10. Customer Service

### Confidentiality

Confidentiality is not only a basis of trust in business relationships but also impacts on the protection of the Group's own interests in terms of retaining competitive advantage. It is the responsibility of any member of staff conducting procurement on behalf of the Group to ensure that third party information, which is of a commercially sensitive and confidential nature, is properly safeguarded. This may require that the supplier or agent of the Group signs a confidentiality agreement.

All personal information given by customers and suppliers in relation to this policy will be treated in accordance with data protection legislation.

The Group complies with the Environmental Information (Scotland) Regulations 2004 and is subject to the Freedom of Information (Scotland) Act 2002 (Designation of Persons as Scottish Public Authorities) Order 2019 which extends the Freedom of Information (Scotland) Act 2002 to cover Registered Social Landlords (RSLs) and their subsidiaries in respect of certain functions. This means that we respond to any request for information in accordance with the requirements of these regulations and this legislation. It is a standard condition of all our contracts that suppliers will assist the Group in complying with its obligations in terms of Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004.

### Complaints Policy

Our aim is to get it right first time. However, if you are dissatisfied with this policy, its operation or otherwise wish to raise a complaint the Group has a Complaints Policy. A copy of the complaints policy can be found on our websites and the staff intranet, or a copy can be requested by contacting the Wheatley Group on 0800 479 79 79. As with all our policies, a copy can be made available on tape, in Braille, in large print or in translation.

Where a complaint relates to the conduct of procurement under The Public Contracts (Scotland) Regulations 2015 the procedures outlined in the Regulations will be followed. The complaint will also be logged in accordance with the Group's Complaints Policy.

A Single Point of Enquiry (SPoE) has been established at the Scottish Government Procurement Directorate to which suppliers can address concerns about public funded procurement practices. Further information can be found at: <http://www.gov.scot/Topics/Government/Procurement/Selling/supplier-enquiries>

As set out on the website the supplier is expected to liaise with the contracting authority in the first instance to seek resolution or clarification

## 11. Relationship to Other Policies

This policy should be read in conjunction with the following documents which can be found on the staff intranet:

- Procurement Guidance Page on WE Connect
- Group Procurement Strategy
- Group Sustainable Procurement Policy
- Scheme of Financial Delegation
- Group Standing Orders
- Gifts, Hospitality, Payments and Benefits Policy
- Non-Executive Director Conflicts of Interest Policy
- Group EDI and Human Rights Policy
- Group Sustainability Framework
- Group Whistleblowing Policy
- Code of Conduct
- Group Fraud Corruption and Bribery Policy
- Group Anti Money-Laundering and Counter Terrorism Financing Policy
- Group Data Protection Policy
- Group Freedom of Information Policy

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### Would you like more information?

Freephone 0800 479 7979

Visit: <http://www.wheatley-group.com/>

Email: [procurement@wheatley-group.com](mailto:procurement@wheatley-group.com)

Wheatley Housing Group Limited is a company limited by guarantee and registered in Scotland under the Companies Acts, having its registered office at Wheatley House, 25 Cochrane Street, Glasgow, G1 1HL. It is registered with The Scottish Housing Regulator as a registered social landlord. Company registration no. SC426094 Social Landlord no. 363

