



Procurement Policy

August 2025

Owner: Procurement and VFM Manager

<u>Version No.</u>	<u>Purpose/Changes</u>	<u>Approval Date</u>	<u>Approved By</u>	<u>Suggested Review Date</u>
V7.0	Compliance review	03/09/2025	Leadership Team	2028/2029
V6.0	Annual review	20/04/2022	Executive Leadership Team	February 2025
V5.0	Full review	18/01/2021	Executive Leadership Team	January 2022
V4.0	Health check	13/07/2017	Ongo Partnership Board	June 2019
V3.0	Compliance check	08/06/2016	Heads of Service	June 2019
V2.0	Full review	27/03/2014	Ongo Partnership Board	March 2016
V1.0	New Policy	06/10/2010	Resources Committee	October 2012



1. Our policy is...

- 1.1 At Ongo, we have effective and clear procurement practices that deliver value for money. Having these practices in place ensures we meet our legal and regulatory obligations that mean we can deliver efficient services whilst achieving our corporate objectives of being a great landlord, offering quality homes and creating opportunities.

2. It applies to...

- 2.1 This policy (and guidance) applies to all entities of the Ongo Group including all commercial subsidiaries.

3. Because we want to...

- 3.1 The aims of this policy are to make sure:
- We comply with legal and regulatory requirements and our procurement and tendering is in line with our Group Procurement and Tendering Procedures.
 - When procuring goods and services, we:
 - achieve value for money on all our expenditure
 - are compliant with all regulation and legislation
 - achieve social value wherever possible
 - strive for environmental excellence and sustainability
 - meet our obligations in respect of equality, diversity and inclusion, health and safety and the environment
 - always comply with health, safety, and environmental standards
 - always meet our wider objectives in terms of growing the business and getting the basics right.

4. We will...

- 4.1 Any spending that exceeds the Procurement Act 2023 (the Act) financial thresholds will be procured using compliant procedures, and we will take advantage of compliant procurement frameworks wherever possible to help us achieve this.
- 4.2 A register of goods, services and works to be procured will be managed and maintained, to help support and plan for and track all procurement activity.
- 4.3 All our contractors and suppliers will comply with the requirements of relevant legislation, including the Bribery Act 2010, Equality Act 2010, Health and Safety at Work etc. Act 1974, the Environmental Protection Act 1990 and the Modern Slavery Act 2015.
- 4.3 Our criteria for awarding contracts are based on whole life costs, including;
- Inception, design and planning
 - Implementation, construction and development
 - Operation, use and disposal of resources, abnormal and emergency situations, repairs, and maintenance, refurbishment
 - Decommissioning and demolition.

Furthermore, we will make sure that all contracts and tenders are awarded using the most advantageous tender (MAT) criteria, or the equivalent best practice criteria as prescribed and recommended by the Cabinet Office.

- 4.4 For all procurements, our Procurement and Tendering Procedures will be followed ensuring our procurement activity is in line with the key pillars of public procurement; transparency, equal treatment and proportionality at all times.
- 4.5 Our procurement activity will follow the National Procurement Policy Statement (NPPS), which sets out the Government's strategic policy priorities for public procurement, gives guidance on social value and seeks to support the challenge of applying the full potential of public procurement to deliver value for money, economic growth, and social value. Benefits of all investments, including social value and environmental benefits, and savings from spending will be recorded and reported to tenants on an annual basis, ensuring compliance with the Social Value Act 2012.
- 4.6 Encourage, advise and assist small and medium enterprises (SME's), social enterprises, voluntary organisations and local suppliers to bid for opportunities and to take part in our tender processes wherever possible.
- 4.7 We will consider all different methods of sourcing goods, services and works, including in-house provision and existing contracts in place where optional extensions are available.
- 4.8 All relevant stakeholders will be consulted when tendering including tenants and leaseholders (when appropriate under Section 20 of the Landlord and Tenant Act 1985).

5. Making sure we do what we say.....

- 5.1 We will monitor all procurement activity and will report annually on compliance with the Group Procurement and Tendering Procedures to the Executive Leadership Team.
- 5.2 We will provide training to make sure staff members involved in procurement and contract management understand their obligations and that failure to comply with requirements will be treated as a disciplinary matter.
- 5.3 We will conduct planned audits of procured activities to ensure company procedures, and this policy are adhered to.

6. Other things to bear in mind.....

Document or legislation	What it is
Bribery Act 2010	The law relating to bribery. It defines what bribery means as a criminal offence, places a responsibility on us to prevent it wherever possible and deal with it if it happens, and also sets out the penalties for committing it
Contracts Register	Our register of all works, services and goods to be procured. It allows us to plan and track procurement activity
Delegations Framework	Ongo's Framework which sets out the ways in which the work of Ongo Group will be carried out and the approach to approvals in relation to matters such as purchasing goods and services, authorisation of invoices and decision making

Document or legislation	What it is
Environmental Protection Act 1990	The UK law enacted to ensure that the environment is suitably protected from adverse environmental impacts
Equality Act 2010	The UK law which places a responsibility on us to prevent unlawful discrimination, be fair and promote good relations between different protected groups
Modern Slavery Act 2015	UK law designed to tackle slavery in the UK and consolidates previous offences relating to people trafficking and slavery. The Transparency in Supply Chain Provisions require businesses to publish an annual statement if they have a turnover of more than £36m. The statement must confirm the steps taken to ensure that slavery and human trafficking are not taking place in the business (or in any supply chain) or as it may place their ethical position into question and affect their reputation declare that no steps to confirm the existence of slavery or trafficking have been taken. It is expected that few businesses would take the latter option
National Procurement Policy Statement (NPPS)	A statutory policy that sets out the Government's strategic priorities for public procurement and operates alongside the Procurement Act. The NPPS seeks to apply the full potential of public procurement to deliver value for money, economic growth, and social value.
Probity Policy	Sets out Ongo's rules on remuneration, gifts and expenses received by Ongo staff and partners
Public Contract Regulations 2015 (PCR 2015)	The legislation that regulated public sector procurement in the UK up until 23 rd February 2025 and will continue to apply to any procurement commenced up to and including 23 rd February 2025, including post-contract management of those arrangements. Any call-off contracts from existing framework agreements established prior to 24 th February 2025 will equally be governed by PCR 2015.
Procurement and Tendering Procedures	Ongo's rules for procurement of works, goods and services. These must be followed by all staff members
Procurement Act 2023 (the Act)	Legislation that regulates public sector procurement in the UK. The key pillars of public procurement; transparency, equal treatment and proportionality are reflected in the Act. The Act sets thresholds above and below which procurement activity is regulated. Above threshold, full compliance with the Act is mandatory and cannot be avoided using an exemption/waiver process. In addition any contract above £30,000 requires a more limited compliance regime.
Regulatory Framework for Social Housing	This document sets out the regulatory standards and expectations of social housing providers
Section 20 Procedure	Section 20 is contained within the Landlord and Tenant Act 1985 and states how we must consult with leaseholders
Social Value Act 2012	It is law that social value must be considered when a public body procures goods and/or services
The Health and Safety at Work Act 1974	The UK law enacted to ensure that health and safety risks arising from work activities are suitably managed.
Value for Money Framework	Sets out Ongo's strategy on value for money and how best to achieve this at Ongo

7. We'll look at this again...

- 7.1 In a years' time and then on a three-year cycle or earlier if anything changes that affects it.

8. What we mean...

When we say	We mean
Crown Commercial Services (CCS)	The UK Government's procurement department within Cabinet Office, responsible for managing the procurement of common goods, services and works, increasing savings for the taxpayer by centralising buying requirements, and leading on procurement policy on behalf of the government.
Framework Agreements / Dynamic Purchasing Systems (DPS)/ Dynamic Markets	<p>These are procurement tools. Frameworks and DPS agreements help to simplify and speed-up high value procurements processes (for contracts subject to the Public Contract Regulations) by each having a mechanism for restricting the pool of pre-approved suppliers entitled to bid for our contract. Framework Agreements have a closed pool of suppliers whereas DPS Agreements have an open pool.</p> <p>Dynamic Markets were introduced under the Procurement Act 2023 (the Act) and comprise a list of qualified suppliers who are eligible to participate in future procurements. A dynamic market may be split into categories (referred to as 'parts' in the Act), with suppliers only eligible to participate in the parts for which they have qualified.</p>
PCR 2015	Public Contracts Regulations 2015. Regulations currently governing spend from the public purse. Applicable to all Public Sector organisations and procurements. Also includes any superseding regulations introduced following completion of the current government 'Transforming Public Procurement' review.
Procurement	Buying goods, services or works from external providers, following procurement and tendering procedures. This also includes considering other ways of obtaining what is required such as hire, rental or leasing and evaluating the best options going forwards.
Social Enterprise	A social enterprise is an organisation that applies commercial strategies to maximise improvements in social and environmental well-being, rather than maximising profits for external shareholders
Small and medium enterprises or SME's	Any company that employs less than 250 people and has a turnover not exceeding £43m (€50m) and have a balance sheet total of less than £34m (€43m).
Thresholds	<p>Financial values set out in the Act that are updated biannually on 1st January of even dated years. The current thresholds are therefore in place until 31st December 2025 and for non-central Government contracting authorities, are:</p> <p>Supplies and Services: £214,904 (incl. VAT)</p> <p>Light Touch Regime: £663,540 (incl. VAT)</p>

When we say	We mean
	Works: £5,372,609 (incl. VAT)
Value for Money (VFM)	Getting the most economically advantageous solution from the price paid. (i.e. NOT necessarily the lowest cost)