



Golden Lane Housing Limited

Procurement Policy

Policy Owner: Director of Business Services

Policy Manager: Procurement Manager

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Version	Author	Amendments	Approved By	Approval Date	Review Date
1.2	Joanne Keating	Original Document	Board	24/09/2025	Sept 2026
1.3	Joanne Keating	Minor Change - To incorporate the revised threshold amounts effective from 1 January 2026, as set out in PPN 023: 2026	Not required for minor change	-	Sept 2026

1. Purpose

This policy governs the way Golden Lane Housing Limited (“Golden Lane Housing”) procures goods, services and works from external suppliers, promoting a consistent approach across the organisation.

This policy addresses the key principles to be adhered to when conducting a procurement exercise. Detailed procedures setting out the required procurement activities for all values of external expenditure are set out in the Procurement Procedures. A separate Contract Management Procedure will set out the principles governing our approach to the ongoing monitoring and management of contracts.

This policy pertains to external expenditure across the organisation for goods, services or works. However, it should be noted that contracts relating to the purchase of land and property, rates and council tax, leases with private landlords, bank loans and credit facilities are covered in the Financial Regulations and Scheme of Financial Delegation.

This policy and the related procurement procedures are designed to ensure Golden Lane Housing:

- Procures goods, services and works which meet the requirements of tenants and colleagues,
- Delivers Value for Money (VfM) by securing the most advantageous contract(s) for goods, services and works¹,
- Maximises Social Value (Social, Economic and Environmental benefits) delivered to Golden Lane Housing, it’s tenants, colleagues and communities,
- Makes procurement opportunities accessible to diverse suppliers²,
- Makes procurement decisions in a transparent, fair and ethical way,
- Applies a level of administration and effort that is proportional to the value of the procurement, and
- Complies with all relevant regulations.

2. Scope

This policy applies to Golden Lane Housing employees, contractors, consultants who undertake any form of procurement on behalf of Golden Lane Housing.

¹ The value for money objective encourages contracting authorities to consider further what value means to their organisation and the community it serves, and how they can get the best mix of economy, efficiency and effectiveness that achieves the intended outcome over the whole lifetime of the contract

² Small and Medium-sized Enterprises (“SMEs”), Voluntary, Community and Social Enterprises (“VCSE”) and Charity Organisations.

3. Definitions

Refer to the Glossary detailed within Appendix 4 of the Procurement Procedures.

4. Link to the Risk Management Framework

The following risks are addressed in this policy, based on the current Golden Lane Housing taxonomy:

Level 2 Risk	Level 3 Risk
Procurement	Failure to comply with the requirements of the Procurement Act and Procurement Regulations
Procurement	Failure to demonstrate Social Value / Value for Money
Legal	Failure to monitor, meet or enforce contractual obligations or rights, or enter into contracts with terms that are either inadequate, unfair or unenforceable
Environmental and Climate Risk	Failure to successfully embed environmental risk regulation and industry standards
Third Party	Failure to ensure that suppliers and other third parties are compliant with applicable laws and regulations
Third Party	Supplier onboarding failure

5. Roles and Responsibilities

In addition to overall policy ownership and management, the following roles and responsibilities apply:

Role	Responsible For
All colleagues (and any third party procuring on behalf of Golden Lane Housing)	• Compliance with all aspects of this Procurement Policy and related Procedures • Early engagement with Procurement team in relevant procurement activities • Completion of Supplier Due Diligence activities as per the Procurement Procedures • Escalation to Procurement team of any contractual breaches or supplier issues / concerns
Procurement team	• Support colleagues to compliantly procure goods, services and works efficiently and effectively; • For procurement exercises above a contract value of £30k (inc. VAT), the Procurement team will work with colleagues to establish or conduct an efficient, compliant procurement process. • Lead on all above Public Procurement threshold procurement exercises (currently greater than £207k for goods and services and greater than £5.1m for works (inc. VAT)). • Provide good practice guidance and templates.

	• Provide procurement training and support across all levels of the organisation. The level of support and training colleagues receive will be proportionate to their role within the organisation and the level of risk they are potentially exposed to. • Maintain a central record of contracting arrangements. The contracts register is used to compile a procurement workplan. When recurring contracts are due for renewal the Procurement team will contact the relevant contract owner, to ensure that ample time is allowed to conduct the appropriate procurement process. • Ensure that this policy and the related procurement procedures continue to reflect relevant UK procurement regulations and that any changes are effectively communicated to colleagues.
Leadership team	• Ensuring all colleagues understand the importance of this policy and the related procurement procedures and comply with them.
Head of Governance, Procurement and Risk	• Effective implementation of this policy.

6. Content

Golden Lane Housing procures c. £15 million (inc. VAT) of goods, services and works per annum from external suppliers. The majority of this expenditure is incurred by developing new housing schemes and repairing and maintaining Golden Lane Housing's existing housing stock, with the remainder of the expenditure relating to goods and services required to effectively operate the organisation e.g. IT and telecommunications, insurance, legal services and office equipment.

Golden Lane Housing is a public contracting authority and is required to comply with the Procurement Act 2023 ("PA 2023") and the related Procurement Regulations 2024 ("PR 2024"). This legislation governs how we procure, award and manage contracts for goods, services and works and must be adhered to.

We must ensure that:

- Any barriers that small and medium-sized enterprises (SMEs) may face when competing for a contract are removed or reduced;
- We meet our transparency obligations by publishing all required notices, tender information, and contractual details to the UK Government's Central Digital Platform;
- All 'covered procurements' in excess of the Public Procurement Thresholds (currently greater than £207k for goods and services and greater than £5.1m for works (inc. VAT))

must be undertaken in accordance with the permitted public procurement procedures.

Golden Lane Housing is committed to maximising the social value delivered through our procured contracts. We want to see social value commitments made by suppliers impacting directly on our tenants, communities and local areas.

This is aligned to the Government's National Procurement Policy Statement, which requires all public procurement activity to have due regard to wider socio-economic and environmental benefits and impacts in particular;

- Driving economic growth and strengthening supply chains by giving SMEs and VSCEs a fair chance at public contracts, creating high quality jobs and championing innovation;
- Delivering social and economic value benefits for the people and places that need them the most, including creating opportunities in areas of deprivation;
- Delivering sustainable, long-term outcomes.

In all areas of procurement, Golden Lane Housing will act with integrity by being transparent, fair and ethical and procuring in line with the Code of Conduct Policy.

The Procurement Procedures states a relevant and proportionate process for all values of procurement exercise, ensuring efficient and effective use of colleagues' time. The Procedures also set out aggregation rules and how to determine contract values to ensure these are not disaggregated or artificially shortened to avoid these Procurement thresholds.

Goods and Services – Refer to Procurement Procedure	
Value (inclusive of VAT)	Procurement Process
Between £0 - £10,000	Minimum 1 written quote
Between £10,000 - £30,000	Minimum 2 written quotations <i>Procurement team to be notified</i>
Between £30,000 to £207,000	Request for Quotation / Tender Exercise – at least 3 quotes / tenders to be sought <i>Procurement team to be consulted prior to requesting quotes / tenders</i>
Over £207,000	UK Procurement Regulations (PA 2023) compliant exercise <i>To be conducted by the Procurement team</i>
Light Touch Services ³ Over £663,000	UK Procurement Regulations (PA 2023) compliant exercise <i>To be conducted by the Procurement team</i>

Table 1: Procurement Process for Goods and Services

³ Light Touch Services – social, health, education, legal and other public services which are subject to more flexible procurement rules.

Works - Refer to Procurement Procedure	
Value (inclusive of VAT)	Procurement Process
Between £0 - £10,000	Minimum 1 written quote
Between £10,000 - £30,000	Minimum 2 written quotations <i>Procurement team to be notified</i>
Between £30,000 to £400,000	Request for Quotation / Tender Exercise – at least 3 quotes / tenders to be sought <i>Procurement team to be consulted prior to requesting quotes / tenders</i>
Between £400,000 to £5.1 million	Formal tender exercise – at least 3 quotes/tenders to be sought <i>To be conducted with the support of the Procurement team</i>
Over £5.1 million	UK Procurement Regulations (PA 2023) compliant exercise <i>To be conducted by the Procurement team</i>

Table 2: Procurement Process for Works

This procurement policy is based upon a process which is open and transparent to all. Therefore, it is not expected that it will adversely impact upon any diverse groups. However, as detailed above and in the procurement procedures, consideration will be given during procurement exercises to the accessibility of the process to diverse suppliers, with participation requirements being relevant and proportionate to contracts and suppliers being offered when appropriate.

Any concerns of improper procurement practice should be reported to the Director of Business Services. All reports of improper procurement practices will be taken seriously and thoroughly investigated to establish whether there has been a breach of this policy or UK procurement legislation.

Golden Lane Housing wants all colleagues to feel confident that they can report any improper procurement practices without any risk to themselves. Golden Lane Housing has a Whistleblowing Policy which should be read in conjunction with this policy.

7. Regulatory Context

This policy aligns to the below regulations:

- The Procurement Act 2023 (“PA 2023”) and the related Procurement Regulations 2024 (“PR 2024”);
- The Public Services (Social Value) Act 2012;
- Regulator of Social Housing; Value for Money Standard and Governance and Financial Viability Standard and accompanying codes of practice;
- Landlord & Tenant Act 1985 - Section 20; and
- Off Payroll Working (IR35) legislation.

8. Related Policies

This policy should be read in conjunction with the following:

- Financial Regulations and Scheme of Financial Delegation
- Code of Conduct
- Conflict of Interest Policy
- Whistleblowing Policy

9. Linked Standards and Procedures

The following documents support the implementation of this policy:

- Procurement Procedures
- Contract Management Procedures

10. Oversight and Reporting

This Policy will be monitored against the following factors:

- Value for Money – Evidence that Value for Money is being obtained;
- Benefits – Evidence of Added Value and Social Value delivered;
- Compliance with internal and external regulations.

Procurement team prepare a submission of procurement activities for inclusion in the Risk & Audit Committee which includes:

- Procurement Work plan update;
- Contracts awarded;
- Exceptions to policy;
- Cash Savings;
- Cost Avoidance Savings;
- Policy Waivers;
- Social Value.

11. Policy Non-Compliance

The provisions of this policy are Rules where compliance is mandatory and any exceptions or waivers may only be authorised by the Policy Owner, with escalation to Executive or Board Committees if required. Unauthorised breaches must be recorded as a Policy Non-Compliance within 4Risk and reported as such to Risk and Audit Committee on a case by case basis.

It is the responsibility of all colleagues to ensure any policy non-compliance issues are raised in a timely manner to the Policy Owner in order that corrective action may be taken.

Where a provision of this Policy is explicitly expressed as a Guideline, non-compliance does not need to be recorded.

In exceptional or emergency circumstances, Executive Directors may request a waiver to the Procurement Policy and related procedures. Due to the restrictions of the UK Procurement Regulations, it is not possible to waive purchases when the value approaches or exceeds the relevant UK Public Procurement Thresholds. Waiver requests must be submitted in writing using the relevant template to the Procurement team, who will assess the waiver request to determine whether such waiver is appropriate or would result in a material breach of regulation or policy and provide advice accordingly. Where a decision is made to proceed with a waiver following Procurement advice, approval must be obtained from two Executive Directors including the Chief Finance Officer prior to the procurement being initiated. In the absence of the Chief Finance Officer, approval must be sought from the Chief Executive Officer.

12. Ownership & Regular Review

This policy is owned by the Director of Business Services. It is reviewed and renewed every three years by Executive Committee and ultimately approved by Risk & Audit Committee.

Interim policy reviews will occur in the event of a material change in business strategy, the Golden Lane Housing Plan, operating environment or at the direction of the Executive or Board.

The policy may be subject to further thematic targeted reviews on a risk-based approach through Heads of Service monitoring or Internal Audit reviews.

13. Link to GLH Plan

This policy supports the delivery of 'Our Plan 2025-2028' by ensuring Golden Lane Housing;

- Obtains value for money from our external expenditure;
- Maximises the social value delivered to Golden Lane Housing, its tenants, colleagues and communities
- Our suppliers are environmentally responsible.