Islington & Shoreditch Housing Association

Procurement policy

Contents

1. Purpose and scope

1.1 This procurement policy sets out ISHA's approach to purchasing and contract management for all works, goods, and services, ensuring compliance with the financial regulations and relevant laws. It applies to all procurement activities undertaken by staff, board members, and consultants acting on ISHA's behalf. Board approval gives this policy authority as a key internal control document, alongside the Standing Orders, the Scheme of Delegation, and the financial regulations. The policy serves as both a governance framework for the Board/Committees and a practical guide for operational procurement, integrating key procedural steps (with cross-references to detailed procedures where needed).

1.2 The Board of ISHA and its Leadership Team (LT) are committed to value for money, legal compliance, and ethical standards in procurement. All ISHA staff must follow this policy; non-compliance may result in remedial action as per the financial regulations.

2. Legal and regulatory framework

2.1 ISHA is a contracting authority under UK public procurement law and must therefore comply with the latest legislation and guidance. The policy aligns with and incorporates the requirements of:

- The Procurement Act 2023 (effective Feb 2025) and the Procurement Regulations 2024 replace the EU-derived Public Contracts Regulations 2015. This includes a shift to a single competitive procedure ("Competitive Flexible Procedure") and a heightened emphasis on transparency throughout the procurement and contract lifecycle. ISHA will fully comply with all statutory obligations under PA23, including publishing notices, ensuring fair treatment of suppliers, and applying exclusion rules where necessary.

- The Public Services (Social Value) Act 2012 requires consideration of economic, social, and environmental well-being in service procurement. ISHA will embed Social Value considerations in procurement of all sizes (see Core Principles), not just those above legal thresholds.

- Transparency requirements: All contracts equal to or greater than £30,000 (inc. VAT) must be published on the appropriate government platform in line with UK transparency rules. ISHA will use the Central Digital Platform (CDP) and the Find-a Tender Service (FTS) as mandated:

    - Below regulated thresholds (contracts equal to or greater than £30,000): publish notices and awards on FTS to ensure transparency.
    - Above the regulated thresholds (£214,904 for supplies/services or £5,193,000 for works, inclusive of VAT): follow PA23 procedures and publish on the CDP in addition to FTS.
      Please note that the thresholds above will change annually, and the Procurement Manager is responsible for updating the latest figures.

- Other legal duties: Eight working days' standstill periods for above-threshold awards, mandated Key Performance Indicators (KPIs) and annual performance publication for contracts over £5M and use of electronic tendering only.
- Other laws and policies: The Bribery Act 2010, the Fraud Act 2006, Anti-Money Laundering (AML) regulations, and data protection laws apply to procurement. This policy must be read alongside ISHA's Anti-Fraud, AML Policy, Code of Conduct and Gifts, Benefits & Hospitality Policy to ensure high standards of integrity.

2.2 By following this framework, ISHA ensures that procurement operations comply with the Regulator of Social Housing (RSH) standards on financial probity, governance, and value for money.

3. Core procurement principles

3.1 ISHA's procurement activities are underpinned by core principles that ensure every purchasing decision supports the Association's strategic goals, delivers best value, and upholds ethical and legal standards. Specifically:

- **Value for money (VfM):** Achieve the best overall outcome for money spent by balancing cost and quality. Decisions are based on the Most Advantageous Tender (MAT), meaning ISHA considers quality, social value, delivery, and lifecycle benefits, not just the lowest price. This supports long-term value and aligns with regulatory expectations on VfM.

- **Public benefit and social value**: Maximise wider social, economic, and environmental benefits through procurement. This includes favouring solutions that deliver community benefits, sustainability, and resident wellbeing, in line with the Social Value Act and the National Procurement Policy Statement (NPPS) priorities. ISHA will seek to incorporate social value criteria (e.g. local employment, community initiatives) and consider environmental, social and governance (ESG) factors in sustainable procurement.

- **Integrity and fairness**: Conduct all procurement with honesty, impartiality, and professionalism. All suppliers are treated equally and without discrimination throughout the process. Any conflicts of interest must be declared by all parties involved, and any form of bribery or collusion is strictly prohibited.

- **Transparency**: Ensure open and transparent processes. From advertising opportunities (as required) to providing feedback to bidders and publishing contract awards and modifications, ISHA will be transparent about procurement decisions. Records and decisions will be well documented and available for audit or stakeholder scrutiny.

- **Proportionality and efficiency**: Apply procurement procedures that are proportionate to the size and complexity of the spend. Simpler, streamlined processes (e.g. obtaining quotes) for low-value procurements, and more formal competitive processes for higher-value contracts will be used, avoiding unnecessary bureaucracy, especially for SMEs (small and medium enterprises), to encourage their participation. ISHA strives to be efficient and timely in procurement to support service delivery.

- **Accountability and risk management**: Maintain clear audit trails and accountability at all stages. Each procurement has an identified budget holder/project lead responsible for compliance with this policy. Risks (financial, legal, operational) will be assessed and mitigated at key stages (planning, evaluation, contract management).

- **Collaboration and innovation**: Where beneficial, ISHA may engage in pre-market engagement or partnerships (e.g. consortia, frameworks) to leverage innovation and best practice. Supplier engagement should remain open and competitive (no unfair advantages) while encouraging fresh ideas and solutions that add value for residents.

3.2 These principles align with the Cabinet Office guidance and sector best practice, underpinning every section of this policy. Adherence to them by all staff ensures procurement decisions support ISHA's mission and values.

4. Governance, roles and responsibilities

4.1 Effective procurement requires clear governance and defined responsibilities at all levels of ISHA. The following outlines the key roles:

- **ISHA Board**: Ultimate accountability for procurement policy and oversight. The Board approves this policy and any material updates. It ensures that procurement aligns with ISHA's strategic objectives and regulatory obligations and monitors significant procurement outcomes (e.g. large contract awards, value-for-money gains, or major deviations from policy). The Board delegates detailed oversight to its committees as appropriate (e.g. the Audit and Risk Committee may receive reports on procurement compliance and risk).

- **Audit and Risk Committee (ARC):** Monitors compliance and risk aspects of procurement. Receives reports on policy breaches and on audit findings related to procurement and ensures that adequate controls are in place (e.g. contract register, internal audits).

- **Leadership Team (LT)** – ISHA's executive directors, led by the Chief Executive, are responsible for implementing this policy and ensuring resources and systems are in place for effective procurement. LT members (Directors of each department) enforce compliance in their areas and provide guidance to staff. The Director of Development and Building Safety (or designate) provides specialist oversight of procurement across ISHA, ensuring financial regulations and legal requirements are met, and advises on training or support for complex tenders.

- **Managers and Heads of Service**: Responsible for day-to-day compliance with this policy within their teams. They must plan procurement early, work with ISHA's Procurement Manager, seek the required approvals, and ensure staff follow the correct procedures (e.g. obtaining quotes or using approved frameworks). They should coordinate with colleagues (and procurement advisors, if available) to allow sufficient time for proper tender processes, thereby minimising last-minute waivers or emergencies. Managers must monitor contracts in their area and manage supplier relationships in line with contract terms.

- **Procurement Lead /Project Lead**: For each significant procurement, an LT member or manager will serve as Project Sponsor or Lead Officer, responsible for the procurement's integrity from planning through to award. They ensure the process is followed and act as a point of contact for guidance (with Finance or external procurement professionals as needed). The Procurement Manager or external advisor will support the Project Lead with compliance and documentation.

- **Procurement Manager**: Is responsible for our procurement strategy, leading and supporting our procurement aligned to our corporate objectives and providing advice, as necessary.

- **All staff** involved in procurement must adhere to this policy and associated procedures. Staff raising purchase requisitions or evaluating quotes/tenders must be trained or briefed on the relevant process. Conflicts of interest must be declared by all participants in a procurement project and logged on the Contract Register or an appropriate record. Staff must also report any suspected irregularities (e.g. bid rigging, supplier collusion) immediately to the relevant LT and/or follow fraud/whistleblowing procedures.

- **Delegated authority**: All commitments and contract awards must be approved in accordance with ISHA's authorisation limits (as set out in the financial regulations appendices). Only designated authorities (by role and limit) may sign contracts or approve purchase orders (see Thresholds and approval limits). The Company Secretary or authorised signatories apply ISHA's seal to contracts requiring sealing (usually deeds and large works) in accordance with the financial regulations. Managers and directors should ensure sufficient procurement capability within their teams, or seek assistance (e.g., from the Procurement Manager, the Finance Directorate, or external procurement frameworks) when needed, particularly for complex or high-value procurements.

5. Procurement planning and procedures

5.1 Procurement should be treated as a planned lifecycle of activities, from initial need through to contract management. This section outlines ISHA's end-to-end procurement process, with embedded procedural guidance (further detailed in internal Procurement Procedures documents on the intranet). The major stages include:

1. **Needs identification and business case**: Before any procurement over £30,000 the responsible manager must identify and prepare a business case or procurement plan. This should outline the requirement, budgeted funds, options (e.g. use of frameworks), and the value for money rationale. Business case preparation must also consider the Social Value Act 2012 duties: how the procurement could improve social and environmental outcomes, and whether to consult stakeholders on these aims.

2. **Approval**: Business cases for projects or contracts outside existing budgets or above delegated authority require LT or Board approval, as per the financial regulations.

3. **Market research and early engagement**: When appropriate, ISHA may conduct preliminary market engagement (such as issuing Prior Information Notices or holding informal supplier discussions) to inform the strategy. Records of meetings and information provided, such as slides, must be kept on file. Such engagement must be conducted transparently and must not distort competition. If early market notices ("UK3 Planned Procurement Notice") are used, staff will publish them via official channels to reduce procurement lead times and ensure fairness.

4. **Procurement route and thresholds**: Based on the estimated contract value (inclusive of VAT), the Project Lead selects the appropriate route to market (see Thresholds below for required methods). For contracts under £30,000, a simplified quote process (gathering competitive quotations) can be used; for contracts over £30,000, a formal tender is required. If appropriate, consider using framework agreements or consortia that ISHA is part of (e.g. PfH, LHC, or other pre-tendered frameworks), as these can offer compliant, efficient routes for certain goods/works. Use of frameworks must be approved by LT and remain aligned with value thresholds and transparency requirements (e.g., mini competitions where required).
   - **Procurement routes**

5. **The open procedure** is a single-stage tender process where any interested supplier may submit a full tender. It is used for straightforward procurements where the requirements are clear, and there is no need for a separate shortlisting or negotiation stage.

6. **The competitive flexible procedure** is the main competitive route under the Procurement Act 2023. It allows ISHA to design a proportionate procurement process that reflects the complexity of the contract, which may include stages such as shortlisting, dialogue, or negotiation, provided the process remains transparent, fair, and compliant with statutory principles.

7. **A direct award** involves awarding a contract without competition and is permitted only in limited and exceptional circumstances set out in the Procurement Act 2023. These include situations of extreme and unavoidable urgency, protection of life or safety, or where only one supplier has exclusive rights to deliver the requirement. Direct awards are not the default route and must receive prior approval in line with ISHA's governance arrangements.

8. **A framework** is a pre-procured arrangement with one or more suppliers that sets out agreed terms and conditions under which contracts can be awarded during the framework period. Contracts are awarded either through a direct call-off or a mini competition, in line with the framework rules, and must continue to demonstrate transparency, fairness, and value for money in accordance with the Procurement Act 2023.

9. **Preparing the tender/quote documents**: Prepare a specification of requirements and clear evaluation criteria. For quotes (below the tender threshold), a brief scope and price request is sufficient, but for tenders, a formal Invitation to Tender (ITT) pack is required. All procurement documents must incorporate ethical requirements, e.g., requiring bidders to confirm compliance with the Bribery Act (through a declaration or Anti-Collusion Certificate) and setting out how bids will be evaluated (using price: quality ratios or the MAT approach). Procurement procedure templates and standard terms (maintained by ISHA) should be used to ensure completeness.

10. **Advertising and supplier selection**: For tenders equal to or greater than £30,000, opportunities shall be appropriately advertised:

    - Below UK threshold (equal to or greater than £30,000 but less than £214,904/£5.19M): At a minimum, advertise via Contracts Finder/FTS if not using a closed framework. If using a select list or dynamic purchasing system, ensure pre-qualified suppliers are rotated or given an equal chance.

    - Above UK threshold: Follow the PA23 competitive procedure—advertise on the Central Digital Platform (CDP) with the required notices (e.g. tender notice UK4). For quotations (less than £30,000), at least the minimum number of firms (see the Thresholds table) should be invited to quote. In all cases, adequate time must be allowed for suppliers to respond (in line with complexity and any legal minimums).

11. **Receipt and opening of bids**: ISHA uses electronic tendering for formal tenders wherever possible. Late submissions are not accepted. Bid receipt is confidential until the deadline passes. An opening panel (two people, including at least one manager outside the procuring team) see ISHA's financial regulations for opening and acceptance of tender requirements based on tender size) are required to open and record bids to ensure transparency. Electronic portals automatically time-lock submissions.

12. **Evaluation and contract award**: A panel of appropriate staff (and possibly residents or technical experts, depending on the contract) evaluates bids against the published criteria. The contract is awarded based on the Most Advantageous Tender (MAT), taking into account quality, cost, social value, and other criteria disclosed in advance. Post-tender clarifications are permitted only to resolve errors, not to negotiate basic terms, unless a Competitive Flexible procedure with negotiation stages is used. For above-threshold tenders, after identifying a preferred bidder, an 8-working-day standstill period is observed (intention-to-award letters are issued to all bidders). If no legal challenge arises, a formal contract award letter is issued, and the required contract award notices are published on CDP/FTS. The threshold is regulated thresholds (£214,904 for supplies/services or £5,193,000 for works, inclusive of VAT): follow PA23 procedures and publish on the CDP in addition to FTS.

13. **Pre-award due diligence**: Prior to signing, financial due diligence on the winning supplier should be updated (credit checks and references, if not already completed), especially for high-value or strategic contracts. Contracts must be approved and signed in accordance with delegation limits (see below).

14. **Contract documentation and signature**: All contracts must be documented in writing. Contracts above certain values or of specific types may be executed under the seal (see Fin Regs sealing requirements), but generally a Leadership Team member (or authorised manager) can sign contracts that do not require a seal. Contracts must not commence before sign-off is completed. If, exceptionally, work commences on a LOI (letter of intent), it must have proper authorisation.

15. **Publication and recording**: ISHA maintains a Contracts Register of all live contracts. For any contract equal to or greater than £30,000, ensure that details (contract name, value, supplier, duration) are promptly entered and, where required by law, published on the government platform. Even for lower-value contracts above £9,000, staff should update the register for internal transparency. All procurement documents and evaluation records are retained in line with the data retention policy and audit requirements.

16. **Debriefing and lessons learned**: Unsuccessful bidders should be given feedback on request, in accordance with the law (above-threshold – provide standstill debrief information; below-threshold – simpler feedback). Internally, significant procurements should undergo a post-procurement review to capture lessons and improvements for the future.

6. Procurement thresholds and approval limits

6.1 To ensure proportionality and compliance, ISHA operates a tiered procurement threshold system linked to required levels of competition and approval. For threshold purposes, all contract values are inclusive of VAT. The table summarises the routes to market and minimum requirements:

Contract value (inc. VAT)	Procurement method	Minimum competition	Approval authority
Up to £5,000	Informal quotes (email/online pricing)	*Works:* Two quotes Non-works: One quote	Manager (budget holder)
£5,001 – £10,000	Written quotes (informal)	*Works:* Two quotes *Non-works*: Two quotes	Manager (budget holder); notify Director as needed
£10,001 – £30,000	Competitive quotes (formal RFQ)	*Works:* Three quotes *Non-works:* Three quotes	Department Director
Above £30,000 up to the UK threshold	PA23-compliant Tender (open or by invite)	Public advertisement recommended (CDP/FTS); at least three bids sought	Procurement Manager for procurement route then Leadership Team (or as delegated by Board)
Above UK Threshold (£214,904 goods/services; £5.193M works)	Full PA23 Tender (Open or competitive flexible)	Public tender – advertise via CDP; follow all PA23 notice & procedure rules	Procurement Manager for Procurement route, then Board or Committee (depending on delegated limits)

Notes

- **“Works” vs “Non-works”**: ISHA distinguishes works contracts (construction, maintenance, and repairs directly for assets/residents) from non-works (supplies, services, consultancies) for thresholds below £30,000, as some dispensations apply differently (see below).
- **All value bands include aggregation**: Do not deliberately split or underestimate contract values to circumvent thresholds. The total contract term value should be used (e.g., a 4-year contract at £10,000/year = £40,000, which requires a tender).
- **Framework call-offs**: If using a framework, competition requirements follow the framework rules (e.g. mini-competition vs direct award). Always ensure compliance with PA23 if aggregate spend via frameworks reaches thresholds.
- **Dispensations (Single quotation/tender)**: For contracts up to £30,000, exceptions to obtaining multiple quotes are permitted only in specific cases (e.g. sole supplier, sector "go-to" contractor, or genuine emergency with risk to life/property). Such waivers must be approved by a director in advance, recorded, and reported to LT. Exemptions are only permitted for tenders above £30,000 in an emergency or sole provider scenario.

- **Authorisation limits**: Commitment and payment approvals must comply with delegated approval limits (as set out in the financial regulations appendices). For example, Board approval is required for capital projects over £1M and for any unbudgeted spend over £100,000; the Leadership Team or designated directors can approve within lower limits. See financial regulations appendices 2.1 and 6 for the full table of authorisation by role and amount. The approver of a contract award must not be the same person who evaluated or initiated the procurement, ensuring a separation of duties in line with good practice and internal control requirements.

7. Social value, sustainability and diversity in procurement

7.1 ISHA is committed to leveraging procurement to achieve wider community benefits, environmental sustainability, and equality objectives:

- **Social value**: For all applicable contracts, ISHA will consider social value opportunities and incorporate them into specifications and evaluation. This includes encouraging bidders to deliver community benefits, such as apprenticeships, local employment, community engagement programmes, or improvements to residents' quality of life. ISHA's compliance with the Public Services (Social Value) Act 2012 is embedded in business cases and tender criteria for relevant procurements (especially service contracts and works).

- **Environmental sustainability**: Procurement decisions should align with ISHA's sustainability objectives. We prefer products and services that reduce the carbon footprint, improve energy efficiency, and promote sustainable materials and practices, while achieving value for money. Large works or service contracts will be assessed for environmental impact and will require contractors to meet applicable environmental standards (e.g. waste reduction, net-zero goals).

- **Equality, diversity and inclusion (EDI):** ISHA will ensure equal opportunities for suppliers. No bidder will be unfairly disadvantaged based on size, ownership, or protected characteristics. We encourage participation from SMEs, social enterprises, and diverse suppliers (e.g., minority-owned and local businesses) where possible, consistent with quality and cost requirements. Procurement processes (particularly below threshold) will avoid overly burdensome requirements that could exclude smaller bidders. All contractors must comply with anti-discrimination law and our EDI policy when delivering services.

- **Ethical sourcing**: ISHA is mindful of labour standards and human rights across its supply chain. We avoid contracts with suppliers engaged in unethical practices, such as modern slavery, and include due diligence checks, including requiring Modern Slavery Act compliance statements for relevant contracts and robust supplier code of conduct commitments. We are committed to the London Living wage (LLW).

7.2 By integrating these considerations, ISHA's procurement contributes not only to organisational needs but also to broader social responsibility goals. The National Procurement Policy Statement (2021) emphasises "public good" outcomes, and ISHA fully supports those aims in procurement decisions.

8. Risk management and ethical standards

8.1 Procurement entails various risks – legal, financial, operational, and reputational – that must be managed. ISHA enforces strong controls and ethical standards:

- **Conflicts of interest**: All staff and Board members involved in a procurement must declare any actual or potential conflicts (e.g. a personal interest in or relationship with a bidder) before the process begins. Such conflicts are recorded (e.g. in the contract file or register) and managed (the person may be recused from the process) to ensure impartiality. Suppliers are also required to declare any conflicts in their bids.

- **Anti-fraud and bribery**: ISHA has zero tolerance for fraud, bribery or corruption. Staff must not accept any gifts, hospitality or inducements from bidders beyond what is permitted under ISHA's gifts, benefits and hospitality policy. Procurement documents include anti-collusion and anti-bribery clauses; bidders must confirm they have not engaged in any corrupt practices, or they will be excluded. If any irregularity or suspicion of fraud arises (e.g. bid rigging, kickbacks), staff must report it immediately under ISHA's fraud or confidential reporting (whistleblowing) policies.

- **Exclusions and due diligence**: In line with PA23, ISHA will exclude suppliers for mandatory reasons (e.g. convictions for fraud or corruption) and apply discretionary exclusions (e.g. poor past performance or misconduct) where justified. The evaluation process includes necessary due diligence – financial checks, references, insurance, and compliance with relevant laws (such as IR35, health and safety, and GDPR). Our tender qualification stage follows the standard selection questionnaire principles but is tailored to the contract size to remain proportionate and not overburden bidders, especially SMEs.

- **Risk assessments**: Before launching a procurement, the Project Lead should perform a risk assessment, identifying key risks (market interest, price volatility, supply chain issues, legal challenge) and plan mitigations (e.g. early engagement, flexible pricing mechanisms, robust T&Cs (approved by Procurement Manager).

- **Deviations from policy**: No circumvention of this policy is permitted without formal approval. If an exception (waiver) is necessary (e.g. in an extreme emergency or a sole-supplier scenario exceeding £30,000), it must be justified in writing, approved in advance by the Chief Executive or Leadership Team. All waivers are logged centrally (exemptions register) for audit and reviewed to ensure they remain minimal and appropriate.

8.2 By rigorously enforcing these standards and implementing checks and balances (such as requiring approvals from higher authority for key decisions), ISHA protects itself against fraud, legal non-compliance, and reputational damage. The Audit and Risk Committee and internal audit will periodically review procurement activities to provide assurance of adherence and identify any areas for improvement.

9. Contract management and performance monitoring

9.1 Effective contract management is a crucial phase of the procurement cycle, ensuring that the value anticipated from the procurement is delivered. ISHA's approach includes:

- **Contract handover and mobilisation**: Once a contract is awarded, the Project Lead or the relevant Contract Manager (often a service or project manager) will hold a kick-off meeting with the supplier to clarify roles, expectations, KPIs, reporting, and communication protocols. The final executed contract and key information will be logged in the Contracts Register or an assigned contract management function.

- **Performance monitoring**: Regular monitoring of supplier performance against contract requirements and KPIs is mandatory. For major contracts, ISHA will implement at least three KPIs to measure critical aspects (e.g. service quality, timeliness, resident satisfaction). Contract Managers must maintain records of performance reports, minutes of review meetings, and issues arising. Poor performance is addressed promptly under the contract terms (e.g. remedial plans or, if necessary, invoking contractual remedies).

- **Contract changes and extensions**: Any variations to the contract scope, time, or price are controlled. All contract changes must be authorised at the appropriate level (e.g. LT for significant changes) and documented through contract variation agreements. For substantial contracts, particularly those above PA23 thresholds, certain modifications may require the publication of a Contract Change Notice on the central platform. The total value of modifications is tracked to ensure we remain within legal allowances and do not inadvertently create a new procurement requirement.

- **For high-value contracts (over £5M)**: In compliance with PA23, ISHA will publish annual reports of contractor performance against KPIs for contracts over £5 million. Additionally, we flag contracts over £5M in the register to ensure the additional obligations (e.g. performance reporting, special payment terms, limits on modifications) are met. These reports are published on the central digital platform.

- **Record keeping and audit trail**: All key contract deliverables, communications (like change orders, significant correspondence), and performance data are filed in an official contract file or system for easy retrieval. This supports audit and ensures continuity in case of staffing changes.

- **Supplier relationship and development**: ISHA aims to maintain constructive relationships with suppliers. This includes holding periodic performance meetings, sharing feedback, including resident feedback where relevant, and collaborating to resolve issues. Where suppliers consistently perform well, ISHA may consider them for future opportunities (subject to competition rules) and capture lessons learned to refine future procurement specifications.

- **Termination and exit planning**: Should a contract need to be terminated (for default or convenience), advice is sought (including legal counsel if needed), and statutory termination notices are issued if required. An exit plan is prepared to ensure service continuity and a smooth transition (especially for critical services).

9.2 By actively managing contracts rather than "letting and forgetting", ISHA ensures it realises the expected benefits of each contract, mitigates the risk of failure, and remains compliant with new legal obligations on contract management introduced by PA23 (which has effectively made contract management a statutory requirement for public contracts).

10. Transparency, reporting and continuous improvement

10.1 Effective transparency in procurement continues beyond the contract award. ISHA commits to ongoing transparency and continuous improvement:

- **Publication of awards and data**: As noted, all contract awards meeting the thresholds are published on appropriate platforms (FTS, CDP). The threshold is regulated thresholds (£214,904 for supplies/services or £5,193,000 for works, inclusive of VAT): follow PA23 procedures and publish on the CDP in addition to FTS. Additionally, where required or beneficial, ISHA will publish forward-looking procurement plans (anonymised pipeline information) to give suppliers notice of upcoming opportunities, thereby boosting competition and market interest.

- **Internal reporting**: A summary of procurement activity and compliance will be provided to the Audit and Risk Committee and the Board at least annually. Key findings from any internal audits or procurement reviews will also be shared, along with action plans to address any identified weaknesses.

- **Monitoring compliance**: The Procurement Manager monitors adherence to this Policy on a day-to-day basis. They may carry out spot checks (e.g. verifying that competitive quotes were obtained for random purchases) and will coordinate periodic formal internal audits of procurement. Breaches of this policy or the financial regulations (procurement sections) are categorised by severity and addressed in accordance with ISHA’s financial regulations. Significant breaches (e.g., a high-value contract let without approval) are raised to LT and, possibly, the Audit and Risk Committee or Board, with appropriate remedial action (training, disciplinary action if warranted).

- **Policy review and updates**: This policy will be reviewed every three years (or sooner if significant legal/regulatory changes occur. Updates require Board approval. ISHA’s Procurement Manager will keep abreast of changes such as new procurement policy notes (PPNs) or threshold updates and update procedures accordingly (e.g., thresholds are normally revised biennially by the government).

- **Training and guidance**: ISHA will provide training and guidance to staff on this Policy and on using procurement tools (e.g. e-tendering system, evaluation techniques).

- **Continuous improvement**: ISHA strives for continuous improvement in procurement. We will benchmark our policies and outcomes against sector best practices (e.g. G15 housing associations) and implement improvements. Feedback from suppliers and internal stakeholders about the procurement process is welcome to help refine our approach. Opportunities for collaboration or shared procurement (where they deliver better value) will be explored, subject to maintaining control and compliance.

10.2 By following this policy and the associated procedures, ISHA will ensure that its procurement activities are legally compliant, value-driven, and support the Association's mission to deliver quality housing and services with integrity and efficiency.

Reference	**Version**	**Created**	**Author**	**Review**	**Board approved**
Procurement policy	1	May 2026	Development Team	June 2025	

Appendix

Approved frameworks at 30 June 2026:

- Connected Contractor Framework
- Fusion 21
- Notting Hill Genesis
- LHC
- Procurement for Housing
- NHR SoR

ISHA is also a member of the London Construction Programme framework (LCP). The LCP was established by a group of local authorities in London and is led by the London Borough of Haringey Construction Procurement Group. The ‘LCPC Major Works 2019’ is the applicable framework and covers housing refurbishment and extensions. Contracts can be awarded until June 2024. Any addition to the above frameworks shall require the approval of the Leadership Team.