



Procurement Policy

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1. POLICY SUMMARY

Please note that where we use EPIC within this Policy, we refer to EPIC Limited.

- 1.1 This Policy covers the procurement requirements and obligations to be adhered to when conducting any procurement process for EPIC Ltd.

2. APPLICABILITY

- 2.1 This Policy applies to procurement of all goods, services and works undertaken by EPIC, including those that are undertaken in collaboration with other organisations.
- 2.2 The UK procurement rules do not apply to the purchase of land or completed buildings (e.g., existing homes where EPIC have not been involved with the design or build), a contract for the lending of money, or financial investment activity. As such, contracts of this nature do not need to comply with the rules outlined in this Policy but must still adhere to the documented Financial Regulations.
- 2.3 All employees, Board members and other parties working on behalf of EPIC are required to comply with this Policy.

3. INTRODUCTION

- 3.1 The over-riding procurement policy requirement is that all public procurement must comply with UK procurement law and be based on value for money. Value for money is defined as “the best mix of quality and effectiveness for the least outlay over the period of use of the goods or services bought”. This should be achieved through competition unless there are compelling reasons to the contrary.
- 3.2 Public sector procurement is subject to a legal framework which encourages free and open competition and value for money, in line with nationally agreed obligations and regulations.

4. CONTEXT

- 4.1 EPIC operates in accordance with government-published procurement legislation and guidance (in particular the Procurement Act 2023) along with internal Financial Regulations. The regulations, policies and guidance relating to the procurement of supplies, services and works for the public sector can be found at: <https://www.procurementpathway.civilservice.gov.uk/>
- 4.2 Contracts may be governed by the Public Contracts Regulations 2015 in some circumstances, e.g., contracts procured prior to the Procurement Act 2023 coming into effect or new procurement processes conducted under commercial tools governed by the Public Contracts Regulations 2015.
- 4.3 Contracts and purchases will be procured within the constraints of the Tables 1 and 2 below. Table 1 defines EPIC’s internal thresholds defined as “Below Threshold” and Table 2 provides the external thresholds as defined as “Above Threshold” and set out in legislation. External Thresholds change every two years, the latest legislative limits are shown in Table 2 as well as in the link at 4.1. The limits shown in Table 2 are valid until December 2027. The Policy will be updated for the cyclical changes to Above Threshold; this legal update is to be delegated to the Executive Team.

4.4 Table 1:

Internal procurement thresholds	
Value (inclusive of VAT)	Minimum Process Requirement
< £2,000	1 written quotation
£2,000 - < £10,000	2 written quotations
£10,000 – £100,000	3 written quotations
£100,000 - < Applicable UK procurement threshold	Competitive tender process (minimum 3 bids)
> Applicable UK procurement threshold (see table below)	Procurement process compliant with UK procurement rules

4.5 Table 2:

Current UK procurement thresholds (valid Jan 2026 to Dec 2027)		
Type of contract	Example	Threshold (inc VAT)
Works	Installation of new kitchen	£5,193,000
Supplies	IT hardware, Utilities	£207,720
Services	Responsive Repairs, Consultancy	£207,720
Light Touch	Legal services	£663,540

4.6 Other relevant internal governance and legal obligations include:

- Control Framework and Financial Regulations
- The Bribery Act 2010
- The Equality Act 2010
- The Modern Slavery Act 2015
- Value for Money Standard (Regulator of Social Housing)
- The Public Services (Social Value) Act 2012
- Section 20 of the landlord and Tenant Act 1985 (as amended by Section 121 of the Commonhold and Leasehold Reform Act 2002)
- Charity Commission
- The Care Act 2014

5. STATEMENT OF INTENT

5.1 The keys objectives of the Policy are:

- To ensure EPIC meets its statutory and legal requirement along with its internal Control Framework.
- To set clear guidelines and methods by which EPIC will procure works, services or supplies.
- To set internal procurement thresholds for purchases that are below the legislative thresholds.
- To award contracts that achieve value for money and meet the needs of the business.
- To promote and encourage partnership working.
- To promote involvement in community benefits e.g., apprenticeships, sponsorship.
- To contribute to the aims and objectives of EPIC as detailed in the Corporate Plan 2024-2027.

6. PRINCIPLES

- 6.1 Procurement processes should be as simple as possible, aiming to demonstrate the achievement of value for money, fairness and open competition.
- 6.2 Gifts and hospitality should not be accepted from suppliers unless they are of trivial value or directly related to goods and services being supplied (e.g., business meetings or conferences). Any suspicions of poor practice or wrongdoing (such as bribery) will be investigated with rigour. More detail can be found in the Gifts and Hospitality Policy.
- 6.3 EPIC aims to achieve a positive social return through procurement to improve the economic, social and environmental wellbeing of the local area.
- 6.4 Sustainability of the environment (a 'green approach') will be considered as part of every procurement undertaken where it is proportionate and practical to do so.

7. RESPONSIBILITIES

- 7.1 All staff are responsible for carrying out procurement in line with this Policy and associated procedures.
- 7.2 Procurement is conducted at departmental level, with specialist support sought where required. Department-level procurement helps ensure that contracts meet the needs of users.
- 7.3 The Financial Regulations, as part of the Control Framework, delegate authority to the Senior Leadership Team (SLT) to conduct tenders for suppliers, contractors and consultants in accordance with the approved Procurement Policy.
- 7.4 The responsibility for following the correct process will fall upon any staff member using the process who has the relevant budget/spend authority under the Control Framework and Financial Regulations (the "procuring manager"), with appropriate oversight from Executive Team.

8. TRAINING

- 8.1 EPIC will ensure that staff who are responsible for procurement receive the relevant information, instruction and training to become competent
- 8.2 Advice, guidance and practical support in relation to the whole procurement process is available from Resources.
- 8.3 For complex/high-risk procurement processes that are above threshold, EPIC may seek external advice from a procurement advisor.

9. DATA VALIDATION, REVIEW AND MONITORING

- 9.1 The Director of Resources is responsible for the monitoring and review of the Procurement Policy. The Policy will be reviewed every three years as a minimum, or sooner if required due to statutory, regulatory or best practice changes.

9.2 To make sure this Policy is effective an annual compliance review will be conducted by Head of Finance. Monitoring will include:

- Actual expenditure against budget.
- Actual expenditure against procured value.
- Value of expenditure covered by compliant contracts (% of total expenditure).
- Value of expenditure covered by exemption (% of total expenditure).

10. EQUALITY AND DIVERSITY IMPLICATIONS

We are committed to ensuring and promoting equality of opportunity for all. We are opposed to discrimination on any grounds, including race, religion, gender, marital status, sexual orientation, disability, age, or any unjustifiable criteria. We are committed to developing a culture that values people from all sections of society and the contribution which each individual can make. We will ensure our approach to accessing properties is considerate to people's individual needs. We also adhere to the Equality Act 2010.

EPIC recognises that some people experience disadvantage due to their socio-economic circumstances and will strive to ensure no person or groups of persons is treated with injustice due to their personal circumstances. EPIC will also ensure that all services and actions are delivered within the context of current Human Rights legislation and will make sure the central principles of the Human Rights Act (1998) will be adhered to.

An equality impact assessment has been carried out on this Policy and is available on request.

11. MONITORING / REVIEW

This Policy will be reviewed every three years. A review may be conducted earlier if there are significant changes to either regulation, legislation, or EPIC's operating practices.

12. ASSOCIATED DOCUMENTS

12.1 The following documents are related to this Policy:

- Procurement Procedures
- Corporate Plan
- Control Framework (including Financial Regulations)
- Value for Money Policy
- Equality, Diversity and Inclusion Policy
- Fraud Risk Management Policy
- Whistleblowing Policy
- Contracts Register
- Sustainability Strategy
- Gifts and Hospitality Policy

Version Control

Date of Review	Reviewer	Version Number	Changes	Date of Next Review	Approved By
July 2022	Director of Corporate Services	3.0	Three-year view	Jul 2025	Board
February 2025	Director of Resources	4.0	Introduction of Procurement Act 2023	February 2028	Board
January 2026	Director of Resources	5.0	Update of UK Procurement Thresholds	January 2028	Board