



PROCUREMENT POLICY



Procurement Policy

Who's this for?	Honeycomb Group including subsidiaries]
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Consultation with stakeholders – please list	Finance Directorate, Governance Team.
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Data Protection Assessment (by DPO) & date	Not applicable – policy review does not involve processing of personal data.
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Owner (Executive Lead)	Executive Director of Finance
Reviewed by:	Executive Director of Finance, Governance Team
Approved by:	Audit and Risk Committee 09.07.2026

Document Revision History

Version	Date	Description of Change	Author
1.0	March 2023	First approval	
2.0	9/7/2026	Legislative, governance and housekeeping updates; converted to new template	GvEB

Links to Associated Policies and Procedures

- **Financial Regulations**
- **Delegations Framework**
- **Standing Orders**
- **Anti-Fraud, Bribery and Corruption Policy**
- **Whistleblowing Policy**
- **Value for Money Strategy**
- **Procurement Procedures and Guidance Notes**

- **Contract Management Arrangements**
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1. Introduction and Purpose

Honeycomb Group is committed to achieving value for money through effective, transparent and accountable procurement practices.

This policy establishes the principles, responsibilities and governance arrangements that apply to procurement activity across the Group. It seeks to ensure that procurement decisions support the delivery of services, comply with legal and regulatory requirements and demonstrate effective stewardship of resources.

The policy applies to all procurement activity undertaken by any entity within Honeycomb Group.

2. Policy Aims and Objectives

The objectives of this policy are to:

- Embed value for money within all aspects of the Group's services.
 - Ensure openness, transparency, fairness, accountability and probity throughout procurement activity.
 - Promote procurement practices that support sustainability, social value and positive community outcomes.
 - Ensure compliance with applicable procurement legislation and regulatory requirements.
 - Protect the financial, operational and reputational interests of the Group.
 - Ensure procurement authority is delegated appropriately and exercised responsibly.
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3. Roles and Responsibilities

3.1 Audit and Risk Committee

The Audit and Risk Committee is responsible for approving this policy and receiving assurance that procurement arrangements remain effective and fit for purpose.

3.2 Executive Director of Finance

The Executive Director of Finance is responsible for:

- Ensuring effective procurement and contract management arrangements are in place.
- Maintaining supporting procedures and guidance.
- Ensuring appropriate procurement support is available for colleagues.
- Promoting compliance with this policy.

3.3 Heads of Service

Heads of Service are responsible for:

- Implementing this policy within their service areas.
- Ensuring procurement activities comply with policy requirements.
- Ensuring appropriate procurement planning is undertaken.

3.4 All Employees

Employees involved in procurement activity must comply with:

- This policy.
 - Relevant procedures and guidance.
 - Defined delegated authority limits.
 - Applicable legal and regulatory requirements.
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4. Procurement Principles

All procurement activity shall be undertaken in accordance with the following principles.

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4.1 Accountability

Procurement decisions must:

- Be justifiable and evidence based.
- Use clear and objective criteria.
- Maintain an appropriate audit trail.

Appropriate procurement and contract documentation must be retained within approved corporate systems in accordance with record management requirements.

4.2 Transparency

The Group will conduct procurement activity openly and fairly.

The MyTenders eTender system shall be used for all tender activity and supplier communications during formal procurement exercises.

Information that could provide an unfair competitive advantage must not be shared before or during a procurement process.

4.3 Integrity

Procurement activities must be conducted honestly, ethically and professionally.

Information submitted by suppliers shall be treated confidentially and shall not be disclosed inappropriately.

Corruption, collusion or conflicts of interest will not be tolerated.

Requests for exceptions to procurement procedures should only be made in exceptional circumstances and will not normally be approved where inadequate planning has resulted in the request.

5. Value for Money

Honeycomb Group is committed to securing value for money from all procurement activity.

Internal procurement thresholds and procedures have been established to support this objective.

Where informal or historic arrangements exceed approved thresholds, procurement activity may be undertaken to test the market and ensure best value is achieved.

The Group will actively consider collaborative opportunities with:

- Housing associations.
- Public sector organisations.
- Central purchasing bodies.
- Other partner organisations.

Collaborative procurement will be supported where it can improve value for money, increase purchasing power or reduce procurement costs.

6. Value for Money Reporting

The Group will monitor and report on value for money through its annual reporting framework.

Procurement efficiencies and improvements achieved through procurement and contract management activities may be included within value for money reporting and performance information.

7. Sustainable and Responsible Procurement

Honeycomb Group recognises its wider responsibilities to customers, communities, partners and stakeholders.

When undertaking procurement activity, staff should consider environmental, social and governance factors where appropriate.

7.1 Sustainability

Procurement decisions should support sustainable business practices wherever practicable.

7.2 Support for Local and Small Businesses

The Group will seek, where appropriate, to:

- Support local suppliers.
- Promote opportunities for SMEs.
- Ensure suppliers are paid in accordance with agreed payment terms.

7.3 Environmental Impact

Procurement activities should consider opportunities to:

- Reduce waste.
- Improve resource efficiency.
- Reduce carbon emissions.
- Support environmental sustainability.

7.4 Equality, Diversity and Inclusion

The Group will promote fair access to procurement opportunities and, where appropriate, seek participation from:

- Small businesses.
- Social enterprises.
- Voluntary and community organisations.
- Diverse suppliers.

7.5 Social Value

The Group will seek opportunities to maximise wider community benefits through procurement activity, including:

- Employment opportunities.
- Apprenticeships.
- Training opportunities.
- Community investment.
- Support for local economic growth.

8. Probity and Conflicts of Interest

The Group must ensure procurement decisions are free from actual, potential or perceived conflicts of interest.

Any employee, Board Member or associated person who has an interest in a supplier or potential supplier must declare that interest in accordance with the Group's governance arrangements. Appropriate steps will be taken to manage any conflict of interest that arises.

9. Performance Monitoring and Compliance

Compliance with this policy will be monitored through:

- Internal management controls.
- Procurement and contract management processes.
- Internal audit activity where applicable.
- External assurance where appropriate.
- Reporting to management and governance bodies.

Managers are responsible for ensuring compliance within their areas of responsibility.

10. Data Protection

Procurement activity may involve the processing of personal information.

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Any such activity must comply with:

- UK GDPR.
- Data Protection Act 2018.
- Honeycomb Group data protection policies and procedures.

Personal data must only be processed where there is a lawful basis and appropriate safeguards are in place.

11. Review

This policy shall be reviewed annually or earlier where:

- There is a significant change in legislation.
- Regulatory requirements change.
- Internal governance arrangements change.
- The Audit and Risk Committee requests an earlier review.

Next Review Date: July 2027