

## Procurement Policy

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<b>Target Audience-</b> who does the document apply to and <u>who should be using it.</u> - The target audience has the responsibility to ensure their compliance with this document by:	<ul style="list-style-type: none"> <li>Ensuring any training required is attended and kept up to date.</li> <li>Ensuring any competencies required are maintained.</li> <li>Co-operating with the development and implementation of policies as part of their normal duties and responsibilities.</li> </ul>		
<b>Special Cases</b>	None		
<b>Accountable Director</b>	Director of Finance		
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<b>If developed in partnership with another agency ratification details of the relevant agency</b>	Head of Operational Procurement & Systems		
<b>Regulatory Position</b>			
<b>Review period.</b> This document will be fully reviewed every three years in accordance with the Trust's agreed process for reviewing Trust -wide documents. Changes in practice, to statutory requirements, revised professional or clinical standards and/or local/national directives are to be made as and when the change is identified.			

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# 1 Introduction & Purpose

## 1.1 Introduction & Purpose

Procurement is the process of acquiring goods and services from third parties. The process spans the whole life cycle from identification of needs, management of the process and through to its expiry.

The management of Procurement is essential to the efficiency and effectiveness of both clinical and support services. Patient care depends on the guaranteed availability of quality equipment, materials and services. Accountability for the expenditure of taxpayer’s money requires that sound economic decisions are taken in relation to procurement.

Great Western Hospitals National Health Service (NHS) Foundation Trust (the Trust) recognises that the provision of quality patient care is supported by using cost effective procurement process which delivers value for money. This can be achieved by developing supplier and customer relationships that consider whole life cost, and ensure appropriate competition.

Procurement is managed by Salisbury NHS Foundation Trust and performance at the Trust is reported monthly to the Director of Finance. It recognises and endorses the key recommendations of the Best Practice Guidelines – NHS Procurement “Raising Our Game” (Ref 1) and is aligned with the NHS Standards of Procurement (Ref 2). These documents are the framework around which improvements in procurement performance are measured.

This policy sets out the principles that ensure the Trust provides an effective procurement process, good stewardship and value for money. The role of the Procurement Department can be defined as follows:

- To lead and operate a comprehensive best practice supply management service, that adds value to the healthcare provision for patients by delivering value for money.
- To deliver procurement services that are efficient, innovative, cost effective and continually developing for the overall benefit of the Trust and its patients.
- This policy should be read in conjunction with the Trust’s Procurement Strategy (Ref 3) which provides the vision and direction for procurement and is linked to the Trust's service delivery plan. The annual procurement business plan is a summary of operational objectives to be achieved in order to meet the strategy.

## 1.2 Glossary/Definitions

The following terms and acronyms are used within the document:

<b>CE</b>	Conformité Européenne (European Conformity)
<b>CIP</b>	Cost Improvement Plan
<b>EIA</b>	Equality Impact Assessment
<b>EU</b>	European Union
<b>FOIA</b>	Freedom of Information Act
<b>FOM</b>	Future Operating Model – NHS Supply Chain Operating Model
<b>JAC</b>	Pharmacy Robot System
<b>MEAT</b>	Most Economically Advantageous Tender
<b>NHS</b>	National Health Service
<b>OJEU</b>	Official Journal of the European Union
<b>PO</b>	Purchase Order
<b>PTP</b>	Procurement Transformation Plans

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<b>SFI</b>	Standing Financial Instruction
<b>UK</b>	United Kingdom
<b>VFM</b>	Value for Money

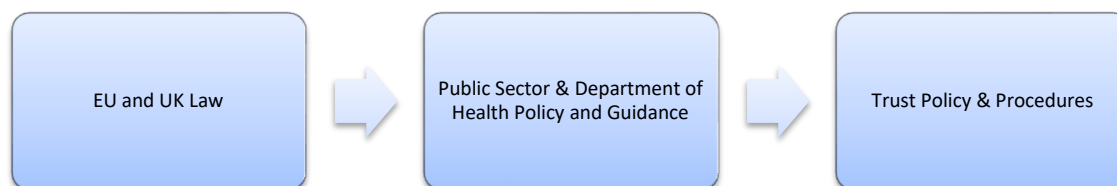
## 2 Main Document Requirements

### 2.1 Procurement Objectives

There are **four main objectives** of the procurement department within the Trust which are to:

- Provide end users with what they need, when they need it and at the best value for money.
- Protect the Trust and minimise risk through means of appropriate managerial and contractual arrangements.
- Provide the tax payer with value for money through expenditure on procurement, demonstrating through annual savings plans benefiting patient care.
- Support the Trust's core objective of providing the local community with excellent health care, maintaining its competitive advantage to be the hospital of choice.

The department's activities are also influenced by:



The European Union (EU) Procurement Directives, and the Public Contracts Regulations that implement them in the United Kingdom (UK), set out the law on public procurement. Their purpose is to open up the public procurement market and to ensure the free movement of goods and services within the EU.

The rules apply to purchases by public bodies and certain utilities which are above set monetary thresholds. They cover all EU Member States and, because of international agreements, their benefits extend to a number of other countries worldwide. Where the Regulations apply, contracts must be advertised in the Official Journal of the European Union (OJEU) (Ref 10) and there are other detailed rules that must be followed. The purchase of all goods and services are subject to the EU regulations regardless of whether they are capital or revenue funded. The regulations also specify thresholds over which the full OJEU must be applied.

The thresholds are currently:

<b>Supplies &amp; Services</b>	<b>&amp; Works</b>
£189,330 (€209,000)	£4,733,252 (€5,225,000)

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However, it should be noted that the UK sterling thresholds are revised every two years in line with fluctuations in exchange rates, with the last review being in January 2020. The Trust has a legal requirement to adhere to these regulations.

## 2.2 Legal Obligations

All public bodies are responsible for ensuring that they comply appropriately with their legal obligations. The legal framework for public procurement includes:

- International obligations as implemented in UK legislation or by direct effect, including the Public Contracts Regulations 2015 (Ref 4);
- Specific domestic legislation, for example, on unfair contract terms;
- Contract and commercial law in general;
- Domestic case law;
- Specific product legislation, e.g. medical devices to be Conformité Européene (CE) marked;
- Freedom of Information Act 2000 (FOIA), (Ref 5); and Bribery Act 2010 (Ref 6).

## 2.3 Ordering Probity

The placing of a physical order with suppliers prior to receipt of goods and invoice is good business practice. Standing Financial Instructions (Ref 7) state that an official order **must** be placed in advance of receipt of goods.

An order is a legally binding contract between the buyer and seller. It is important for both parties to understand which terms and conditions of contract they are working on. A formal order in advance of purchase means the supplier is working from the Trust's terms and conditions. Goods purchased without a formal order from the Trust results in the Trust working to the Suppliers Terms and Conditions of Contract which could be detrimental to the Trust.

The Department of Health and Social Care is responsible for drawing up standard Terms and Conditions of contract for purchase within the NHS, and these must be used for all purchases, whether one off, or period contracts. These terms and conditions are available from the Procurement Department.

## 2.4 Trust Procedures and Standing Financial Instructions

The Trust currently operates three different ordering systems:

- JAC (Pharmacy Robot System) for Pharmacy.
- Oracle for all other areas.

For all products other than those covered by Pharmacy and Orthotics, **an order must be raised in advance via Oracle** with the following exceptions:

- Rent and Rates, Telecoms.
- One off low value items where a credit card is needed (use one of the Trust's authorised cards).
- Subscriptions – One of the Trust's authorised cards or Cheque Application Form.
- Agency.
- Specific product areas with the agreement of the Financial Controller and Associate Director of Procurement and Commercial Services.

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Authorisation for purchase is built within the Oracle systems and therefore **purchases undertaken outside the agreed processes are undertaken outside the Trust Standing Financial Instruction (Ref 7), for which the Trust does not accept liability.**

Invoices for items/services without a valid order number may be returned to suppliers or become the personal liability of the person who placed the order.

## 2.5 Competitive Sourcing

All procurement activity throughout the Trust will be conducted under the professional and ethical guidance provided by the Chartered Institute of Purchasing and Supply. Public Procurement Regulations (Ref 4) will also be adhered to, in conjunction with local Trust Standing Orders and Standing Financial Instructions.

Prior to undertaking any competition, a review of goods or services available through National and Regional Contracts / Framework Agreements should be performed. A Framework Agreement is a centrally pre-tendered list of suppliers who are available for the Trust to contract with, without the need to follow a more strenuous tendering procedure (e.g. OJEU). The Framework itself is not a contract but the 'call off' from the Framework is a contract. Frameworks can be used for services, supplies and works and used in conjunction with the OJEU procedures, and the Trust is able to often award directly to a supplier as well as run a 'mini-competition' between suppliers capable of meeting the Trust's need.

Evaluation of the range of items held on the NHS Supply Chain catalogue must also be undertaken. Benchmarking price, quality and service of proposed purchases with other Trusts also proves valuable and is supported by the Procurement Department.

Through using the Procurement Department's contacts in other trusts, there may be the opportunity for both formal and informal collaboration. For some products and services, combining demand can improve the commercial outcome and ensure better value for this Trust.

## 2.6 Authorisation Levels for Electronic Requisitioning System

All employees authorised to approve the purchase of goods or services, and signing of invoices where appropriate, will be allocated in accordance with the Trust Scheme of Delegation (Ref 8).

## 2.7 Tendering

Once it is established that specific goods or services cannot be sourced through the above mentioned routes, the Trust should seek to obtain best value for money through competition.

Each tender must have a clear specification or scope and a strong scoring system agreed prior to the issue of documentation. The most economically advantageous tender (MEAT) will be awarded the business, provided that the total amount falls within the agreed budget. This scoring mechanism will be the basis for all debriefs to unsuccessful bidders. Guidance will be given by the Procurement Department in constructing the evaluation criteria, examples of which can be found via Procurement Intranet Page (Ref 15). Details of operational procedures relating to procurement can be found in the Procurement Manual (Ref 12) which can be found on the Procurement Intranet Page (Ref 15).

All purchases/contracts which exceed the relevant European financial thresholds (except those where appropriate National Contracts are in place), will be advertised in the OJEU, through the Procurement Department:

Failure to comply with Trust rules could result in disciplinary action. Failure to comply with EU procurement could result in:

- The High Court setting aside a contract.

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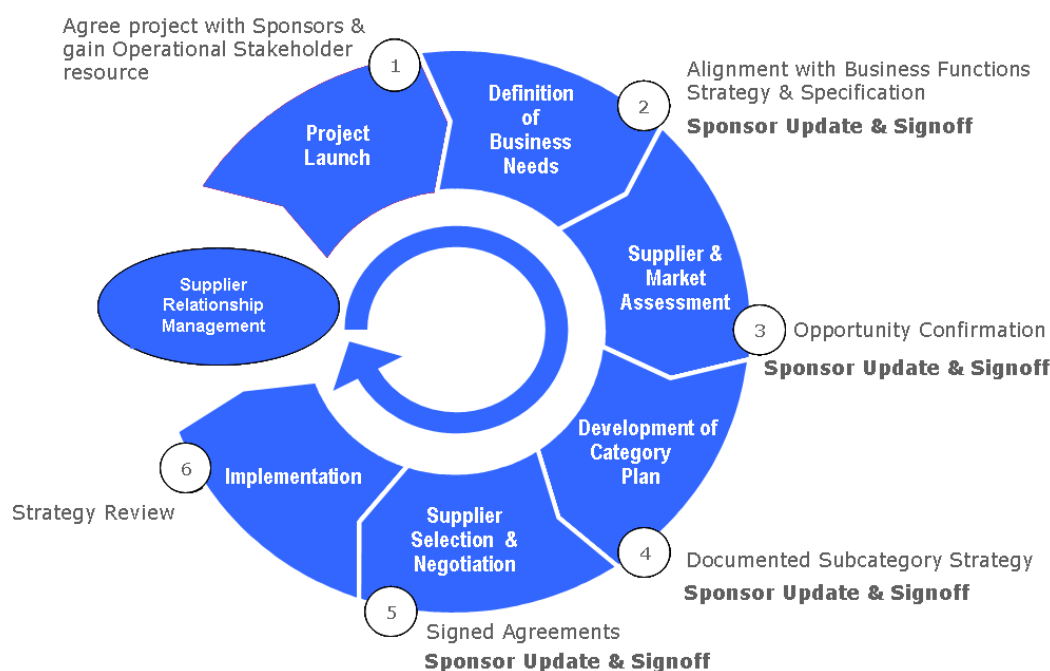
- High Court claims for damages from companies denied the ability to participate in competitive tenders.
- Infringement proceedings in the European Court of Justice.

For purchases which fall below the OJEU threshold, potential alternative sources can be found through placing an electronic notice through the Procurement department on to the Government Opportunities website.

## 2.8 Tendering for Goods and Services

In order to ensure best value for money it is essential that competitive quotations or tenders are obtained. This is the case whether an Item is to go onto the Trust catalogue or not. In determining the number of quotes or tenders to obtain, consideration should be given to the likely volume of the goods or services to be required in the year ahead and subsequent years. The following are the quotation and tender requirements based on total life time costs (ie goods + x years maintenance) or total value over contract period:

The procurement process spans a life cycle from identification of need, through the selection of suppliers and providers, to post-contract award management. A typical procurement process is shown below;



## 2.9 Contract Monitoring

Key contracts will be regularly monitored to ensure that the Trust gains full value from the supplier, ensuring that suppliers adhere to agreed policies and performance indicators.

## 2.10 Ethical and Equality

All employees involved with procurement must undertake to comply with the Ethical Procurement guidelines provided by the Chartered Institute of Purchasing and Supply.

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### 2.10.1 Modern Slavery

The Trust, working with the wider NHS, will ensure that no form of slavery is in our supply chains and that suppliers comply with the Modern Slavery Act.

### 2.10.2 Fair Trade

The Trust will endeavour to satisfy itself that all purchases are made from organisations advocating fair trade. It will not support purchases from organisations which exploits labour.

### 2.10.3 Anti-Bribery

The Trust complies with the Bribery Act 2010 (Ref 6) and in doing so seeks to ensure that any procurement activity is not influenced by the giving of any kind of extra benefit to decision makers or associated parties rather than by what can legitimately be offered as part of a tender / procurement process.

### 2.10.4 Environmental

The Procurement Environmental Policy (Ref 21) is covered within the Sustainable Procurement Policy (Ref 17) be found on the Procurement intranet. Consideration of the impact of all purchases on the environment will be made in all tenders.

### 2.10.5 Equality Analysis

All contracts must be awarded and delivered in a way which is non- discriminatory, and promotes equality of opportunity for employees, service users, the general public and businesses.

There must be a level playing field for all potential contractors, regardless of size or ethnicity of ownership

Within each tender the equality impact will be assessed and will form part of the overall scoring as appropriate ensuring that no evidence of corruption and / or bribery fraud exists.

Terms and Conditions of Contract will include clauses with regard to Equality and Diversity, and the Trust will work with its suppliers so that they are aware of and understand the Trust's requirements, and have the appropriate policies and practices within their organisation.

The Trust will promote its commitment to diversity, equality, human rights and social inclusion through the procurement activity.

### 2.10.6 Local Trading

Where appropriate and in accordance with Public Procurement guidelines (Ref 18), the Trust will seek to support the regional economy using local suppliers.

Suppliers wishing to introduce their product range to the Trust must comply with the Trust's policy for Representatives on Site.

### 2.11 Sustainable and Local Procurement

This policy complements and supports the aims incorporated within the Sustainable Procurement Policy (Ref 17). The Trust will consider the use of reusable products wherever possible in order to reduce the waste generated, and will introduce low carbon criteria into its procurement decisions where appropriate.

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The Trust is mindful of its position in the local health economy and will encourage local suppliers to bid to supply goods and services, promoting the use of local businesses whenever possible and cost effective, but ensuring that any such activity is within the Public Contracts Regulations (Ref 4).

## 2.12 Awarding of Contracts

This will be undertaken by the Procurement Department in conjunction with the user department, based on whole life costing, taking full consideration of value for money and the benefits for patient care.

No debriefing of unsuccessful bidders will take place unless led by a representative of the Procurement department, supported by user departments as appropriate.

## 2.13 Freedom of Information

### 2.13.1 Public Sector Contracts

When entering into contracts the Trust will refuse to include contractual terms which purport to restrict the disclosure of information held by the Trust and relating to the contract beyond the restrictions permitted by the Freedom of Information Act (Ref 5). Unless an exemption provided for under the Act is applicable in relation to any particular information, the Trust will be obliged to disclose that information in response to a request, regardless of the terms of any contract.

When entering into contracts with public or non-public authority contractors, the Trust may be under pressure to accept confidentiality clauses so that information relating to the terms of the contract, its value and performance will be exempt from disclosure. The Trust will reject such clauses wherever possible. Where, under exceptional circumstances, it is necessary to include non-disclosure provisions in a contract, the Trust will agree with the contractor a schedule of the contract which clearly identifies information which should not be disclosed and include provision that The Trust will be responsible for determining in its absolute discretion whether any of the content of the contract is exempt from disclosure in accordance with the provisions of the FOIA. Any acceptance of such confidentiality provisions must be for good reasons and capable of being justified in the public interest and to The Information Commissioner.

It is for the Trust to disclose information pursuant to the Act, and not the contractor. The Trust will take steps to protect from disclosure by the contractor, information which the authority has provided to the contractor which would clearly be exempt from disclosure under the Act, by appropriate similar contractual terms. In order to avoid unnecessary secrecy, any such constraints will be drawn as narrowly as possible and according to the individual circumstances of the case. Apart from such cases, the Trust will not impose terms of secrecy on contractors.

### 2.13.2 Accepting Information in Confidence from Third Parties

The Trust will only accept information from third parties in confidence if it is necessary to obtain that information in connection with the exercise of any of the authority's functions and it would not otherwise be provided.

The Trust will not agree to hold information received from third parties 'in confidence' which is not confidential in nature. Again, acceptance of any confidentiality provisions must be for good reasons, be in the public interest and be capable of being justified to the Information Commissioner.

Information will be made available upon request within the remit of the prevailing NHS Terms and Conditions of Contract (Ref 20) and the guidelines of the Freedom of Information Act (Ref 5).

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### 3 Monitoring Compliance and Effectiveness of Implementation

The arrangements for monitoring compliance are outlined in the table below: -

Measurable policy objectives	Monitoring or audit method	Monitoring responsibility (individual, group or committee)	Frequency of monitoring	Reporting arrangements (committee or group the monitoring results is presented to)	What action will be taken if gaps are identified
Compliance to Procurement Legislation (Ref 11)	<p>Audit</p> <p>Gateways signed off at key stages, at the appropriate level in accordance with the Trusts Standing Financial Instruction (SFI):</p> <ul style="list-style-type: none"> <li>Gateway 1 – Pre-tender</li> <li>Gateway 2 – Tender Summary</li> <li>Gateway 3 – Evaluation</li> <li>Gateway 4 –Final Sign off/recommendation Report</li> </ul>	<p>Director of Procurement/Deputy Director of Procurement</p> <p>Head of Sourcing</p> <p>Procurement Project Lead</p>	<p>Annual – Audit. Bi – Annual internal audit</p> <p>Agreed Project Stages</p>	<p>Audit review</p> <p>Audit review</p>	Compliance to Procurement Legislation
SFI Waivers (Ref 14)	<p>Procurement Log and Trustwide tracking process.- Process included in the Procurement Manual</p> <p>Process for managing non-compliance in place included in the Procurement Manual</p> <p>Audit</p>	Director of Finance	<p>Monthly</p> <p>Quarterly</p>	Director of Finance/Head of Procurement – face to face meetings with requestor.	SFI Waivers

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				Audit report issued to Audit Risk and Assurance Committee	
On-Catalogue Transactions	Carter Metrics via Bravo system	Head of Operational Procurement and Systems	Monthly	Better Buying Committee	On-Catalogue Transactions
On-Purchase Order (PO) Transactions	Carter Metrics via Bravo system	Head of Operational Procurement and Systems	Monthly	Better Buying Committee	On-PO Transactions
On-PO Spend	Carter Metrics via Bravo system	Head of Operational Procurement and Systems	Monthly	Better Buying Committee	On-PO Spend
On Contract Spend	Carter Metrics via Bravo system	Head of Operational Procurement and Systems	Monthly	Better Buying Committee	On Contract Spend
New Supplier Set Ups ref: 13	Review of any abnormalities or compliance risk	Operational Procurement Team	Monthly	No formal review	New Supplier Set Ups
Declaration of Interest	Audit	Head of Sourcing	Annual – Audit. Bi – Annual internal audit	Audit review	Declaration of Interest
Better Buying Cost Improvement Plan (CIP)	Procurement/Finance	Director of Finance	Monthly	Better Buying Committee	Better Buying CIP
Non-CIP Savings	Procurement/Finance	Director of Finance	Monthly	Better Buying Committee	Non-CIP Savings

## 4 Duties and Responsibilities of Individuals and Groups

### 4.1 Chief Executive

The Chief Executive is ultimately responsible for the implementation of this document.

### 4.2 Ward Managers, Matrons and Managers for Non Clinical Services

All Ward Managers, Matrons and Managers for Non Clinical Services must ensure that employees within their area are aware of this document; able to implement the document and that any superseded documents are destroyed.

### 4.3 Document Author and Document Implementation Lead

The document Author and the document Implementation Lead are responsible for identifying the need for a change in this document as a result of becoming aware of changes in practice, changes to

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statutory requirements, revised professional or clinical standards and local/national directives, and resubmitting the document for approval and republication if changes are required.

#### 4.4 Director of Finance

The Director of Finance has overall responsibility for ensuring good procurement practice throughout the Trust.

#### 4.5 Director of Procurement

The Director of Procurement will report monthly to the Director of Finance on procurement at the Better Buying Project Group.

## 5 Further Reading, Consultation and Glossary

### 5.1 References, Further Reading and Links to Other Policies

The following is a list of other policies, procedural documents or guidance documents (internal or external) which employees should refer to for further details:

Ref. No.	Document Title	Document Location
1	NHS Procurement – Raising Our Game	<a href="https://www.gov.uk/">https://www.gov.uk/</a>
2	NHS Procurement Standards	<a href="https://www.gov.uk">https://www.gov.uk</a>
3	Procurement Strategy	<a href="http://gwh-intranet/">http://gwh-intranet/</a>
4	Public Contracts Regulations 2015	<a href="http://www.legislation.gov.uk/">http://www.legislation.gov.uk/</a>
5	Freedom of Information Act 2000	<a href="https://www.legislation.gov.uk/">https://www.legislation.gov.uk/</a>
6	Bribery Act 2010	<a href="https://www.gov.uk">https://www.gov.uk</a>
7	Standing Financial Instructions	T:\Trust-wide Documents
8	Scheme of Delegation	<a href="http://gwh-intranet/">http://gwh-intranet/</a>
9	HM Treasury Rules - Public Procurement Policy	<a href="https://www.gov.uk">https://www.gov.uk</a>
10	OJEU	<a href="http://www.ojeu.eu">http://www.ojeu.eu</a>
11	Legislation Content	<a href="http://www.legislation.gov.uk">http://www.legislation.gov.uk</a>
12	The Procurement Manual	<a href="http://gwh-intranet/">http://gwh-intranet/</a>
13	Supplier Set up Process	<a href="http://gwh-intranet/">http://gwh-intranet/</a>
14	Single Tender Waiver Process	<a href="http://gwh-intranet/">http://gwh-intranet/</a>
15	Procurement Intranet Page	<a href="http://gwh-intranet/">http://gwh-intranet/</a>
16	Government Opportunities Website	<a href="http://www.govopps.co.uk/">http://www.govopps.co.uk/</a>
17	Sustainable Procurement Policy	<a href="http://gwh-intranet/">http://gwh-intranet/</a>
18	Public Procurement Guidelines	<a href="https://www.gov.uk">https://www.gov.uk</a>
19	Policy for Representatives on Site	T:\Trust-wide Documents
20	NHS Terms and Conditions of Contracts	<a href="https://www.nhsemployers.org">https://www.nhsemployers.org</a>
21	Procurement Environmental Policy	<a href="http://gwh-intranet/">http://gwh-intranet/</a>

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## 5.2 Consultation Process

The following is a list of consultees in formulating this document and the date that they approved the document:

Job Title / Department	Date Consultee Agreed Document Contents
Systems & Payables Manager – end user	15.01.2020
Non-Executive Director	23.03.2020
Acting Chief Executive	23.03.2020
Interim Director of Finance	23.03.2020
Non-Executive Director	23.03.2020

## 6 Equality Impact Assessment

An Equality Impact Assessment (EIA) has been completed for this document and can be found at Appendix A.

## Appendix A - STAGE 1: Initial Screening For Equality Impact Assessment

At this stage, the following questions need to be considered:			
1	What is the name of the policy, strategy or project? <b>Procurement Policy</b>		
2.	Briefly describe the aim of the policy, strategy, and project. What needs or duty is it designed to meet? Guidance of how to procure goods and services in accordance with EU law, UK law and Trust SFI's		
3.	Is there any evidence or reason to believe that the policy, strategy or project could have an adverse or negative impact on any of the nine protected characteristics (as per Appendix A)?		<b><u>No</u></b>
4.	Is there evidence or other reason to believe that anyone with one or more of the nine protected characteristics have different needs and experiences that this policy is likely to assist i.e. there might be a <i>relative</i> adverse effect on other groups?		<b><u>No</u></b>
5.	Has prior consultation taken place with organisations or groups of persons with one or more of the nine protected characteristics of which has indicated a pre-existing problem which this policy, strategy, service redesign or project is likely to address?		<b><u>No</u></b>

Signed by the manager undertaking the assessment	Jen Hykin
Date completed	16/03/2020
Job Title	Head of Operational Procurement & Systems

On completion of Stage 1 required if you have answered YES to one or more of questions 3, 4 and 5 above you need to complete a [STAGE 2 - Full Equality Impact Assessment](#)

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