

PARAGON HOUSING ASSOCIATION LIMITED

POLICY	PROCUREMENT POLICY
POLICY AREA	FINANCE & INVESTMENT
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Introduction

Public procurement in the UK and the rest of the EU is governed by a number of Directives and Regulations which are then implemented in national legislation.

Public procurement law is devolved responsibility of the Scottish Parliament and is enforced through the following legislation:

- Procurement Reform (Scotland) Act 2014
- Public Contracts (Scotland) Regulations 2015
- Procurement (Scotland) Regulations 2016

The Scottish Government has developed comprehensive procurement guidance for public bodies to improve the quality of and value delivered through procurement of the public contracts in Scotland. The guidance can be found at: [Guidance under the Procurement Reform \(Scotland\) Act 2014.](#)

Aims & Objectives

The key aims and objectives of the policy are:

- To set clear guidelines and methods by which the Association will procure works, services or supplies
- To award contracts that achieve value for money**
- To promote and encourage partnership working
- To promote involvement in community benefits e.g. apprenticeships, sponsorship etc where practical
- Contribute to the aims and objectives of the Association as detailed in the business plan
- To ensure that the business needs are met through procurement of works, services or supplies
- To support the Association in meeting particular aspects of the Scottish Housing Regulator's Standards of Governance and Financial Management

** Value for money can be defined as the optimum combination of the whole-life cost and quality (or fitness for purpose) to meet the user's requirements.

Procurement Routes

The public procurement rules vary depending on the type and value of the contract.

When contracts above a certain value (EU Regulated Contract Thresholds) more detailed rules apply. These contracts must be advertised in the Official Journal of the European Union (OJUE) although they are also advertised through the Public Contracts Scotland.

The financial thresholds above which the association must publish the procurement opportunity in OJUE are currently set at

OJUE – Excluding VAT	
SUPPLIES/SERVICES	£164,176
WORKS	£4,104,394
Last updated January 2016	
Review Period Every 2 years	

The financial thresholds above which the Association must publish the procurement opportunity on the Public Contracts Scotland website are

Lower Value – excluding VAT	
SUPPLIES/SERVICES	£50,000
WORKS	£2,000,000
Last updated January 2016	
Review Period Every 2 years	

The current thresholds values are laid out in Appendix 1 Page 13

Procurement Strategy Requirement

Section 15 of the Procurement Reform (Scotland) Act 2014 requires any public organisation, which has an estimated total value of regulated procurement spend of £5 million or more (excluding VAT) in a financial year, to prepare and publish a procurement strategy.

The period the procurement strategy covers can be defined by the organisation e.g. 3 years, 5 years. etc.

Paragon HA's projected annual procurement spend over the next 5 years is below the £5 million threshold each year, therefore at this time, the Association is not required to prepare or publish a procurement strategy. A review of this will be done in line with the next procurement policy review in 4 years' time.

Procurement Activities

The main goods and services that will require to be procured by the Association are as follows:

- Small items of office supplies or other consumable products
- All office printing, stationery, postage and other materials
- Trade materials used by the estate and office cleaners
- Office furniture and equipment
- ICT equipment and back up services
- Maintenance contracts related to office based equipment or services e.g. ICT equipment, fire and security alarms etc.

- Professional services including internal/external auditors, solicitors, bankers, insurance brokers, architects, design consultants and management consultants employed on specific projects
- Contractors covering a full range of trades and professions

Roles & Responsibilities

The Management Committee has ultimate responsibility for the procurement of works, services and supplies and for policy review. As a result the Management Committee and delegated Sub-Committees will oversee the particular works, services or supplies and will receive regular reports on the basis of procurement and the awarding of contracts.

The specification for the works, services or supplies, with performance indicators and associated methods of measuring and performance, will be the responsibility of the senior officer managing that particular area of work.

Delegation of Authority

The relevant levels of delegated authority are dealt with through the Association's Financial Regulations and Schedule of Internal Controls and Delegated Authorities which are regularly reviewed. Financial values and limits may change from time to time.

EU Regulated Contracts

If the contract value is equal to or greater than the relevant threshold, (See Appendix 1 Page 13) then that contract will be publicly procured in accordance with the terms of the Regulations.

In terms of the guidance, where a proposed contract contains elements of both supplies and services, the classification should be determined by the respective values of the two elements. Where it covers works/supplies or works/services it should be classified according to the predominant purpose.

The European Single Procurement Document (ESPD) replaced the Pre-Qualifying Questionnaire (PQQ) in April 2016 for EU regulated contracts.

The questions contained in the ESPD are set and cannot be added to although questions can be deleted that are not relevant to a particular contract.

The questions ask bidders either to confirm that they meet the minimum standards set for selection set out in the contract notice or to describe how they meet the criteria set out in the contract notice.

Bidder's self-declaration that their responses are true must be accepted and they can only be asked to provide supporting documentation during the shortlisting stage but before a contract is awarded.

Where a bidder proposes to sub-contract part of a contract, and relies on the capacity of the sub-contractor to fulfil the selection criteria, a separate ESPD must be submitted on behalf of the sub-contractor.

Lower Value Regulated Contracts

All supplies and services contracts with an anticipated contract value of £50,000 over the term ¹ of the contract to EU thresholds (currently £164,176) and works contracts with an anticipated value of £2,000,000 to EU threshold (currently £4,104,394) are required to be advertised on the Scottish Procurement Portal “ Public Contracts Scotland” website www.publicprocurementcontractscotland.gov.uk

As this will be the route followed in the majority of cases by the Association in relation to developments and major investment works, the following details will apply:

Contracts that require to be advertised will involve a two stage tender process for selecting contractors i.e. Pre-Qualifying Questionnaire (PQQ) & Invitation to Tender (ITT). The PQQ is the point in the procurement process where the Association assesses a bidder’s capacity and capability to carry out a contract. Where a bidder is deemed to meet the PQQ criteria, those bidders will be invited to tender.

PQQ Information

In obtaining information to evaluate whether a contractor can undertake works to a standard required by the Association, the following considerations would need to be evidenced in the PQQ responses:

- Financial resource
- Experience & capacity
- Health & Safety Policy
- Quality Management Procedures
- Staff resources and employment policy
- Equal opportunities policy & practice
- Public liability insurance
- Indemnity insurance up to a certain limited – for consultants
- Two years publicised accounts
- Valid registration card or certificates for trade body or standard
- Proof of membership of federation or trade association
- Workforce details

References

References should be taken up before placing a contractor on the tender list

Partnering Contract

¹ The term of the contract is the period of the contract plus any potential extensions

Partnering is not a procurement route, rather a term used to describe a non-confrontational way of working through which all parties, including clients and suppliers act as a single team to achieve a common goal. It is about developing systems and methods to enable people and organisations to operate more effectively and efficiently together irrespective of the nature of the project or the method of procurement used. It is intended to overcome the old confrontational way of working on contracts.

Partnering agreements will be considered by the Association where added value can be clearly demonstrated with all legislation complied with before entering into any contract through this route.

Framework Agreements (approved list of contractors)

In certain circumstances, it may be beneficial for the Association to establish Framework Agreements over a period of time rather than individual tenders.

This may be a suitable arrangement where the Association would want a number of contractors/suppliers in place for various projects over a period of time. An example of this would be a Framework for Development Contracts and Framework for Major Repairs. (Note: Paragon HA is already a Partner on Link HA Framework for Consultants & Contractors Development Framework since 10th October 2016 which operates to 9th October 2020)

Frameworks can be in place for no longer than 4 years and there requires an agreed and transparent process in place in order to allocate work within the framework e.g. mini tenders, award work by rotation, direct award etc.

The full tender process would be followed for a framework agreement as above.

Public Procurement Frameworks

The Association can also consider procuring works and services through Public Procurement Frameworks. Public Procurement Framework Agreements differ from standard framework agreements in that a public body has completed the procurement exercise following legislation and good practice. Public Procurement Framework Agreements take full account of value for money, community benefits, environmental issues, the need for openness & transparency in the appointment process and compliance with organisational objectives.

Good examples of Public Procurement Agreements would be the Scottish Procurement Alliance (SPA) & Scotland Excel.

To use these types of frameworks, membership is required. The Association are already a member of the SPA therefore able to use the SPA Framework Agreements at no charge.

Scotland Excel is the Centre of Procurement Expertise for the local government sector. Established in 2008, they are a leading non-profit shared service funded by Scotland's 32 local authorities. To use this service, the Association would need to pay an annual fee of £500.00. To date there has been no requirement by the Association to use this service although it may be considered in future.

Contracts Values below Thresholds – Financial Limits

Contracts with anticipated values less than the regulated thresholds for works, services and supplies are not required to be procured through either the EU or the Public Contracts Scotland routes as noted above.

The current financial limits below which no quotations or tenders are required are detailed in the Association's Schedule of Authorities.

The Management Committee review these financial limits regularly to ensure they remain appropriate for effective governance.

The procurement methods below the regulated thresholds follow in the next section.

Obtaining Prices, Quotations & Tenders below Thresholds

The summary table in Appendix 1A also sets out the different methods of obtaining prices, quotations and tenders that should be followed when procuring goods and services. This is in line with the Associations Schedule of Internal Controls / Authorities as approved 10 February 2016 and should be checked for any changes prior to awarding services, works etc.

The Scottish Procurement Portal "Public Contracts Scotland" website www.publicprocurementcontractscotland.gov.uk can still be used although the anticipated costs may be below the threshold. The Quick Quote facility within the Portal should also be considered.

Prices

For items under the current cost limit which do not require quotations or tenders, the authorised member of staff will, where appropriate and /or possible seek to check at least two alternative prices either by telephone, catalogue, price list, on-line comparison or by requesting details by e-mail.

Quotations/Estimates

Quotations/Estimates may be requested either verbally, in writing or by email. In these cases, the authorised member of staff will ensure sufficient detail is provided to those invited to quote to enable accurate, comparable quotes to be received and records will be retained.

Tenders

Following the development of the appropriate tender documentation whether in-house or through a consultant, contractors/suppliers will be invited to tender. See Tender Procedure Page 9

Reports on tenders and recommendations will be presented to the relevant budget holder, management team member or Committee for approval prior to an award being made.

In line with Sub Committee remit the Committee Members may consider delegating authority to a Sub-Committee or Senior Officer to approve up to a pre-approved level with a retrospective report presented to the Committee at the next available meeting.

Negotiation

Where it is proposed that services, supplies or contracts are to be procured through negotiation, there must be clear justification for doing so and the decision to enter into this must be approved at the appropriate level of authority.

Contracts & Service Agreements

The Association will procure certain services through contracts or service agreements for periods of 1 to 4 years where appropriate. Examples are contracts for the provision of stair lift maintenance, office equipment, fire and security alarms etc. Threshold levels for the life of the contract as per the Schedule of Authorities.

Specialist Suppliers or Contractors

Where there are limited specialist suppliers or contractors for a particular item or service or there deliverability issues the Association will seek to negotiate the most advantageous price and terms prior to placing an order or signing an agreement. Details of the discussions held and the reason for the final recommendation will be fully recorded and reported to the committee for approval subject to financial limits reporting.

Other Methods of Procurement

The Association will continually review our methods of procurement in order to achieve the best value for money, meet our duty of sustainable procurement and to comply with current statutory regulations, the Scottish Housing Regulators guidance and good practice.

Price/Quality and /or Sustainability

Tender evaluations will be based on a split between weighting and marks for quality and price. The split can vary between 60% - 70% price and 40% - 30% quality criteria with a 10% sustainability dependant on the type of contract.

This will ensure that a tenderer should not be able to win a contract by submitting the lowest price but must also address the quality and sustainability elements of the tender invitation. The criteria should be agreed prior to the contract being advertised.

Repeat & Extended Contracts

The Association is conscious of the time and cost that is involved in the procurement process, both from the Association's point of view and that of the prospective bidders. As a result, the association will seek where feasible and within the boundaries of the current procurement legislation and good practice, to develop a partnership approach with contractors and consultants. In this respect, successful completion of specific pieces of work may lead to the offer of further negotiated packages of work.

The possibility and maximum duration of any such extension should be indicated in the original procurement process. The contract extension should only be proposed where the cost uplift is at or below what is being experienced in the sector at the time.

Exceptions

In emergency situations, the use of non-approved contractors is acceptable provided the work is instructed as per the Schedule of Authorities and reported to the Director and the Housing Management & Investment Sub Committee. This authority only extends to work to deal with the emergency situation and should not be extended to further remedial work. Examples of emergency situations include major weather related situations, health and safety matters requiring urgent action etc. This list is for illustrative purposes and is not exhaustive.

Tender Procedures

Contract documentation will be according to the scope and size of the contract and should include:

- Letter of invitation
- Instructions to tenderers including tender return date
- A full description of the works or scope of the project
- Contractors or Consultants brief
- Principles of assessment
- Questionnaire (if applicable)
- The conditions of the contract which will apply
- The period in which the works are to be completed
- Insurance requirements
- Conditions of payment
- Details of the procedure to follow for tender submissions

Tender Opening Procedure

In most cases for the Association, the route taken for tender will be the regulated routes therefore the initial tender opening, scoring and reporting to the Association will be undertaken by the appointed consultants.

Where the Association is managing the tender process in-house, the procedure below should be followed:

- Tenders will not be opened before the submission date
- The date and time received will be marked clearly on the envelope and signed by the member of staff accepting delivery
- Tenders will be stored in a lock fast area until opening
- Tender opening will take place as soon as possible after the submission date but not more than 7 working days after
- All tender openings should be in the presence of 2 people. This can be through the following combination of staff/management committee members

Management Committee Member
Management Team Member
Corporate Services Supervisor
The management team member responsible for the tender should not be one of the members opening the tender

- The witnessed tenders are to be recorded in the contract register

Contract Register

The Association has a contract register in place where all projects, contracts or other should be registered. The register is split between Minor Works & Investment Works and holds the following details:

- Financial Year
- Project Code No
- Project Description
- Location of project / works
- No Properties included
- Budget Provision excluding VAT
- Tender Route
- Nos Tenders Received
- Name of appointed contractor
- Contract Value excluding VAT
- Approved by, committee or other
- Date Approved
- Name of Consultants appointed if applicable

The staff member responsible for procuring the services works or other is responsible for updating the Contract Register.

Contracts/projects procured through the Public Contracts Scotland Portal are also maintained on the portal website.

Community Benefit

The Association will include consideration of contractual clauses relating to community benefits as appropriate to ensure our communities can benefit through maximising employment, training and business opportunities as a result of the expenditure undertaken.

Monitoring and review

It is essential that the Association monitors contractors/suppliers performance and ensures that the end user/customer/client is also satisfied with the service that they are receiving.

In most cases, the customer/client will be the Associations tenants, factored owner occupiers and private landlords therefore it is important that the Association effectively manages contracts. During the contract period, a monthly report on progress/performance will be provided to the Management Committee.

At the end of each contract, a satisfaction survey will be carried out with the outcome reported to committee. Poor performance issues will be raised with the Committee for review of the individual contractors.

Disputes

Disputes may arise at any time during the tendering contract process. There are legal and contractual routes to deal with these and in some circumstances it may be appropriate to invoke the Association's Complaints Policy.

Conflicts of Interest

The Association will comply with the relevant standards in relation to management of conflict of interest and governance.

Tenant Participation

The Association is committed to tenant participation and taking account of tenant feedback. The Tenant Participation Policy and Strategy identifies opportunities for tenants to influence procurement decisions eg through design choices, service standard and other relevant items and our practice of obtaining and acting on project feedback.

Review of Policy

The policy will be reviewed every 4 years or sooner if required by statutory regulation or best practice requirements

Equal Opportunities

The Association has an Equalities Policy and will ensure equality of opportunity across the full range of our activities, including both employment and service provision.

Appendix 1 – Procurement Thresholds

EU Regulated Contract Thresholds as at 18th April 2016

Supplies	£164,176.00	€209,000.00
Services	£164,176.00	€209,000.00
Works	£4,104,394.00	€5,225,000.00

Procurement Reform (Scotland) Act 2014 – Lower Value Regulated Contract Thresholds

Supplies	£50,000.00	Public contract (other than works contract)
Services	£50,000.00	Public contract (other than works contract)
Works	£2,000,000.00	Public works contract

Appendix 1 A : Procurement Levels & Routes for Prices, Quotations & Estimates below Thresholds

Anticipated Contract Value	Advertisement Provision	Selection Process
Under £5k	None required	At least two competitive quotes from suitably competent contractors, consultant or service provider. Award based on most economically advantageous. Award in line with Schedule of Authorities.
£5k - £25k	Advertise locally or by invitation	Competitive Quotes, award based on most economically advantageous and in line with Schedule of Authorities (Up to £30k inc vat, Director & Finance Manager)
£25k - £50k	Advertise locally or by invitation, also consider quick quote on PCS	Competitive Tendering, award based on most economically advantageous or balancing Price/Quality (where applicable) in line with Schedule of Authorities (up to £50k inc vat – Sub Committee)
£50k – EU Thresholds	Advertise in the Scottish Procurement Portal “Public Contracts Scotland” or through Public Procurement Frameworks or similar	Competitive Tendering Award criteria based on Capability & Quality analysis, followed by Balancing Quality/Price. Public Procurement Frameworks – Direct Award or Mini Tender Committee approval required

Appendix 2 – Procurement Summary : Proposed Schedule of Internal Controls / Authorities

SECTION 1 : GOODS & SERVICES				
OPERATIONAL AREA	ACTIVITY	TASKS	AUTHORITY	COMMENTS
CORPORATE	SERVICES eg utilities, annual maintenance, taxi account etc	Authorising supply of service – within set budget limits	<p>1a) Any Management Team member</p> <p>1b) Taxi account – Any Management Team / Senior Housing Officer & Corporate Services Team</p> <p>1c) Senior Housing Officer / Programme Co-ordinator to value of £500.00</p>	<p>Management Team comprises of</p> <p>Director</p> <p>Depute Director/ Finance & investment Manager</p> <p>Housing Manager</p> <p>Programme & Regeneration Manager</p>
		Verification of account	2. As above other than staff member authorising the supply of service plus finance staff	
		3. Authorisation for payment	<p>3.Any Management Team member – any value</p> <p>4. SHO/Programme Co-ordinator to value of £1000</p>	Authorisation should only be exercised by staff member who has NOT authorised the supply of the service.
		1.Ordering by in house purchase order or supplier's forms etc	<p>1.Management Team member – to budget levels</p> <p>2. Finance Co-ordinator/ Programme Co-ordinator/Senior Housing Officer to limit of £100</p>	<p>This authority excludes petty cash activities – see separate section</p> <p>This should be an exception. Can only order if budget approved and should not order for own section.</p>

OPERATIONAL AREA	ACTIVITY	TASKS	AUTHORITY	COMMENTS
CORPORATE	PROCURING NON PROGRAMME RELATED GOODS AND SERVICES – all departments financial limits	Contracting for supply of goods of or services	<p>Director/ Depute Director</p> <p>All goods and services up to and including £20,000 (including outlays/ excluding vat)</p> <p>This relates to the total or cumulative value if term contract over period.</p> <p>F&GP Sub Committee</p> <p>All goods and services up to and including £50,000 (including outlays/ excluding vat.)</p> <p>This relates to the total or cumulative value if term contract over period.</p> <p>Management Committee</p> <p>In excess of £50,000 (including outlays/ excluding vat.)</p>	<p>This relates to all other unspecified goods or services but excludes the provision of ongoing services such as utilities</p> <p>Note at all times account should be taken of the Procurement Policy & relevant legislative/ regulatory requirements</p>

SECTION 10: REPAIRS/ IMPROVEMENTS				
OPERATIONAL AREA	ACTIVITY	TASKS	AUTHORITY	COMMENTS

HOUSING MANAGEMENT	WORKS ORDERS REACTIVE REPAIRS	1. Raising <i>initial</i> works orders via Miracle	Reactive Maintenance budget delegated to Housing Manager Single Works order (see comments) Up to and including £500 – all staff Over £500 and up to and including £1,000 – staff Grade 6 and above Over £1,000 and up to £7,000 Director/Housing Manager / Finance & Investment Manager/ Programme & Regeneration Manager / Programme Co-ordinator /SHO Any amount over this to be approved by the Director	While there may be a single works orders it may contain several SOR items. The key for authorisation is the estimated cost of the Works Order. Note there will be a requirement to make alterations to system set up
HOUSING MANAGEMENT	REACTIVE MAINTENANCE INVOICES	1. Work verified & coding input	All staff Grade 4 and above	
		2. Agree variations	Staff Grade 6 and above	This refers to authorisation – may be processed by Staff 4 & 5
		3. Authorisation of Invoices for Payment	Director ,Finance & Investment Manager, P&R Manager, Programme Co-ordinator	This is authorisations of invoices on Miracle system Housing Manager excluded as budget holder
		4. Financial Integration	Finance Staff Grade 5 and above	
		5. Instruction to pay	Director ,Finance & Investment Manager	

SECTION 13: PROGRAMME ACTIVITY

OPERATIONAL AREA	ACTIVITY	TASKS	AUTHORITY	COMMENTS
PROGRAMME & REGENERATION	PROGRAMME / PLANNED MAINTENANCE /REACTIVE MAINTENANCE CONTRACTS /PARTNERSHIP AGREEMENTS	1. Prepare Cost Plan /Estimate	Programme & Regeneration Manger/ Finance & Investment Manager/ Programme Co- ordinator Cost guidelines as per approved budget.	<p>See flowchart. See Procurement Policy \\Phapdc\common\Policies & Procedures\Current Policies\Finance & Investment\Procurement Policy Jan 2013.doc</p> <p>See Financial Regulations \\Phapdc\common\Policies & Procedures\Current Policies\Finance & Investment\FINREG Approved 120214.docx</p> <p>If project is on an annual basis e.g. landscape maintenance then the values apply for the projected value of the total project period,</p> <p>As per Procurement Policy/Procedures \\Phapdc\common\Policies & Procedures\Current Procedures\Finance & Investment\Tendering.doc</p>
		2. Approve cost plan	<p>Director/ Finance & Investment Manager for minor works to the value of £30,000 inc vat</p> <p>Housing Management & Investment Sub Committee up to £50,000 inc vat</p> <p>Management Committee - over £50,000 inc vat</p>	
		3. Invitation to tender/ Partnering	Contractors selected from approved list or in accordance with Procurement Policy	Where tendering takes place \\Phapdc\common\Policies & Procedures\Current

				Policies\Finance & Investment\Procurement Policy Jan 2013.doc
		4. Opening of Tenders	As per Tendering Procedure	
		5. Preparation of tender report	Programme & Regeneration Manager/ Programme Co-ordinator /Consultant	

OPERATIONAL AREA	ACTIVITY	TASKS	AUTHORITY	COMMENTS
PROGRAMME & REGENERATION	PROGRAMME / PLANNED MAINTENANCE /REACTIVE MAINTENANCE CONTRACTS /PARTNERSHIP AGREEMENTS	6. Tender/ Contract Acceptance Approval	Director/ Finance & Investment Manager for minor works to the value of £30,000 inc vat Approval of Works up to and including £50,000 inc vat by the HM & Investment Sub Committee – signed off by HM&I Chair In excess of £50,000 inc vat approval by Mgt. Committee required – to sign as mandated.	Contracts details to be entered in register and counter signed by approver
		7. Report projections/variances Against cost plan monthly		
		8. Approve Variances	Programme & Regeneration Manager to provide details to Finance & Investment Manager Spend to be reported to Management Committee through Management Accounts and Programme report Any variances to be agreed in line with Financial regulations	

OPERATIONAL AREA	ACTIVITY	TASKS	AUTHORITY	COMMENTS
FINANCE & INVESTMENT	MEDICAL ADAPTATIONS	1. Request processed	1. Programme staff	Ensure take account of any Payment & Benefit requirements See appropriate policy \\Phapdc\common\Policies & Procedures\Current Policies\Governance\Schedule 7 Payments & Benefits July 2007.doc Within budget limits
		2. Request approved	2. Programme & Regeneration Manager/ Finance & Investment Manager	
		3. 3. Work Ordered/Payment	3. As per procurement procedures	

SECTION 18 : PROGRAMME PROJECT APPROVAL FLOW CHART

