

# GMC Procurement Policy

## Document History

Revision date	Owner	Version Number	Summary of Changes	Approved by	Date approved
13/06/24	Gordon Duffus	1.0	Update of the Procurement Policy that was previously approved on 28/07/23 to reflect the changes with the Procurement Act. This policy to take effect from 28/10/24	Exec Board	24/06/24
16/12/25	Gordon Duffus	2.0	Update to thresholds from PPN23:2026	Neil Roberts	16/12/25
02/06/26	Gordon Duffus	3.0	Update to Procurement policy to add clarifications identified in Internal Audit of Procurement in 2026	Neil Roberts	02/06/26

The policy will be reviewed no later than 31/12/27

## Introduction

- 1 The GMC's procurement policy aims to support the business functions and achievement of strategic objectives by ensuring that all purchases of goods and services are made in a professional, transparent manner, employing best practice and achieving the most advantageous terms for the GMC without compromising quality, ethics, safety or security.

## Legal and Policy Frameworks

- 2 All GMC Procurements have to comply with the Procurement Act 2023 (PA), which sets us the objectives of:
  - delivering value for money
  - maximising public benefit

- sharing information for the purpose of allowing suppliers and others to understand the authority's procurement policies and decisions
  - acting, and being seen to act, with integrity
  - treating suppliers the same unless a difference between the suppliers justifies different treatment
  - removing or reducing barriers to participation for Small, Medium sized Enterprises
  - giving due regard to the "National Procurement Policy Statement".
- 3 All goods and services tenders with a value above £207,720 (inclusive of VAT), or works and concession tenders with a value\* above £5,193,000 (inclusive of VAT) are subject to strict procedural rules in the PA. These tenders are known as "Find a Tender Service" (FTS) tenders. Contracts below these thresholds, although not subject to these procedures, shall follow the same principles, with all requirements over £50k (inclusive of VAT) maintaining comparable records to those required under PA such as Conflicts of interest records and risk assessments.
  - 4 All tenders shall be published on the Cabinet Office's Central Digital Platform, and only submissions received via this portal will be accepted.
  - 5 Submissions from all organisations and suppliers from countries included within the World Trade Organisation Government Procurement Agreement will be treated on an equal basis.
  - 6 We will follow the guidance in the application of the PA provided by the Cabinet Office or others, as appropriate, or included in the "National Procurement Policy Statement". Where the guidance is categorised as "advisory" for wider public sector organisations, the GMC will consider their implementation on a case by case basis.
  - 7 GMC Services International (GMCSI) Ltd is considered outside of the scope of the PA, but will follow similar procedures, as appropriate.

## Value for Money (VfM)

- 8 Value for money is defined by the GMC as the optimum balance of price, social value, and quality. The relative weighting of price, social value and quality will be predefined in the tender documentation and set specifically to each requirement's needs. GMC will ensure

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\* Contract value calculated as the spend through the entire duration of the contract (including all extension options) accounting for forecast demand, and a reasonable assessment for the use of additional services

that it obtains the optimal VfM outcome through appropriate competition based on the value and complexity of the procurement.

- 9 Through tendering, GMC shall ensure value for money is obtained at the start of a contract, and throughout the life of the contract through active Contract Management activity. This is for contracts valued over £50k (inclusive of VAT) and running for over 6 months.

## Commercial Authority

- 10 The person giving commercial approval will be responsible for ensuring that the contract is procured in line with the GMC Procurement Policy, the goods/services are appropriate, and sufficient budget is available to cover the costs.
- 11 Commercial approval within the GMC is delegated in line with financial delegation and ensures that we have a clear framework that is applied consistently across all directorates:

Staff	Commercial Authority
Chief Executive	No limit within the constraints of the annual budget and business plan approved by Council.
Director of Resources	Up to £500,000 (inc VAT)
Directors and the Chair of the MPTS (Excluding Director of Resources)	Up to £200,000 (inc VAT)
Assistant Directors and Executive Manager - MPTS	Up to £100,000 (inc VAT)
Heads of Section	Up to £60,000 (inc VAT)
Other designated staff	Up to £20,000 (inc VAT)

## Sourcing Route

- 12 GMC has preferred suppliers for sourcing standard goods and services. This list is available on the Finance and Procurement pages of the intranet and should be used where applicable.
- 13 Where no preferred supplier exists, or the preferred supplier is unable to meet the specific requirement then, if available, an FTS compliant framework or dynamic market, should be

the preferred sourcing route. The Procurement Team will advise on complaint frameworks or dynamic market.

- 14 If it is not possible to use either an existing supplier, framework, or dynamic market, then the following rules apply (unless competition is identified as unnecessary under the PA eg situations where direct awards are allowed, or the scope of the PA explicitly excludes the purchase):

Value of Procurement (£ inc VAT)	Procurement route
Up to £30,000	One written Quotation
£30,000 - £50,000	Three written Quotations or Formal Tender
£50,000 - £207,720 £50,000 - £5,193,000	Formal Tender for Goods and Services Formal Tender for Works or concession contracts
Over £207,720 Over £5,193,000	Full FTS Tender for Goods and Services Full FTS Tender for Works or concession contracts

- 15 The Procurement team will support the sourcing process for all contracts over £30,000 (inc VAT).
- 16 Any variation from these sourcing routes must be approved by the Chief Executive.
- 17 All tendering activity will be managed by the GMC Procurement team.

## Market Engagement

- 18 Market engagement is encouraged prior to the start of a tender in order to:
- Develop our requirements and approach to procurement.
  - Design a procedure, conditions of participation or award criteria.
  - Prepare a tender notice and tender documents.
  - Identify suppliers that may be able to supply goods, services or works required.
  - Identify likely contractual terms.
  - Build capacity among suppliers in relation to the contract being awarded.

- 19 All suppliers should be provided with sufficient information about the tender so that all suppliers are bidding on the basis of a level playing field.
- 20 A record of all pre-market engagement activity will need to be maintained for each procurement activity.

## Evaluation

- 21 The process, procedure, evaluation weightings and evaluation criteria will be fully detailed in the tender documentation issued prior to the tender, which will be applied consistently across all suppliers' submissions.
- 22 A minimum weighting of 10% will be applied to social value criteria for all FTS tenders.
- 23 A tender will be successful if it offers us the best value for money based on the pre-defined criteria.
- 24 Evaluations will be moderated across multiple assessors.
- 25 We will not contract with suppliers on the Cabinet Office's Procurement Review Unit's Debarment list. Suppliers included on the Cabinet Office's Procurement Review Unit's excludable list will be considered on a case by case basis.
- 26 Information security considerations will generally be reviewed outside of the evaluation, and if a supplier is unable to satisfy us that the risks are sufficiently mitigated, then the contract will not be awarded to them.
- 27 An Assessment Summary will be issued to all suppliers detailing the key points of both their submission and the successful supplier's submission.
- 28 For all FTS tenders a minimum standstill period of 8 working days will apply.
- 29 A contract will be awarded as soon as possible after the evaluation process has been completed, subject to any necessary standstill periods.

## Contract

- 30 For quotes and tenders, the default terms and conditions applied to a contract will be the standard GMC terms and conditions. Variation from this standard must be an element of the evaluation criteria.

- 31 Regardless of value, any variations from the standard GMC terms and conditions, or the use of non-standard terms and conditions, must be reviewed by GMC Procurement team prior to the award of a contract.
- 32 Specifications will be drafted as output based specifications wherever possible, setting out scope, service levels, key performance indicators, and quality requirements.
- 33 Validation that the company is a valid company will be performed before the award of any contract over £30K (inc VAT). Bids from companies claiming to be sole traders will be exempt from this check.
- 34 A risk assessment will be conducted and maintained for all tendered opportunities and contracts over £50,000 (inc VAT) and lasting in excess of 6 months.
- 35 Extension of an existing contract within the terms of the initial agreement (i.e. take up of extension option), is the responsibility of the Commercial Approver, but will be administered by the Procurement team.
- 36 Variation of a contract (i.e. altering the terms of a contract) is the responsibility of the Commercial Approver in conjunction with the Procurement Team.
- 37 Duration of a contract will reflect the specific requirements for the service, but will be for an initial fixed period, with optional extension periods. The total of the extension periods will not exceed the initial period. The duration of the contract will be stated in the tender.

## Conflicts of Interest

- 38 Anyone involved in specification preparation, evaluation, approval, or contract management for a particular contract must complete a conflicts assessment regardless of whether they are conflicted or otherwise. These conflict assessments must be maintained through the life of the contract and sent to the Procurement team.
- 39 Any conflicts must be declared to the Procurement team who will advise on how to manage / mitigate the conflict.
- 40 Where the CEO is involved in a particular contract and is conflicted, then the approval of the contract would be sought from the Chair of the Council.

## Centralised Information

- 41 Copies of all contractual information, for contract over £30K (inc VAT), should be sent electronically to the [GMC Procurement team](#) for storage in the GMC contracts database.
- 42 For contracts below £30K (inc VAT), the individual responsible for the service must store as a minimum, within the GMC corporate storage solution:
  - Any terms and conditions
  - Official quote
  - Acceptance of quote
  - Record of quote evaluation
  - Record of any agreed material variation

## E-Procurement

- 43 Tenders will be conducted electronically.
- 44 Electronic signatures will be the default means of signing contracts.

## Transparency

- 45 All transparency information notices will be published on the Cabinet Office's Central Digital Platform (CDP). The transparency notices that we will have to maintain are:
  - **Planned procurement notice** - Pre-advertisement of an opportunity to reduce tender timescales
  - **Preliminary market engagement notice** – Information on planned pre-market engagement activities before the issue of the tender
  - **Tender or Transparency notice** – Details of the tender or framework call off opportunity
  - **Procurement termination notice** - Explanation if, following a tender or transparency notice, the procurement ends without a contract award
  - **Contract award notice** – Details of whom a contract is being awarded to

- **Contract details notice** – Details of all contracts awarded over £30K (inc VAT) within 30 days of award; including for contracts over £5M redacted versions of the contract and a minimum of 3 key KPI's
- **Contract termination notice** – Notice of contract terminations or expiry
- **Contract payments notice** – A quarterly publication of all payments valued over £30K (inc VAT)
- **Payment compliance notice** – Notice setting out the % of uncontested invoices paid within 30 days, to be issued twice a year
- **Contract performance notice** – Annual notice setting out for contracts over £5M KPI performance and performance and/or as required to report breach of contract / poor performance
- **Contract change notice** – Notice setting out material changes to contract valued over £5M

## Ethical and Sustainable Procurement

- 46 Supplier information included on the Cabinet Office Central Digital Platform will be considered in the assessment of suppliers.
- 47 We will encourage best practices within the first tier of our supply base eg net-zero plans, modern slavery statements, payment terms with their sub-contractors of less than 30 days.
- 48 We will incorporate consideration of environmental issues in the evaluation for all relevant contracts.
- 49 The GMC will ensure that all suppliers (including sub-contractors) delivering services to the GMC pay their staff at least the Living Wage.
- 50 GMC will attempt to remove obstacles to Small and Medium-sized Enterprises (SMEs) tendering for opportunities, and will encourage their participation in the pre-advertising of opportunities.

## Purchasing Authority

- 51 Only individuals designated as “buyers” should order goods / services on behalf of the GMC.
- 52 To be designated as a “buyer”, an individual shall have attended buyer training.

- 53 Only individuals designated as “approvers” can authorise spend on goods / services on behalf of the GMC.
- 54 For a specific transaction, an individual can only be designated as one of a “buyer” or an “approver”.

## Purchasing

- 55 Any payments to a supplier based in a “High Risk” sanctioned country will be individually assessed to ensure appropriateness of the payment in line with the sanction restrictions.
- 56 The default approach to purchasing goods / services is through the raising of requisitions.
- 57 The GMC procurement card is available for purchases where neither invoices or BACs payments can be utilised. A completed procurement card request form must be approved by your budget holder to use the card. All requests could be reviewed by Assistant Director of Finance and Procurement.
- 58 Any direct debits must be approved by the Assistant Director of Finance and Procurement and the Head of Procurement.
- 59 Individual GMC credit cards should only be used for travel, hotel and subsistence, unless approved by the Procurement team.

## Contract Management

- 60 GMC will review each contract with suppliers at a minimum of every quarter.
- 61 The designated Contract Manager is responsible for conducting the contract reviews and informing the GMC Procurement team of the outcome.
- 62 For contracts over £5M, the Procurement team will actively support the Contract Manager in conducting the Contract Management activity.
- 63 Templates and guidance will be provided by the GMC Procurement team.
- 64 Instances of significant poor performance and material breaches of the contract will be highlighted to the Cabinet Office’s Procurement Review Service.

## Conduct and Ethics

- 65 Individual's must treat all interested parties in a fair and consistent manner.
- 66 All personnel directly responsible for entering into contractual commitments with third party suppliers must follow the GMC's policy on gifts and hospitality.
- 67 We will direct interested parties to the Cabinet Office's Procurement Review Unit as the primary route to raise concerns about our procurement activities.

## Fraudulent Use

- 68 Any fraudulent use of any of the purchasing systems used by the GMC will result in disciplinary action and possible criminal prosecution.