

Procurement Strategy and Policy Framework

May 2024 to March 2025*

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1.0 Introduction

VisitScotland is a non-departmental public body (NDPB) and is the lead delivery agency for the visitor economy. Our updated Strategic Framework sets out our purpose, vision, and mission:

Our Purpose

To drive the visitor economy, growing its value to Scotland.

Our Vision

Contribute to a vibrant and dynamic visitor economy, creating better places for people to live, work and visit.

Our Mission

Through strategic leadership and industry partnerships, lead, support and contribute to a globally competitive visitor economy, highlighting the benefits of tourism and events in delivering the very best for our visitors, our businesses, our people, our communities, and our environment.

To deliver on our purpose, vision, and mission, we have created five pillars which inform and shape our activities each year. These pillars are:

- stimulating demand
- supporting tourism and events businesses
- working collaboratively with our partners including community destination and sector organisations
- enhancing our organisation insight, capability, planning and compliance
- supporting and enabling our people

The work we are carrying out will ensure our activities will help to support the industry's transition to net zero as well as deliver the objectives of the National Strategy for Economic Transformation (NSET) and priorities identified in the National Tourism Strategy, Scotland Outlook 2030.

Current position

Our current Procurement Strategy was devised in recognition of the requirement to adhere to the Procurement Reform (Scotland) Act 2014, Public Contracts (Scotland) Regulations 2015, The Concession Contracts (Scotland) Regulations 2016 and the Procurement (Scotland) Regulations 2016. This strategy has been updated to reflect major changes internally and externally. This takes into account:

- new and updated internal strategic policies and structures. For example, this includes the new Strategic Framework, new National Events Strategy – “Scotland the Perfect Stage 2024-2035”, updated Corporate Plan, our Strategic Reviews. Internal changes also include the reshaping of the procurement team following COVID-19 and UCI Cycling World Championship activities
- changes within the procurement landscape. This includes the introduction of the [Public Procurement Strategy for Scotland 2023-2028](#), the refresh of the [Scottish Procurement Policy Manual](#), various Scottish Procurement Policy Notes (SPPNs) and guidance notes

Since the last update of our strategy, the procurement team have supported significant changes and events. This included:

- focusing on COVID-19 related procurements (e.g. personal protection equipment (PPE), enhanced office cleaning) during the pandemic

- assisting organisational activity to deliver and administer business support grants on behalf of the Scottish Government
- creating a dedicated procurement team to procure all goods and services required for the UCI Cycling World Championships. The Scottish Government was awarded to host and deliver the Championships, and they asked us to undertake this work.
- The Scottish Government were awarded the rights to host and deliver the UCI Cycling World Championships in August 2023 and asked VisitScotland to undertake this work. We created a wholly owned subsidiary, the 2023 Cycling World Championships LTD (CWC Ltd) as the vehicle for delivery of the major event. A dedicated procurement team was created to procure all goods and services required for the event.

Now these events have past, we are reshaping the team to focus on our future strategy and activities.

This document sets out our Procurement Strategy and Policy Framework for 2024-2025 and outlines how all procurement activity will be undertaken in a compliant, sustainable, and responsible manner. It enables us to continue the journey from “Good to Great to World Class” and support the delivery of our Strategic Framework.

NB: The broad principles and policies described in this document are expected to remain relevant until 31 March 2025. At that point VisitScotland will have completed its new 3-year corporate plan and this plan will be revised to ensure it remains appropriate to deliver the organisation’s procurement requirements. Thereafter, the strategy will be reviewed once a year to ensure that it remains current. Any update to the strategy will be published on our website.

2.0 Procurement vision and values

2.1 Vision

The vision for procurement is to provide a high quality, fit-for-purpose procurement service to support our internal stakeholders to deliver the aims and objectives of our Strategic Framework.

2.2 Mission

To provide leadership in all procurement activity through a customer-focused approach, early involvement, and teamwork with internal stakeholders. Our activities will support the organisation as it continues to make procurement decisions and deliver Value for Money (VfM) in an open, compliant, transparent, and sustainable manner.

3.0 Strategic aims, objectives and key priorities

In broad terms, these aims and objectives can be summarised as per the following:

3.1 Compliance with legislation and best practice guidance

As an NDPB, we have a legal obligation to ensure compliance with the Scottish Public Procurement Regulations and best practice.

Key Priorities

- We will continue to conduct activities with regards to the above requirements and apply the principles set out in the refreshed [Scottish Procurement Policy Manual](#), but we will have different documented procedures and

processes in place. For example, in relation to approval levels, Single Source Justification (SSJ) approvals, records management systems, grant awards and more.

- We will accelerate our activities in scope three / net zero to further embed these into our procurements.
- The Head of Procurement will continue to review Scottish Procurement Policy Notes (SPPNs) and Construction Policy Notes (CPNs) and update internal procedures and templates if required.

3.2 Aligning our activities to help drive value for money and deliver the aims and objectives of the VisitScotland Strategic Framework.

Rewriting this strategy comes at a time of change, set against a backdrop of economic uncertainty, public sector reform and changing consumer behaviour. This includes increasing use of digital technology, desire for quality and interest in sustainability. At time of writing, we are undertaking an internal Strategic Review which is expected to re-shape our business strategy and priorities going forward.

Key Priorities

As the business reshapes and prioritises activities, we will engage with the leadership teams to ensure the procurement activities are focussed accordingly and remain aligned to the business needs and our new Strategic Framework.

Adopting a new approach

We will implement a customer focused “business partner” approach to working. This will ensure a pro-active engagement across all areas of the organisation and enables us to deliver an enhanced commodity-based approach that provides early identification of procurements and delivery of strategic planning activities. It will also focus our work into “value add” activities to help deliver Value for Money, and be the recognised experts on procurement, contractual and supplier management matters.

3.3 Focusing on value-add activities that will drive value for money

Adopting the “business partner” model will bring early and regular engagement with our customers and this will allow the team to develop plans to drive value for money.

Key Priorities

We will focus on:

- challenging the need / specification
- influencing our approach to the market
- developing cost saving opportunities
- streamlining and automating our administrative tasks

3.4 Working collaboratively with other public bodies to deliver best value and to be efficient and effective with our resources

As an NDPB we are expected to work collaboratively with other public bodies.

Key Priorities

We will:

- continue to work collaboratively and align with the Public Procurement Strategy for Scotland to secure best value for money for public sector finances
- adopt, where applicable, Scottish Government and wider public sector frameworks and contracts to deliver efficiencies and reduce individual resource requirements

- work with the Heads of Procurement Group and the Central Government Cluster Group to share best practice and identify opportunities for improvement
- identify collaborative procurement opportunities
- lead on collaborative procurements where we are best placed to do so

4.0 Specific policies and activities

Our Procurement Strategy directs a set of activities that drive continuous improvement in our procurement processes, whilst considering the strategic objectives of the organisation. This includes the following key themes:

4.1 Efficiency and collaboration

4.1.1 Regulated procurement

Purpose:

To ensure best practice is applied for all regulated procurement activity.

How will we manage this?

The Scottish Model of Procurement is widely acknowledged and is used in VisitScotland. The Scottish Government Procurement Journey is embedded within our procurement process. The principles of cost, sustainability and quality are key to all our procurement decisions.

Scottish Procurement



Scottish Model of Procurement



We will publish, and update quarterly, a Contracts Register on VisitScotland.org in accordance with the Procurement Reform (Scotland) Act 2014.

4.1.2 Ensuring value for money, savings and efficiency

Purpose:

To deliver value for money when procuring goods, services and works. This is guided by the consideration of whole life costs, “make versus buy” and fitness for purpose.

How will we manage this?

We are committed to open competition opportunities in accordance with the current Procurement Directives and best practice.

Our Procurement team will obtain value for money through best practice contracting and supplier management and through undertaking key strategic procurement activities including:

- working closely with subject matter experts at the strategy and specification stage.
- understanding the supply markets we operate in
- challenging the need and demand management
- early market engagement, where appropriate
- undertaking robust contract and supplier management

The [Public Contracts Scotland](#) (PCS) portal will continue to be used to publicly advertise all relevant tender opportunities with an aggregated spend greater than £50,000 (excluding VAT). Such exercises are classed as ‘regulated’ procurements. We will also use PCS to run Quick Quotes (procurements between £5,000 and £50,000 (ex VAT)) where appropriate.

Contracts will be awarded based on the most economically advantageous tender (MEAT) which balances price with quality, with adherence to the specification using our evidence-based procurement evaluation methodology.

[We will track and report annualised cash and non-cash efficiencies in accordance with the best practice guidance from The Scottish Government.](#) This will be published in the Annual Procurement Report. Our target procurement efficiencies will be in the range of £300,000 - £600,000 per annum. Work will be undertaken to consider additional value add and efficiency metrics to report on the benefits from procurement activity.

4.1.3 Collaboration

Purpose:

To work collaboratively where possible, to drive value and minimise individual resource commitments.

How will we manage this?

As well as working collaboratively with other public bodies, as outlined in section 3.4, we seek to identify potential collaborative procurement opportunities and develop working relationships, both internally and externally, to work collaboratively. This will allow us to aggregate spend and leverage savings opportunities through economies of scale, refine requirements, drive innovation, and to develop commodity strategies aligned to the organisational operational and strategic requirements. This will be carried out with consideration to efficiency savings and sustainability benefits (economic, social, and environmental).

External Contracts – We will continue to actively contribute and provide resources, where possible, to collaborative User Intelligence Groups (UIGs) led by external public bodies, such as Scottish Procurement and Property Directorate (SPPD). This may be resources from the procurement team or subject matter experts from the appropriate business area. Our engagement will ensure that our operational requirements are considered in specification development and that our value for money expectations drive the category and commodity strategies.

We will continue to lead on collaborative procurement activity where we are best placed to do so, working with other organisations to achieve common aims, outputs, and efficiencies. Current examples of collaborative procurement involve working with:

- Scottish Government
- Scottish Enterprise
- Historic Environment Scotland
- Scottish Parliament
- National Trust for Scotland
- Royal Botanic Gardens Edinburgh

Internal Contracts – We will use data analysis and market intelligence to identify, develop and lead on collaborative opportunities with both internal stakeholders and externally with other public bodies with similar commodity requirements. Invitations will be extended to other public bodies, where appropriate, to work collaboratively in procuring goods and services.

4.2 Due process and best practice

4.2.1 Most Economically Advantageous Tender (MEAT)

Purpose:

We will evaluate all publicly advertised contracts in terms of Most Economically Advantageous Tender (MEAT).

How will we manage this?

In all relevant procurements, evaluation shall be conducted against the criteria that will best deliver the operational objectives of our Strategic Framework and Corporate Plan. As required by the Procurement Reform (Scotland) Act 2014, contract award decisions will be determined based on Most Economically Advantageous Tender (MEAT). In doing so, evaluation criteria will be weighted in order of importance to the identified success factors of contract.

4.2.2 Commodity strategies

Purpose:

To have documented processes to allow us to consider and embed strategic procurement considerations in our regulated procurements.

How will we manage this?

VisitScotland will complete a commodity strategy for all regulated procurements (i.e. those greater than £50,000 (ex VAT) and subject to the Regulations).

Our Application to Tender (ATT) template and commodity strategy will be populated and approved in line with organisational requirements. This includes considering:

- a needs assessment (including a make or buy decision)
- collaborative opportunities
- evaluation criteria based on MEAT
- tender route to market
- sustainable procurement duty considerations
- risk management in the supply chain
- supplier Cyber Security or Cloud Based (solutions) Assessment
- data protection and data privacy legislation

- “Fair Work First” guidance
- implementation and exit strategies
- contract & supplier management requirements (using a contract management assessment tool (CMAT))
- appropriate approval levels (for example our Leadership Group, Audit and Risk Committee and Board)

4.2.3 Fair and equal treatment

Purpose:

As an organisation, we are subject to specific equality duties through the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012. The duties came into force in 2012 and it is necessary that we ensure that our tender processes comply with the legislation.

How will we manage this?

We consider equality throughout our tender process and suppliers are required to demonstrate their legal obligations through the provision of any equality policies or systems and process that they have in place.

Additionally, our standard and long form conditions of contract refer to compliance with legislation as well as employers’ liabilities under the Equalities Act.

Employment Relations Act 1999 (Blacklists) Regulations 2010 is also captured within our standard conditions of contract.

4.2.4 Fair Work First, including the Living Wage and Real Living Wage

Purpose:

As a public body, we are expected to implement and promote Fair Work First in all relevant procurement processes. We expect suppliers delivering public contracts to adopt and demonstrate appropriate fair work practices, for all workers engaged in delivering the public contract.

How do we manage this?

Before undertaking a procurement exercise, we consider whether it is relevant and proportionate to include questions on Fair Work First, including the real Living Wage. Where they are included, the Fair Work First questions are evaluated along with other relevant criteria, to ensure there is an appropriate balance between quality and cost of the contract.

4.2.5 Payment and management of contractors and sub-contractors

Purpose:

The organisation aims to meet the Scottish Government’s objective of ensuring that contractor’s invoices and subsequent sub-contractor’s invoices are paid no later than 10 working days upon receipt of a valid invoice.

How will we manage this?

We will ensure that all valid invoices are paid within 10 working days of receipt. Conditions of contract are prepared to ensure that where a lead contractor is using the services of a sub-contractor, appropriate terms are in place to ensure that sub-contractor invoices are paid timeously.

4.2.6 Tools and templates

Purpose:

To use appropriate tools and templates to manage and support the organisation in our procurements and internal processes.

How will we manage this?

We will use Oracle Cloud Enterprise Resource Planning (ERP) as our integrated HR, Finance and Procurement system. Within the Finance and Procurement functions there is a clear separation of duties, delegated authority, and approval levels in accordance with the Chart of Accounts.

All Purchase Orders (PO) are approved and issued by the Procurement team. We have a “no PO, no payment” policy. It is standard policy whereby any invoices submitted to us without a valid PO number will be returned to the supplier.

We have deployed purchasing cards as an additional purchase-to-pay tool for small value and one-off spend. Further work is planned to consider how best to optimise use of the cards.

We will continue to use PCS, Procurement Journey and associated tools and guidance as appropriate.

4.2.7 Data protection

Purpose:

We will include suitable Data Protection clauses in our procurements where appropriate and will ensure we manage data flow within the supply chain to comply with Data Protection legislation.

How will we manage this?

Our procurement procedures and standard terms and conditions (long and short form) reflect data protection requirements. For each procurement, the ATT will identify if data transfer forms part of the service. If the answer is yes, then a data protection processing activity assessment will be completed, to ensure that requirements are captured within the tender specification and the data protection schedule is completed within the contract to set out the details of the processing. A data protection impact assessment (DPIA) will also be completed where appropriate.

We have reviewed our contracts to ensure they contain appropriate data protection clauses. Data protection legislation (the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR)) impose a legal obligation on controllers and processors to formalise their working relationship. Where personal data is processed under a procurement contract, the subject matter and duration of the processing; the nature and purpose of the processing; the type of personal data and categories of data subject; and the controller’s obligations and rights are included within the schedule of the contract.

We have undertaken an exercise to identify all active suppliers on our ERP system where data protection clauses are included. We use an IT solution to record and manage here all suppliers who manage data on behalf of the organisation. The new supplier form also requires identification of data management by the supplier.

Data protection training is mandatory for all internal staff.

4.2.8 Cyber security

We will include suitable cyber security requirements, assessments, and clauses into our procurements where appropriate.

We will identify cyber security risk in the supply chain and put measures in place to mitigate the risk.

How will we manage this?

We carry out a solutions assessment which includes security and data protection. The assessment is aligned with data protection and National Cyber Security Centre best practice. It is also aligned with the Scottish Government security framework.

We have identified key assets based on risk to the organisation, these are reassessed on a regular basis, at least annually.

4.3 Sustainable procurement duty (including economic, social, and environmental considerations)

Purpose:

To comply with the sustainable duty of the Procurement Reform (Scotland) Act 2014, which requires that before the organisation buys anything it must consider how it can:

- improve the social, environmental, and economic wellbeing of the area in which it operates.
- facilitate the involvement of small and medium enterprises, third sector and supported businesses in the process
- promote innovation

The sustainable procurement duty applies to all regulated procurement exercises.

We also have a clear focus on driving responsible tourism. This is all about a collaborative approach to rebuilding and growing the value of tourism. It does so in a way that makes better places for people to live and visit every corner of Scotland. It maximises everyone's positive benefits of tourism. This includes host communities and the environment.

Procurement is aligned with the responsible tourism message. It requires the tourism industry, government, public sector, communities, and visitors to collectively respond and manage their economic, social, and environmental impacts. This maximises the positive and negative effects and making all forms of tourism sustainable. Part of this work is influencing behaviour change in supply and value chains.

Working towards these principles will remain at the forefront of our procurement decisions. This will be done by striving to make our procurement process and suppliers sustainable through continual enhancement and development.

Responsible procurement applies when dealing with businesses, particularly those within the tourism supply chain. This aligns with our approach as a member of the travel tourism community, promoting responsible practices across the Industry Destination Development (IDD) team, of whom we also procure and influence, whether through the responsible tourism team or other contracts.

As the national tourism organisation for Scotland, we're expected to lead by example when dealing with our supply chains to promote best practice. Influencing this behaviour change supports our ambitions towards meeting net zero targets by 2045.

How will we manage this?

Identified procurement requirements will be managed in accordance with the Scottish Government Procurement Journey.

Our Application to Tender (ATT) will ensure that relevant duties of the procurement regulations, and the Procurement Reform Act, are considered and evidenced as a key part of the approval process.

Whole life costs are considered at the outset of a procurement exercise and Value for Money for goods or services will be based on the total cost of ownership. Specification and price considerations of the procurement requirement will be balanced alongside the sustainable duty impacts. We will work with internal customers to ensure that Whole Life Costs are considered at the outset and incorporated into the ATT.

We will seek to procure fairly and ethically traded goods and services wherever possible.

Community benefits clauses shall be incorporated into all regulated procurements on a voluntary basis. Where a bidder offers community benefits within their tendered submission, these will be accepted as a contractual requirement.

The potential to deliver community benefits will be considered in all regulated procurements. When the organisation has a procurement requirement greater than £4 million pounds in total value (excluding VAT), mandatory community benefits clauses will be applied in accordance with the Procurement Reform (Scotland) Act.

The sustainable procurement considerations outlined above will be included in the application to tender and commodity strategy and carried through to tender documentation.

4.4 Monitoring and measuring performance and continuous improvement

Purpose:

To have processes and procedures in place to effectively manage the implementation and review of this strategy and seek continuous improvement.

How will we manage this?

The Head of Group Procurement will ensure that that the operational activities of the team are focused on delivery of this strategy and our strategic objectives. This will also include a regular, formal review.

4.4.1 Contract and supplier management

Purpose:

To have processes and procedures in place to effectively manage the performance of contracted suppliers and seek continuous improvement of service and delivery outcomes.

How will we manage this?

We will refocus our contract and supplier management activities, by working closely with internal customers and contracted suppliers to optimise efficiency and reduce risks in the contract.

We will oversee a schedule of contract and supplier management activities for applicable regulated contracts. This will be agreed with internal colleagues. At the point of contract award, implementation meetings will be established, and contract specific key performance indicators (KPIs) and service level agreements (SLA) agreed with contracted suppliers. Frequency, measures and roles and responsibilities may vary subject to the contract requirements. The value and risk(s) will be agreed with relevant stakeholders.

Regular supplier review meetings will be scheduled to provide a formal route of monitoring, measuring, and reporting on contract and supplier performance. It will also provide a platform for suppliers to appraise the contribution of the purchaser to the contract.

4.4.2 Best practice indicators (BPIs)

Purpose:

We will continue to report best practice indicators (BPIs) to the Scottish Procurement Information Hub on an annual basis and submit our annual return within agreed deadlines.

How will we manage this?

BPI reporting will continue against the planned programme required by Scottish Procurement and Property Directorate (SPPD).

4.4.3 Lessons learned

Purpose:

To embed lessons learned into major procurements.

How will we manage this?

As part of our drive to embed continuous improvement, a lessons learned exercise will be conducted for major procurements. Findings and actions will be documented in a lessons learned register and used as part of training, development, and future planning activities.

4.5 Capability to deliver, develop and grow

4.5.1 The Procurement team

Purpose:

To have a team with the right knowledge, skills, and experience to support and continually improve the service we provide.

How will we manage this?

The skills and knowledge of the Procurement team will continue to be developed through further education and internal training programmes. This will also enhance the contribution and services they deliver.

All staff within Procurement are encouraged to work towards a Chartered institute of Procurement and Supply (CIPS) recognised qualification. In addition, they will all be encouraged to participate in relevant vocational training appropriate to their role.

We adopt the Scottish Government Procurement Development framework. The framework is applied to profile team members, identify any skills gaps and enabling them to access courses which supports their learning and development.

4.5.2 Internal Colleagues

Purpose:

To ensure that all staff who are involved in procurement activities are aware of their roles and responsibilities.

How will we manage this?

On a regular basis, the Head of Procurement will deliver a high-level awareness session as part of the corporate induction session. This will signpost attendees to the help, advice, and guidance available from the procurement team. The Head of Procurement will also deliver important procurement messaging through the Heads of Department group and will present updates at Head of Department meetings.

Detailed Procurement awareness and best practice will continue to be delivered on a monthly or bi-monthly basis as part of the induction process for new employees. Further tailored training is provided for staff depending on their job role, relative to their involvement in the process.

All new-starts who have access the purchase-to-pay system must undertake procurement training before gaining access rights.

When colleagues are involved in a competitive tender, specific training will be provided in advance of the tender process.

4.6 Procurement and commercial improvement programme (PCIP)

Purpose:

To undertake a PCIP review when scheduled and to use this as part of continuous improvement based on the feedback provided.

How will we manage this?

We had our PCIP assessment in May 2024 and provided the necessary evidence to detail how we adhere to policy and best practice guidelines, whilst delivering value for money for the organisation.

Once we receive the PCIP feedback, we will consider this and develop an improvement plan for any areas identified. This will complement our drive for continuous improvement.

4.7 Annual procurement report

Purpose:

To produce and publish an Annual Procurement Report in accordance with the Procurement Reform (Scotland) Act 2014. This will include the minimum requirements, detail achievements and performance against the objectives of our Procurement Strategy.

How will we manage this?

In line with our annual accounting process, we will seek to finalise and publish our annual procurement report once our annual financial accounts have been approved. The procurement report will be aligned with the key areas of our Procurement Strategy.

Section 18 (2) of the Procurement Reform (Scotland) Act 2014 lists the minimum requirements that the annual procurement report must contain:

- a summary of the regulated procurements that have been completed during the year covered by the report
- a review of whether those procurements complied with the authority's procurement strategy
- to the extent that any regulated procurements did not comply, a statement of how the authority intends to ensure that future regulated procurements do comply
- a summary of any community benefit requirements imposed as part of a regulated procurement that were fulfilled during the year covered by the report

- a summary of any steps taken to facilitate the involvement of supported businesses in regulated procurements during the year covered by the report
- a summary of the regulated procurements the authority expects to commence in the next two financial years

Our annual procurement report will include the above, will be submitted to the Scottish Government and published on our corporate website, VisitScotland.org.

5.0 Good governance

VisitScotland operates within a strict governance framework which is rigorously applied and subject to internal and external audit as well as oversight from our Leadership Group, Audit & Risk Committee (ARC) and our Board.

5.1 Governance

Purpose:

To ensure that all procurement decisions are made in accordance with our governance framework and our scheme of Delegated Purchase Authority (DPA).

How will we manage this?

The organisation operates to a framework document which has been agreed by Scottish Government, in accordance with the Scottish Public Finance Manual.

Internally, the organisation functions within a scheme of delegated authority, ensuring that appropriate separation of duties exist and that all procurement decisions are made within a regulated environment.

All procurement processes are aligned to the governance framework, and we will continue to be awarded in compliance with procurement rules and guidance.

5.2 Audit

Purpose:

To ensure that clear audit processes are in place to document our activity and decision-making process for all procurement activity.

How will we manage this?

Audit services are provided internally by our appointed internal auditors and externally via Audit Scotland.

The Procurement team apply procedures that ensure that we maintain transparency in the procurement process. All procurement information is held centrally on our SharePoint site.

5.3 Risk management

Purpose:

To ensure that risk management is considered early in our procurement activity.

How will we manage this?

We maintain a Corporate Risk Register that include corporate level procurement risks. This includes, but is not limited to:

- provision of procurement support is sufficient for the needs of the organisation and group (i.e. subsidiaries)
- regular monitoring of change to the procurement landscape (i.e. via SPPNs)
- risk of business disruption due to contractor or partner issues or significant price increases
- managing Health and Safety in the supply chain*
- suitable Data Protection clauses included where appropriate
- risks associated with fraud
- best value practices

*For facilities contracts, there is also a requirement to manage Health and Safety in compliance with the Health and Safety at Work etc. Act 1974.

At an operational level, the procurement team will conduct a risk assessment at the outset of each regulated procurement exercise with risk management allocated at contract level to the stakeholder best placed to manage the risk. Risk registers will be developed and maintained within the process of Contract and Supplier Management on a contract-by-contract basis.

5.4 Fraud avoidance

Purpose:

To ensure that our procedures minimise the potential for fraud in our procurement activity.

How will we manage this?

The organisation maintains a fraud policy and fraud plan which provides guidance on the prevention, detection, reporting and handling of fraud within VisitScotland. Procurement is a key area where fraud prevention measures can have a major positive impact.

To support our approach to fraud avoidance, we will ensure that:

- all Procurement staff complete anti-fraud training, including refresher training as required
- fraud awareness is included in our procurement awareness training, as recommended by the 2019 PCIP.
- separation of duties is a guiding principle throughout our Purchase-to-Pay process and system
- declared conflicts of interest are required. In addition, conflict of interest statements require to be signed by all stakeholders involved in a regulated procurement
- we maintain a comprehensive Whistleblowing Policy within the Employee Handbook
- our standard Terms and Conditions of Contract include anti-corruption and anti-fraud clauses aligned with the Bribery Act 2010

6.0 Strategy ownership and contact details

The Head of Group Procurement is the owner of this strategy and is responsible for implementation and review.

Billy Hislop MCIPS

Head of Group Procurement

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7.0 Legislation, Policies and Tools

We refer to, and consider, multiple pieces of legislation, policies, and tools in our procurement activities. This includes (but is not limited to):

External

[Chartered Institute for Procurement & Supply \(CIPS\)](#)

[Contract Register](#)
[Employment Relations Act 1999 \(Blacklists\) Regulations 2010](#)
[Equality Act 2010 \(Specific Duties\) \(Scotland\) Regulations 2012](#)
[Procurement \(Scotland\) Regulations 2016](#)
[Procurement Journey](#)
[Procurement Reform \(Scotland\) Act 2014](#)
[Procurement Reform \(Scotland\) Act 2014: statutory guidance](#)
[Public Contracts \(Scotland\) Regulations 2015](#)
[Public Contracts Scotland](#)
[Public Contracts Scotland – Tender](#)
[Public Procurement Reform Programme / Scottish Procurement Policy Handbook](#)
[Scottish Model for Procurement](#)
[The Procurement and Commercial Improvement Programme](#)
[The Procurement Competency Framework](#)
[Thresholds | Procurement Journey](#)
[Zero Waste Scotland](#)

Internal (available on www.visitscotland.org/about-us/our-policies)

Anti Bribery & Corruption Policy
Anti Criminal Finance Policy
Authorised Signatory Policy
Best Value Policy
Business Continuity Policy
Data Protection Policy
Equality Policy
Freedom of Information Procedure
Fraud Policy
Gifts and Hospitality Policy
Health & Safety Policy
Risk Management Policy
Subsidy Control Policy
Sustainability Policy
Terms and Conditions (various and bespoke)
Whistleblowing Policy