



# PROCUREMENT POLICY

---



# Table of Contents

S.No.	Description	Page No.
1	Introduction	1
2	Purpose	1
3	Scope	2
4	Procurement Principles	2
5	Procurement Planning	3
6	Procurement Process	5
7	Supplier Selection	6
8	Contract Management	7
9	Payment Procedures	8
10	Ethics and Compliance	10
11	Documentation and Record-Keeping	11
12	Monitoring and Audit	12
13	Training and Awareness	14
14	Legal and Regulatory Compliance	16
15	Policy Review and Updates	17

# PROCUREMENT POLICY

## INTRODUCTION

The purpose of this procurement policy is to ensure the acquisition of relevant goods and services at market-appropriate and competitive rates while maintaining quality and timely delivery. This policy is designed to uphold transparency and accountability within the purchasing system. It is important to note that while adhering to procedures is crucial, the relevance of the procurement's purpose must not be compromised. For instance, in situations requiring the purchase of relief materials, the goods must meet the local people's needs and be delivered promptly to mitigate human suffering.

## PURPOSE

The purpose of a procurement policy is to establish a structured framework for acquiring goods and services in a manner that ensures efficiency, fairness, transparency, and compliance. Key objectives include:

1. **Transparency:** Ensure that procurement processes are conducted openly and that decisions are made in a clear and accessible manner, providing all potential suppliers with equal opportunities.
2. **Fairness:** Promote impartiality in procurement decisions, ensuring that all suppliers are treated equally and that no favouritism or bias influences the outcome.
3. **Efficiency:** Optimise the procurement process to achieve timely and cost-effective acquisition of goods and services, maximising value for money and minimising delays.
4. **Compliance:** Adhere to relevant legal, regulatory, and organisational requirements to ensure that procurement practices are lawful and aligned with industry standards.
5. **Accountability:** Maintain accurate records and documentation of procurement activities, ensuring that all decisions are justified and that there is a clear audit trail.
6. **Ethical Conduct:** Promote ethical behaviour and integrity in procurement, preventing conflicts of interest, corruption, and fraudulent activities.
7. **Value for Money:** Strive to obtain the best possible combination of quality, cost, and service, ensuring that organisational resources are used effectively.
8. **Risk Management:** Identify and manage risks associated with procurement activities, including supply chain risks, financial risks, and legal risks.
9. **Consistency:** Apply uniform procedures and standards across all procurement activities to ensure consistency and fairness in decision-making.
10. **Improvement:** Continuously review and improve procurement practices based on feedback, performance data, and evolving best practices.

## SCOPE

The scope of a procurement policy defines the boundaries and applicability of the policy, outlining which aspects of procurement it covers and to whom it applies. It establishes the framework for procurement activities and ensures that all relevant areas are addressed. The scope typically includes:

1. **Applicability:**
  - **Organisation-Wide:** Applies to all departments and units within the organisation involved in procurement activities.
  - **Staff:** Includes all employees, managers, and other personnel who are involved in or responsible for procurement processes.
2. **Types of Procurement:**
  - **Goods:** Covers the procurement of physical items such as equipment, supplies, and materials.
  - **Services:** Includes the acquisition of services such as consulting, maintenance, and professional services.
  - **Works:** Encompasses procurement related to construction, renovation, and other physical works.

### 3. Procurement Activities:

- **Planning:** Involves identifying needs, budgeting, and developing procurement strategies.
- **Sourcing:** Includes supplier research, market analysis, and issuing requests for proposals (RFPs) or quotations (RFQs).
- **Selection:** Encompasses the evaluation of bids or proposals, and the selection of suppliers based on established criteria.
- **Contracting:** Covers the award of contracts, negotiation of terms, and formalising agreements with suppliers.
- **Management:** Involves overseeing supplier performance, managing contracts, and addressing any issues that arise.

### 4. Procurement Procedures:

- **Competitive Bidding:** Defines the process for soliciting bids from multiple suppliers to ensure fair competition.
- **Direct Procurement:** Outlines circumstances under which direct procurement (without competitive bidding) may be permissible.
- **Emergency Procurement:** Specifies procedures for procurement in urgent or emergency situations where standard processes may not be feasible.

### 5. Legal and Regulatory Compliance:

- **Local Regulations:** Ensures adherence to relevant national and local laws and regulations governing procurement.
- **Donor and Funding Requirements:** Covers compliance with specific procurement requirements set by donors or funding agencies.

### 6. Ethical Standards:

- **Conflict of Interest:** Addresses how conflicts of interest should be managed and disclosed.
- **Gifts and Hospitality:** Prohibits the acceptance of gifts or hospitality from suppliers that could influence procurement decisions.

### 7. Documentation and Record Keeping:

- **Records Management:** Details requirements for maintaining accurate and comprehensive records of all procurement activities, including contracts, invoices, and correspondence.

### 8. Monitoring and Evaluation:

- **Auditing:** Specifies the procedures for internal audits and reviews of procurement activities to ensure compliance and identify areas for improvement.
- **Performance Review:** Includes processes for assessing the effectiveness of procurement activities and supplier performance.

### 9. Training and Awareness:

- **Training Programs:** Ensures that staff involved in procurement are trained on the policy and its procedures.
- **Awareness Campaigns:** Promotes understanding of the procurement policy throughout the organisation.

### 10. Policy Review and Updates:

- **Review Schedule:** Defines the frequency and process for reviewing and updating the procurement policy to ensure its ongoing relevance and effectiveness.

## PROCUREMENT PRINCIPLES

Procurement principles are foundational guidelines that govern the procurement process, ensuring that it is conducted in a manner that upholds integrity, fairness, and efficiency. Key principles include:

### 1. Transparency:

- **Open Processes:** Ensure that procurement activities are conducted in an open and transparent manner, providing clear information about the procurement process and decisions.
- **Disclosure:** Make relevant information about procurement decisions and processes accessible to stakeholders to build trust and accountability.

### 2. Fairness:

- **Equal Opportunity:** Provide equal opportunities to all potential suppliers, ensuring that no supplier is unfairly disadvantaged or given preferential treatment.

- **Non-Discrimination:** Avoid any form of discrimination based on factors such as nationality, ethnicity, gender, or other irrelevant criteria.
- 3. Competitive Bidding:**
  - **Market Competition:** Encourage competition among suppliers to achieve the best value for money, ensuring that procurement decisions are based on competitive offers.
  - **Best Value:** Select suppliers based on a balanced evaluation of cost, quality, and other relevant criteria to ensure optimal value for the organisation.
- 4. Accountability:**
  - **Responsibility:** Assign clear responsibilities for procurement decisions and actions, ensuring that individuals are accountable for their roles in the procurement process.
  - **Record Keeping:** Maintain comprehensive records of all procurement activities, including decisions, contracts, and correspondence, to provide a clear audit trail.
- 5. Value for Money:**
  - **Cost-Effectiveness:** Strive to obtain the best possible combination of quality, cost, and service, ensuring that resources are used efficiently and effectively.
  - **Lifecycle Costs:** Consider the total cost of ownership, including initial costs, maintenance, and operational expenses, to make informed procurement decisions.
- 6. Ethical Conduct:**
  - **Integrity:** Conduct procurement activities with honesty and integrity, avoiding any actions that could be perceived as corrupt or unethical.
  - **Conflict of Interest:** Identify and manage conflicts of interest to prevent undue influence on procurement decisions.
- 7. Compliance:**
  - **Legal Requirements:** Adhere to all relevant laws, regulations, and standards governing procurement activities.
  - **Organisational Policies:** Follow internal procurement policies and procedures to ensure consistency and compliance with organisational standards.
- 8. Efficiency:**
  - **Timeliness:** Conduct procurement activities in a timely manner to meet organisational needs and avoid unnecessary delays.
  - **Process Optimisation:** Streamline procurement processes to reduce administrative burden and improve overall efficiency.
- 9. Risk Management:**
  - **Risk Assessment:** Identify and assess potential risks associated with procurement activities, including financial, operational, and reputational risks.
  - **Mitigation Strategies:** Develop and implement strategies to manage and mitigate identified risks, ensuring that procurement activities are resilient to potential challenges.
- 10. Sustainability:**
  - **Environmental Considerations:** Consider the environmental impact of procurement decisions and seek sustainable and eco-friendly options where possible.
  - **Social Responsibility:** Promote social responsibility by considering the social impact

## PROCUREMENT PLANNING

**Purpose:** The purpose of procurement planning of the organisation is to ensure that all procurement activities are conducted efficiently, effectively, and in alignment with the organisation's goals and objectives. This planning process helps in acquiring the necessary goods and services in a timely manner, within budget, and in compliance with organisational and regulatory requirements.

### 1. Procurement Needs Assessment:

- **Identify Requirements:** Assess and define the specific needs for goods, services, or works required to support the organisation's projects and operations.
- **Engage Stakeholders:** Consult with project managers, department heads, and other relevant stakeholders to gather input and ensure that all needs are accurately captured.

### 2. Budgeting:

- **Financial Planning:** Determine the budget available for procurement activities, considering both short-term and long-term financial resources.

- **Cost Estimates:** Prepare cost estimates for each procurement item or service, ensuring alignment with budgetary constraints and project requirements.
3. **Procurement Strategy:**
- **Procurement Approach:** Develop a strategy outlining the approach to be used for sourcing and acquiring the required items. This may include competitive bidding, direct procurement, or other methods.
  - **Supplier Market Research:** Conduct research to identify potential suppliers and understand market conditions, pricing, and availability.
4. **Procurement Schedule:**
- **Timeline:** Create a detailed timeline for procurement activities, including key milestones such as issuing requests for proposals (RFPs), receiving bids, and awarding contracts.
  - **Deadlines:** Set deadlines for each stage of the procurement process to ensure timely acquisition of goods and services.
5. **Risk Management:**
- **Risk Identification:** Identify potential risks associated with procurement, including supply chain disruptions, budget overruns, and quality issues.
  - **Mitigation Plans:** Develop strategies to mitigate identified risks, such as establishing backup suppliers, negotiating flexible contract terms, and implementing quality control measures.
6. **Procurement Methodology:**
- **Competitive Bidding:** Outline the process for soliciting bids from multiple suppliers to ensure fair competition and value for money.
  - **Direct Procurement:** Define conditions under which direct procurement (without competitive bidding) may be used, such as for urgent needs or sole-source suppliers.
  - **Framework Agreements:** Consider establishing framework agreements with key suppliers to streamline future procurement and secure favourable terms.
7. **Documentation and Record Keeping:**
- **Procurement Documents:** Prepare and maintain all necessary procurement documents, including specifications, RFPs, bids, contracts, and invoices.
  - **Records Management:** Ensure that records are accurately documented and securely stored for future reference and auditing purposes.
8. **Approval and Oversight:**
- **Approval Processes:** Establish clear procedures for the approval of procurement plans, including budget approvals and authorisation of contracts.
  - **Oversight:** Implement oversight mechanisms to monitor the procurement process and ensure adherence to policies and procedures.
9. **Training and Capacity Building:**
- **Staff Training:** Provide training for staff involved in procurement activities to ensure they understand and follow procurement policies and procedures.
  - **Capacity Building:** Enhance the capacity of procurement staff through ongoing development and support.
10. **Monitoring and Evaluation:** - **Performance Metrics:** Define metrics to evaluate the effectiveness of the procurement process, such as cost savings, supplier performance, and timeliness. - **Review and Improvement:** Regularly review procurement outcomes and processes to identify areas for improvement and make necessary adjustments.
11. **Ethical Considerations:** - **Code of Conduct:** Ensure that procurement activities are conducted in accordance with the organisation's ethical standards and code of conduct. - **Conflict of Interest:** Manage and disclose any potential conflicts of interest to maintain transparency and integrity in procurement decisions.
12. **Compliance:** - **Legal and Regulatory Compliance:** Ensure that procurement activities comply with relevant laws, regulations, and donor requirements. - **Internal Policies:** Adhere to internal procurement policies and procedures established by the organisation.



## PROCUREMENT PROCESS

To ensure transparent and effective procurement, adhere to the following steps:

### 1. Requisition Process

- **Initiation:** The Programme Coordinator, Program Manager, Finance Manager, Director, or their nominees must submit a requisition detailing the purpose, quantity, quality, and timeframe.
- **Validation:** Requisitions must be validated by at least two additional staff members at or above the level of Program/Admin/Finance Officers. Written validation and approval by the Director are mandatory. Documentation must meet audit requirements.

### 2. Procurement Thresholds

- **Up to Rs. 25,000:**
  - **Procedure:** Conduct an informal market survey for purchase.
  - **Approval:** Obtain necessary approvals as per organisational guidelines.
- **Rs. 25,000 to Rs. 2,00,000:**
  - **Procedure:** A three-member internal procurement committee (comprising two Programme members and one Finance-Administration member) will initiate the process. Obtain three quotations, prepare a comparative statement, and recommend the supplier. Negotiation for a lower rate may be conducted if necessary.
- **Rs. 2,00,001 to Rs. 5,00,000:**
  - **Procedure:** Include an external person (e.g., organisation partner representative, chartered accountant, or community representative) in the procurement process.
- **Above Rs. 5,00,000:**
  - **Procedure:** Invite tenders with estimates, bills of quantity (BOQ), and material grades determined by a technical expert. Follow standard tender procedures.
- **Vehicle Purchases:**
  - **Up to five vehicles:** No tender required. If only one dealer is available, direct procurement is allowed but must be documented and approved by the internal procurement committee.
- **Annual Maintenance Contracts (AMC):**
  - **Above Rs. 50,000:** Obtain three quotations. The procurement committee will manage the process with Director approval.
- **Consultant Services:**
  - **Up to Rs. 2,00,000:** Engage with written Director approval if the daily fee is Rs. 5,000 or less. For fees above Rs. 5,000/day or total fees exceeding Rs. 2,00,000, obtain three quotations and establish a formal task contract outlining objectives, deliverables, timeframe, quality control, fee, and expenditure limits.
- **Non-Budgeted Items (Above Rs. 5,00,000):**
  - **Procedure:** Obtain written approval from the Executive Committee. Follow the procurement process as outlined above.

### 3. Procurement Procedures

- **Small-Value Procurements (Below INR 50,000):**
  - **Procedure:** Submit a purchase request form with justification. A single quote may suffice, but seek additional quotes if possible. Approval generally by the relevant department head or manager.
- **Medium-Value Procurements (INR 50,000 to INR 5,00,000):**
  - **Procedure:** Issue a Request for Quotation (RFQ) to at least three suppliers. Evaluate quotations based on price, quality, and delivery terms. Issue a purchase order to the selected supplier. Approval from the procurement committee or senior management required.
- **High-Value Procurements (Above INR 5,00,000):**
  - **Procedure:** Issue a Request for Proposal (RFP) with detailed specifications and evaluation criteria. Allow suppliers to submit proposals or bids. Form a bid evaluation committee to assess proposals. Award the contract to the successful bidder and maintain comprehensive records of the RFP process, bid evaluations, and contract agreements. Approval from the procurement committee, senior management, or board of directors is necessary.

#### 4. Approval Process

- **Delegation of Authority:** Define approval levels based on the procurement amount. Clearly outline approval levels in the procurement policy.
- **Authorisation:** Obtain necessary authorisations from designated personnel or committees before proceeding with procurement.

#### 5. Compliance and Transparency

- **Documentation:** Maintain thorough records of all procurement activities, including quotations, evaluations, and approvals.
- **Audits:** Prepare for periodic audits to ensure compliance with procurement policies and procedures.

## SUPPLIER SELECTION

**Purpose:** The purpose of supplier selection is to ensure that the organisation acquires goods and services from suppliers who meet the required standards of quality, reliability, and value for money. Effective supplier selection supports transparency, fairness, and accountability in procurement processes.

#### 1. Supplier Selection Criteria:

- **Eligibility Requirements:** Ensure suppliers meet minimum requirements such as legal status, financial stability, and relevant industry certifications.
- **Quality of Goods/Services:** Evaluate the quality and suitability of the goods or services provided by the supplier, including adherence to technical specifications and standards.
- **Experience and Reputation:** Consider the supplier's experience in the industry, track record, and reputation for reliability and performance.
- **Cost and Value:** Assess the cost of goods or services and determine whether they offer good value for money while considering budget constraints.
- **Delivery Capability:** Evaluate the supplier's ability to deliver goods or services on time and in accordance with agreed-upon schedules.
- **Compliance:** Ensure the supplier complies with relevant legal, regulatory, and environmental standards.

#### 2. Supplier Selection Process:

- **Preparation:**
  - **Define Needs:** Clearly define the goods or services required, including specifications, quantities, and delivery timelines.
  - **Develop Criteria:** Establish selection criteria based on the factors outlined above.
- **Supplier Identification:**
  - **Market Research:** Conduct market research to identify potential suppliers and gather information about their offerings.
  - **Pre-qualification:** Use pre-qualification procedures to shortlist suppliers who meet basic requirements and are eligible to participate in the procurement process.
- **Request for Proposals (RFPs) / Quotations (RFQs):**
  - **Issue RFPs/RFQs:** Prepare and issue RFPs or RFQs to shortlisted suppliers, providing detailed information about requirements and evaluation criteria.
  - **Receive Submissions:** Collect and review proposals or quotations submitted by suppliers.
- **Evaluation:**
  - **Review Submissions:** Evaluate supplier submissions based on predefined criteria, including technical, financial, and compliance aspects.
  - **Scoring:** Use a scoring or rating system to objectively assess and compare supplier offers.
  - **Shortlisting:** Shortlist suppliers based on evaluation results and select those who best meet the criteria.
- **Supplier Due Diligence:**
  - **Reference Checks:** Conduct reference checks to verify the supplier's performance and reliability based on past projects or client feedback.
  - **Site Visits:** If necessary, perform site visits to assess the supplier's facilities, processes, and capabilities.



- **Contract Negotiation:**
  - **Terms and Conditions:** Negotiate contract terms and conditions with the selected supplier, including pricing, delivery schedules, quality standards, and payment terms.
  - **Finalise Contract:** Finalise and sign the contract with the chosen supplier, ensuring that all agreed-upon terms are documented.
- 3. **Documentation and Record Keeping:**
  - **Document Evaluation:** Maintain records of supplier evaluations, including scoring sheets, reference check reports, and site visit notes.
  - **Contract Records:** Keep copies of all contracts, amendments, and related correspondence.
- 4. **Ethics and Transparency:**
  - **Fairness:** Ensure the supplier selection process is fair, transparent, and free from bias or favouritism.
  - **Conflict of Interest:** Manage and disclose any potential conflicts of interest that may affect the selection process.
- 5. **Supplier Relationship Management:**
  - **Communication:** Maintain open and effective communication with selected suppliers throughout the contract period.
  - **Performance Monitoring:** Monitor supplier performance to ensure compliance with contract terms and address any issues or concerns.
- 6. **Review and Improvement:**
  - **Process Review:** Periodically review the supplier selection process to identify areas for improvement and ensure it remains effective and relevant.
  - **Feedback:** Gather feedback from staff and suppliers to refine and enhance the selection process.

## CONTRACT MANAGEMENT

**Purpose:** The purpose of contract management is to ensure that all contractual agreements are effectively executed and monitored, maintaining compliance with agreed terms and conditions, and managing relationships with suppliers to achieve desired outcomes.

### 1. Contract Preparation and Execution:

- **Contract Drafting:**
  - **Terms and Conditions:** Clearly define terms and conditions, including scope of work, deliverables, timelines, payment terms, and quality standards.
  - **Legal Review:** Ensure contracts are reviewed by legal experts to comply with applicable laws and regulations.
  - **Signatures:** Obtain signatures from authorised representatives of both the organisation and the supplier to formalise the contract.
- **Contract Signing:**
  - **Formal Agreement:** Ensure that the contract is signed by all parties and that each party retains a copy of the signed document.
  - **Documentation:** File the signed contract in a secure and organised manner for easy retrieval and reference.

### 2. Contract Implementation:

- **Kick-Off Meetings:** Conduct initial meetings with the supplier to discuss contract details, expectations, and implementation plans.
- **Monitoring:** Regularly monitor contract performance to ensure that all terms and conditions are being met by both parties.
- **Communication:** Maintain open lines of communication with the supplier to address any issues or changes that may arise.

### 3. Performance Management:

- **Performance Metrics:** Define and use performance metrics to evaluate the supplier's performance against contract requirements.
- **Regular Reviews:** Conduct regular performance reviews to assess the supplier's adherence to the contract terms and resolve any issues.
- **Feedback:** Provide constructive feedback to the supplier and address any performance concerns or discrepancies.

#### 4. Change Management:

- **Change Requests:** Manage and document any changes to the contract, including scope, timelines, or costs, through formal change requests.
- **Approval Process:** Obtain necessary approvals for changes from authorised personnel before implementing any modifications.
- **Contract Amendments:** Update the contract to reflect agreed-upon changes and ensure that all parties sign the amended contract.

#### 5. Issue Resolution:

- **Problem Identification:** Identify and document any issues or disputes that arise during the contract period.
- **Resolution Process:** Implement a formal process for resolving issues, including negotiations, mediation, or arbitration if necessary.
- **Documentation:** Keep records of all issue resolution processes, including communications and agreements.

#### 6. Compliance and Risk Management:

- **Contract Compliance:** Ensure that all parties adhere to contract terms and conditions, including regulatory and legal requirements.
- **Risk Assessment:** Regularly assess and manage risks associated with contract performance, including financial, operational, and legal risks.
- **Audit:** Conduct periodic audits of contract performance and compliance to identify any discrepancies or areas for improvement.

#### 7. Documentation and Record Keeping:

- **Contract Records:** Maintain accurate and complete records of all contracts, including signed agreements, amendments, and related correspondence.
- **Performance Records:** Document performance reviews, issue resolutions, and any communications related to contract management.
- **Retention:** Follow retention policies for contract records, ensuring they are kept for the required period and securely stored.

#### 8. Contract Closeout:

- **Completion Review:** Conduct a final review to ensure that all contract terms have been fulfilled and that any outstanding issues have been resolved.
- **Final Payment:** Process any final payments to the supplier in accordance with the contract terms.
- **Documentation:** Archive the contract and all related documentation as part of the contract closeout process.

#### 9. Continuous Improvement:

- **Feedback Collection:** Gather feedback from staff and suppliers on the contract management process to identify areas for improvement.
- **Process Review:** Regularly review and update contract management procedures to enhance efficiency and effectiveness.

10. **Training and Awareness:** - **Staff Training:** Provide training for staff involved in contract management on best practices, procedures, and legal requirements. - **Ongoing Education:** Keep staff informed about changes in regulations, policies, or contract management practices.

## PAYMENT PROCEDURES

**Purpose:** The purpose of payment procedures is to ensure that payments for goods and services procured by the organisation are processed efficiently, accurately, and in accordance with contractual terms and organisational policies. Proper payment procedures support financial management, accountability, and transparency.

#### 1. Payment Authorisation:

- **Invoice Review:** Verify that the invoice matches the purchase order or contract terms, including amounts, quantities, and descriptions of goods or services.
- **Approval Process:** Ensure that invoices are reviewed and approved by authorised personnel before processing for payment. This may include departmental heads, finance managers, or project managers.

- **Supporting Documentation:** Ensure that all necessary supporting documentation (e.g., delivery receipts, contracts) is attached to the invoice for review and approval.
2. **Payment Processing:**
    - **Payment Methods:** Define acceptable payment methods, such as bank transfers, checks, or electronic payments, and ensure they comply with organisational policies.
    - **Payment Schedule:** Adhere to the payment schedule outlined in the contract or agreement, including any milestones or due dates.
    - **Payment Verification:** Verify that payment details, including bank account information and payment amounts, are accurate before processing.
  3. **Payment Approval:**
    - **Signatory Authority:** Ensure that payments are authorised by individuals with signatory authority as per the organisation's delegation of authority policy.
    - **Dual Control:** Implement a dual control system for payment approval, where one person prepares the payment and another person authorises it, to reduce the risk of errors and fraud.
  4. **Record Keeping:**
    - **Payment Records:** Maintain accurate records of all payments, including invoices, payment vouchers, bank statements, and related correspondence.
    - **Documentation Storage:** Store payment records securely, both physically and electronically, to ensure they are easily accessible for review and audit purposes.
    - **Retention:** Follow retention policies for payment records, ensuring they are kept for the required period in compliance with regulatory and organisational requirements.
  5. **Payment Reconciliation:**
    - **Bank Reconciliation:** Regularly reconcile bank statements with payment records to ensure accuracy and identify any discrepancies.
    - **Account Reconciliation:** Reconcile accounts payable records with financial statements to ensure that all payments are accurately recorded and accounted for.
  6. **Compliance and Controls:**
    - **Policy Adherence:** Ensure that payment procedures comply with organisational policies, donor requirements, and legal regulations.
    - **Internal Controls:** Implement internal controls to prevent and detect fraud, errors, and mismanagement in the payment process.
  7. **Dispute Resolution:**
    - **Issue Identification:** Identify and document any issues or discrepancies related to payments, such as billing errors or disputes with suppliers.
    - **Resolution Process:** Implement a process for resolving payment disputes, including communication with suppliers and investigation of issues.
    - **Documentation:** Maintain records of all disputes and resolutions for future reference and accountability.
  8. **Audit and Review:**
    - **Internal Audits:** Conduct regular internal audits of payment procedures to ensure compliance with policies and identify areas for improvement.
    - **External Audits:** Facilitate external audits by providing required documentation and cooperating with auditors to ensure transparency and accountability.
  9. **Training and Awareness:**
    - **Staff Training:** Provide training for staff involved in payment processing on procedures, policies, and compliance requirements.
    - **Ongoing Education:** Keep staff informed about updates to payment procedures, regulatory changes, and best practices.
  10. **Process Improvement:** - **Feedback Collection:** Gather feedback from staff and stakeholders on the payment process to identify challenges and areas for improvement. - **Process Review:** Regularly review and update payment procedures to enhance efficiency, accuracy, and compliance.

## ETHICS AND COMPLIANCE

**Purpose:** The purpose of ethics and compliance in procurement is to ensure that all procurement activities are conducted with integrity, fairness, and transparency, adhering to legal and regulatory requirements. Upholding ethical standards and compliance practices supports the credibility of the organisation and fosters trust with stakeholders.

### 1. Ethical Principles:

- **Integrity:** Conduct procurement activities with honesty and transparency, avoiding any form of corruption, bribery, or conflict of interest.
- **Fairness:** Ensure that all suppliers are given a fair opportunity to compete, and that decisions are made based on merit and in compliance with established criteria.
- **Transparency:** Maintain transparency in procurement processes by documenting all steps and decisions, and providing clear information to stakeholders.
- **Accountability:** Hold individuals and teams accountable for their actions and decisions in the procurement process, ensuring adherence to policies and procedures.

### 2. Conflict of Interest:

- **Disclosure:** Require all staff involved in procurement to disclose any potential conflicts of interest that may affect their impartiality.
- **Management:** Implement procedures to manage and mitigate conflicts of interest, including recusal from decision-making processes where a conflict exists.
- **Policy Adherence:** Ensure that all procurement activities are conducted in accordance with the organisation's conflict of interest policy.

### 3. Compliance with Laws and Regulations:

- **Legal Requirements:** Ensure that procurement activities comply with all relevant local, national, and international laws and regulations, including anti-corruption, labor, and environmental laws.
- **Regulatory Standards:** Adhere to regulatory standards and guidelines applicable to procurement, including donor-specific requirements and industry best practices.

### 4. Supplier Code of Conduct:

- **Ethical Standards:** Require suppliers to adhere to ethical standards consistent with the organisation's values, including fair labor practices, environmental responsibility, and anti-corruption measures.
- **Monitoring and Enforcement:** Monitor supplier compliance with the code of conduct and take appropriate action in cases of non-compliance.

### 5. Procurement Processes:

- **Transparent Procedures:** Implement transparent procurement procedures that include competitive bidding, clear evaluation criteria, and documented decision-making processes.
- **Documentation:** Maintain thorough documentation of all procurement activities, including RFPs/RFQs, evaluations, contract awards, and communications.

### 6. Training and Awareness:

- **Staff Training:** Provide training for staff involved in procurement on ethical standards, compliance requirements, and the organisation's procurement policies.
- **Ongoing Education:** Regularly update staff on changes in laws, regulations, and best practices related to procurement ethics and compliance.

### 7. Reporting and Whistleblowing:

- **Reporting Mechanisms:** Establish confidential reporting mechanisms for staff and stakeholders to report unethical behaviour or compliance violations.
- **Protection:** Ensure that individuals who report concerns are protected from retaliation and that their reports are investigated promptly and thoroughly.

### 8. Audit and Oversight:

- **Internal Audits:** Conduct regular internal audits of procurement activities to assess compliance with policies and identify any areas of concern.
- **External Audits:** Facilitate external audits by providing necessary documentation and cooperating with auditors to ensure transparency and accountability.

### 9. Continuous Improvement:

- **Feedback Collection:** Gather feedback from staff, suppliers, and stakeholders on procurement practices to identify areas for improvement.

- **Policy Review:** Regularly review and update procurement policies and procedures to enhance ethical practices and compliance.

10. **Enforcement:** - **Disciplinary Actions:** Implement disciplinary actions for violations of procurement ethics and compliance policies, including corrective measures and sanctions as appropriate. - **Policy Adherence:** Ensure that all procurement decisions and actions align with ethical principles and compliance requirements.

## DOCUMENTATION AND RECORD KEEPING

**Purpose:** The purpose of documentation and record keeping in procurement is to ensure that all procurement activities are transparent, accountable, and compliant with policies and regulations. Proper documentation supports effective management, audits, and reviews of procurement processes.

### 1. Types of Procurement Documents:

- **Procurement Planning Documents:**
  - **Procurement Plans:** Outlines the procurement strategy, including scope, timelines, and budgets.
  - **Specifications and Requirements:** Detailed descriptions of goods or services to be procured.
- **Solicitation Documents:**
  - **Requests for Proposals (RFPs) / Requests for Quotations (RFQs):** Issued to solicit bids or proposals from suppliers.
  - **Bidding Documents:** Includes the invitation to bid, instructions to bidders, and terms of reference.
- **Bid and Proposal Documents:**
  - **Bid Submissions:** Proposals or quotations received from suppliers.
  - **Bid Evaluation Records:** Documentation of the evaluation process, including scoring and justifications.
- **Contractual Documents:**
  - **Contracts and Agreements:** Signed agreements outlining terms, conditions, and obligations between the organisation and the supplier.
  - **Amendments and Addendums:** Modifications to contracts, including scope changes or extensions.
- **Transaction Records:**
  - **Purchase Orders:** Documents confirming the order of goods or services.
  - **Delivery Receipts:** Evidence of receipt of goods or services from suppliers.
  - **Invoices:** Billing statements from suppliers requesting payment.
  - **Payment Vouchers:** Documentation of payment transactions.
- **Compliance and Audit Documents:**
  - **Audit Reports:** Findings and recommendations from internal or external audits.
  - **Compliance Checklists:** Records demonstrating adherence to procurement policies and legal requirements.

### 2. Documentation Standards:

- **Accuracy:** Ensure all procurement documents are complete, accurate, and reflect the true nature of the procurement process.
- **Consistency:** Follow standardised formats and procedures for creating and managing procurement documents.
- **Timeliness:** Record and process procurement documents promptly to maintain up-to-date and accurate information.

### 3. Record Keeping Procedures:

- **Storage:**
  - **Physical Records:** Store physical documents in a secure, organised filing system to prevent loss or damage.
  - **Electronic Records:** Use secure electronic storage systems with backup procedures for digital records.

- **Access Control:**
    - **Restricted Access:** Limit access to procurement records to authorised personnel only.
    - **Data Security:** Implement safeguards to protect electronic records from unauthorised access or data breaches.
  - **Retention:**
    - **Retention Schedules:** Establish and follow retention schedules for procurement documents, specifying how long different types of documents should be kept.
    - **Archiving:** Archive records that are no longer actively used but must be retained for historical reference or compliance.
  - **Disposal:**
    - **Secure Disposal:** Follow procedures for the secure disposal of records that are no longer needed, including shredding physical documents and securely deleting digital files.
4. **Compliance and Legal Requirements:**
- **Regulatory Compliance:** Ensure that procurement documentation and record-keeping practices comply with relevant laws, regulations, and organisational policies.
  - **Donor Requirements:** Adhere to donor-specific documentation and record-keeping requirements for procurement, including reporting and auditing standards.
5. **Documentation Practices:**
- **Documentation Creation:** Ensure procurement documents are created clearly and in detail, providing all necessary information for transparency and accountability.
  - **Review and Approval:** Implement procedures for reviewing and approving procurement documents to ensure accuracy and completeness.
  - **Version Control:** Maintain version control for documents subject to updates or revisions, ensuring that the most current version is used.
6. **Records Management System:**
- **System Selection:** Choose an appropriate records management system (electronic or physical) based on the organisation's needs and the complexity of procurement activities.
  - **System Maintenance:** Regularly maintain and update the records management system to ensure it meets organisational needs and remains secure.
7. **Confidentiality and Privacy:**
- **Data Protection:** Implement measures to protect the confidentiality and privacy of sensitive procurement information.
  - **Disposal:** Follow procedures for the secure disposal of sensitive records to prevent unauthorised access or misuse.
8. **Training and Awareness:**
- **Staff Training:** Provide training for staff involved in procurement on documentation and record-keeping procedures.
  - **Regular Updates:** Keep staff informed about changes in documentation practices, regulatory requirements, and best practices.
9. **Audit and Review:**
- **Internal Audits:** Conduct regular internal audits of procurement documentation and record-keeping practices to ensure compliance with policies and procedures.
  - **Continuous Improvement:** Review audit findings and feedback to identify areas for improvement and enhance documentation and record-keeping practices.
10. **Emergency Preparedness:** - **Backup Procedures:** Implement regular backup procedures for digital records to prevent data loss in case of system failures or disasters. - **Disaster Recovery:** Develop and maintain a disaster recovery plan to ensure procurement records can be recovered and restored in the event of a significant disruption.

## MONITORING AND AUDIT

**Purpose:** The purpose of monitoring and auditing in procurement is to ensure compliance with policies and procedures, identify areas for improvement, and maintain accountability and transparency in procurement activities. Effective monitoring and auditing help detect and prevent errors, fraud, and inefficiencies.



## 1. Monitoring Procedures:

- **Ongoing Monitoring:**
  - **Procurement Performance:** Regularly review procurement activities to ensure they align with established policies and procedures.
  - **Contract Compliance:** Monitor compliance with contract terms, including delivery schedules, quality standards, and payment conditions.
  - **Supplier Performance:** Track supplier performance, including the quality of goods or services, adherence to delivery timelines, and responsiveness to issues.
- **Performance Metrics:**
  - **Key Performance Indicators (KPIs):** Develop and track KPIs to measure the effectiveness and efficiency of procurement processes, such as cost savings, procurement cycle time, and supplier performance.
  - **Regular Reports:** Generate and review regular reports on procurement activities, highlighting any issues or deviations from expected performance.
- **Issue Identification:**
  - **Regular Reviews:** Conduct periodic reviews of procurement documentation, transactions, and processes to identify any discrepancies, errors, or non-compliance.
  - **Feedback Mechanisms:** Implement mechanisms for staff and stakeholders to report concerns or issues related to procurement practices.

## 2. Audit Procedures:

- **Internal Audits:**
  - **Audit Plan:** Develop an internal audit plan outlining the scope, objectives, and frequency of audits for procurement activities.
  - **Audit Execution:** Conduct audits to evaluate compliance with procurement policies, procedures, and regulatory requirements.
  - **Audit Findings:** Document audit findings, including any identified issues, deviations, or areas for improvement.
  - **Corrective Actions:** Develop and implement corrective action plans to address audit findings and resolve identified issues.
- **External Audits:**
  - **Facilitation:** Facilitate external audits by providing required documentation and information to external auditors.
  - **Audit Cooperation:** Cooperate with external auditors throughout the audit process, including responding to inquiries and providing additional information as needed.
  - **Audit Reports:** Review and address recommendations and findings from external audits, implementing necessary changes to improve procurement practices.

## 3. Compliance Checks:

- **Regulatory Compliance:** Ensure procurement activities comply with relevant laws, regulations, and donor requirements.
- **Policy Adherence:** Regularly review procurement processes and practices to ensure they align with organisational policies and procedures.

## 4. Documentation and Record Keeping:

- **Audit Trail:** Maintain a clear and complete audit trail for all procurement activities, including documentation of decisions, approvals, and transactions.
- **Record Access:** Ensure that procurement records are accessible for review by auditors and relevant stakeholders.

## 5. Risk Management:

- **Risk Assessment:** Identify and assess risks associated with procurement activities, including potential for fraud, errors, or non-compliance.
- **Risk Mitigation:** Implement risk mitigation strategies to address identified risks and minimise their impact on procurement processes.

## 6. Training and Awareness:

- **Staff Training:** Provide training for staff on monitoring and audit procedures, including the importance of compliance and the role of audits in improving procurement practices.
- **Ongoing Education:** Keep staff informed about updates to monitoring and audit practices, regulatory changes, and best practices.

## 7. Continuous Improvement:

- **Feedback Collection:** Gather feedback from staff, auditors, and stakeholders on monitoring and audit processes to identify areas for improvement.
- **Process Review:** Regularly review and update monitoring and audit procedures to enhance effectiveness and efficiency.

## 8. Ethics and Integrity:

- **Ethical Standards:** Ensure that monitoring and audit activities are conducted with the highest ethical standards, maintaining integrity and objectivity.
- **Conflict of Interest:** Manage and disclose any potential conflicts of interest that may arise during monitoring and audit activities.

## 9. Reporting and Accountability:

- **Audit Reports:** Prepare and distribute audit reports to relevant stakeholders, including senior management and the board of directors.
- **Follow-Up:** Track the implementation of audit recommendations and corrective actions to ensure issues are addressed and resolved.

10. **Documentation and Record Keeping:** - **Audit Documentation:** Maintain detailed records of audit activities, including plans, findings, reports, and follow-up actions. - **Retention:** Follow retention policies for audit records, ensuring they are kept for the required period and securely stored.

## TRAINING AND AWARENESS

**Purpose:** The purpose of training and awareness in procurement is to ensure that staff and stakeholders are knowledgeable about procurement policies, procedures, and best practices. Effective training supports compliance, efficiency, and integrity in procurement activities.

### 1. Training Programs:

- **Induction Training:**
  - **New Staff:** Provide comprehensive training for new staff on the organisation's procurement policies, procedures, and ethical standards.
  - **Orientation:** Include an overview of procurement processes, roles, and responsibilities during orientation sessions for new hires.
- **Ongoing Training:**
  - **Refresher Courses:** Offer periodic refresher courses to update staff on changes in procurement policies, regulations, or best practices.
  - **Advanced Training:** Provide specialised training for staff involved in complex or high-value procurements, including negotiation and contract management.
- **Training Modules:**
  - **Procurement Procedures:** Detailed training on the procurement process, including planning, solicitation, evaluation, and contract management.
  - **Ethics and Compliance:** Focus on ethical standards, conflict of interest management, and compliance with legal and regulatory requirements.
  - **Risk Management:** Training on identifying and managing risks associated with procurement activities.

### 2. Awareness Initiatives:

- **Policy Dissemination:**
  - **Policy Documents:** Ensure that procurement policies and procedures are accessible to all staff and stakeholders through internal communication channels, such as intranet or physical copies.
  - **Regular Updates:** Communicate updates or changes to procurement policies and procedures to all relevant parties promptly.
- **Workshops and Seminars:**
  - **Internal Workshops:** Conduct workshops and seminars on procurement topics to enhance staff understanding and skills.
  - **Guest Speakers:** Invite experts or external consultants to provide insights on procurement best practices and trends.

- **Communications:**
    - **Newsletters:** Include procurement-related information and updates in internal newsletters or bulletins.
    - **Notices:** Use internal notices or memos to highlight important procurement policies, deadlines, or compliance issues.
3. **Training Delivery Methods:**
- **In-Person Training:**
    - **Interactive Sessions:** Conduct interactive training sessions with opportunities for discussion, role-playing, and hands-on practice.
    - **Case Studies:** Use real-life case studies to illustrate procurement challenges and solutions.
  - **Online Training:**
    - **E-Learning Modules:** Develop and deliver e-learning modules for staff to access training at their convenience.
    - **Webinars:** Host webinars on procurement topics to reach a wider audience and provide flexible learning options.
  - **On-the-Job Training:**
    - **Mentoring:** Pair new or less experienced staff with experienced mentors to provide practical guidance and support.
    - **Job Aids:** Provide job aids, such as checklists and flowcharts, to assist staff in following procurement procedures.
4. **Evaluation and Feedback:**
- **Training Evaluation:**
    - **Assessments:** Conduct assessments or quizzes to evaluate staff understanding of procurement policies and procedures.
    - **Feedback Surveys:** Collect feedback from training participants to assess the effectiveness of training programs and identify areas for improvement.
  - **Continuous Improvement:**
    - **Review Feedback:** Analyse feedback and training outcomes to make necessary adjustments and enhancements to training programs.
    - **Update Training Materials:** Regularly update training materials to reflect changes in policies, regulations, and best practices.
5. **Roles and Responsibilities:**
- **Training Coordinators:** Designate staff responsible for organising and managing procurement training programs.
  - **Management Support:** Ensure that senior management supports and participates in training initiatives, reinforcing the importance of procurement compliance.
6. **Documentation and Record Keeping:**
- **Training Records:** Maintain records of training sessions, including attendance, content covered, and feedback received.
  - **Certification:** Issue certificates or acknowledgments of completion for training programs to document staff participation and competence.
7. **Ethics and Conduct:**
- **Code of Conduct:** Include training on the organisation's code of conduct and ethical standards, emphasising their importance in procurement activities.
  - **Ethical Scenarios:** Discuss ethical scenarios and dilemmas to reinforce the importance of ethical behaviour in procurement.
8. **External Training:**
- **Professional Development:** Encourage staff to participate in external procurement-related training programs, conferences, or workshops.
  - **Certification Programs:** Support staff in obtaining professional certifications related to procurement and supply chain management.

## LEGAL AND REGULATORY COMPLIANCE

**Purpose:** The purpose of ensuring legal and regulatory compliance in procurement is to adhere to applicable laws, regulations, and standards, thereby protecting the organisation's reputation, avoiding legal liabilities, and ensuring transparent and fair procurement practices.

### 1. Regulatory Framework:

- **Local Laws:** Adhere to national and local procurement laws and regulations that govern procurement activities in the organisations's operating regions.
- **International Standards:** Comply with relevant international procurement standards if the organisation operates internationally or receives funding from international donors.

### 2. Legal Compliance:

- **Contract Law:** Ensure that all procurement contracts are legally binding and include essential terms and conditions, such as scope of work, delivery schedules, payment terms, and dispute resolution mechanisms.
- **Anti-Corruption Laws:** Comply with anti-corruption laws and regulations to prevent bribery, fraud, and other unethical practices in procurement.
- **Employment Laws:** Follow employment laws related to procurement staff, including fair hiring practices, working conditions, and non-discrimination.

### 3. Donor Requirements:

- **Funding Agreements:** Adhere to procurement requirements specified in donor agreements and grant contracts, including compliance with donor guidelines and reporting requirements.
- **Audit and Reporting:** Ensure that procurement practices meet donor expectations for transparency and accountability, and prepare for donor audits and reviews.

### 4. Procurement Procedures:

- **Standard Operating Procedures (SOPs):** Develop and implement SOPs for procurement that reflect legal and regulatory requirements.
- **Documentation:** Maintain accurate and complete records of all procurement activities to support compliance and facilitate audits.

### 5. Ethics and Integrity:

- **Code of Conduct:** Implement a code of conduct that outlines ethical standards and expectations for procurement staff and other stakeholders.
- **Conflict of Interest:** Establish procedures to manage and disclose conflicts of interest in procurement decisions.

### 6. Training and Awareness:

- **Legal Training:** Provide training for procurement staff on relevant laws and regulations, including contract law, anti-corruption measures, and donor requirements.
- **Ongoing Education:** Offer ongoing education and updates on changes in legal and regulatory requirements affecting procurement.

### 7. Monitoring and Auditing:

- **Internal Audits:** Conduct regular internal audits to assess compliance with legal and regulatory requirements in procurement processes.
- **External Audits:** Facilitate external audits by providing necessary documentation and cooperating with auditors to verify compliance.

### 8. Compliance Checks:

- **Regulatory Updates:** Stay informed about changes in laws and regulations that impact procurement and update policies and procedures accordingly.
- **Compliance Reviews:** Regularly review procurement activities and policies to ensure alignment with current legal and regulatory standards.

### 9. Risk Management:

- **Risk Assessment:** Identify and assess legal and regulatory risks associated with procurement activities.
- **Mitigation Strategies:** Develop and implement strategies to mitigate identified risks, including preventive measures and contingency plans.

10. **Documentation and Record Keeping:** - **Legal Records:** Maintain detailed records of procurement-related legal documents, including contracts, compliance certificates, and correspondence with regulatory bodies. -

**Retention Policies:** Follow retention policies for legal and regulatory documents to ensure they are available for review and audit purposes.

11. **Complaints and Dispute Resolution:** - **Complaint Mechanism:** Establish a mechanism for handling complaints related to procurement practices, including a process for investigating and addressing grievances. - **Dispute Resolution:** Include dispute resolution procedures in procurement contracts to address any legal disputes that may arise.

12. **Legal Consultation:** - **Legal Advisors:** Engage legal advisors or consultants to provide guidance on complex legal and regulatory issues related to procurement. - **Legal Reviews:** Obtain legal reviews of procurement policies and contracts to ensure compliance and minimise legal risks.

13. **Ethics and Compliance Committees:** - **Compliance Committee:** Form a compliance committee to oversee adherence to legal and regulatory requirements in procurement. - **Ethics Committee:** Establish an ethics committee to address ethical concerns and ensure that procurement practices align with organisational values.

14. **Emergency and Contingency Planning:** - **Compliance Failures:** Develop plans for addressing compliance failures, including corrective actions and communication strategies. - **Regulatory Changes:** Implement procedures for quickly adapting to significant changes in legal and regulatory requirements.

## POLICY REVIEW AND UPDATES

**Purpose:** The purpose of policy review and updates is to ensure that the procurement policy remains relevant, effective, and compliant with current laws, regulations, and best practices. Regular reviews and updates help address changes in the operating environment, organisational needs, and regulatory requirements.

### 1. Review Schedule:

- **Regular Review:** Conduct a formal review of the procurement policy at least annually to assess its effectiveness and relevance.
- **Trigger Events:** Initiate a review outside of the regular schedule if significant changes occur, such as new regulations, major organisational changes, or identified issues in procurement practices.

### 2. Review Process:

- **Assessment:**
  - **Policy Evaluation:** Evaluate the current policy against legal requirements, industry standards, and organisational needs.
  - **Stakeholder Input:** Gather feedback from stakeholders, including staff, suppliers, and auditors, to identify areas for improvement or concerns.
- **Policy Analysis:**
  - **Compliance Check:** Ensure the policy complies with relevant laws, regulations, and donor requirements.
  - **Effectiveness Review:** Assess the policy's effectiveness in achieving procurement objectives, managing risks, and ensuring transparency and accountability.
- **Drafting Updates:**
  - **Revision Drafts:** Prepare drafts of proposed updates or revisions to the procurement policy based on the review findings.
  - **Consultation:** Consult with relevant departments, legal advisors, and procurement professionals to ensure the proposed changes are appropriate and feasible.

### 3. Approval and Implementation:

- **Approval Process:**
  - **Management Review:** Present the revised policy to senior management for review and approval.
  - **Board Approval:** Obtain approval from the board of directors or governing body if required by the organisation's governance structure.
- **Communication:**
  - **Policy Dissemination:** Communicate the updated policy to all relevant staff and stakeholders through internal channels, such as emails, meetings, or intranet postings.

- **Training:** Provide training or briefings on significant changes to ensure that staff understand and comply with the updated policy.
- **Documentation:**
  - **Version Control:** Maintain version control for the policy, including records of revisions, approval dates, and effective dates.
  - **Accessibility:** Ensure that the updated policy is accessible to all staff and stakeholders.
- 4. **Monitoring and Feedback:**
  - **Implementation Monitoring:** Monitor the implementation of the updated policy to ensure it is being followed correctly and effectively.
  - **Feedback Mechanism:** Establish mechanisms for staff and stakeholders to provide feedback on the policy and its implementation.
- 5. **Continuous Improvement:**
  - **Ongoing Evaluation:** Regularly evaluate the policy's impact and effectiveness, incorporating feedback and lessons learned into future reviews.
  - **Best Practices:** Stay informed about best practices in procurement and incorporate relevant practices into the policy.
- 6. **Compliance and Legal Requirements:**
  - **Regulatory Changes:** Monitor changes in laws and regulations that may impact procurement practices and ensure the policy remains compliant.
  - **Donor Requirements:** Adjust the policy as needed to meet the requirements of donors and funding agencies.
- 7. **Documentation and Record Keeping:**
  - **Review Records:** Keep detailed records of the policy review process, including notes from consultations, draft versions, and final approvals.
  - **Historical Records:** Maintain historical records of previous versions of the policy for reference and audit purposes.
- 8. **Roles and Responsibilities:**
  - **Policy Owner:** Designate a policy owner or team responsible for managing the policy review process and ensuring timely updates.
  - **Review Committee:** Form a review committee, if applicable, to oversee the review and update process, including representatives from relevant departments.
- 9. **Audit and Oversight:**
  - **Internal Audits:** Include policy review and update processes in internal audits to ensure compliance with the organisation's procedures and standards.
  - **External Audits:** Facilitate external audits by providing documentation related to policy reviews and updates.
- 10. **Emergency Updates: - Urgent Revisions:** Implement a procedure for making urgent policy updates in response to critical issues or emergencies that require immediate attention.