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Swansea Bay University Health Board File Note for Retrospective Action Relating to Breach of SFI's, SO's & Competition Rules

At several points in the Procurement ISO Quality Procedures, there is a requirement to "place a note on file" as a record of decisions or authorisation of variations from the norm. This form has been produced to meet these requirements.

PLEASE NOTE COMPLETED FORMS WILL BE PRESENTED TO AUDIT COMMITTEE

Each Section of this form must be completed in full. Failure to comply will result in the form being returned to you.

**The Requestor or Associated Finance Business Partner maybe required to attend Audit Committee to explain the breach
Please see embedded copies of the No Po No Pay Compliance Procedure and an Extract of the Procurement Thresholds from the
Health Board's SFIs**

Form to be completed in line with the HB's Scheme of Delegation as outlined below:

Committee / Post Maximum Financial Limit (excl. VAT)

- 1 Board £1m**
- 2 Chief Executive (CEO) (in the absence of the Chief Executive only, the Deputy Chief Executive would take on this level to provide cover and in exceptional circumstances where both are unavailable, the lead executive will have approval authority to this level) - £750k**
- 3 Deputy CEO - £500k**
- 4 Executive Directors/Board Secretary/Chief Operating Officer/Chief Operating Officer/Director of Digital/Director of Communications - £250k**
- 5 Deputy Chief Operating Officers (revenue and capital)/Assistant Director of Strategy (capital planning) (capital only) - £150k**
- 6 Managers reporting Directly to line four above (excluding service group directors whose limits are outlined separately) £75k**
- 7 Managers reporting directly to line five above £25k**



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Register Reference Number (To be obtained from Procurement for purpose of reporting to Audit Committee)		
Procurement Title (High level description of goods/ services procured)		
Supplier (Name and Address)		
Type of Breach	(Please tick)	
Competition not sought in accordance with SFI'S		
Extended without appropriate authorisation		
Extended in excess of SFI allowable limits		
Requested Goods/Services from the market without recourse to Procurement		



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Other (Please detail)	
Expenditure (For this breach)	£

McLennan Alison
21/08/2026 08:31:14



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Explanation for Breach *Mandatory

(To be completed by the requestors budget holder with sufficient delegated authority to approve this level of expenditure)

McLennan Alison
21/08/2026 08:31:14

DECLARATION OF INTEREST

Please confirm the following statements are correct: (tick box if you have nothing to declare)

		Requester	Budget Holder	Finance Business Partner	Directorate Manager/Head of Service	Procurement Lead	Head of Procurement	Executive Director
		✓ x	✓ x	✓ x	✓ x	✓ x	✓ x	✓ x
1	Neither I, my family, friends, acquaintances or work colleagues involved in this process, will receive any benefit or gain (financial or otherwise, directly or indirectly) if the contract is awarded to any of the bidders involved in the process as they become known.							
2a.	I have no material interest in whether the contract is awarded or not.							
2b.	I am not in possession of any Additional Information in respect of the procurement process. (Save for the information in the 'Additional Information box below)							
3	I currently do not benefit in any way, financially or otherwise, including (but not limited to) the receipt of a grant or outside funding, that could influence my decision in respect of the procurement or any of the bidders involved in this process.							
4	I have not received hospitality (other than of a nominal value or that declared in the register of gifts and hospitality maintained by Corporate Management) or any material gifts, as outlined in the Health Boards Standards of Behaviour Policy SBU Intranet - Standards of Business Conduct Policy.pdf - All Documents (sharepoint.com) from any of the bidders involved in the process.							
5	I have read, understood and will abide by the NHS Guidance entitled "Standards of Business Conduct for NHS Staff" (DGM (93)84) and the Health Boards Standards of Behaviour Policy. SBU Intranet - Standards of Business Conduct Policy.pdf - All Documents (sharepoint.com)							
6	By signing this declaration I understand that it is my responsibility that should my circumstance change or a new relationship be established in relation to any bidding organisation, I will consult with the Lead Procurement contact and am aware that I may be required to complete a new Declaration of Interest or be required to withdraw my participation.							
7	I will keep the identities of the bidders, the content of the bids and procurement documents confidential.							



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The following signatories confirm that they have read the embedded documents below and understand their responsibility in adhering to them



Procurement

Thresholds - Extract fr



No PO No Pay.docx

	Print	Signature	Date
Requestor Name			
Designation			
	Print	Signature	Date
Budget Holder Name (If different to Line Manager)			
Budget Holder Designation			
	Print	Signature	Date
Finance Business Partner			
	Print	Signature	Date
Directorate Manager/Head of Service			

Alison
11/07/2026 08:31:14

Further Comments	
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Signatories below acknowledge the breach for reporting to Audit Committee as part of the Procurement Return

	Print	Signature	Date
Procurement Lead			
Comments (Including corrective advice provided on appropriate procedure)			
	Print	Signature	Date



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Head of Procurement			
Comments			

	Print	Signature	Date
Executive Director			
Comments			

McLennan, Alison
21/08/2026 08:31:14

**Upon completion, this form is to be attached to the requisition.
The Director of Finance will determine whether any further action will be taken.**