NATIVE CHILD
AND FAMILY SERVICES
OF TORONTO

FINANCE POLICY MANUAL			
Policy Name:	PURCHASE OF GOODS AND SERVICES		
Section:	FINANCE	**Policy No:**	TBA
Approved by:	Leadership Council	**Date of Issue:**	November 15, 2026
Signature:		**Date of Approval:**	November 13, 2026
Review/Revision Date (s):	November 13, 2027		
Date of Next Review/Revision:	At least every three years and sooner following material legislative, directive, trade-agreement or MCCSS funding-agreement changes	**Reviewed/ Revised by:**	Lindsay Seifried, Veronika Bencze
This Policy Applies to: Contractual, Relationships and Purchased Services			

1. PURPOSE AND PRINCIPLES

NCFST will acquire goods, construction, and services including consulting services and information technology through procurement processes that are open, fair, transparent, ethical, accountable and designed to achieve value for money over the full life cycle of the purchase. Procurement decisions must support service quality, continuity and the best interests of the children, youth, families and communities served by NCFST.

This Policy is established according to the Ontario Management Board of Cabinet's Broader Public Sector (BPS) Procurement Directive, April 2026. Native Child and Family Services of Toronto (NCFST), as a designated broader public sector organizations under section 12 of the Broader Public Sector Accountability Act, 2010, is required to adhere to the updated procurement guidelines.

All procurement activity must comply with applicable legislation, the Broader Public Sector Accountability Act, 2010, the current BPS Procurement Directive, the Buy Ontario Procurement Directive, applicable trade agreements, the Ontario BPS Supply Chain Code of Ethics, NCFST policies, and all applicable MCCSS transfer-payment, accountability and program-specific agreement requirements.

Procurement must not be divided, split, phased or structured to avoid a competitive threshold, approval level, public posting, trade-agreement obligation or other requirement. Procurement value

is the total estimated financial commitment, including all options, renewals, extensions, phases, fees and related costs, excluding applicable sales taxes for BPS Directive approval-threshold purposes.

NCFST shall conduct procurement activities in accordance with the five key principles as outlined in the Broader Public Sector Procurement Directive as follows:

Accountability

Procurement activities will be conducted in a manner that ensures clear authorization, documentation, oversight, and accountability for procurement decisions and outcomes.

Transparency

Procurement opportunities, processes, decisions, and results will be communicated in an open, fair, and transparent manner, providing appropriate access to information for suppliers and stakeholders.

Value for Money

Procurement decisions will maximize value through consideration of cost, quality, service, risk, and total lifecycle costs.

Quality Service Delivery

Procurement activities will support the timely acquisition of goods and services required for effective and uninterrupted service delivery to children, youth, families, and communities.

Process Standardization

Standardized procurement processes, practices, and documentation will be used to promote consistency, efficiency, fairness, and compliance.

2. SUPPLY CHAIN CODE OF ETHICS

NCFST is committed to conducting supply chain activities in an ethical, accountable, and transparent manner. Individuals engaged in procurement and supply chain activities will comply with the Ontario Broader Public Sector Supply Chain Code of Ethics and shall:

- Act with integrity and professionalism;
- Avoid actual, perceived, or potential conflicts of interest;
- Treat suppliers fairly and consistently;
- Maintain confidentiality of information obtained through procurement activities;
- Support accountability, transparency, and responsible stewardship of public funds and
- Promote continuous improvement in procurement and contract management practices.

3. SCOPE AND RESPONSIBILITIES

This policy applies to all NCFST Board members, employees, volunteers, consultants, contractors and other individuals involved directly or indirectly in supply-chain activities, including planning, requisitioning, budgeting, sourcing, evaluation, contracting, receipt and payment.

The Leadership Council approves this policy and accountable for implementation. Finance and Procurement are responsible for procurement oversight, guidance, records and compliance monitoring. Program and operational leaders are responsible for defining needs, confirming budgets, participating in evaluations where appointed, monitoring supplier performance and confirming receipt of goods/services.

4. APPROVAL AUTHORITY AND SEGREGATION OF DUTIES

NCFST shall maintain and comply with Board-approved signing authority limits that establishes approval authorities and spending limits for requisition, budgeting, commitment, receipt, and payment. All required approvals must be obtained before procurement commences.

At least three procurement functions must be segregated among different individuals or departments. Where this is not feasible, documented compensating controls approved by an external auditor shall be implemented and retained by Procurement.

All procurements require prior signing authority approval. Non-competitive procurements of goods and non-consulting services require approval one authority level higher than comparable competitive procurements.

Non-competitive procurements of consulting services may proceed only where a valid trade-agreement exemption applies and require Leadership approval for values below $1,000,000 and Board approval for values of $1,000,000 or more. Such approvals do not constitute authorization to sole-source.

No employee shall commit NCFST to a purchase, contract, amendment, or supplier engagement without prior budget confirmation and signing authority approval.

5. COMPETITIVE PROCUREMENT REQUIREMENTS AND THRESHOLDS

The following table reflects the Ontario Management Board of Cabinet's Broader Public Sector (BPS) Procurement Directive, April 2026.

These thresholds are minimum requirements and may be subject to stricter internal approval or competition requirements through NCFST procedures.

Procurement category	Estimated total value (before tax)	Required procurement approach	Status
Goods, non-consulting services and construction	Under $50	Petty cash may be used, subject to internal controls	Directive recommendation
	$51 to under $3,000	Procurement card (P-card) may be used, subject to cardholder and approval controls	Directive recommendation
	$3,000 to under $10,000	Purchase order recommended	Directive recommendation
	$10,000 to under $139,000	Invitational competitive process; invite at least three qualified suppliers to submit bids	Directive recommendation
	$139,000 or more	Open competitive procurement through an electronic tendering system readily accessible to suppliers	Mandatory
Consulting services	Any value	Competitive procurement required at every value; invitational or open competitive below $139,000; open competitive at $139,000 or more	Mandatory

For the purposes of this policy, we define consulting services as the provision of expertise or strategic advice presented for consideration and decision-making. Classification must be determined by the

substance of the engagement, not the title of the supplier or contract. If uncertain, Procurement must determine the appropriate classification before sourcing.

For goods and non-consulting services below $139,000, NCFST should use a documented invitational process and invite at least three qualified suppliers for procurements of $10,000 or more, unless the signing authority or an approved procedure sets a stricter requirement. If fewer than three suppliers are reasonably available or respond, the procurement file must document the steps taken and rationale.

For open competitive procurements, the solicitation must be posted on an electronic tendering system readily accessible to suppliers. The closing date must be a normal working day (Monday to Friday, excluding provincial and national holidays). Late submissions must be returned unopened.

For procurements valued at $139,000 and up to $368,000, suppliers must be provided at least 15 calendar days to respond. NCFST must consider at least 30 calendar days for procurements of high complexity, risk or dollar value, subject to applicable trade agreements and any longer period required by them. For other procurements, response times must be reasonable and proportionate to complexity and risk.

Procurement value must include the full expected term, options, extensions and associated deliverables. Staff must not split procurements to remain below a threshold.

6. BUY ONTARIO REQUIREMENTS

In addition to the BPS Procurement Directive and applicable trade agreements, NCFST must apply the Buy Ontario Procurement Directive, April 2026, to procurements within its scope. The Buy Ontario framework consolidates the Building Ontario Businesses Initiative and the Procurement Restriction Policy and introduces requirements for specified strategic categories.

For BPS entities, the current Buy Ontario preference bands for goods and services are:

Estimated procurement value	Required preference strategy	Policy application
Below $139,000	Wherever feasible, give preference to Ontario businesses	Apply the current Guide for Buyers and document the approach
$139,000 to under $368,000	Wherever feasible, give preference to Canadian businesses	Apply the current Guide for Buyers and document the approach
$368,000 or more	Give preference to businesses of Ontario's trading partners	Apply the current Guide for Buyers and trade-agreement requirements

The Buy Ontario preference rules are subject to the Directive's detailed definitions, process requirements and stated exceptions. Any exception must be supported and documented. Staff must not assume that a local preference overrides applicable trade-agreement obligations.

NCFST must comply with the Procurement Restriction Policy incorporated into the Buy Ontario Procurement Directive, including restrictions on procuring goods or services from U.S. businesses where applicable. Before excluding or considering a U.S. supplier, staff must consult the current Supply Ontario guide and document the required assessment and any permitted exception. The restriction applies to new procurements within scope, including invitational, open and non-competitive methods.

Where a procurement involves capital infrastructure or a strategic category covered by the Buy Ontario Procurement Directive including specified light-duty fleet vehicles, Procurement must consult the current directive and Supply Ontario operational guidance before the procurement is designed or posted. Additional domestic supply-chain plans, evaluation methods or vehicle requirements may apply.

Buy Ontario requirements must be applied consistently with applicable trade agreements and the current BPS Directive. The Buy Ontario Directive prevails over inconsistent procurement-directive requirements to the extent specified in the legislation/directive.

7. PROCUREMENT PLANNING, SOLICITATION AND EVALUATION

Before issuing a solicitation, the requesting department must document the business need, scope, specifications, estimated procurement value, budget, funding source, procurement method, applicable thresholds, evaluation approach, risks, accessibility requirements, and required approvals.

Market research, a Request for Information (RFI) or a Request for Expression of Interest (RFEI) may be used. Participation in an RFI or RFEI will not pre-qualify a supplier or influence its evaluation in a future competition.

A Request for Supplier Qualifications (RFSQ) may be used to pre-qualify suppliers. The RFSQ must state that NCFST has no obligation to call on a pre-qualified supplier to provide goods or services. Any subsequent procurement must follow the process disclosed in the RFSQ and applicable requirements.

EVALUATION

Evaluation criteria must be approved before issuance and clearly disclosed in the solicitation, including mandatory and rated criteria, weightings, evaluation methodology, disqualification rules, and any applicable tie-breakers or alternative solutions.

Evaluation criteria may only be amended through a formal addendum issued to all suppliers. Submissions that fail mandatory requirements will be disqualified, and all criteria must comply with applicable non-discrimination and trade-agreement requirements.

An evaluation team must assess compliant submissions. Evaluators must sign conflict-of-interest and confidentiality declarations and conduct evaluations fairly, objectively, and consistently. Evaluation records, including scores, consensus results, clarifications, approvals, and award recommendations, must be retained.

Contracts must be awarded to the highest-scoring compliant submission based on the published criteria. Any exception requires legal authorization and review by Finance. Competitive solicitations must state submission deadlines. Late submissions will not be accepted, and all supplier communications be managed through the designated procurement contact.

8. NON-COMPETITIVE PROCUREMENT AND EXCEPTIONS

NCFST may use non-competitive procurement only where a specific exemption, exception or non-application clause under an applicable trade agreement permits it, or where another legally applicable exemption is established. Convenience, urgency that could reasonably have been anticipated, preference, staff time, continuity alone, or the absence of an established purchasing arrangement is not, by itself, sufficient justification.

Before any non-competitive procurement begins, the requesting department must present written justification identifying exemption or exception relied upon; scope and total value; research undertaken; conflict checks; funding restrictions; proposed supplier; and contract term. Finance must review the justification and obtain the higher approval required by the signing authority and BPS Directive.

A non-competitive procurement must not be used to avoid competition or Buy Ontario obligations. The file must contain approval and supporting evidence before the supplier is engaged. The procurement and resulting contract remain subject to contract-management and records-retention requirements.

Where an urgent and unforeseen emergency requires immediate procurement, staff must follow applicable emergency provisions and NCFST emergency/financial approval procedures. Documentation must include the emergency, justification for bypassing normal competition, supplier selection, pricing rationale, approvals, and actions taken to restore normal procurement controls.

This policy does not prevent urgent action required to protect a child or meet a statutory child-welfare obligation; however, the decision, legal/program basis, approvals and value-for-money rationale must be documented as soon as practicable and reviewed by Finance.

9. CONTRACT AWARD AND CONTRACT MANAGEMENT

Before goods or services commence, the successful supplier and NCFST must execute a written contract using the form of agreement released with the solicitation. If an immediate need exists and the final contract cannot be completed, an interim purchase order may be used only where the justification is documented and approved by the appropriate authority.

All contracts must include appropriate cancellation/termination clauses. The initial term and all extension options must be disclosed in the competitive procurement documents. An approval by the appropriate authority is required before any modification to the term. An extension beyond the disclosed term that changes procurement value or deliverables constitutes a non-competitive procurement and must be assessed and approved accordingly.

Contracts must clearly describe scope, deliverables, service levels, milestones, pricing, invoicing, insurance and risk requirements, privacy/security obligations, confidentiality, accessibility where applicable, records access, subcontracting, audit rights, dispute resolution, termination, and any required child/youth safety or safeguarding obligations. Legal review may be required for complex, high-risk or material contracts.

The Contract owner must monitor contract performance, deliverables, service quality, timelines, expenditures, amendments, insurance and compliance. Invoices must contain sufficient detail to support payment and must be checked against the contract and evidence of receipt/performance. Payments must follow contract terms; overpayments must be recovered promptly. Supplier performance concerns and corrective action must be documented.

For service contracts, terms of reference must identify objectives, background, scope, constraints, staff responsibilities, tangible deliverables, timing, progress reporting, approval requirements and knowledge-transfer requirements. Supplier expenses may be reimbursed only where the contract expressly permits them and only in accordance with the BPS Expenses Directive and NCFST policy.

10. CONTRACT AWARD NOTIFICATION AND DEBRIEFING

For procurements valued at $139,000 or more, NCFST must post a contract award notification in the same manner as the procurement documents were posted, after the contract is executed. The notice must identify the successful supplier, agreement start and end dates, and any extension options.

For procurements valued at $139,000 or more, all unsuccessful suppliers must be informed of their entitlement to a debriefing. Suppliers must be allowed 60 calendar days following the contract award notification to request a debriefing. Debriefings must be conducted fairly and documented. Any bid dispute must be handled in accordance with the procedure disclosed in the solicitation and applicable trade-agreement dispute provisions.

11. PROCUREMENT RECORDS, CONFIDENTIALITY AND CONFLICTS

Procurement documentation and pertinent information must be retained in a recoverable form for at least seven years, or longer where required by law, the MCCSS funding agreement, litigation hold, audit direction, contract or NCFST records-retention schedule. Procurement files must include all documentation supporting the procurement process, contract administration, and supplier communications.

Procurement must maintain procedures for the secure handling, storage, access, retention, and disposal of confidential and sensitive supplier information. Access must be restricted to authorized individuals, and information must not be disclosed except as authorized by law, the procurement documents or contract.

NCFST must identify, disclose, document, and manage actual, potential, and perceived conflicts of interest in procurement activities. This applies to Board members, employees, advisors, external consultants, volunteers, contractors and suppliers. Gifts, favours, preferential treatment, and supplier endorsements that could create a conflict of interest are prohibited.

12. CREDIT CARDS AND PROCUREMENT CARDS

An NCFST credit card or procurement card must be used only for authorized business purchases, in accordance with the Credit Card Policy. The card is a payment method, not an exemption from procurement procedures or directives, as outlined above. Purchases must not be split to avoid approval or competition requirements. All usage of these cards will be for agency business and must be supported by appropriate documentation with an indication of the purpose of the expenditure.

13. CHILD AND FAMILY WELLBEING

Residential care, foster/residential placement-related purchases and other child-welfare service arrangements must be managed in a manner that protects the child's best interests, safety, continuity of care and statutory service obligations while maintaining accountability for public funds. The Leadership Council may authorize a placement or service within approved program, statutory and budget parameters, subject to applicable MCCSS requirements.

Where the nature of an individual placement, specialized service or urgent child-welfare need makes a competitive process impracticable, the file must record the child-centred/program rationale, available alternatives considered, rate and value assessment, funding eligibility, conflict check, approval and any required MCCSS authorization. This section is not a blanket exemption from the BPS Procurement Directive or applicable trade agreements.

14. MINISTRY OF CHILDREN, COMMUNITY AND SOCIAL SERVICES (MCCSS) FUNDING

Where procurement is funded wholly or partly by Ministry of Children, Community and Social Services (MCCSS), the responsible manager and Procurement must review prior to committing funds.

Any additional funder-specific approval, prior consent, eligible-cost rule, procurement condition, Indigenous/community-specific requirement, asset-disposal condition or record-retention requirement must be followed.

The Transfer Payment Accountability Directive and Transfer Payment Operational Policy establish obligations for the ministry in its oversight of transfer payments; they do not, by themselves, replace NCFST's procurement obligations.

If the MCCSS agreement or program-specific direction imposes a stricter procurement or approval requirement than outlined in this policy, the stricter requirement must be followed. If a funding agreement appears to conflict with a statutory or directive requirement, NCFST must obtain written clarification from MCCSS before proceeding.

15. POLICY ADMINISTRATION AND COMPLIANCE

Procurement will provide guidance, maintain templates and records, monitor compliance, and report material exceptions or control failures to Finance and the Leadership Council and, where appropriate, the Board or Finance Committee.

This policy must be reviewed at least every three years and whenever material changes occur to relevant directives or NCFST policy.

REFERENCE LINKS

Ontario Broader Public Sector Procurement Directive (April 13, 2026)
Buy Ontario Procurement Directive (April 13, 2026)
Buy Ontario- Overview and Guidance
Broader Public Sector Accountability Act

Ministry of Children, Community and Social Services
Transfer Payment Accountability Directive
Transfer Payment Operational Policy