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Summary of Changes from Previous Version

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1. INTRODUCTION

This policy is designed to ensure that:

A MULTI-ACADEMY TRUST

- All Trust funds are used in accordance with applicable legislation, the Trust's Articles of Association, Funding Agreement, and the Academy Trust Handbook.
- Procurement activities are conducted through open, fair and transparent procedures.
- Procurement decisions demonstrate best value by securing the optimum balance of cost, quality and sustainability to meet the Trust's requirements.
- Trustees fulfil their responsibilities and statutory duties as both Charity Trustees and Company Directors.
- The Trust delivers social value to the communities in which it operates and serves.
- Actual, potential and perceived conflicts of interest are identified, managed and recorded appropriately.

2. LEGISLATION AND GUIDANCE

The Academies Trust Handbook states that Multi-Academy Trusts are required to ensure that competitive procurement procedures are in place and incorporated into the Trust's financial framework. They must ensure that the thresholds contained within the Procurement Act 2023 and its associated regulations are followed.

This policy is based on the:

- Academy Trust Handbook.
- Department for Education (DfE) guidance on buying procedures and procurement law.
- The Procurement Act 2023

This policy also complies with the Trust's Funding Agreement and Articles of Association.

3. EXTENT AND APPLICATION

This policy applies to all expenditure on goods, services, and works undertaken for and on behalf of the Trust, including ad hoc and one-off purchases. It must be followed by all Trustees, Governors, and staff involved in any purchasing or procurement activity on behalf of the Trust.

4. ROLES AND RESPONSIBILITIES

TRUSTEES

Trustees will ensure that:

- All expenditure decisions represent and demonstrate best value for money.
- The Trust's funds are managed and utilised in a manner that commands public confidence and withstands appropriate scrutiny.
- Relevant professional advice, including legal and external audit support, is obtained where necessary to inform decision-making and ensure compliance.
- Procurement activities, where appropriate and practicable, contribute social value and support the wellbeing of the communities served by the Trust.
- In accordance with Department for Education (DfE) guidance, any goods or services provided by individuals or organisations connected to the Trust are supplied on a no-profit basis and at no more than cost.

- No individual or organisation connected to the Trust, whether directly or indirectly, derives improper personal benefit from their association with the Trust.

FINANCE AND RESOURCES COMMITTEE

Trustees delegate procurement and competitive tendering responsibilities to the Finance and Resources Committee. The committee is responsible for:

- Overseeing the Trust's compliance with guidance on conflicts of interest and related party transactions.
- Ensuring compliance with tendering processes through approval and oversight.
- Waiver of financial regulations in respect of purchasing.

CHIEF FINANCE OFFICER (CFO)

The Chief Finance Officer is responsible for:

- Ensuring appropriate financial governance and risk management arrangements are in place.
- Preparing and monitoring budgets.
- Providing information to the Finance & Resources Committee and Trustees, as appropriate.
- Developing procurement strategy, overseeing, and supporting competitive tendering.
- Placing orders, entering contracts, and waiving financial regulations within the limits set out in the Scheme of Delegation and Financial Regulations.

ACADEMY LEADERS AND BUDGET HOLDERS

All academy leaders and budget holders are responsible for ensuring that they have read and understood this policy and work at all times within the principles and guidelines contained within it.

5. PROCUREMENT PLANNING

Before a procurement process is planned, the following will be considered.

- Whether equipment can be loaned, or resources shared with another school / public body.
- The existence of opportunity for collaborative approval to increasing buying power.
- Any existing contracts or frameworks in place, including through the local authority or other purchasing consortium.
- Trust-wide contracts for category spend, enabling direct purchasing and avoiding the administrative costs and time involved in sourcing and purchasing goods and services with individual suppliers.

6. FORMS OF PROCUREMENT AND PURCHASE THRESHOLDS

The Trust's procurement thresholds are contained within the Place Partnership Scheme of Delegation and are set out below:

Delegation	Value	Delegated Authority
Ordering Goods and Services (raising	Up to £5,000	2 signatories required: Budget Holder and either Trust Finance Manager or Senior Finance Officer

requisitions) in line with Trust Purchasing Statement		
	£5,001 to £10,000	As above plus Executive Principal/Headteacher/Head of Academy As above plus Chief Finance Officer/Chief People Officer & Chief Commercial Operating Officer (Shared services orders only) - Three written quotes/Preferred Supplier Status/Approved Framework Agreement
	£10,001 to £50,000	As above plus Chief Finance Officer
	£50,001 to £100,000	As above plus Chief Finance Officer and CEO - Formal Tendering Process required and completion of Procurement Checklist
	£100,001 to £200,000	As above plus Finance and Resources Committee.
	Over £200,000	In accordance with the provisions outlined above, however approval must be sought from the Board of Trustees rather than Finance and Resources Committee. If procurement is over thresholds prescribed in schedule 1 of the Procurement Act 2023, it is subject to the full suite of regulations governing public contracts.
Non-Purchase order invoices	Up to £5,000	Budget Holder
	£5,001 to £10,000	As above plus Executive Principal/Headteacher/Head of Academy As above plus Chief Finance Officer/Chief People Officer & Chief Commercial Operating Officer (Shared services orders only)
	£10,001 to £50,000	As above plus Chief Finance Officer
	£50,001 to £100,000	As above plus Chief Finance Officer and CEO - Formal Tendering Process required and completion of Procurement checklist
	£100,001 to £200,000	As above plus Finance and Resources Committee. Formal Tendering Process including advertising on Contracts Finder and Find a tender if over threshold.
	Over £200,000	In accordance with the provisions outlined above, however approval must be sought from the Board of Trustees rather than Finance and Resources Committee.
Operating Leases/Contracts	Above £5,000	Chief Finance Officer
Purchase or sale of freehold property	Any	DfE approval required (notify the Chief Finance Officer in first instance)
Granting or take up of any leasehold or tenancy agreement (refer to operating leases over 1 year)	Any	DfE approval required (notify the Trust Chief Finance Officer in first instance)

7. SINGLE SUPPLIERS – PURCHASING ARRANGEMENTS

Where the Trust or any of its Academies is unable to procure goods or services through the approved procurement routes outlined above, procurement from an individual supplier may be considered with the prior approval of both the CFO and CEO. Such approval will only be granted in exceptional circumstances, including where:

- The requirement is urgent and any delay would result in loss, injury, or damage. The urgency must arise from unforeseeable events that are not attributable to the Trust and where failing to approve

the exemption would cause significant detriment to the Trust; and/or

- The goods or services are of a specialised nature, such that no benefit would be gained from seeking competitive quotations or tenders; and/or
- Effective competition does not exist because prices are fixed by statutory authority, the goods or services are protected by patent or proprietary rights, or they are available from a single source only.

For purchases exceeding £5,000 from a single supplier, the relevant Single Supplier Justification Form must be completed by the Academy and approved by the CFO before the order is placed. The purchase must then be processed and authorised in accordance with the Trust's Scheme of Delegation.

To ensure compliance with these Financial Regulations, the Finance Team will periodically review procurement activity across the Trust to confirm that purchases demonstrate value for money, propriety, transparency, and adherence to the Trust's procurement requirements.

Failure to follow the above procedures may result in the delegated responsibilities to the budget holder, being withdrawn.

8. PROBITY AND BEST VALUE

The Trust is committed to securing best value in all purchasing and procurement activities. Best value is not considered solely in financial terms; it also reflects the wider social, environmental and economic benefits that contribute to the well-being of our communities.

To achieve this, the Trust and its academies will procure the goods, services and works they require at the appropriate quality, at the right time and at the most advantageous whole-life cost, while seeking opportunities to generate social value for the communities they serve.

Employees involved in purchasing and procurement are responsible for ensuring that resources are used economically, efficiently and effectively, so that all expenditure delivers demonstrable best value.

Within this context:

- **Cost** refers to the consideration of whole-life costs rather than purchase price alone.
- **Quality** means meeting a specification that is fit for purpose and sufficient to satisfy the Trust's operational requirements.
-

The Chief Financial Officer (CFO) will use the Department for Education's *Buying for Schools* resources and benchmarking tools to support purchasing decisions and ensure value for money.

9. USING CONSULTANTS TO SUPPORT PROCUREMENT

The Trust may from time to time, require specialist consultants to support the procurement of large-scale projects, for example, capital building programs, or large contracts such as Catering or Cleaning.

In deciding whether to work with external consultants, the CFO, CEO or Finance & Resources Committee will need to demonstrate that the services offer a clear advantage to the Trust and value for money. The cost of the services will be agreed in advance, either as a flat fee or as a percentage of the overall cost of the contract. A letter of engagement or an agreement signed between both parties should be put in place before work commences.

10.SUPPLIERS

The CFO is responsible for maintaining a register of approved suppliers on the financial accounting system. Before entering any details to the approved list, Finance will undertake a range of checks to establish the propriety of the supplier. This will include gaining confidence in their economic standing, ensuring they have not been convicted of any fraudulent activities and cross referencing with Business Interest declarations. The Trust encourages and values the use of local providers, wherever possible, and strives to build local connections through a range of networking events organised as part of the employer engagement agenda.

The CFO will also undertake a regular check of the business interest declarations against the register of suppliers to identify any potential contentious purchases. For any proposed purchases that involve a declared business interest, they should be referred to the CFO.

For further information on protecting the Trust from exposure to fraudulent activities, staff should refer to the Place Partnership Anti- Fraud Policy.

11.ROUTINE PURCHASING WITH A VALUE OF LESS THAN £5000

At least one quotation is required for all purchases. These can be received by post, or electronically (including screenshots from websites). The purchaser must be confident that they have secured both quality and value for money and be able to demonstrate this to be the case if requested. The quotation(s) should be recorded and retained within the Finance Department and attached to a copy of the authorised Purchase Order. Contracts up to and including £5,000 will be awarded by means of a Purchase Order and which must be sent to the successful supplier.

12.PURCHASING OF GOODS AND SERVICES BETWEEN A VALUE OF £5000 AND £50,000

A minimum of three quotations must be obtained for purchases of £5,001 up to and including £50,000. These can be received by post, or electronically (including screenshots from websites where appropriate). The quotations and the purchasing form should be recorded and retained for audit purposes within the Finance Department and documentation must be attached to a copy of the authorised Purchase Order.

The overall value of a contract must not be broken up into stages in order to avoid the procurement regulations or this policy applying.

It is not a requirement for the lowest price to be accepted; however, the reasons for not accepting the lowest price will be recorded and kept with the documentation for future reference. Reasons for not accepting the lowest price may include, but are not limited to:

- Specification not being met.
- Delivery dates.
- Quality issues.
- Unsatisfactory references.

If the order is via the list of pre-authorised suppliers, the need for three quotes is waived. The list of pre-authorised suppliers should be compiled and utilised in the following way:

- a) Must be reviewed at least annually using the correct procedures for the value of the goods/services being purchased (unless a longer contract has been agreed).
- b) Wherever possible, there should be up to three suppliers for a specific type of service included in the list and usage rotated equally to ensure fairness as well as best value

- amongst suppliers.
- c) The order has been approved by the CFO or CEO.

14. PURCHASING OF GOODS AND SERVICES BETWEEN A VALUE OF £50,000 AND £100,000

A formal tender process is required for purchases greater than £50,000. The procurement process will be managed by the CCOO / CFO with a lead contact from the Shared Service team relative to the nature of the tender. Prior to the commencement of the procurement process, approval to go out to tender for services / goods will be sought from the Principal/CEO and if appropriate the Board of Trustees.

The CCOO / CFO will require a written specification which will be provided to potential suppliers including the evaluation criteria to be applied. Where a tender process is completed, this must be advertised on Central Digital Platform, Find a Tender and a link to the Place Partnership Procurement site where tender documentation is held should be made available. The received quotations or tenders will be evaluated against the agreed criteria. Following approval the procurement checklist will be completed. The subsequent award will be made by either an official purchase order, offer letter or formal form of contract, dependent on the required terms and conditions for the goods or services purchased.

15. PURCHASING OF GOODS AND SERVICES WITH A VALUE OF OVER £100,000

For the procurement of all goods and services with a value of more than £100,000, the Trust will engage with a framework agreement or competitive tendering process, and they will additionally require approval from the Finance & Resources Committee. Decisions may be taken at a committee meeting or via e-mail with approval from a quorate number of Trustees, as appropriate to the circumstances.

Where a contractual arrangement exists between the supplier and Place Partnership, creating a legal obligation to make payment, for example, arrangements associated with the PFI contract, further approval will not be required subject to the original contract being approved in line with the Trust's Financial Regulation Thresholds.

16. FORMAL TENDER PROCESS

Tenders, or mini competition / direct awards under a Framework, must be undertaken for all contracts above £50,000.

The key stages are summarised below:

- Pre-Tender planning.
- Developing a specification.
- Agreeing the evaluation criteria.
- Invitations to tender/quotations.
- Clarification period.
- Shortlisting (for above EU Thresholds only).
- Submission, receipt and opening of tenders.
- Evaluation and recommendation to Trustees for approval to award tender.
- Award of contract.

17. PROCUREMENT ACT 2023 – THRESHOLDS AND NOTICES

The main core of the regulations applies to procurements over the threshold prescribed in Schedule 1 of the Procurement Act (updated annually). When calculating the estimated value of the contract

to determine whether the regulations apply, the contract value estimation should be inclusive of VAT (where applicable).

Supply & Service Contracts	£207,720
Works Contracts	£5,372,609
Light touch regime for health/social services £	£663,540

Schools are exempted from below-threshold procurement requirements in the Procurement Act. Any contracts valued above these thresholds are subject to the full suite of regulations governing public contracts and must be managed by the COO / CFO who will work in collaboration with the relevant project manager. Where contracts are above these thresholds, we will be required to publish a procurement notice on the Central Digital Platform and publish the required notices.

18. FRAMEWORK AGREEMENTS

Framework contracts are those where several suppliers have been pre-procured with all public sector rules complied with. Due to this it is possible to purchase directly from a framework without the need to complete a further procurement exercise, irrespective of the value being procured. In appropriate circumstances, this can be an efficient way of procuring goods and services as it reduces administration costs on the procurement as well as potentially securing value for money through pre-tendered low prices.

A framework agreement (or call-off agreement) is one where the terms of supply are fixed but it does not involve the supply of goods or services until an order is placed for the supply. Where appropriate, the Trust will use a framework agreement to contract suppliers.

Depending on the framework chosen, the Trust will either pick the best value supplier from a list or run a mini competition between listed suppliers. In either case, the Trust will follow the DfE guidance on procurement to ensure good practice. The reasons for the choice of framework, and for the choice of supplier, will be clearly recorded.

When using a framework contract, it is essential that the Trust considers whether:

- The Trust is entitled to call off from the arrangement.
- The specification and the contract terms are suitable for the Trust's particular needs.

The Trust must follow the framework's guidance, particularly about how orders should be placed. This will generally permit either direct awards of contracts to a supplier (with justification) and/or a further round of mini competition between all suppliers with capacity to deliver the requirement on the framework.

When running a mini competition, the Trust will:

- Comply with the terms of the framework agreement.
- Decide how it will assess bids, following any rules stated within the framework.
- Decide the level of service required.
- Decide if it wants to run an expression of interest process.
- Send an invitation to tender to all suppliers who can provide what the Trust needs.
- Fairly assess all bids received.
- Choose the supplier that offers the best value for money.
- Award the contract to the winning supplier.

The CFO has delegated authority to choose whether to use a framework agreement and which framework to use.

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19. FAIR TREATMENT OF SUPPLIERS

The Trust will comply with the key principles of the Procurement Legislation one of which being that all suppliers are treated fairly and equally in any competitive process, regardless of value. Suppliers will be provided with the same documentation and have access to specifications, plans, staff time and facilities upon request. Any clarification questions relating to tender documents raised by the supplier will be responded to and the answers will be provided to all prospective suppliers. Any request for price reduction or a best and final offer will be asked of all bidders. The evaluation criteria will be decided in advance and published with procurement competition documents to be available in full to suppliers to show they will be treated fairly when scoring the tender bids. During the evaluation stage, staff will ensure they note appropriate feedback which can be shared with the suppliers who request feedback at the end of the process when confirmation of the winning bid is sent.

20. SOCIAL VALUE (VALUE ADDED)

Sustainable procurement takes a wide view and incorporates the net benefits for both the Trust and the wider world. It considers the impact of environmental, economic and social factors along with price and quality. This is important in terms of how the Trust conducts its relationship with suppliers, including contract negotiation. The Trust has a duty to lookout for signs of unacceptable practices in the supply chain such as fraud, corruption, environmentally damaging practices, modern-day slavery, human trafficking and wider issues such as child labour.

The specifications and evaluation criteria must reflect the Trust's corporate values. Colleagues must ensure that all procurement activities consider the Trust's equality and diversity policy and is sensitive to cultural differences. Colleagues must also ensure that all procurement activity considers the social impact and the Trust's values.

To support and encourage an effective local business community, the Trust will ensure local suppliers have opportunities as appropriate to participate in tender exercises.

All procurement exercises above the EU threshold will evaluate each bidder's environmental sustainability. Each applicable procurement exercise will ask the bidder to confirm and attach their current Environmental Policy and provide information regarding their current Carbon emissions.

21. MODERN SLAVERY

The Trust is committed to ensuring that workers employed or engaged in its supply chains throughout the world are treated fairly, humanely and equitably and to this end we shall comply and shall ensure as far as is reasonably possible that its sub-contractors comply, in relation to all workers employed or engaged by it directly or indirectly in connection with the supply of goods and the performance of the Services, with the Modern Slavery Act 2015.

In this respect, the Trust will ensure that as far as is reasonably possible, procurement is undertaken with suppliers who either are pre-approved by a purchasing consortium / framework or are appointed by means of a tender process.

Reviewed: July 2026

Where procurement takes place within sectors where modern slavery offences could occur such as within our catering, cleaning, school uniform supply chains and building contractors we will work with these suppliers to ensure they are complying with the Modern Slavery Act. Where this cannot be verified by the supplier the Trust will seek alternative suppliers.

When one of our academies is selecting a new supplier, such as a school uniform supplier we will consider the supplier's ethical trading policies and review their code of conduct for suppliers as part of the tender and selection process.

Where new suppliers are required, the Trust undertakes due diligence and will include compliance with the Modern Slavery Act as a condition or criterion in tender documents.

22. VALUING CONTRACTS

The Trust must ensure that contracts are valued properly and that the spend is not deliberately segregated to appear below procurement thresholds. The total value of the contract can be calculated as follows:

- Calculating the annual spend.
- Multiplying by the number of years of the contract.
- Multiplying by the number of Academies within the Trust that the contract will be awarded to.

For fixed term contracts with an option to extend the term, the value of the contract will be the price of the fixed term plus the potential extension period. An example is a contract for 3 years with an option to extend for a further 2; the total number of years that needs to be considered in determining the value is 5 years.

23. LEASE ARRANGEMENTS

The Trust and its Academies should refer to the Academy Trust Handbook, paragraphs 5.25 to 5.28 for the latest information and guidance before considering or entering a lease.

Trusts must obtain ESFA's prior approval for the following leasing transactions:

- Taking up a finance lease on any asset not on the DfE approved list for any duration from another party, which are subject to the borrowing restrictions described in paragraphs of Academy Trust Handbook 5.34 and 5.35.
- Taking up a leasehold or tenancy agreement on land or buildings from another party for a term of seven or more years.
- Granting a leasehold interest, including a tenancy agreement, of any duration, on land and buildings to another party.
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NB. This does not include operating leases, where the goods will be returned at the end of the term, for example, lease of photocopiers, minibuses etc.

Any potential contentious lease arrangements, in the first instance, will always be discussed by the FAR Committee. The FAR Committee will consider whether DfE approval is required and will refer this to the Trust Board, for a decision on whether to proceed with the request for approval.

To ensure that adequate due diligence has taken place, the Trust Board will consider taking professional advice from Audit and Legal services before making a request to the DfE.

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24. RELATED PARTY TRANSACTIONS

All members, Trustees, Governors and key staff must declare any pecuniary interests. Any changes to a declaration should be reported to the Trust's CFO / CCOO or HR Department without delay.

As required by the Academy Trust Handbook, Trusts must declare their intention to enter into a new agreement before confirming the transaction with a related party supplier. This includes agreements being renewed with a related party supplier.

Academy Trusts must obtain DfE's prior approval using the DfE's related party on-line form, for contracts and other agreements for the supply of goods or services to the Trust by a related party where a contract or other agreement exceeds £40,000 in the same financial year ending 31 August.

The Trust must follow the guidance within the Academy Trust Handbook for all related party transactions including the "at cost" requirements.

25. RECORD KEEPING

Records will be kept securely, only for as long as necessary and in line with data protection law, our privacy notices and [records management policy/record retention schedule].

26. MONITORING ARRANGEMENTS

The Finance & Resource Committee is responsible for the implementation of this policy and for reviewing procurement activity. This is supported through routine reporting led by the CFO/Business and Finance Professional.

27. LINKS WITH OTHER POLICIES

This policy is linked to the Trust's Financial Regulations and Scheme of Delegation.

28. REVIEW OF CONTRACTOR DELIVERABLES

Following the award of a contract through a framework or competitive tender process, the specific deliveries provided by the winning contractor or supplier, will be reviewed against the original specification and scoring matrix.

29. REVIEW OF POLICY

This Policy will be included in the Trust's Policy Compliance Tracker and will be circulated to every Trustee, Executive and Senior Leaders.

The Trustees (Finance & Resources Committee) are responsible for reviewing and approving the Procurement Policy.

Reviewed: July 2026