Procurement Policy

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Date	**Version**	**Reason for change**	**Overview of changes made**	**Source**
01.09.20	0.1	Scheduled Internal Lead Review		
02.09.20	0.2	Scheduled Board Lead Review		
18.09.20	1.0	Scheduled Board review	Ratified	
12.09.23	1.1	Scheduled Review - Internal Lead	Changes made to reflect procedure. S Cole	
19.09.23	1.2	Scheduled Review - Board Lead	No changes. C Bradshaw Smith	
29.09.23	2.0	Scheduled Review - Board	Ratified	
20.05.26	2.1	Scheduled internal review	All references to the obsolete *Public Contracts Regulations 2006* (and old EU/OJEU terminology) have been permanently removed and replaced with the **Procurement Act 2023** and the **Academy Trust Handbook** (formerly the	

			Academies Financial Handbook). **2026 Financial Thresholds:** Updated to reflect the mandatory UK statutory thresholds that took effect on **1 January 2026**. **VAT Inclusion:** In line with Section 123 of the new Act, all contract valuation definitions and thresholds are now strictly **inclusive of VAT**. **Bespoke Process Updates:** Swapped the rigid "lowest price vs price/quality" text for above-£50k spend to align with the new **Competitive Flexible Procedure (CFP)**, the shift from MEAT to **MAT (Most Advantageous Tender)**, and updated digital platform notice frameworks.	
17.06.26	2.2	Board lead review		
10.07.26	3	Board review	Ratified by Board	

1: PURPOSE, SCOPE AND GUIDING PRINCIPLES

1.1 Introduction and Purpose

This policy ensures that all procurement activities across The Staffordshire Schools Multi Academy Trust (TSSMAT) are carried out in a strategically aligned, ethical, and legally compliant manner, with the overarching principle of achieving best overall value for the Trust.

Purchasing decisions are not judged solely on obtaining goods or services for the lowest possible upfront price. Instead, choices are based on Value for Money (VfM), taking into account the whole lifecycle costs, delivery quality, sustainability, and the total cost of procurement.

To support these objectives, the Trust enforces rigorous procedures to ensure:

- Suppliers are appropriately selected and vetted.
- Goods and services are purchased only with proper, documented authorization.
- Appropriate and legally compliant tender processes are implemented.
- Goods and services are received, audited, and correctly recorded.
- Payments are only released for goods and services successfully received.

1.2 Legislative Compliance

TSSMAT operates as a sub-central contracting authority. All procurement activities undertaken on behalf of the Trust must comply with the requirements of all relevant and applicable legislation, including but not limited to:

- The Procurement Act 2023 (and all associated Threshold Regulations)
- The Academy Trust Handbook (latest edition) and DfE funding agreements
- The Fraud Act 2006 and The Bribery Act 2010
- The Climate Change Act 2008 and Environmental Protection Act 1995
- The Transfer of Undertakings (Protection of Employment) Regulations (TUPE)
- The Construction Industry Scheme (CIS)

1.3 Scope

This policy is compulsory for every member of TSSMAT staff, executives, and external contractors who hold budget management or purchasing responsibilities. It applies to any contract, lease, or single transaction that results in a financial payment being made by TSSMAT or any of its schools.

1.4 Guiding Principles

- Proportionality: Rigor scales with value. More intensive procurement processes apply to higher-value contracts; low-value purchasing does not require a formal competitive process.
- Equal Treatment and Transparency: All suppliers in a competitive process must be treated equally, with absolute transparency and zero discrimination. All bidders will be issued identical information at the exact same time, including clear, unchangeable evaluation timelines.

2: ROLES AND RESPONSIBILITIES

2.1 The Trust Finance Manager

The Trust Finance Manager is responsible for enforcing financial governance protocols, managing risk relative to commercial activities, and delivering quantifiable savings while maximising value for money. Core responsibilities include:

- Overseeing the end-to-end procurement process, optimising product lines, and converting approved requisitions into official purchase orders.
- Leading stakeholder consultations (internal and external) to secure authoritative technical/commercial feedback prior to spend.
- Mitigating contractual and legal risks during quote and tender processes.
- Standardising high-volume commodity items (e.g., paper, textbooks, and stationery) across the MAT to leverage economies of scale.
- Introduction of procurement systems which support the Procurement strategy and policy
- Developing strategic supplier relationships to secure an uninterrupted flow of goods, works, and services.

  Operational Notice: The efficiency of procurement depends heavily on advance notice. The Trust Finance Manager must receive adequate, early notification of potential high-value purchases. Constituent schools must advise the Trust Finance Manager of any pipeline requirements arising from new developments or capital needs as soon as information becomes available.

2.2 Counter-Fraud, Bribery, and Conflict of Interest Compliance

The financial management team and all purchasing staff are required to actively prevent, identify, and report any potential offences under the Fraud Act 2006 and Bribery Act 2010:

- Fraud: Intentionally or dishonestly making a false representation, failing to disclose legally required information, or abusing a position of trust to secure personal gain or cause loss to another.
- Bribery: Offering, giving, requesting, or receiving a financial or other advantage to induce or reward the improper performance of a position of trust or function expected to be executed impartially.

In line with the Trust's overarching Finance Policy:

- All Trustees, Directors, Local Governors, senior leadership staff, and employees with spending power must complete a Declaration of Interest form annually.
- Transactions must be cross-referenced against this register before any contract is awarded.
- Material changes in personal circumstances must be declared immediately. Failure to declare a conflict of interest may lead to disciplinary action up to dismissal, contract termination, and potential criminal prosecution.

3: DELEGATED SCHEME OF AUTHORITY

The following financial limits dictate the minimum approval requirements for transactions. This table will be updated sequentially by the Trust Finance Manager as required.

Transaction Type	Value	Authorised Approvers
Credit Card	Up to £250 per single transaction per day	Authorised Cardholder
Credit Card	£251 to £1,500 per single transaction per day	Cardholder plus one written approval from: - School Headteacher - Trust Finance Manager - Chief Executive Officer (CEO)
Purchase Orders & Invoices	Up to £1,000	School Headteacher (In their absence, Trust CEO)
Purchase Orders & Invoices	£1,001 to £5,000	Trust Chief Executive Officer (CEO)
Purchase Orders & Invoices	£5,001 to £50,000	Trust CEO plus FAR Approval
Purchase Orders & Invoices	£50,001 and above	Full Board of Directors approval

4: PROCUREMENT PROCEDURES

4.1 General Preliminaries & Valuing a Contract

Before any sourcing process begins, the designated purchaser ("the orderer") must execute the following preliminary steps:

- Aggregation Check: Consult with the Trust Finance Manager to determine if other schools within TSSMAT require the same or similar items. If so, requirements must be grouped together into a single procurement.

- Artificial Splitting Prohibited: Contracts must be valued based on the whole-life value (the entire anticipated spend across the life of the contract, inclusive of VAT, extensions, or renewal options). Artificially dividing contracts into smaller, distinct parcels to bypass quotation bands or statutory thresholds is an explicit breach of financial regulations.
- Framework Analysis: Assess if the requirement can be satisfied via an approved, compliant public framework agreement (e.g., Crown Commercial Service, CPC) or via existing internal resources, negating the need for a full bespoke process.
- Statement of Need: As a minimum, the orderer must document the exact justification of need, volume required, maximum budgeted cost, and strict delivery timelines.

4.2 Low-Value and Operational Spend Pathways

A. Credit Cards (Low Value, One-Off Purchases)

- Credit cards are reserved strictly for minor, non-recurring spends that cannot be efficiently executed via purchase orders or corporate accounts. They must not be used for repeat or high-value items.
- No single item may exceed £250. Any card transaction over £500 requires explicit, prior written approval from the Trust CEO. All receipts must be provided to the Trust Finance Manager.

B. Spend up to £1,000

- No formal competitive quotations are mandated. The orderer must visually verify and document that value for money has been achieved as far as practicable.

C. Spend between £1,001 and £2,500

- A minimum of two independent prices must be checked, evaluated, and retained on file. Prices may be drawn from written quotes, formal online pricing sheets, or supplier catalogues. This audit trail must be recorded before a purchase order is processed.

D. Spend between £2,501 and £10,000

- A minimum of three written quotes must be formally requested, analysed, and retained before a purchase order is raised.

4.3 Medium-Value Spend Pathway (£10,001 to £50,000)

A business case must be produced by the budget holder and submitted to the Trust Finance Manager, who will seek consultative advice from the Trust CEO. The Trust Finance Manager will authorize one of two strategic approaches based on the complexity of the requirement:

- Approach A (The Lowest Accountable Price): A minimum of three written quotations must be obtained based on a fixed specification. The invitation must explicitly state that the contract will be awarded to the lowest-priced bidder who fully satisfies the baseline technical criteria.
- Approach B (Balanced Price and Quality): A minimum of three written quotations are evaluated against both financial and qualitative criteria. The specification must explicitly detail the evaluation criteria, sub-criteria, and relative weightings (e.g., 60% price/40% quality) that will determine the selection.

4.4 High-Value Spend Pathway (£50,001 up to Regulated Thresholds)

For any project exceeding £50,001, a formal, bespoke internal tender process must be followed, supported by full authorisation from the Board of Directors.

- Business Case Requirement: A comprehensive business case must be co-signed by the Trust Finance Manager and CEO, with notification provided to the Board.
- Advertising: Tender opportunities must be advertised transparently to stimulate fair market competition. Depending on the scale, advertisements may be placed on the central TSSMAT website, relevant trade journals, or national public sector portals.
- The Tender Pack: The Trust Finance Manager will compile a comprehensive digital tender pack containing clear submission criteria, required pricing schedules, method statements, technical specification thresholds, the evaluation rubric (with sub-criteria weightings), and a copy of the draft TSSMAT terms and conditions.
- Tender Opening and Security: Tenders must remain digitally or physically locked and secure until the exact closing deadline. Submissions will be opened simultaneously by the Trust Business Manager under the formal supervision of an independent member of staff, with a log recorded.
- Evaluation Panel: Tenders will be objectively evaluated by a minimum of two executive Trust members and one member of the FAR against the exact, pre-determined criteria published in the tender pack. No criteria may be modified post-issuance.

4.5 Regulated Statutory Threshold Procurements (Procurement Act 2023)
Whenever a contract's estimated whole-life value meets or exceeds the statutory UK thresholds set out in the Procurement Act 2023, the Trust must execute a full regulated procurement process.

A. Statutory Financial Thresholds (Effective 1 January 2026)

Values are calculated inclusive of all extension variables and must strictly include VAT.

- Supplies & Services Contracts: £207,720
- Light Touch Regime Contracts *(e.g., School Catering, specific Education Services)*: £663,540
- Works Contracts *(e.g., Major Building Construction, Infrastructure, Roof Replacement)*: £5,193,000

B. The Regulated Procedure Pathway

1. **The Competitive Flexible Procedure (CFP):** The Trust will design a bespoke, flexible tendering process matching market conditions, utilising the centralized digital platform (*Find a Tender*). This may include multi-stage down-selection or supplier negotiations, provided it remains fair, non-discriminatory, and fully transparent.
2. Awarding under MAT: Contracts are evaluated and awarded based on the Most Advantageous Tender (MAT), effectively replacing the old "Most Economically Advantageous Tender" (MEAT) protocol. This allows the Trust to formally factor in broader non-price priorities, including social value, environmental sustainability, local community impact, and supply chain resilience.
3. Statutory Notice Deployments: The Trust will satisfy its statutory transparency duties by publishing the mandatory sequence of public notices on the central digital platform:
    - *Planned Procurement Notices* (Forward pipelines)
    - *Tender Notices* (Invitations to participate)
    - *Contract Award Notices* (Announcing the winner, which initiates a mandatory standstill period before execution)
    - *Payments Compliance Notices*
4. Contract Performance (KPIs): For any contract surpassing the statutory Supplies & Services threshold, the Trust will establish and publish at least three Key Performance Indicators (KPIs). The supplier's actual performance against these metrics must be audited and logged at least once every 12 months.

5: GOVERNANCE, AUDITS AND OPERATIONAL DISPENSATIONS

5.1 Emergency Exemptions and Business Continuity

TSSMAT may divert from standard competitive quote or tendering requirements only in cases of extreme, unforeseeable urgency or to secure immediate business continuity (e.g., immediate structural failure, flooding, or severe health and safety risks) where the crisis was not caused by Trust delay or inaction.

- This exemption can only be enacted with the express, prior written consent of the Trust CEO.
- The exemption and its detailed justification must be formally logged as a standing item at the next scheduled meeting of the Board of Directors.

5.2 Budgetary Tracking of Unspent Allocations

To maintain strict budgetary tracking:

- Any unspent excess procurement allocations or designated reserves tied to multi-year capital, IT, or operational contracts will be displayed transparently on a dedicated, separate line within the Trust's operational budget.
- The balance and drawdown schedule of these lines will be evaluated routinely by the Trust Finance Manager and reported directly to the Board of Directors.

5.3 Clear Segregation of Duties & Audit Trail

An audit trail must be maintained for every purchase.

- Segregation of Duties: The individual responsible for authorising the initial decision to procure must not be the same individual who checks the received goods or authorises the final invoice payment.
- Record Retention: All primary documentation including original specifications, submitted supplier quotes,, contracts, delivery notes, and invoices must be retained securely within the Trust's financial management system for a minimum of six years following the formal expiration of the contract or purchase order.

5.4 Receipt of Goods

Upon physical delivery of any ordered items, the recipient must execute an immediate, detailed check of the goods received against the original purchase order. Any identified discrepancies, shortages, or visible defects must be officially noted on the documentation and reported to the Trust Finance Manager within two working days of receipt.