We are an ambitious and inclusive Trust of schools
strengthening communities through excellent education.

Procurement Policy
(Competitive Tendering)

Responsibility for approval: Board of Trustees
Date of approval: May 2026
Next review: April to June 2028

Contents Page

1 Policy Statement

1.1 The Trust's policy is to ensure that all goods, services, and works are procured fairly and openly, in a transparent and economical manner, achieving value for money (economy, efficiency, effectiveness) and supporting public benefit. The Trust is committed to using best practice in procurement, including the integration of Environmental, Social and Governance (ESG) considerations and the promotion of supplier diversity, in line with statutory procurement objectives and the Academy Trust Handbook (ATH).

1.2 Together with financial regulations, procedures and guidelines, this policy serves the following principles:

- Transactions must comply with applicable laws, Trust policy and the Academy Trust Handbook.
- Trust policy is best achieved through competitive "best value" procurement processes: exceptions must have appropriate justification and approval.
- Appropriate due diligence, oversight, and documentation must be undertaken in order to demonstrate accountability and transparency in decision-making and the management of public funds
- Third party, legal, financial, cyber, security and privacy risks shall be suitably assessed, identified and managed within the Trust's procurement and contracting processes.
- Contract terms and conditions are negotiated with vendors that ensure the successful delivery of goods and services.
- Guidelines, procedures and controls must be based on best practices.

2 Scope and Purpose

2.1 This policy applies to all spending on goods, services, and works for and on behalf of the Trust, including ad-hoc one-off requirements and will be applied by any trustee, governor or staff member, who is undertaking any purchasing or procurement activity on behalf of the Trust.

2.2 This policy aims to ensure that:

- the Trust's funds are used only in accordance with the law, its Articles of Association, Funding Agreement and the Academy Trust Handbook (ATH)
- the Trust's funds are used in a way that commands broad public support
- value for money (economy, efficiency and effectiveness) is achieved
- trustees fulfil their duties and responsibilities as charitable trustees and company directors
- conflicts of interest and related party transactions (RPTs) are managed adequately and appropriately
- The trust has open and transparent procurement procedures

2.3 The policy includes procedures for open tenders. This approach allows anyone to submit a tender to supply goods or services required, and offers an equal opportunity to any organisation to submit a tender.

3 Definitions

- **ATH**: Academy Trust Handbook (2025).
- **DfE**: Department for Education.
- **ESFA**: Education and Skills Funding Agency.
- **ESG**: Environmental, Social and Governance.
- **F&RC**: Finance and Resources Committee.
- **FTS**: Find a Tender Service.
- **KPI**: Key Performance Indicator.
- **PA 2023**: Procurement Act 2023 and Procurement Regulations 2024 (for procurements commenced on/after 24 February 2025)
- **PCR 2015:** Public Contracts Regulations 2015 (for procurements commenced before 24 February 2025).
- **PME**: Preliminary Market Engagement

- **RPT**: Related Party Transaction.
- **SCA**: Schools Condition Allocation.
- **SLA**: Service Level Agreement.
- **SME**: Small and Medium Enterprises.
- **SSA**: Single Source Approval.

4 Legislation and Guidance

4.1 The ATH requires academy trusts to have appropriate competitive procurement procedures in place and to comply with the procurement regime applicable to the value and timing of each procurement.

4.2 This policy is based on:

- the Academy Trust Handbook (2025)
- DfE guidance on buying for schools, and either
- PCR 2015 or PA 2023/Procurement Regulations 2024 depending on the procurement's commencement date.

4.3 The Trust will comply with Cabinet Office transitional arrangements and publish notices on Find a Tender as required.

4.4 Regulatory regimes:

- Procurements commenced before 24 February 2025 are governed by PCR 2015;
- Procurements commenced on or after 24 February 2025 are governed by the PA 2023 and Procurement Regulations 2024.

4.5 This policy also complies with the Trust's funding agreement and articles of association.

5 Roles and Responsibilities

Roles and approval authorities below are aligned to the Trust's Scheme of Delegation (2025–26) and Financial Regulations and Controls Manual (2025). Where titles differ, this policy adopts the current titles used in those documents (e.g., Director of Finance, Head of Procurement, Senior Executive).

Academy Trustees:

5.1 Academy trustees will ensure that:

- spending decisions represent value for money
- the Trust's funds are used in a way that commands broad public support
- relevant professional advice (legal, external audit) is used, where appropriate
- goods or services provided by individuals or organisations connected to the Trust are provided at no more than cost
- nobody connected to the trust, directly or indirectly, uses their connection to the trust for personal gain, and
- where any trustee has a pecuniary interest in a procurement decision, they exclude themselves from the process and records (e.g. meeting minutes) show that they had no influence on the decision.

Finance and Resources Committee

5.2 Academy trustees delegate competitive tendering responsibilities to the Finance and Resources Committee.

5.3 The Finance and Resources 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
- placing orders for goods and services, and entering into contracts within delegated limits
- waiver of financial regulations in respect of purchasing

Senior Executive

5.4 The Senior Executive are responsible for:

- placing orders, entering into contracts and waiving financial regulations within the limits set out in the Scheme of Delegation and Financial Regulations and Controls Manual.

Director of Finance

5.5 The Director of Finance is responsible for:

- ensuring appropriate financial governance and risk management arrangements are in place
- preparing and monitoring budgets
- providing information to the Finance and Resources Committee and academy trustees, as appropriate
- placing orders, entering into contracts and waiving financial regulations within the limits set out in the Scheme of Delegation and Financial Regulations and Controls Manual.

Director of Infrastructure

5.6 The Director of Infrastructure is responsible for:

- placing orders and authorising contracts within the limits set out in the Scheme of Delegation and Financial Regulations and Controls Manual, particularly in relation to estates, capital and operational infrastructure.

Head of Procurement

5.7 The Trust's Head of Procurement and Procurement Team are responsible for:

- approval of suppliers and related due diligence
- overseeing and supporting competitive tendering.
- maintaining lists of approved suppliers and Trust-wide contracts
- developing procurement strategy
- contractor and supplier management
- competitive tendering, including market research and benchmarking
- identifying opportunities for savings
- working collaboratively to develop procurement policies and processes which establish effective controls and maximise value from suppliers, and
- placing orders, entering into contracts and waiving financial regulations within the limits set out in the Scheme of Delegation and Financial Regulations and Controls Manual.

6 Purchase Thresholds

6.1 The Trust's procurement thresholds are contained within the Financial Regulations and Controls manual, and set out below (updated to reflect the new threshold values effective from 1 January 2026).

6.2 All values below are exclusive of VAT for internal approval bands, but threshold tests under PA 2023/PCR 2015 are VAT-inclusive when assessing legal regime.

Estimated Value (excl. VAT, except as stated)	Procurement Requirements
Up to £2,000	Estimated price. Order from an approved supplier where possible. Orders should be approved before the order is placed with the supplier.
£2,000 - £10,000	Written quotation (two, preferably three, dependent on 'market- supply' and value), or

	Single Source Approval (SSA). Select approved supplier where available. Save evidence of quotations (as required by the central finance function) to support requisition approval. If required, a written contract can be authorised and signed by the Headteacher or appropriate Head of Service / Director of Infrastructure. Single Source Approval requires the agreement of the Head of Procurement or the Director of Finance.
£10,001 - £40,000	At least three competitive written quotations. **Nb. That the requirement for 'capital / estates' is currently two quotations for up to £20,000. This is in response to limited suppliers for this type of work.** Save evidence of quotations (as required by the central finance function) to support requisition approval. If required, a written contract can be authorised and signed by the Head of Procurement or the Director of Finance. Single Source Approval requires the agreement of the Director of Finance or Head of Procurement.
£40,001 to £100,000	At least three competitive written quotations / tenders against a formal Request for Quotation / Tender Process, led by the Procurement Team under the oversight of the Director of Finance and Senior Executive. Written contract required, authorised and signed by a Senior Executive Team member or the Director of Finance. Single Source Approval requires the agreement of Senior Executive (Authorised nominees: CEO /Director of Finance acting jointly).
£100,001 to the relevant above-threshold limit.	At least three competitive written quotations / tenders against a formal Request for Quotation / Tender Process, led by the Procurement Team under the oversight of the Director of Finance. Spend must be authorised by the Finance & Resources Committee. Written contract required, authorised and signed by a Senior Executive Team member or Director of Finance. Single Source Approval requires the agreement of the Finance & Resources Committee.
Above the relevant above threshold limit.	A regime-compliant competitive process, led by the Procurement Team under the oversight of the Director of Finance. Spend must be authorised by the Finance & Resources Committee. Written contract required, authorised and signed by a Senior Executive Team member or

	Director of Finance. Schools must consult with the Head of Procurement before any process is initiated or Contract created.

6.3 Where a procurement exceeds £100,000 and relates to a SCA capital project that has already been individually approved by the F&RC on a project-specific basis, a separate contract award approval will not be required unless:

- the procurement outcome materially differs from the approved project scope, specification or budget; or
- the contract sum represents a material deviation from the assumptions underpinning the original project approval.

6.4 For the avoidance of doubt, general or high-level budget approval does not remove the requirement for F&RC to approve contract awards above £100,000.

6.5 Where the contract value exceeds £100,000 but the expenditure is already included within a budget approved by the F&RC, a separate contract award approval would not be required unless the procurement outcome differs materially from what was budgeted (in scope, specification, supplier type or financial value).

6.6 If it is estimated that the cost of a contract is above the procurement threshold, the trust will seek legal advice to ensure it runs a regime-compliant process.

6.7 The current thresholds are as follows:

- Goods and most services have a threshold of £207,720 including VAT.
- The Light Touch Regime threshold is currently £663,540 (including VAT).
- Contracts classified as Works have a threshold of £5,193,000 including VAT.

6.8 These values are subject to periodic revision by the Cabinet Office and will be applied in accordance with the regulations in force at the time of procurement.

7 Approval Authority

7.1 Levels of delegation are governed by the Scheme of Delegation 2025–26; this policy adopts those levels for procurement approvals and signatures.

8 Single Source Approval and Emergency Procurement

General Principles

8.1 Single source approval is required where it has not been possible to obtain competitive quotations or tenders in accordance with this policy.

8.2 Single Source Approval will only be given in limited circumstances, including where:

- the spend is urgently required and delay would cause loss, injury or damage. The urgency must be brought about by events that were unforeseeable by and not attributable to the Trust and which will result in loss or damage to the Trust if the suspension or exemption is not allowed; and / or
- the spend is of such a special nature that no advantage would be gained by inviting competitive tenders; or
- there is no effective competition because payment is fixed under statutory authority or the item is a patented or proprietary article or is available from only one source.

8.3 Single source approval must not be used for reasons of convenience, expediency, supplier preference, or to avoid procurement thresholds or governance requirements.

Exemptions

8.4 Single source approval is not required for the following categories of expenditure, provided appropriate budgetary approval is in place:

- examination and awarding body fees;
- agreed support packages for students with Education, Health and Care Plans (EHCPs);
- transactions with the Trust's wholly owned subsidiary where goods or services are provided at cost;
- expenditure incurred under a strategic partnership with another public sector organisation.

8.5 The following standard exemptions from competitive quotation requirements apply. Single source approval documentation must still be completed to evidence the exemption:

- proprietary items available only from the owner of intellectual property rights, copyrights or distribution rights;
- goods or services where prices are controlled by government regulation;
- repairs to, or parts for, existing plant, equipment or machinery where it is considered that the original supplier should carry out the work or parts are not available from alternative suppliers;
- upgrades to existing equipment or software where the original supplier is used because:
  - the supplier owns the relevant intellectual property rights and/or copyrights;
  - the supplier is the sole distributor or agent in the UK;
  - there is substantial risk in using a third party (in which case a brief statement identifying those risks must be provided); or
  - the use of a third party would invalidate warranties or maintenance agreements;
- used, second-hand or ex-demonstration items sold at a substantially reduced price (with evidence of the new-item price provided).

Procedural Requirements

8.6 Where single source approval or a standard exemption is relied upon:

- a written justification must be prepared in advance of commitment;
- proportionate market testing must be undertaken where practicable;
- the whole-life value of the contract must be confirmed in accordance with section 10 of this policy;
- any actual or perceived conflicts of interest must be identified, declared and recorded.

8.7 Nb. That Schools must first approach the Head of Procurement, allowing sufficient time for market analysis to ensure that wherever possible the Trust follows procurement law, notably the principles of equality of treatment, transparency and proportionality. Approval will not be given without this step.

8.8 Single source approval authorises the Trust to proceed with the named supplier only and does not constitute budgetary authorisation, which remains the responsibility of the relevant budget holder.

8.9 Retrospective single source approval will only be permitted in genuine emergency circumstances and must be reported to the Finance and Resources Committee at the earliest opportunity.

Emergency and Urgent Procurement

8.10 Emergency and urgent procurement is a more limited form of non-competitive procurement and operates within the single source approval principles set out above.

8.11 Emergency procurement may be used only where immediate action is required to address:

- a serious risk to health, safety or safeguarding;
- significant disruption to the operation of a school or the Trust; or
- material financial or reputational damage to the Trust.

8.12 Emergency procurement must be limited strictly to what is necessary to address the immediate situation and must not extend to non-urgent or discretionary goods, services or works.

8.13 Where emergency procurement is undertaken:

- approval must be obtained from an authorised officer in accordance with the Scheme of Delegation (verbal approval may be given where necessary);
- a written record must be created as soon as practicable documenting the nature of the emergency, the reason competition was not possible, the scope and value of the expenditure, and the approvals granted; and
- the Director of Finance and the Procurement Team must be notified without delay.

8.14 All emergency procurements must be subject to retrospective review and reported to the Finance and Resources Committee, including confirmation that value for money, regularity and propriety have been maintained.

9 Framework Agreements

9.1 Where appropriate, the Trust will use a framework agreement to contract suppliers. These are arrangements that a contracting authority, such as a public sector buying organisation, makes with suppliers. The benefits of frameworks are that they have already been through a competitive tender process and they have favourable terms and conditions. In addition, the framework provider may offer advice and support.

9.2 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.

9.3 The Head of Procurement has delegated authority to choose whether to use a framework agreement and which framework to use.

10 Valuing contracts

10.1 The value of a contract will be determined by calculating the estimated whole-life value of the goods, works or services, including any related fees.

10.2 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.

10.3 For indefinite terms, the value of the contract will be the monthly price multiplied by 48.

10.4 The Trust will not divide a single contract into smaller contracts to bypass the purchase thresholds.

10.5 The Trust will assess legal threshold tests on a VAT-inclusive basis.

11 Evaluating tenders

11.1 Tenders will be evaluated against the criteria and weighting outlined in the tender document. Criteria will include:

- cost
- quality
- delivery
- performance and
- risk

11.2 The Trust may specify additional criteria based on the type of tender, as outlined in the tender document.

11.3 In accordance with the applicable regime (PCR 2015 or PA 2023), contracts must be awarded on the basis of the Most Advantageous Tender on the basis of the Best Price/Quality Ratio, which must be assessed on the basis of criteria linked to the subject matter of the contract. Suggested criteria and ratios depending on the nature of the commodity/service being procured and the strength of competition are tabulated below. Weightings should be pre-agreed by the Trust's Head of Procurement. Weightings are at the Trust's discretion and the below is a guide.

Commodity Type	Description	Suggested Price/Quality Ratio
Routine	• Low Value/High Volume • Many Existing Alternatives	80:20
Leverage	• High spend area • Many Sources of Supply • Commercial involvement can influence price	60:40
Strategic	• Strategic to Operations • Few Sources of Supply • Large Spend Area • Specification may be complex	60:40, 50:50, 40:60
Bottleneck	• Few Sources of Supply and alternatives available • Complex specifications • If supply fails, impact on organisation could be significant	40:60, 10:90

11.4 Tenderers will be advised of price /quality ratio within published invitation to tenders. Figures can be within the ranges identified above: i.e.. where there is a bottleneck, the price/quality ratio could vary as between 40:60 to 10:90.

12 Conflicts of Interest

12.1 The Director of Finance (acting for the Trust) will report all contracts and other agreements with related parties to the ESFA in advance of the contract or agreement commencing.

12.2 Related parties include persons and entities with control or significant influence over the academy trust, and members of the same group (e.g. parent and subsidiary companies, key management personnel and close family members). This description is not comprehensive. See section 33 of Financial Reporting Standard 102.

12.3 The Trust will obtain the ESFA's prior approval for contracts and other agreements for the supply of goods or services to the Trust by a related party where necessary. (Refer also to the Related Party Transaction Policy: prior approval is not necessary for goods and services supplied by another state-funded school or college, or a college, university or school which is a Member. Prior approval is also not required for the provision of services to the Trust by the Trust's religious authority, for schools with a religious designation, where such services can only be provided by the Diocese).

13 Procurement Planning

13.1 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, and
- 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.

14 Tendering procedure: medium-value purchases

14.1 When making medium-value purchases without a framework agreement, the trust will use the process outlined below.

- **Create a specification:** a specification document will set out what suppliers need to understand about the purchase, including the quality, quantity and delivery date.
- **Compare suppliers:** a comparison of different suppliers, including their reputation, will help the trust develop a shortlist of at least three suppliers to approach for a written quote.
- **Assess quotes:** Award criteria will be developed to assess suppliers' quotes. Criteria may include:
  - how well the supplier meets our specification
  - the whole-life cost of the contract (price, delivery and maintenance costs, running costs and the cost ore moving or disposing of items not needed)
  - whether there will be price increases or decreases over the life of the contract, and
  - value for money.

  Each aspect of the criteria should be scored, and a record kept of the evaluation. The choice of suppliers and evaluation of quotes will be supported by the Head of Procurement, under the oversight of the Director of Finance.
  NB. That the choice of suppliers should be **pre-agreed** with the Trust's Head of Procurement.
- When the Trust **contacts suppliers**, it will send them:
  - the specification
  - deadlines for quotes and when decisions will be made
  - instructions on how to ask for clarification questions about the specification.

- **Place an order**: when the best value quote is identified, the Trust will send the supplier a purchase order, which will include details of the:
  - goods, works or services we are purchasing
  - price
  - delivery address
  - delivery deadline and any other important dates
  - payment schedule.

15 Tendering procedure: high-value purchases

15.1 Where high-value purchases are made without a framework, legal support may be required. Where purchases are secured outside a framework, the process will be as follows:

- **Create a specification**.
- **Assess the market**: prepare for the tendering process by assessing knowledge of the market. Find out how many suppliers are available and the best way to advertise the contract to a range of suppliers.
- **Check the Trust's position in relation to the procurement thresholds (PCR 2015 or PA 2023, depending on commencement date).**
- **Develop a service level agreement (SLA):** an SLA sets out the standards of service expected from a supplier. Some suppliers may have their own SLAs, which the Trust will consider using on a case-by- case basis.
- **Develop a contract:** a contract will include terms and conditions, a contract management plan and an exit strategy.
- **Reduce the number of bids**: to reduce the number of bids the Trust needs to evaluate, the Trust will either use an expression of interest process to gauge interest in the contract or a pre-qualification questionnaire.

- **Establish how quotes will be assessed**: set out criteria that will allow the Trust to evaluate which of the suppliers' bids best meets the requirements of the specification, and is the most economically advantageous tender (the best combination of cost and quality).
- **Create a timeline for the tender process:** this will include the dates of the clarification period, the deadline for submitting tenders and the date of contract award.
- **Prepare an invitation to tender:** this will include:
    - a covering letter with a timeline for the process
    - instructions on how suppliers can ask clarification questions and submit their tender
    - the specification
    - a pricing schedule
    - any SLA requirements
    - the contract's terms and conditions
    - contract management requirements (see 'develop a contract' above)
    - award criteria, including the scoring system and any weightings, and
    - if appropriate, an invitation for suppliers to give a practical demonstration of their goods, works or services.

- Advertise the contract: the contract will be advertised where suppliers are likely to look, such as:
    - the Find a Tender service: this is a requirement for above-threshold procurements under PCR 2015 or the Procurement Act 2023 (depending on commencement date).
    - local or national newspapers
    - education publications or websites, and
    - trade magazines.

- **Run the tender process and provide clarifications**.
- **Evaluate tender responses:** at least two people will independently score and evaluate each bid, and then compare notes after completing their evaluations. Records of decision making and moderation decisions will be kept.
- **Notify suppliers and award the contract**.
- **Finalise the contract** (and advertise the award, if the contract was advertised in the Find a Tender service).
- **Abandoning the tender process**: on very rare occasions the Trust may need to halt the tender process. Should this occur, we will notify suppliers who are preparing their bids as soon as possible.

16 Record keeping

16.1 Records will be retained for a minimum of six years, or longer where required by law or the Trust's retention schedule.

17 Transparency (Procurement Act 2023)

17.1 For procurements commenced on or after 24 February 2025, the Trust will publish the required notices on Find a Tender at relevant stages of the lifecycle.

18 Monitoring arrangements

18.1 The Finance and Resources Committee is responsible for the implementation of this policy and for reviewing procurement activity. This is supported through routine reporting led by the Director of Finance / Head of Procurement.

19 Links with other policies.

19.1 This competitive tendering policy is linked to the Trust's Financial Regulations and Controls Manual (2025), Scheme of Delegation (2025-26), and Related Party Transaction policy.