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| <b>Title</b>               | Procurement Policy  |
| <b>Associated Policies</b> | <ul style="list-style-type: none"> <li>• Charging and Remissions (TPO/FIN/01)</li> <li>• Anti-Bribery and Corruption (TPO/QA/01)</li> <li>• Modern Slavery and Human Trafficking Statement (GU/05)</li> </ul> |

**REVIEWED: MAY 2025****NEXT REVIEW: MAY 2028****1. Policy Statement****1.1 Purpose of the Policy**

This document sets out the Procurement Policy (“the Policy”) of Brooke Weston Trust (“the Trust”). It defines the governance structure, responsibilities, thresholds, and compliance requirements that underpin the procurement of goods, services, consultancy, and works across all constituent Academies and central operations of the Trust. This policy ensures procurement activity:

- Complies fully with UK public procurement legislation, including the Procurement Act 2023.
- Aligns with the Academy Trust Handbook and the Trust’s Funding Agreements with the Department for Education.
- Promotes fairness, transparency, and ethical conduct in supplier selection and contract management.
- Maximises value for money by encouraging centralised purchasing, contract aggregation, and strategic sourcing.

This Policy replaces all previous procurement policies and must be adhered to across the Trust without exception.

**1.2 Scope**

This Policy applies to all procurement activity- irrespective of value or funding source- undertaken across the Trust, including:

- School-based purchasing
- Central Trust procurement
- Capital and estates projects
- Use of purchase cards
- Third-party service contracts
- Specialist educational services

It is mandatory for all staff, governors, trustees, and associates involved in procurement processes.

**1.3 Statutory and Regulatory Framework**

This Policy ensures compliance with the following frameworks:

- The Procurement Act 2023, including the five statutory procurement objectives:
  - (a) Delivering value for money
  - (b) Maximising public benefit
  - (c) Sharing information
  - (d) Acting with integrity
  - (e) Equal treatment of suppliers
- Academy Trust Handbook (ATH)
- Public Contracts Regulations 2015 (where still applicable during transition)
- Concession Contracts Regulations 2016
- Utilities Contracts Regulations 2016
- Equality Act 2010
- DfE Buying for Schools Guidance
- Cabinet Office Procurement Policy Notes (PPNs)

## 2. How should this policy be applied?

- 2.1 This policy is mandatory and applies to any procurement activity which results in a payment being made by or on behalf of the Trust or an Academy- irrespective of funding source, value, or whether initiated at school or Trust level. All procurement must follow this policy without exception.
- 2.2 The Trust maintains a centralised contract register. No staff member or Academy may enter into procurement activity without first checking:
  - Whether a Trust-wide contract already exists;
  - Whether the requirement can be aggregated across multiple sites;
  - Whether it has been previously procured through an approved framework.
- 2.3 All procurement activity must be undertaken in accordance with this policy, the Academy Trust Handbook, the Funding Agreements, and the statutory obligations of the Procurement Act 2023.

## 3. Who is responsible for carrying out this policy?

- 3.1 Every individual involved in purchasing activity across the Trust — including Principals, Finance teams, curriculum leads, IT managers, estate officers, and central team staff — is responsible for ensuring compliance.
- 3.2 Implementation will be monitored through delegated approvals (see Appendix A), financial oversight, internal audit, and scrutiny by the Trust's Finance & Resources Committee. Non-compliance will be reported and investigated.
- 3.3 All contracts must be approved by the Trust Chief Operating and Resources Officer (CORO) and/or Chief Financial Officer (CFO) and/or Chief Executive Officer (CEO), depending on the total contract value

## 4. What are the principles behind this policy?

- 4.1 The overall aim of this policy is to ensure that all purchasing activity achieves **Best Value**: meeting the defined needs of the Trust or Academy at the optimal balance of cost, quality, timing, and risk.
- 4.2 The Trust is committed to **strategic procurement**: buying once, buying well, and avoiding piecemeal spending. This includes:
  - Mandatory use of Trust-wide contracts where they exist;
  - Coordinated procurement through approved frameworks;
  - Identification of aggregated needs across the Trust.
- 4.3 **Sustainability and Environmental Responsibility:**  
Where feasible, procurement decisions must account for whole-life costs, environmental impact, and social value in line with national policy objectives.
- 4.4 **Ethical and Legal Procurement:**  
Procurement activity must demonstrate adherence to principles under the Procurement Act 2023, including:
  - **Probity:** No personal or private gain may result from procurement activity. All conflicts of interest must be declared (see Section 6).
  - **Fairness:** Competition must be managed equitably and transparently. All suppliers must be given the same information and treated without bias.
  - **Integrity:** Procurement must uphold public confidence, avoid undue influence, and apply consistent governance standards.
- 4.5 All procurement must be in line with the Trust's Scheme of Financial Delegation, associated category guidance (Appendix B), and thresholds as detailed in Appendix A.
- 4.6 Staff must not split purchases to avoid procurement thresholds and are expected to actively identify and report opportunities for consolidated procurement across the Trust.

## 5. Procedures

### 5.1 Procurement Considerations

Before any procurement commences, the following must be considered:

- **Timeframe:** Allow adequate time to conduct compliant procurement- rushed purchases lead to risk and a reduction in value.
- **Permissions:** Ensure all required authorisations and budget has been obtained (via the Trust Budget Manager and/or a representative Strategic Financial Business Partner) prior to engagement with suppliers.
- **Compliance:** The Academy Trust Handbook and DfE guidance must be consulted, especially for Opex/Finance arrangements or any novel/contentious procurement requiring Secretary of State consent.
- **Value Calculation:** The total contract value includes all costs over its expected lifetime, including options to renew. Where the same product or service is used across multiple Academies, the total Trust-wide spend must be used for threshold determination.

### 5.2 Procurement Thresholds and Processes

**Thresholds from January 2024 (Procurement Act 2023):**

- **£213,477 (incl. VAT)** for goods and services
- **£5,372,609 (incl. VAT)** for works contracts
- **£663,540** for services under the Light Touch Regime
- **£213,477** for concession contracts

All contracts above these thresholds must be procured in line with PA2023 statutory requirements, including use of the new central digital platform, publication of notices, and compliance with pre-/post-award transparency obligations.

#### 5.2.1 Public Sector Frameworks

- For specific requirements, all Trust and School staff must check for relevant frameworks (e.g. CCS, DfE-approved, ESPO) prior to any direct procurement route.
- The Trust supports the use of both direct awards and mini competitions under frameworks where appropriate.
- Schools must use a Trust-developed framework if there is one available for the purchase requirement.

#### 5.2.2 One Written Quote (Spend: £0 – £5,000)

- A written quote must be obtained to demonstrate value for money.
- Approved suppliers and/or Suppliers already registered on the Trust's finance system must be utilised
- The addition of new suppliers will be made by exception, if supported with a New Supplier Form from the Trust's Finance Systems Manager
- All documentation must be uploaded into PSF when the requisition and Purchase Order is being raised. Failure to do so will result in the purchase request being denied by the Approver

#### 5.2.3 Three Written Quotes (Spend: £5,001 – £25,000)

- A minimum of three written quotes must be sought.
- All suppliers must be given the same specification and reasonable time to respond.
- If the recommended supplier is not the lowest priced, the CFO must approve.
- All documentation must be uploaded into PSF when the requisition and Purchase Order is being raised. Failure to do so will result in the purchase request being denied by the Approver.
- The following steps must be followed to ensure fairness, consistency, and value for money:

- **Specification Development:** A clear written specification must be prepared outlining the required goods or services. This should include quality standards, quantity, delivery timelines, and any essential service expectations.
- **Supplier Shortlisting:** At least three suppliers must be identified and pre-agreed with the Trust's Central Procurement Team. Selection should be based on reputation, reliability, and ability to meet the specification.
- **Quotation Requests:** Suppliers must be contacted with the specification and provided with:
  - Submission deadlines
  - The date by which a decision will be communicated
  - Instructions for how to raise clarification questions
- **Evaluation of Quotes:** Award criteria should be established prior to review and may include:
  - Technical compliance with the specification
  - Total life-cycle cost (including purchase, delivery, maintenance, and disposal)
  - Price stability over the contract term
  - Overall value for money

Each supplier's response must be scored objectively against the defined criteria, and a clear record of the evaluation must be retained and uploaded into PSF.

## 5.2.4 Tender (£25,001+)

- An approved business case and budget form the Trust Budget Manager is required, prior to any supplier engagement
- Purchases of this value must be managed by the Trust's Central Procurement team
- All tenders must be published and managed through the Trust's e-Procurement Portal, In-Tend.
- All documentation must be uploaded into PSF when the requisition and Purchase Order is being raised. Failure to do so will result in the purchase request being denied by the Approver

## 5.2.5 Procurement Waiver

- May only be used for sub-threshold procurement with exceptional justification (e.g. validated sole provider, urgent safeguarding need).
- Must be reviewed by the Trust's Central Procurement team and logged in the Tender Waiver Register
- A register of all waivers will be maintained and reported to the Finance & Resources Committee.

## 5.3 Credit Cards

- Use is limited to low-value, one-off transactions where no other route is feasible.
- Authorisation must be granted in advance by the CFO.
- **Maximum per transaction: £500. Full receipts are mandatory.**

## 5.4 Contract Management

- All contracts must be reviewed by the Trust's Central Procurement team and Trust Contracts Manager and approved by the CORO and/or CFO or CEO.
- Contracts must be shared with the Trust Contract Manager recorded in the Trust's Contract Management system in Every to ensure:
  - Timely renewals
  - Supplier performance monitoring
  - Escalation readiness
- **Where possible, Standard BWT Terms & Conditions must be used.**
- Supplier T&Cs must be reviewed to limit risk, especially relating to data, termination, and indemnity clauses.

## 5.5 Audit Trail

- An audit trail must be maintained for **all purchases**, including:
  - Quotations- to be attached in PSF
  - Evaluations- retained in the Contracts Register

- Approvals
- Declarations of interest, where relevant- retained in the Contracts Register and attached in PSF

## 5.6 Third-Party Supplier Onboarding and Review (Cyber Compliance)

As part of the Trust's commitment to cyber security, operational resilience, and good governance, all third-party suppliers engaged by Brooke Weston Trust must be subject to appropriate due diligence and periodic review.

The Trust will implement and maintain procedures that ensure:

- **Proper onboarding** of suppliers, including pre-engagement checks on regulatory compliance, safeguarding, and data protection standards.
- **Formal due diligence** on financial standing, insurance, accreditations, and previous performance.
- **Scheduled reviews** of strategic and high-risk suppliers, which will assess:
  - Internal control measures;
  - Compliance with contractual obligations;
  - Supplier performance and delivery standards;
  - Cyber security or data handling risks.
- **Formal offboarding** processes for outgoing suppliers, ensuring access rights, data handling, and service continuity are managed appropriately.

This process will be coordinated by the Trust's Central Team, an approved third party Data Protection Officer, Finance teams.

## 5.7 Supplier Business Continuity Expectations

The Trust requires key third-party providers to demonstrate that they have robust business continuity arrangements in place. This forms part of the Trust's wider risk management framework and ensures continuity of operations during service disruptions.

Where applicable, suppliers may be requested to provide:

- **Confirmation of an up-to-date Business Continuity Plan (BCP);**
- **Evidence of regular review and testing** of the BCP;
- **Summary of emergency response measures** in the event of disruption;
- **Identification of key risks or dependencies** (e.g. reliance on subcontractors or critical personnel);
- **Clear escalation and contact protocols** for urgent incidents.

The Trust may require this information during onboarding or through annual contract reviews. Suppliers unable to demonstrate adequate continuity planning may be excluded from future procurement exercises.

## 6. Dealing with Conflicts of Interest

- 6.1** This section applies to all purchases and contracts, regardless of value or duration.
- 6.2** The Academy Trust Handbook puts strict obligations on the Trust to ensure that conflicts of interest in procurement are managed.
- 6.3** Trust employees, governors and contractors must declare any interest which may affect the outcome of a procurement process, prior to their involvement.
- 6.4** A record of all such declared conflicts of interest will be capture during the procurement process and must be sent to the CFO.
- 6.5** No gifts or hospitality of any type should be accepted by the employees of the Trust from any service provider as an inducement to award a contract to that supplier. This may be an offence under the provisions of the Bribery Act 2010. You must inform the Trust CFO immediately on becoming aware of any such gifts or hospitality.

7. Compliance

- 7.1 You should check with the Trust’s Central Procurement team or Trust CFO if you are unsure about how this policy may apply to you.
- 7.2 Non-compliance of this policy by Trust and Academy staff may lead to disciplinary procedures, this will depend on the nature of the breach. HR guidance on policy breaches will be followed.

8. Monitoring and Review

- 8.1 This policy will be monitored, reviewed, and updated as part of the Trust’s annual internal review or as required by legislation changes, for example future Procurement Act 2023 amendments or DfE guidance
- 8.2 An up-to-date copy of the policy will be available on the Trust website.

Document Control

|                      |          |          |               |
|----------------------|----------|----------|---------------|
| Date of last review: | May 2025 | Author:  | HoES          |
| Date of next review: | May 2028 | Version: | 5             |
| Approved by:         | SDG      | Status:  | Non-statutory |

Summary of Changes: V5

- Clear emphasis on Trust-wide purchasing and avoidance of piecemeal school-by-school buying
- Stronger controls around supplier onboarding, PSF documentation, and contract approval
- New sections on Third-Party Risk Management and Supplier Business Continuity Planning
- Revised Appendix A for procurement thresholds and controls

## Appendix A: Procurement Process and Delegated Authority

| Value   | Procurement Process          | Delegated Authority                                    |
|---|------------------------------|--|
| £0 - £5,000                                     | 1 Written Quote              | <b>Budget Holder &amp; Principal</b>                   |
| £5,001 - £10,000                                | 3 Written Quotes             | <b>As above plus Trust Financial Controller</b>        |
| £10,001 - £25,000                               | 3 Written Quotes             | <b>As above plus Trust CFO</b>                         |
| £25,001 - £50,000                               | Tender                       | <b>As above</b>  |
| £50,001 - £100,000                              | Tender                       | <b>As above plus Chief Executive Officer</b>           |
| £100,001 - £250,000                             | Tender – following PCR rules | <b>As above</b>  |
| £250,001 - £750,000                             | Tender – following PCR rules | <b>As above plus Finance &amp; Resources Committee</b> |
| £750,001 +                                      | Tender – following PCR rules | <b>As above plus the Board</b>                         |
| Authority to accept other than lowest quotation |                              | <b>Chief Financial Officer</b>                         |

This matrix sets out the required procurement method and approval pathway for all purchasing activities undertaken across the Trust, based on the total contract value (inclusive of VAT and the full contract term, including any extensions).

| Spend Value        | Procurement Process  | Delegated Authority & Requirements   |
|--------------------|----------------------|--|
| £0 – £5,000        | One Written Quote    | <ul style="list-style-type: none"> <li>- Minimum one written quote must be obtained to demonstrate value for money.</li> <li>- Suppliers must be drawn from the Trust's approved supplier list or pre-registered on the PSF finance system.</li> <li>- New supplier requests will only be processed in exceptional circumstances, supported by a completed New Supplier Form approved by the Finance Systems Manager.</li> <li>- All procurement documentation (quote, specification, supplier details) must be uploaded to PSF when raising the requisition. If not uploaded, the requisition will be rejected.</li> </ul> <p><b>- Approved by Budget Holder and Principal.</b></p> |
| £5,001 – £25,000   | Three Written Quotes | <ul style="list-style-type: none"> <li>- Minimum of three written quotes must be obtained for comparison.</li> <li>- All suppliers must receive identical specifications and be given a reasonable response time.</li> <li>- Documentation must be uploaded to PSF with the requisition (specifications, quotes, evaluation).</li> </ul> <p><b>- Approval: Principal, Financial Controller, and CFO</b></p>  |
| £25,001 – £50,000  | Formal Tender        | <ul style="list-style-type: none"> <li>- Must be supported by an approved Business Case and confirmation of budget availability from the Trust Budget Manager.</li> <li>- Managed centrally by the Trust's Procurement Team.</li> <li>- Tender must be advertised and run through the In-Tend e-Procurement Portal.</li> <li>- Full documentation (Business Case, specifications, bidder responses, evaluations) must be uploaded to PSF.</li> </ul> <p><b>- Approval: CFO and CEO following Strategic Delivery Group review.</b></p>  |
| £50,001 – £100,000 | Formal Tender        | <ul style="list-style-type: none"> <li>- As above. Complex procurement support mandatory.</li> <li>- Evaluated through In-Tend with oversight from the Business Systems Manager.</li> </ul> <p><b>- Approval: As above + CEO.</b></p>  |



| Spend Value         | Procurement Process               | Delegated Authority & Requirements   |
|---------------------|-----------------------------------|--|
| £100,001 – £250,000 | PA2023 Compliant Tender           | <ul style="list-style-type: none"> <li>- Process must comply with Procurement Act 2023 including pre-tender transparency notices via the central platform.</li> <li>- Delivered by the Central Procurement Team.</li> <li>- <b>Approval: CFO and CEO</b></li> </ul>  |
| £250,001 – £750,000 | Full Tender – Regulated Threshold | <ul style="list-style-type: none"> <li>- Full PA2023 obligations apply. Publication of pre- and post-award notices.</li> <li>- Board notified via Finance &amp; Resources Committee.</li> <li>- <b>Approval: CFO, CEO + Finance &amp; Resources Committee</b></li> </ul>   |
| £750,001+           | Major Procurement                 | <ul style="list-style-type: none"> <li>- Major project tender with full board-level governance.</li> <li>- Includes Board-approved commercial strategy.</li> <li>- A contract performance notice must be published at least once every twelve months during the contract lifecycle, and again upon contract termination, to report on performance against the agreed key performance indicators (KPIs). This is a requirement under the Procurement Act 2023 for all qualifying contracts.</li> <li>- <b>Approval: CFO, CEO, Finance Committee, and Board of Trustees</b></li> </ul> |