BRADFORD ACADEMY TRUST

Responsibility | Respect | Resilience

Our **Vision** **RESPONSIBILITY** **RESPECT** **RESILIENCE**	**A shining light in our community** You are the light of the world. A city on a hill cannot be hidden. - Matthew 5:14b

Procurement Policy

Approved by:	RMC	**Date:** December 2025
Last reviewed on:	December 2025	
Next review due by:	December 2027	
Related Documents		
Guidance		
Author	**Terry Morton (Finance Director)**	

1. Aim of Policy

The aim of this policy is to ensure that all procurement activities within the educational institution are conducted in a cost-effective, transparent, and legally compliant manner, supporting the institution's strategic goals and educational mission.

2. Legal and Regulatory Framework

This policy adheres to all relevant UK procurement legislation, including:

- The Public Contracts Regulations 2015
- The Education and Skills Funding Agency (ESFA) guidelines
- Any other applicable local and national regulations

3. Roles and Responsibilities

- **Procurement Officer/Finance Director**: Oversees all procurement activities, ensuring compliance with policy and regulations.
- **Department Heads**: Identify procurement needs and work with the Procurement Officer/Finance Director to develop specifications.
- **Finance Department**: Manages budget allocations and ensures financial controls are in place.
- **Senior Leadership Team**: Approves high-value procurements and strategic procurement decisions.

4. Procurement Procedures

1. **Needs Assessment**: Departments identify and document their procurement needs.
2. **Market Research**: Conduct research to identify potential suppliers and solutions.
3. **Specification Development**: Develop clear and detailed specifications for the required goods or services.
4. **Tendering Process**: Issue tenders or requests for proposals (RFPs) to potential suppliers.
5. **Evaluation and Selection**: Evaluate proposals based on predefined criteria and select the most suitable supplier.
6. **Contract Award**: Award the contract to the selected supplier and ensure all terms and conditions are clearly defined.
7. **Purchase Order**: The Purchase order must be raised and approved before an invoice can be sent to the Academy. Therefore, this policy now states that the Purchase order must have at least a minimum of 3 days grace before any Invoice can be sent in. POs provide a clear paper trail for financial audits, helping organisations verify that all purchases were authorised and properly documented. By requiring approval before a purchase is made, Purchase Orders help organisations manage their budgets and prevent unauthorised spending, it provides a clear record of the transaction, which is essential for auditing and accountability.

8. **Contract Management**: Monitor and manage the contract to ensure compliance and performance.
9. **Review and Feedback**: Conduct a post-procurement review to assess the process and outcomes and gather feedback for future improvements.

5. Direct Appointments

In certain circumstances, direct appointments may be made without a competitive tender process. This is typically reserved for low-value procurements or where there is a sole supplier. All direct appointments must be justified and documented.

Direct Award: Under the Public Contracts Regulations 2015, a direct award can be made without competition if there is extreme urgency brought about by unforeseen events. This is often used in emergencies where there is no time for a competitive process.

Accelerated Procedures: Standard procurement procedures can be accelerated to meet urgent needs. This involves shortening the usual timescales for tendering and awarding contracts.

Framework Agreements: Using existing framework agreements can speed up the procurement process since these agreements have pre-approved suppliers and terms.

These options ensure that necessary services can be procured quickly while still maintaining compliance with procurement regulations.

If you can't obtain multiple quotes in time for an urgent purchase, there are a few steps you can take to ensure the process remains compliant and transparent:

Document the Urgency: Clearly document the reasons for the urgency and why it was not possible to obtain multiple quotes. This documentation should be approved by a senior authority.

Use Existing Contracts: If possible, use suppliers from existing framework agreements or contracts. These suppliers have already been vetted and approved, which can expedite the process.

Post-Purchase Review: After the urgent purchase, conduct a review to ensure that the process was followed correctly and to identify any improvements for future urgent situations.

Non-Tender Exceptions: Certain costs cannot be tendered due to external constraints. For example, rates set by a local council are fixed and non-negotiable, even though these charges may exceed standard approval thresholds, they cannot be subject to a tendering process because the fees are determined by the council.

Exam fees also sit within the category of non-tender exceptions, because they are set by awarding organisations or examination boards. These bodies publish standard charges that apply nationally, leaving no scope for negotiation or competitive bidding, this is like council-set rates—there is no alternative supplier for the same accredited exam.

These steps help maintain accountability and compliance, even when time constraints make the standard procurement process challenging.

6. Thresholds and Authorisation

Thresholds

Up to £5,000: no quotes required; however, preference is to use an approved supplier.

£5,001-£20,000: 3 written quotes with approval from the relevant budget holder.

£20,001-£50,000: at least 3 written quotes with approval from the Senior Leadership Team (Melanie Saville, Terry Morton, Chris Rowbottom, Jen Jakes).

Above £50,001: formal tender completed, with approval from the DfE.

Authorisation

Up to £5,000: Department Heads can submit to Finance for approval.

£5,001 to £10,000: Requires approval from the Procurement Officer/Finance Director prior to Finance approval.

£10,001 to £50,000: Requires approval from the Senior Leadership Team (Melanie Saville, Terry Morton, Chris Rowbottom, Jen Jakes) and the RMC Board of Governors. Purchases that require board approval but cannot wait until the next scheduled RMC meeting may be approved or rejected at the sole discretion of the Chair of Trustees.

Above £50,001: Requires approval from the Board of Governors and the DfE.

7. Contract Register

The institution will maintain a contract register that records all active contracts, including details such as contract value, duration, and key terms. This register will be regularly updated and reviewed.

8. Contract Management

Effective contract management is essential to ensure suppliers meet their obligations. This includes regular performance reviews, addressing any issues promptly, and maintaining clear communication with suppliers.

9. Reporting Arrangements

Regular reports on procurement activities will be provided to the Senior Leadership Team and the Board of Governors. These reports will include details on procurement performance, compliance, and any significant issues or risks.

10. Related Parties

This section ensures that any potential conflicts of interest are identified, managed, and documented appropriately, maintaining the integrity and public trust in the procurement process.

1. **Definition of Related Parties**: Related parties include trustees, staff, and their close family members who have a significant influence over the trust. This also includes any entities in which these individuals have a substantial interest or control.
2. **Declaration of Interests**: All trustees and staff must declare any interests that could potentially conflict with the interests of the trust. This includes any financial, personal, or familial relationships that could influence their decision-making.
3. **Management of Conflicts of Interest**:
    - Any potential conflicts of interest must be reported to the governing body immediately.
    - Individuals with a conflict of interest must abstain from participating in any discussions or decisions related to the matter.
    - The governing body must ensure that all decisions are made in the best interest of the trust and are free from undue influence.
4. **Documentation and Transparency**:
    - All declarations of interest and actions taken to manage conflicts must be documented and maintained in a register of interests.
    - The register of interests should be reviewed regularly and updated as necessary.
    - The trust must ensure transparency by making the register of interests available for inspection by relevant authorities and stakeholders.
5. **Compliance and Monitoring**:
    - The trust must comply with all relevant regulations and guidelines regarding related parties and conflicts of interest.
    - Regular audits and reviews should be conducted to ensure adherence to the policy and to identify any areas for improvement.

11. Non-compliance

Non-compliance with the procurement policy can have several serious consequences for an educational institution, including:

1. **Legal Penalties**: Failure to comply with UK procurement legislation, such as the Public Contracts Regulations 2015, can result in legal action, fines, and other penalties.
2. **Financial Loss**: Non-compliance can lead to financial inefficiencies, overspending, and potential loss of funding from the Department for Education (DfE).
3. **Reputational Damage**: Non-compliance can harm the institution's reputation, affecting relationships with suppliers, stakeholders, and the wider community.
4. **Operational Disruptions**: Ineffective procurement practices can lead to delays, poor quality goods or services, and disruptions to the institution's operations.
5. **Audit Failures**: Non-compliance can result in negative audit findings, which can impact future funding and financial stability.
6. **Loss of Trust**: Stakeholders, including staff, students, and parents, may lose trust in the institution's ability to manage resources effectively.
7. **Staff Accountability:** Staff members responsible for non-compliance may face disciplinary actions, including warnings, retraining, or even termination in severe cases.

To mitigate these risks, it is crucial to ensure that all procurement activities are conducted in accordance with the established policy and legal framework. Regular training, monitoring, and reviews can help maintain compliance and address any issues promptly.