



SHARE
MULTI-ACADEMY TRUST

2019-20 PROCUREMENT POLICY AND PROCEDURE

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1.0 POLICY STATEMENT

For the purposes of this policy, SHARE Multi Academy Trust and its' Academies will be referred to as the '**Trust**'.

- 102 As publicly funded organisations, the trust, in accordance with procurement legislation, are 'Contracting Authorities'. Subsequently any procurement activity is regulated by the UK Public Contracts Regulations 2015, EU procurement law and the Bribery Act 2010, and shall be carried out in such a way to ensure compliance with DfE/ESFA requirements.
- 103 Procurement is the process whereby goods, services and works are acquired. The procurement process spans a life cycle from identification of need and resources, through selection of suppliers, purchasing, contract management and disposal. Purchasing is the transactional process of buying goods/services and is just one part of Procurement.
- 104 The Crown Commercial Service (CCS) is responsible for the legal framework for public sector procurement and leads on the development and implementation of procurement policies for government. Other frameworks are also available.
- 105 This policy sets out how the trust will manage its procurement to ensure compliance with relevant legislation. It does not provide guidance on how to procure as this is covered in the trust Financial Regulations (Section 6 Purchasing). Failure to comply with this policy and Financial Regulations could result in a breach of legislation, fines and litigation, claims for damages and loss of reputation for the trust.
- 106 The trust Scheme of Delegation outlines who has authority to award contracts, service level agreements and raise orders. Failure to comply with the Scheme of Delegation, Financial Regulations or Procurement Policy may result in withdrawal of authority and disciplinary action.
- 107 When procuring on behalf of academies, members of SHARE Central Services are acting as 'Agents' in creating binding terms and conditions on the trust. Wherever an academy undertakes any procurement independently then the Principal will be acting as an agent of the trust provided that the procurement is compliant with the Scheme of Delegation, Financial Regulations and Procurement Policy.

2.0 PURPOSE OF THE PROCUREMENT POLICY

- 201 The purpose of this document is to ensure staff undertaking procurement activity follow correct procedure, and guidance.
- 202 This policy should be read in conjunction with other Trust policies, namely:
- Financial Regulations;
 - Scheme of Delegation; AND
 - Business Interest Policy (for staff and trustees).
- 203 The trust Procurement Policy is applicable to all purchasing activity regardless of value and there is a duty on all staff involved in any stage of the procurement process to apply the key principle of best practice procurement to achieve, value for money (vfm), defined as "the best mix of quality and effectiveness for the least outlay over the period of use of the goods or services bought". This should be achieved through competition, unless there are compelling reasons to the contrary.
- 204 This policy is intended to reflect and support the aims of the trust by working with staff and suppliers to optimise vfm in the procurement of goods, services and works. It aims to balance efficiency against risk factors whilst promoting compliance and sustainability.

- 205 SHARE Central Services will work with academies by providing advice in obtaining goods, services and works in a manner which is compliant with current legislation and best practice.
- 206 This policy and associated procurement guidance will be reviewed annually or as required due to a change in legislation.

3.0 GENERAL PRINCIPLES

- 301 When purchasing and contracting for goods, services and works, the trust must demonstrate compliance with procurement legislation and the proper and effective use of public funds at all times. Purchasing procedures should also ensure that goods, services and works procured are for the correct quantity and quality, arrive on time and achieve best value. The following principles must therefore be adhered to:

Transparency and non-discrimination. In all purchasing activity the trust must act in a transparent and proportionate manner, and ensure that all contractors, suppliers and service providers are treated equally and without discrimination. Procurement procedures must not be undertaken in a manner which artificially narrows competition, and favours or disadvantages any contractor, supplier or service provider. All procurement activities with a value in excess of £50,000 must be advertised on the trust website. SHARE Central Services will advise as to the appropriate level of advertising;

Probity - must be demonstrable, in that all parties are dealt with on a fair and equitable basis and that there is no private gain, favouritism or bribery involved in any dealings of the trust;

Accountability. The trust is publicly accountable for all expenditure and for the conduct of its affairs; and

VFM underpins the appropriate use of all public funds. As well as striving to achieve the best price possible for all purchases, consideration should also be given to factors such as quality, suitability, availability, reliability of the supplier, terms and conditions, etc.

4.0 EUROPEAN PROCUREMENT DIRECTIVES

- 401 As a member of the EU the United Kingdom and consequently as a public body, the trust is subject to European Procurement Directives. The purpose of these Directives, covering supplies, services and works, is to encourage and stimulate an open market place for public procurement throughout the EU.
- 402 The European Procurement Directives set out the legal framework for public procurement. They apply when public authorities and utilities seek to acquire supplies, services or works. They set out procedures which must be followed before awarding a contract when its value exceeds set thresholds.
- 403 All UK contracting authorities, irrespective of the source of funding, must comply with the Directives. Because of the importance of securing good quality specifications, it is essential to plan early as European Procurement procedures are lengthy. Contracts with lifecycle costs approaching the European Procurement Directives tender threshold (£181,302 for goods and services and £4,551,413 for works for the period 1st January 2018 to 31 December 2018) must consult with SHARE Central Services as early as possible to avoid any delays.

- 404 EU and UK authorities are becoming increasingly concerned at breaches of the Directives by contracting authorities (including Multi Academy Trusts). Breaches may incur penalties from the European Commission, HM Treasury or the ESFA. Trust budget holders should notify SHARE Central Services of anticipated high value expenditure at their earliest opportunity.
- 405 Even when a tender process is **not** subject to the European Procurement Directives, EU Treaty based principles of non-discrimination, equal treatment, transparency, mutual recognition and proportionality apply. Some degree of advertising, which is appropriate to the scale of the contract, is necessary to demonstrate transparency. This is in line with the UK objective of achieving VFM in all public procurement.

5.0 VALUE FOR MONEY (VFM)

- 501 VFM is the optimum combination of lifecycle cost and quality (or fitness for purpose) to meet the user's requirement. This is rarely possible with the lowest price alone. To ensure that all purchases obtain optimum vfm, other factors (including but not restricted to) quality, suitability, availability, reliability of the supplier and terms available, should be considered. All purchases must be made in accordance with these principles, except in exceptional circumstances where a dispensation may be granted.
- 502 The Scheme of Delegation outlines the threshold values for purchasing, levels of authority, and whether the purchase is subject to written quotations or tenders.
- 503 Unless below the threshold for obtaining written quotations or tenders, all procurement of goods, services or works should be acquired by effective competition (including publication of the contract opportunity), unless there are convincing and justifiable reasons to the contrary. Competition promotes efficiency and effectiveness in expenditure. Awarding contracts on the basis of vfm following competition contributes to the competitiveness of suppliers.
- 504 SHARE Central Services will review Trust procurement plans, and where appropriate, will consult with academies on the potential to develop a range of Trust wide contracts in order to comply with the requirements around VFM.

6.0 FINANCIAL AUTHORITY TO COMMIT EXPENDITURE

- 601 Any process which involves committing the trust to expenditure must be approved in accordance with the Scheme of Delegation which outlines who has the authority and to what financial level.
- 602 Any member of staff placing a purchase order on behalf of the trust must be sure that they have the correct level of authority to do so in accordance with the Scheme of Delegation.
- 603 The trust operates a system of delegated financial authority under which Principals are responsible for the planning and decision making process of purchasing decisions. In accordance with this Procurement Policy, SHARE Central Services may provide technical and professional support as required. An academy is still responsible for specifying requirements, evaluation criteria and committing funding, unless the purchasing decision is deemed to be trust wide (eg catering contract).

- 604 No employee is authorised to commit the trust to expenditure without first ensuring that there is adequate budget provision.
- 605 No member of staff may approve purchases unless they have been given authority within the Scheme of Delegation to do so.

7.0 PURCHASING THRESHOLDS

- 701 There are two types of threshold governing the procurement for the trust. Firstly authority to commit expenditure, which is covered in the Scheme of Delegation, and secondly the procurement process which is governed by the anticipated lifecycle cost of the procurement.
- 702 The various transactional thresholds and procurement process required are covered in more detail in the Scheme of Delegation. However, they are outlined briefly below:
- Up to £2,999 – at least a single written quotation;
 - £3,000 - £49,999 – three written quotations;
 - £50,000 - £99,999 - to be put out to tender (and advertised on the trust website) and approved by the CEO;
 - £100,000 - £181,302 – to be put out to tender (and advertised on the trust website) and approved by 2 members of the SHARE MAT Board, CEO and Finance Director; and
 - £181,302 and above - EU compliant tender procedure or use of EU compliant framework.
- (the above totals are to be calculated based on the duration of the contract)*
- 703 Where SHARE Central Services manage a procurement process on behalf of an academy, orders will not be raised without approval from the budget holder in accordance with the Scheme of Delegation.
- 704 Occasionally there may be a recommendation to award a contract to or place an order with an organisation which has not submitted the lowest priced bid. Approval must be sought **before** confirming the award or raising an order, in accordance with Financial Regulations through completion of the trust Contract Award and Exceptions Form.

8.0 DISPENSATIONS

- 801 In limited circumstances a dispensation from the requirement to obtain alternative quotes may be granted. This may include authority to solicit a single quotation, to award a contract or place an order without having obtained the requisite number of tenders or quotations or to directly award a contract.
- 802 All dispensations require prior approval from the Finance Director before progressing and must not result in a breach of procurement legislation or be contrary to the Scheme of Delegation.
- 803 Full details of the circumstances and reasons where a dispensation may be granted are included below.
- 804 All dispensation requests, whether approved or rejected, will be reported to the Board of Directors. Staff may be called upon to attend the Board of Directors to explain the reasons for requesting a dispensation.

- 805 Dispensations from competitive quotations/tenders must not be used to avoid competition, for administrative convenience, or to award fresh/further work to a supplier originally appointed through a competitive procedure.
- 806 All dispensations will be subject to obtaining and documenting appropriate evidence for single quotation/tender action, obtaining authorisation in accordance with the approved Scheme of Delegation without breaching current Public Contract Regulations or the relevant OJEU thresholds.
- 807 Subject to approval as outlined in the Scheme of Delegation, dispensations may be granted for the following reasons:
- Sole supplier;
 - Limited field of suppliers/providers and no possibility of the trust's requirements being met in any other way;
 - Emergency that might pose a risk to the school;
 - Unforeseen urgency;
 - Compatibility issue;
 - An extension is required to a current contract to allow sufficient time to complete a competitive tendering exercise (but failure to have planned the re-procurement would not be justification for a single tender); and
 - Where the seeking of tenders and subsequent contract award could cause significant operational difficulties and where any potential savings would be outweighed by those operational issues (which along with a VFM analysis must be documented) and only for use in circumstances to be approved in accordance with the Scheme of Delegation, under the specific advice of the Finance Director in terms of compliance with the EU and UK legislation and subject to approval by the CEO and subsequently reported to the Board of Directors.
- 808 The Contract Award and Exceptions Form which records the reason(s) for seeking and granting/declining of dispensations will be kept on file for a minimum of three years.

9.0 RAISING ORDERS

- 901 Procurement procedures must contain adequate controls to ensure that:
- Requisitions approved in accordance with the Scheme of Delegation will be raised;
 - Official orders are raised in respect of **all goods, services and works** required by the trust (except for those specifically exempted);
 - Only goods, services and works required by the trust are actually ordered;
 - Competitive quotations or tenders are obtained for all orders where the value of goods, services or works, individually or for a series of contracts, would exceed the relevant financial thresholds;
 - Orders for goods, services and works are placed with the most appropriate suppliers in terms of cost, quality, delivery, etc;
 - Goods, services and works received are in accordance with those ordered;
 - Payments are made only in respect of invoices authorised in accordance with the approved Scheme of Delegation and the trust's funds are adequately safeguarded;

- All payments are accounted for properly, promptly and in full;
 - Relevant, timely and accurate management information on expenditure is produced; and
 - Adequate physical and logical security is in place.
- 902 Specific exemptions to the requirement to raise an official purchase order are limited to:
- Business rates;
 - Works and services executed under a contract; and
 - Petty cash purchases.
- 903 Details outlining the number of non-order invoices paid on The Access Accounting system will be reported to the Finance Director on a monthly basis, and Business/Finance Managers will be required to explain non-compliance.
- 904 In accordance with the trust avoidance of gain and/or conflict, the Business Interests Register will be reviewed, before raising any order. Checks must be carried out to ensure that no one who has declared a business interest in relation to the purchase or the supplier/service provider has been involved in the selection process.
- 905 No orders shall be placed, or contracts altered or extended, with the intention of avoiding the relevant thresholds applicable within these Financial Regulations. In the event that the terms of any purchase order or contract have to be amended, a revised purchase order must be approved in accordance with the Scheme of Delegation and authorised by the Finance Director.

10.0 SUPPLIER MAINTENANCE

- 1001 Purchase Orders, contracts and payments should only be raised/made to suppliers which have passed Trust supplier vetting procedures and have been added to The Access Accounting System.
- 1002 New suppliers may only be added to The Access Accounting System following completion of a new supplier form and the requisite vetting procedures.
- 1003 All existing suppliers will be vetted on a 3-year cycle, and made 'dormant' in The Access Accounting system in the event that they fail to pass the vetting process, are no longer trading with the trust, or have not been used for more than one year.
- 1004 Trust staff raising purchase orders should satisfy themselves that we hold written assurance (vetting certification, company letter on headed paper) to identify that contractors have appropriate photo identification/DBS clearance as required, before they are permitted to enter a site and before an order is raised. The trust has issued guidance for the safeguarding of pupils whilst contractors are on site which must be followed.

11.0 COMPETITION

- 1101 Subject to the thresholds in section 7, competition should be proportionate to the level of expenditure, complexity and risk. In all cases, Financial Regulations must be followed.
- 1102 Care should be taken to specify accurately the goods, services or works required in a way which is unambiguous, offers equality, and removes barriers to participation without discriminating against others.

- 1103 Any minimum standards should be proportionate to the contract and not discriminatory - other than where legally required.
- 1104 All requests for quotations must be made in accordance with the Scheme of Delegation.
- 1105 When estimating the value of a contract (unless it is a one off cost), the actual cost of the goods, services and works must be for duration of the contract and include any on-going costs. If the duration is unknown, then three years should be the baseline. Once the whole lifecycle cost has been estimated, the appropriate procurement procedure should be followed.

12.0 CONTRACT AGREEMENT/TERMS AND CONDITIONS

- 1201 All procurement should be carried out using the trust terms and conditions. There may be certain exceptions to this where the use of an established framework or access to specific software requires it. In any case any departure from Trust terms and conditions must be approved by the Finance Director **before** agreement is made.
- 1202 Any agreement, contract or lease with a supplier which requires a signature by a member of Trust (excluding general orders for goods and services), should be forwarded to SHARE Central Services for review prior to signature.
- 1203 A signature on an agreement or contract, or even an email response indicates that the trust accepts the supplier's terms and conditions which may not be favourable – so should always be checked.
- 1204 Following the identification of the most favourable offer for the trust, contracts may only be awarded by those officers to whom the Directors have delegated such authority within the approved Scheme of Delegation.

13.0 PAYMENT AND PAYMENT TERMS

- 1301 All invoices from suppliers should be entered on to The Access Accounting system, and when approved, paid by BACS or cheque.
- 1302 The trusts standard payment terms are 30 days following receipt of a correct invoice, unless alternative arrangements have been agreed with the supplier prior to the order being raised.
- 1303 Where purchases are made using established frameworks, the payment and other terms and conditions are likely to be those of the framework. Before purchasing from any framework, it should be confirmed that it is permissible for the trust to use the framework and where required an appropriate access agreement has been approved by the Finance Director.
- 1304 Payment should only be made on receipt of goods. Where services are being procured then payment for work in progress or agreed interim stages may be appropriate in accordance with the contract.
- 1305 With the exception of some software licences, payment should **not** be made in advance of receipt of goods, services or works. If a supplier requests payment in advance then this should be discussed with, and approval sought from, the Finance Director.

14.0 AGGREGATION

- 1401 EU legislation sets out how and when multiple orders and contract values for the same type of work should be added together for the purposes of deciding what procurement process is applicable.
- 1402 As academies manage their own budgets and purchasing decisions independently, seeking advice and support of the SHARE Central Services to procure goods and service on their behalf, where necessary and appropriate, academy expenditure in this instance does not aggregate across the trust.
- 1403 Where an academy or the trust does need to consider aggregation is when expenditure reaches certain thresholds. To ensure that the trust does not fall foul of this, a procurement plan will be required for the trust, outlining all procurement activities within a 12-month cycle. This will enable SHARE Central Services to identify where activity such as contracts being rolled over are proposed and take appropriate action to re-procure on behalf of an academy.
- 1404 Should an academy or the trust identify that specific expenditure is reaching or has exceeded the current EU threshold then action should be taken to re-procure the goods/services in a compliant manner as a matter of urgency. The Finance Director will review termly reports from The Access Accounting system to ensure that this is the case.
- 1405 In appropriate circumstances SHARE Central Services may identify opportunities to establish corporate contracts on behalf of academies. Academies will be invited to participate though SHARE Central Services will work on the basis that this expenditure does aggregate and procure accordingly.
- 1406 Procurement should not be artificially broken down into multiple small orders to circumvent authorisation levels or the requirement to obtain further written quotes or tenders. (1404 outlines the termly review undertaken by the Finance Director to examine aggregation and thresholds).
- 1407 The trust has a duty to comply with the requirements of EU Procurement legislation and Academy Funding Agreements. In order to ensure compliance, the Finance Director will review annual expenditure to determine whether aggregation of orders is complementary or contrary to the requirement to demonstrate VFM.

15.0 ANNUAL PROCUREMENT PLANS

- 1501 SHARE Central Services will complete an annual procurement plan setting out key tender activity and milestones. The plan will include the use of the contract list to plan the requirement for future tenders on going reviews of contracts, strategic areas of development, and any policy and procedural developments required.
- 1502 Academies are required to complete an annual procurement plan detailing key purchases for the year with a lifecycle cost in excess of £5,000. This is to enable SHARE Central Services to identify any opportunity to procure Trust wide services, exploit VFM opportunities and identify potential aggregation or breaches to thresholds.
- 1503 The trust is committed to the preparation and the continued development of the procurement plan. SHARE Central Services will continually review the procurement requirements of the trust whilst complying with all relevant legislation.

- 1504 The practice of renewing annual contracts is not permissible unless specific provision has been made within the original procurement process for contract extensions. Re-procurement should feature should be commenced in a timely manner to ensure completion and transfer to a new contract is managed effectively.
- 1505 To avoid the inefficiencies of re-procuring services annually, SHARE will work with academies to review procurement plans and develop multi-year contracts.

16.0 TENDERS

- 1601 Any expenditure over £50,000 must be subject to tendering in accordance with Financial Regulations and UK Public Contracts Regulations 2015. If the anticipated value is over the current threshold, then also in accordance with EU procurement legislation.
- 1602 To promote competitive tendering, bids for goods, services or works in excess of £50,000 should be made against a pre-prepared specification, to allow for an easier and more transparent comparison.
- 1603 SHARE Central Services will select and manage the most appropriate procurement process in accordance with the anticipated value, any potential aggregation and Trust tendering guidelines which are compliant with current procurement legislation. This may include the use of frameworks, or bespoke tenders.
- 1604 Tendering procedures may take up to six months depending on lifecycle and compliance with legislation. Failure to program sufficient time for procurement will not be a reason to grant a dispensation.
- 1605 All current and future tenders with a value of £50,000 or more are advertised using the trust website (and a more appropriate method as necessary or legally required). It is the responsibility of SHARE Central Services to carry out tenders for goods, services and works on behalf of the trust.
- 1606 Any post tender bid clarification with suppliers will be led by SHARE Central Services.
- 1607 Any communication with the suppliers involved in the tender process will be facilitated by SHARE Central Services.

17.0 EQUAL TREATMENT OF SUPPLIERS

- 1701 One of the key principals of procurement legislation is that all suppliers are treated equally in any competitive process regardless of value. They should have the same availability of access to specifications, plans, staff time, facilities etc.
- 1702 Evaluation criteria should be decided in advance and made available to suppliers to show they will be treated fairly.
- 1703 All bidders are entitled to be debriefed at the end of a process and informed of the winning bidder.
- 1704 Any discussions and or correspondence prior to the conclusion of procurements should be on a "without commitment" basis and this phrase should be clearly stated on any such correspondence. The contract offer or purchase order **must** be the only point at which commitment is made.

18.0 REPORTING REQUIREMENTS

- 1801 All contracts over £25,000 (excluding VAT) should be reported to the Finance Director, outlining the decision and criteria applied.
- 1802 For all contracts in excess of £150,000 (excluding VAT) a report shall be prepared for the trust Board, highlighting the relevant issues and recommending a decision.
- 1803 All contracts whose value is over £150,000 (excluding VAT) must be authorised by the trust Board. In cases where, due to the timing of board meetings, this would not be practicable and any undue delay would cause significant operational issues, the Chief Executive acting jointly with the Chair/Vice Chair of the board may accept a tender in excess of £150,000 but this must be reported to the next meeting of the board.
- 1804 SHARE Central Services is required to complete a tender report for all tenders in accordance with EU procurement legislation.

19.0 CONTRACTS REGISTER

- 1901 SHARE Central Services will maintain a register of contracts detailing all procurement activity undertaken, with a value over £25,000, which will record details of the procurement process followed, supporting documentation (ie copies of written quotes), details of the winning bidder, price, and the duration of the contract.
- 1902 The register will specify renewal review dates so there would be some lead time into reviewing suppliers and identifying project/resources to manage the transition from one supplier/system to another and providing notice for the outgoing contract.

20.0 CONTRACTS REGISTER

- 2001 The trust is aware of The Bribery Act 2010, which came into force in April 2011. To meet our obligations under the Act, the trust assesses the risk of bribery in the context of existing controls over expenditure, accounting and commercial or agent contracts. The assessment is undertaken on an annual basis.

21.0 ACCEPTANCE OF GIFTS OR HOSPITALITY

- 2101 The trust policy is not to accept any form of gift or hospitality from suppliers. Full details are included in the Register of Business Interests which is completed on an annual basis by all staff and trustees.

22.0 CONFIDENTIALITY (FOI)

- 2201 The Freedom of Information Act 2000 gives the public and potential suppliers the right to request certain information regarding Trust purchasing. All such requests should be handled in accordance with the trust policy and subsequently referred to the Director of Operations.
- 2202 As part of the process for providing quotations and tenders, the trust requires all bidders to identify confidential information which they would not want the trust to disclose in response to a freedom of information request.

23.0 INFORMATION SECURITY

- 2301 All suppliers or third parties that require access to the trust or Academy information systems as part of the service they provide must comply with the requirements of the trust IT services.
- 2302 Staff responsible for agreeing maintenance and support contracts where access is required must ensure that prior to the contracts being signed the supplier/third party meets the requirements of the trust IT services and will comply with the trust safeguarding and security policies.
- 2303 In the event of the contract being transferred or terminated appropriate provisions must be in place to ensure the continued security to information and systems. Suppliers/third parties will be asked where appropriate to demonstrate their compliance with the policies.

24.0 LEASES

- 2401 Academies should **not** enter into any finance lease as this would be contravention of the requirements of the Academies Financial Handbook.
- 2402 Academies **may** enter into operating leases subject to the approval from the Finance Director.

25.0 HEALTH & SAFETY

- 2501 When procuring any goods, services or works, Trust staff must ensure that checks are made to confirm that suppliers are suitably experienced and qualified to undertake the work required.
- 2502 Where building or maintenance works is planned, suitable risk assessments and/or method statements must be in place.
- 2503 All services, supply and works procured by the trust must comply with the relevant UK and European health and safety legislation in force at the time the items are procured.
- 2504 Where required by legislation, products (including used or refurbished products) must comply with the relevant UK and European Laws on the design, supply and operation of products.

26.0 SEPARATION OF DUTIES

- 2601 There are a number of processes in procuring goods, services and works. There must be adequate separation of duties to ensure that the process of ordering goods, services and works, checking receipt, preparing and authorising payments is not the responsibility of one person.
- 2602 Where SHARE Central Services undertake tendering exercises on behalf the trust, the receipt and custody of tenders prior to opening must be separated from the specification, selection and evaluation. Contract awards subject to tendering will be subject to approval of the procurement procedure undertaken and in accordance with the Scheme of Delegation.

27.0 PROCEDURAL AND GUIDANCE NOTES

- 2701 To ensure consistent and compliant processes, all trust staff must follow Financial Regulations when undertaking procurement. The regulations are reviewed annually to ensure compliance with legislation and best practice.
- 2702 The Regulations outline the following processes:
- Ordering Goods and Services – up to £2,999;
 - Ordering Goods and Services – between £3,000 and £49,999;
 - Ordering Goods and Services – over £50,000;
 - Tendering; and
 - Raising requisitions and orders.
- 2703 The following policies are relevant to this Procurement Policy
- Conflicts of Interest policy;
 - Health and Safety policy;
 - General Data Protection Regulations (GDPR); and
 - DBS.

28.0 RETENTION OF DOCUMENTS

- 2801 All documentation and communication (including emails) relating to purchases or tenders with a value over £3,000 should be referenced with the transaction number generated by The Access Accounting System and scanned into the system.
- 2802 Tender or quotation documentation should be retained for a minimum of five years from the date of the end of the contract. Documentation may be retained electronically rather than in hard copy, however it must be readily accessible for audit or other purposes as required.
- 2803 SHARE Central Services are required to maintain a contracts register for all purchases with a lifecycle cost over £25,000.
- 2804 Where procurement is undertaken on behalf of an Academy by SHARE Central Services, all documentation in relation to the procurement process will be retained centrally.

29.0 TRAVEL AND ACCOMMODATION

- 2901 All travel and accommodation should be purchased in accordance with the relevant HR Policy and the cost claimed back through the staff expenses procedure.

30.0 MONITORING AND AUDIT

- 3001 The trust is subject to scrutiny by internal and external auditors as well as the ESFA and other statutory organisations. It is the responsibility of everyone involved in the procurement process to ensure that they compliant with current policies, procedures, guidance and legislation.