



2022-23 PROCUREMENT POLICY, PROCEDURE & GUIDANCE

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CONTENTS

	<u>Pages</u>	
1	Policy Statement	3
2	Purpose of the Procurement Policy	3
3	General Principles	4
4	Procurement – post Brexit	4
5	Value for Money (VFM)	4
6	Financial Authority to Commit Expenditure	5
7	Purchasing Thresholds	5
8	Dispensations	6
9	Raising Orders	7
10	Supplier Management	7
11	Competition	8
12	Contract Agreement/Terms and Conditions	8
13	Payment and Payment Terms	8
14	Aggregation	9
15	Annual Procurement Plans	9
16	Tenders	10
17	Reporting Requirements	10
18	Contracts Register	10
19	Equal treatment of suppliers	11
20	The Bribery Act 2010	11
21	Acceptance of gifts or hospitality	11
22	Confidentiality (FOI)	11
23	Information Security	11
24	Leases	11
25	Health and Safety	12
26	Separation of duties	12
27	Procedural and guidance	12
28	Retention of Documents	13
29	Travel and Accommodation	13
30	Monitoring and Audit	13

1.0 POLICY STATEMENT

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

- 1.1 As a publicly funded organisation, the trust, in accordance with procurement legislation, is a 'Contracting Authority', and is regulated by the UK Public Contracts Regulations 2015, UK procurement law and the Bribery Act 2010, and procurement must comply with DfE/ESFA requirements.
- 1.2 Procurement is the process whereby goods, services and works are acquired. The 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 one part of Procurement.
- 1.3 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.
- 1.4 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.
- 1.5 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.
- 1.6 When procuring on behalf of academies, members of Central Services (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

- 2.1 The purpose of this document is to ensure staff undertaking procurement activity follow correct procedure, and guidance.
- 2.2 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).
- 2.3 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.
- 2.4 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.
- 2.5 Central Services will work with academies advising on obtaining goods, services and works in a manner which is compliant with current legislation and best practice.
- 2.6 This policy and associated procurement guidance will be reviewed annually or as required due to a change in legislation.



3.0 GENERAL PRINCIPLES

- 3.1 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 - to act in a transparent and proportionate manner, ensuring all contractors, suppliers and service providers are treated equally and without discrimination. Procurement procedures must not be undertaken in a manner which 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. 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, favoritism or bribery involved in any dealings;
- 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 PROCUREMENT – post Brexit

- 4.1 Since the UK's departure from the EU, the Official Journal of the European Union (OJEU) has been replaced by a UK-only tendering service and there will no longer be a legal requirement to publish procurement contracts on OJEU. Instead, if the contract spend is over the WTO GPA threshold (£189,330 Jan 22), tenders need to be posted on the government's new procurement portal 'Find a Tender'.
- 4.2 Procurement (including framework agreements) commenced before the end of the transition period on 31 December 2020, will continue to be bound by EU procurement law as transposed into UK law.
- 4.3 As the trust would ordinarily use framework agreements for larger contracts, there should be no change in our procurement activity.

5.0 VALUE FOR MONEY (VFM)

- 5.1 VFM is the optimum combination of lifecycle cost and quality (or fitness for purpose) - rarely possible based on price alone. To ensure that all purchases secure vfm, factors such as (not restricted to) quality, suitability, availability, reliability and terms available, should be considered. All purchases must be made in accordance with these principles, unless a dispensation is granted in exceptional circumstances.
- 5.2 The Scheme of Delegation outlines the threshold values for purchasing, levels of authority, and whether the purchase is subject to written quotations or tenders.
- 5.3 Unless below the threshold for obtaining written quotations or tenders, all procurement of goods, services or works should be acquired by effective competition, unless there are convincing and justifiable reasons to the contrary. Competition promotes efficiency and effectiveness in expenditure, and contributes to the competitiveness of suppliers.



- 5.4 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

- 6.1 Any process which involves committing the trust to expenditure must be approved in accordance with the Scheme of Delegation. Any member of staff placing a purchase order on behalf of the trust must be sure that they have the correct level of authority.
- 6.2 The trust operates a system of delegated financial authority under which Principals are responsible for the planning and decision-making process of purchasing decisions. Central Services may provide technical and professional support as required. Academy's are still responsible for specifying requirements, evaluation criteria and committing funding, unless the purchasing decision is deemed to be trust wide).
- 6.3 No employee is authorised to commit the trust to expenditure without first ensuring that there is adequate budget provision.
- 6.4 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

- 7.1 There are two types of threshold governing the procurement for the trust. Authority to commit expenditure, which is covered in the Scheme of Delegation, and the procurement process which is governed by the anticipated lifecycle cost of the procurement.
- 7.2 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 £4,999 – at least a single quotation (this can be verbal, secured from a price list, or in writing);
 - £5,000 - £49,999 – three written quotations;
 - £50,000 - £99,999 - to be put out to tender, advertised on the trust website and approved by the CEO;
 - £100,000 - £189,330 – to be put out to tender, advertised on the trust website, and approved by 2 members of the SHARE MAT Board, CEO and Director of Finance; and
 - £189,330 and above (Jan 22) – Publish on the government's portal 'Find a Tender' or use of a UK compliant framework.
- (the above totals are to be calculated based on the duration of the contract)*
- 7.3 Where 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.
- 7.4 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

- 8.1 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.
- 8.2 All dispensations require prior approval from the Director of Finance before progressing and must not result in a breach of procurement legislation or be contrary to the Scheme of Delegation.
- 8.3 Full details of the circumstances and reasons where a dispensation may be granted are included below.
- 8.4 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.
- 8.5 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.
- 8.6 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 UK thresholds.
- 8.7 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;
 - 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 Director of Finance in terms of compliance with UK legislation and subject to approval by the CEO and subsequently reported to the board of directors.
- 8.8 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

- 9.1 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 reports on expenditure is produced; and
 - Adequate physical and logical security is in place.
- 9.2 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.
- 9.3 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.
- 9.4 No orders shall be placed, or contracts altered or extended, with the intention of avoiding the relevant thresholds applicable. In the event that the terms of any purchase order / contract are amended, a revised purchase order must be approved in accordance with the Scheme of Delegation.

10.0 SUPPLIER MAINTENANCE

- 10.1 Purchase Orders, contracts and payments should only be raised which have passed trust supplier vetting procedures and have been added to The Access Accounting System.
- 10.2 New suppliers may only be added to The Access Accounting System following completion of a new supplier form and the requisite vetting procedures.
- 10.3 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.
- 10.4 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

- 11.1 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.
- 11.2 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.
- 11.3 Any minimum standards should be proportionate to the contract and not discriminatory - other than where legally required.
- 11.4 All requests for quotations must be made in accordance with the Scheme of Delegation.
- 11.5 When estimating the value of a contract (unless 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, three years should be the baseline. Once the whole lifecycle cost has been estimated, procurement procedures should be followed.

12.0 CONTRACT AGREEMENT/TERMS AND CONDITIONS

- 12.1 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 Director of Finance **before** agreement is made.
- 12.2 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 Central Services for review prior to signature.
- 12.3 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.
- 12.4 Following the identification of the most favourable offer for the trust, contracts may only be awarded by those officers to whom the board of directors have delegated such authority within the approved Scheme of Delegation.

13.0 PAYMENT AND PAYMENT TERMS

- 13.1 All invoices from suppliers should be entered on to The Access Accounting system, and when approved are paid by BACS.
- 13.2 The trust's payment terms are 30 days following receipt of a correct invoice, unless alternative arrangements have been agreed prior to the order being raised.
- 13.3 Where purchases are made using established frameworks, payment and other terms and conditions are likely to be those of the framework. Before purchasing, 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 Director of Finance.
- 13.4 Payment should only be made on receipt of goods. Where services are being procured, payment for work in progress or agreed interim stages may be appropriate.
- 13.5 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 Director of Finance.



14.0 AGGREGATION

- 14.1 UK 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.
- 14.2 Academies manage their own budgets and purchasing decisions independently, seeking advice and support of the 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.
- 14.3 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 Central Services to identify where activity such as contracts being rolled over are proposed and re-procure on behalf of an academy.
- 14.4 Should an academy or the trust identify that specific expenditure is reaching or has exceeded the current UK threshold then action should be taken to re-procure the goods/services in a compliant manner as a matter of urgency. The Director of Finance will review termly reports from The Access Accounting system to ensure that this is the case.
- 14.5 Central Services may identify opportunities to establish corporate contracts on behalf of academies. Academies will be invited to participate though Central Services will work on the basis that this expenditure does aggregate and procure accordingly.
- 14.6 Procurement should not be artificially broken down into multiple small orders to circumvent authorisation levels.
- 14.7 The trust has a duty to comply with the requirements of UK Procurement legislation and Academy Funding Agreements. In order to ensure compliance, the Director of Finance 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

- 15.1 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.
- 15.2 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 Central Services to identify any opportunity to procure Trust wide services, exploit VFM opportunities and identify potential aggregation or breaches to thresholds.
- 15.3 The trust is committed to the preparation and the continued development of the procurement plan. Central Services will continually review the procurement requirements of the trust whilst complying with all relevant legislation.
- 15.4 The practice of renewing annual contracts is not permissible without specific provision within the original procurement process for contract extensions. Re-procurement should be managed in a timely manner to manager the transfer to a new contract effectively.
- 15.5 To avoid the inefficiencies of re-procuring services annually, Central Services will work with academies to review procurement plans and develop multi-year contracts.



16.0 TENDERS

- 16.1 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 UK procurement legislation.
- 16.2 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.
- 16.3 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.
- 16.4 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.
- 16.5 All current and future tenders with a value of £50,000 or more are advertised on the trust website. It is the responsibility of Central Services to carry out tenders for goods, services and works on behalf of the trust.
- 16.6 Any post tender bid clarification with suppliers will be led by Central Services.
- 16.7 Any communication with the suppliers involved in the tender process will be facilitated by Central Services.

17.0 EQUAL TREATMENT OF SUPPLIERS

- 17.1 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.
- 17.2 Evaluation criteria should be decided in advance and made available to suppliers to show they will be treated fairly. All bidders are entitled to be debriefed at the end of a process.
- 17.3 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

- 18.1 All contracts over £25,000 (excluding VAT) should be reported to the Director of Finance, outlining the decision and criteria applied.
- 18.2 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.
- 18.3 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.
- 18.4 Central Services is required to complete a tender report for all tenders in accordance with UK procurement legislation.



19.0 CONTRACTS REGISTER

- 19.1 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.
- 19.2 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

- 20.1 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 (annually) the risk of bribery in the context of existing controls over expenditure, accounting and commercial contracts.

21.0 ACCEPTANCE OF GIFTS OR HOSPITALITY

- 21.1 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)

- 22.1 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 referred to the Director of Operations.
- 22.2 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

- 23.1 All suppliers or third parties that require access to the trust or academy information systems as part of their services must comply with the requirements of Central ICT.
- 23.2 Staff responsible for agreeing maintenance and support contracts must ensure that prior to contracts being signed the supplier/third party meets the requirements of the trust IT services and comply with trust safeguarding and security policies.
- 23.3 In the event of the contract being transferred or terminated, appropriate provisions must 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

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



25.0 HEALTH & SAFETY

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

26.0 SEPARATION OF DUTIES

- 26.1 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.
- 26.2 Where 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 in accordance with the Scheme of Delegation.

27.0 PROCEDURAL AND GUIDANCE NOTES

- 27.1 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.
- 27.2 The Regulations outline the following processes:
 - Ordering Goods and Services – up to £4,999;
 - Ordering Goods and Services – between £5,000 and £49,999;
 - Ordering Goods and Services – over £50,000;
 - Tendering; and
 - Raising requisitions and orders.
- 27.3 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

- 28.1 All documentation and communication (including emails) relating to purchases or tenders with a value over £5,000 should be referenced with the transaction number generated by The Access Accounting System and scanned into the system.
- 28.2 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.
- 28.3 Central Services are required to maintain a contract register for all purchases with a lifecycle cost over £25,000.
- 28.4 Where procurement is undertaken on behalf of an academy by Central Services, all documentation in relation to the procurement process will be retained centrally.

29.0 TRAVEL AND ACCOMMODATION

- 29.1 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

- 30.1 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.